MANAGEMENT SUMMARY

Wilton Wind IV, LLC (Wilton IV), a subsidiary of NextEra Energy Resources, LLC (NextEra), is proposing to construct and operate the Wilton IV Wind Energy Center (the Project), an approximately 99 megawatt (MW) wind energy project located approximately 7 miles (mi) southeast of Wilton in Burleigh County, North Dakota. The Project includes the construction of 58 General Electric (GE) 1.7 megawatt (MW) xle turbines in Crofte and Ghylin Townships and associated service roads, electrical collection system, and substation located in Crofte, Ecklund, and Ghylin Townships. The Project substation will be located in the northeast quarter of Section 20 in Ecklund Township adjacent to existing substations that collect power from nearby operating wind energy projects. The substation will connect to the existing Central Electric Power Cooperative transmission line via a 230 kV overhead tie line that spans approximately 240 feet (ft) over 279th Avenue NE to the Central Electric Power Cooperative transmission line. Existing operations and maintenance facilities will be used to support the Project.

The portion of the Project in Crofte Township was previously evaluated as part of the Baldwin Wind Energy Center. The Baldwin Wind Energy Center included 37 alternate turbines in Crofte Township. These turbines were not constructed as part of the Baldwin Wind Energy Center and are currently proposed to be constructed as part of this Project. The Project layout includes 30 turbines and 5 alternative turbine sites located in Crofte Township. Of these, 16 turbines roughly coincide (within 100 ft) with the turbine locations previously evaluated as Baldwin alternates. The remaining 28 turbines and 1 alternative turbine site are proposed to be located in Ghylin Township.

The Project will interconnect to the Western Area Power Administration's transmission system at Western's existing Hilken Switching Station via the Central Electric Power Cooperative transmission line. Western's action to execute an interconnection agreement for the proposed Project requires review under Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). In compliance with the NHPA and NEPA, Western and the State Historical Society of North Dakota (SHSND) are considering how the proposed Project may affect cultural resources that are listed in or are potentially eligible for inclusion to the National Register of Historic Places (National Register). The Project also requires a Certificate of Site Compatibility from the North Dakota Public Service Commission (PSC); therefore, the Project is subject to review by the SHSND under the North Dakota Century Code 55-02-07. The purpose of this investigation is to provide the necessary information for the Western and SHSND review by confirming the presence or absence of archaeological sites and architectural properties within the Area of Potential Effects for direct effects (APE).

Tetra Tech's literature review identified four previous archaeological investigations, one architectural investigation, and four archaeological site leads within the APE. The Class III

Cultural Resources Inventory for the Baldwin Wind Energy Center occurred in 2009 and 2010 and is the largest of the surveys that intersects the APE and includes 253.8 acres or 26 percent of the total APE. A "No Historic Properties Affected" recommendation was made provided that documented Native American stone feature sites were avoided. The Class II Architectural Reconnaissance Survey for the Baldwin Wind Energy Center was conducted in 2010 within 1-mi of the proposed Baldwin turbine layout in Crofte Township and evaluated historic structures over 45 years old or older. This survey did not include the Project area located within Ghylin Township. Tetra Tech recommended that none of the 77 properties documented during survey were potentially eligible to the National Register and a finding of No Historic Properties Affected was proposed.

Four previously documented site leads (32BLx99, 32BLx126, 32BLx127, and 32BLx16)1 are reported to be located within or in the vicinity of the APE; their exact locations are unknown and no evidence of these site leads was documented during the field investigation.

During the survey of the APE, Tetra Tech documented nine new archaeological sites including four Native American stone feature sites (32BL726, 32BL727, 32BL728, and 32BL731, three Native American isolated finds (32BLx291, 32BLx292, and 32BLx293); and one depression (32BL734) and one pile (32BL735) of indeterminate cultural affiliation. In addition, 6 Euro-American stone line sites (1913.007, 1913.012, 1913.103, 1913.111, 1913.115, and 1913.118), 27 Euro-American stone pile sites (1913.002, 1913.008, 1913.009, 1913.010, 1913.013, 1913.014, 1913.015, 1913.017, 1913.019, 1913.024, 1913.028, 1913.029, 1913.030, 1913.032, 1913.033, 1913.104, 1913.112, 1913.114, 1913.116, 1913.117, 1913.142, 1913.144, 1913.150, 1913.152, 1913.154, 1913.300, and 1913.301), and 4 sites that contained both lines and piles (1913.027, 1913.119, 1913.126, and 1913.137) were documented within the APE. Upon the request of Western and the SHPO, the Euro-American stone sites were not recorded with the state and were not given an official site number. Two of the Euro-American stone pile sites are situated on topographically-prominent locations similar to that of locations where Tetra Tech has documented Native American cairns. It is Tetra Tech's opinion that Sites 1913.014 and 1913.152 have an increased potential to contain Native American cairns underneath the fieldstones observed on the surface.

Tetra Tech recommended avoidance for 13 sites including the 8 Native American stone feature sites within the APE (including previously documented site, 32BL653). Tetra Tech also recommends avoidance of the two sites with indeterminate cultural affiliation (32BL735 and 32BL734), the Euro-American dump/stone pile site, and two Euro-American stone pile sites (1913.014 and 1913.152). Tetra Tech also recommended the creation of avoidance buffers for Native American stone cairns (100 ft), Native American tipi rings and alignment (50 ft), sites with indeterminate cultural affiliation (50 ft), and Euro-American stone piles (16 ft). If these sites and their associated avoidance buffers can be avoided during construction, then Tetra Tech recommends a determination of ***No Historic Properties Affected***. The remaining sites including

the Euro-American stone line and pile sites (excluding 1913.014 and 1913.152) and the Native American isolated finds are not considered eligible for inclusion in the National Register nor would they appear to have cultural significance to regional Native American tribe and therefore avoidance is not recommended.

Recommendations for site avoidance also include associated activities such as surveying and staking the proposed layout prior to construction. Tetra Tech recommends delineating the site avoidance buffers prior to construction with snow fence. This will reduce the potential that these sites will be inadvertently disturbed. If areas beyond the currently surveyed APE are to be utilized during construction, then Tetra Tech recommends that a Class III cultural resource inventory be conducted to determine the presence of cultural resources within these areas. Tetra Tech recommends on-site monitoring by archaeologist during the initial grading of roads and turbines, and the installation of the collection line within pasture/prairie areas to document any lithic/artifact scatters that are identified during construction. Tetra Tech does not feel that on-site monitoring is necessary in areas previously disturbed by cultivation. An unanticipated discoveries plan was developed to accommodate any archaeological materials that may be unearthed during the construction of the proposed facilities.