

November 17, 2023

Ericka Massa
SEH Inc.
418 W. Superior St., Suite 200
Duluth, MN 55802-1512

RE: SEH Project # VCATV 173846 14.00
Voyageur Country ATV System Improvements – Phase 2
Koochiching and St. Louis Counties
SHPO Number: 2023-3116

Dear Ericka Massa:

Thank you for consulting with our office during the preparation of an Environmental Assessment Worksheet (EAW) for Phase 2 improvements to the Voyageur Country ATV System. According to your submission, the EAW will review 114 miles of trail, which includes preferred routes and alternate alignments. Of the 114 miles of trail, 39 miles are existing routes with no improvements needed, 71 miles are existing routes with some improvements needed, and 4 miles are new routes.

Due to the nature and location of the proposed project, we recommend that a Phase I archaeological survey be completed in areas of proposed new trail construction as well as in areas of proposed trail improvements where new ground disturbance will take place. The survey must meet the requirements of the Secretary of the Interior's Standards for Identification and Evaluation and should include an evaluation of National Register eligibility for any properties that are identified. For a list of consultants who have expressed an interest in undertaking such surveys, please visit the website preservationdirectory.mnhs.org, and select "Archaeologists" in the "Search by Specialties" box.

Please note that this comment letter does not address the requirements of Section 106 of the National Historic Preservation Act of 1966 and 36 CFR § 800. **If this project is considered for federal financial assistance, or requires a federal permit or license, then review and consultation with our office will need to be initiated by the lead federal agency.** Be advised that comments and recommendations provided by our office for this state-level review may differ from findings and determinations made by the federal agency as part of review and consultation under Section 106.

If you have any questions regarding our review of this project, please contact Kelly Gragg-Johnson, Environmental Review Program Specialist, at 651-201-3285 or kelly.graggjohnson@state.mn.us.

Sincerely,



Sarah J. Beimers
Environmental Review Program Manager

MINNESOTA STATE HISTORIC PRESERVATION OFFICE

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