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August 12, 2009

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PUBLIC SERVICE COMMISSION

Mr. Patrick Fahh
Public Service Commission
600 East Boulevard Avenue, Department 408
Bismarck, ND 58505-0480

**NDSHPO REF. : 09-0217b PSC Roughrider I, LLC Wind Farm (Dickey
County), Class III CRI Report: Addendum Report (July 2009)**
PSC Case No. PU-09-84

Dear Patrick:

As indicated in prior and present correspondence for 09-0217, we have reviewed: "Addendum to: Roughrider I Wind Farm Project: A Class III Cultural Resource Inventory, Dickey County, North Dakota," by Christina Burns and Wade Burns (Beaver Creek Archaeology, July 2009) and find it acceptable. We concur with the level and scope of identification efforts undertaken in the project APE, as revised and currently reported.

If consulted either by a federal agency or a state agency, we would concur with recommended "**No Historic Properties Affected**" and "**No Significant Sites Affected**" determinations provided the avoidance of sites is accomplished as stipulated (p. 39, and attached) and that the project is of the nature stated and it takes place in locations plotted in the addendum report, map, and other documentation. Also, if consulted by a federal agency we would concur with the NRHP eligibility determinations for the sites as enumerated in Tables 4-5 and 6-7, pp. 6-7 of the Addendum Class III CRI report. Thank you for the opportunity to review the project. If you have questions please contact either Paul Picha at (701) 328-3574 or Susan Quinnell at (701) 328-3576.

Sincerely,

Merlan E. Paaverud, Jr.
State Historic Preservation Officer (North Dakota)
and
Director, State Historical Society of North Dakota
enc. as stated

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Class III Cultural Review and Determination

State Historical Society of North Dakota
Merlan Paaverud, SHPO

Conclusion and Recommendation

In May, June and July 2009, BCA conducted a Class III Cultural Resource Inventory of the proposed addition to the Rough Rider I Wind Farm project. During the course of the inventory, thirteen new cultural resource sites were identified within the APE: Two sites containing stone circle and rock cairn features (32DI127, 32DI130), three rock cairn sites (32DI126, 32DI127, and 32DI128), seven stone circle sites (32DI131, 32DI133, 32DI134, 32DI135, 32DI136, 32DI137, and 32DI138), and one historic archaeological site (32DI129).

Although none of the newly recorded sites have been formally evaluated for the NRHP, BCA recommends that twelve sites, 32DI126, 32DI127, 32DI128, 32DI130, 32DI131, 32DI132, 32DI133, 32DI134, 32DI135, 32DI136, 32DI137, and 32DI138 are potentially eligible for listing in the NRHP, and recommends that these sites should therefore be avoided. 32DI129 has been recommended not eligible to the NRHP, and should not need to be avoided during construction.

At the request of Rough Rider I Wind, BCA pin-flagged a 30 meter buffer zone around sites 32DI126, 32DI127, 32DI128, 32DI130, 32DI131, 32DI132, 32DI133, 32DI134, 32DI135, 32DI136, 32DI137, and 32DI138 to avoid accidental disturbance during construction. Beaver Creek Archaeology also accompanied representatives of Rough Rider I Wind to these sites, where engineers recorded site boundaries and buffer areas for avoidance. If project plans do not allow for avoidance of the potential NRHP-eligible sites, a Phase II site evaluation is recommended by BCA to determine NRHP eligibility.

There are no recorded eligible architectural properties within one mile of the wind turbines, and as long as the twelve potentially eligible sites are avoided and all construction takes place within the inventoried corridors, a designation of *No Historic Properties Affected* is recommended for this project.