

# Addendum to: Class III Cultural Resource Inventory – Management Summary

## Brady Wind Energy Center Stark County, North Dakota

ND SHPO REF: 15-1414a



Prepared for



Prepared by



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## MANAGEMENT SUMMARY

Brady Wind, LLC (Brady Wind), a wholly-owned, indirect subsidiary of NextEra Energy Resources, LLC (NEER), proposes to construct the Brady Wind Energy Center (the Project), located approximately 15 miles (mi) (24.1 kilometer [km]) south of the city of Dickinson in Stark County, North Dakota. Tetra Tech, on the behalf of NEER, submitted an initial Class III Cultural Resource Inventory in February 2016 (Holven et al 2016). This investigation received State Historical Society of North Dakota (SHSND) concurrence in February 2016 (NDSHPO REF.: 15-1414a) conditional on completing shovel probing in the Survey Corridor in spring 2016. This addendum investigation presents the findings of shovel probing for the Project layout described in Holven et al. 2016 in addition to the results of pedestrian survey/shovel probing in spring 2016 of minor facility shifts.

The modifications to the Survey Corridor included updates to the following facilities:

- The updated turbine layout dated April 4, 2016;
- The updated service road layout dated April 28, 2016; and
- The updated electrical collection line route layout dated April 7, 2016.

For these Project facilities, Tetra Tech surveyed:

- A 700-foot (ft) (213.4-meter [m]) diameter circular area centered on the proposed turbine locations;
- A 250-ft (76.2-m) corridor for the service roads; and
- A 150-ft (45.7-m) corridor for the collection lines.

These areas comprise the Survey Corridor, which includes 2,472 acres (1,000.4 hectares). Approximately 2,274 ac (920.3 ha) of the current Survey Corridor was previously pedestrian surveyed during the initial Brady Wind Energy Center Class III investigation (Holven et al. 2016). The addendum Survey Corridor is approximately 168 ac (67.9 ha). This investigation presents the shovel probing results for the current Survey Corridor (i.e., 2,472 ac [1000.4 ha]), and the pedestrian survey results for the addendum Survey Corridor (i.e., 168 ac [67.9 ha]).

During the pedestrian survey of the addendum Survey Corridor, Tetra Tech documented seven Native American isolated finds. During shovel probing within the Survey Corridor, Tetra Tech documented 10 additional archaeological resources including five Native American isolated finds, three Native American artifact scatters, and two Native American site leads. An additional isolated find was documented on the surface in a previously pedestrian surveyed portion of the Survey Corridor.

The 3 Native American sites (32SK1191, 32SK1193, and 32SK1195), 2 Native American site leads (32SKx422 and 32SKx457), and the 13 Native American isolated finds (32SKx423, 32SKx424, 32SKx429,

32SKx444, 32SKx445, 32SKx446, 32SKx447, 32SKx448, 32SKx449, 32SKx450, 32SKx451, 32SKx455, and 32SKx456) all consist of non-diagnostic materials.

It is Tetra Tech's recommendation that Native American Sites 32SK1191, 32SK1193 and 32SK1195, and Native American Site Leads 32SKx422 and 32SKx457 be avoided. Portions of these sites and site leads that intersect the Survey Corridor consist of sparse non-diagnostic lithics identified on the surface or recovered from depths of 2 ft (0.6 m) or less beneath the surface. Brady Wind has committed to shifting facilities and laydown areas to avoid Sites 32SK1193 and 32SK1195, and Site Leads 32SKx422 and 32SKx457. Brady Wind has also indicated that horizontal directional drilling (HDD) at depths greater than 4 ft (1.2 m) will be utilized to install collection lines underneath the known extent of Site 32SK1191. At these depths, the HDD will be placed in culturally sterile soils and will not impact the soils containing the archaeological materials. No avoidance buffer is recommended beyond the delineated site boundaries for these sites and site leads.

Tetra Tech does not recommend avoidance for the Native American Isolated Finds 32SKx423, 32SKx424, 32SKx429, 32SKx444, 32SKx445, 32SKx446, 32SKx447, 32SKx448, 32SKx449, 32SKx450, 32SKx451, 32SKx455, and 32SKx456. Tetra Tech determined that the isolated finds were low density with no, or very limited, potential for intact subsurface deposits.

Due to Project layout modifications, two newly documented sites are no longer within the Survey Corridor. These sites included one Native American site consisting of a stone feature and a surface/subsurface artifact scatter (32SK1161), and one Native American site consisting of a surface/subsurface artifact scatter (32SK1194). Avoidance buffers were recommended for these sites and alternative areas were surveyed using pedestrian and/or shovel probing to determine the presence of cultural resources within the alternative areas.

Tetra Tech recommends, and Brady Wind has committed to, avoidance of all cultural resources that are potentially eligible for listing on the National Register, sites deemed culturally sensitive, or sites that have not been evaluated for eligibility following the guidelines outlined by the SHSND. This includes the three sites (32SK1191, 32SK1193, and 32SK1195) and two site leads (32SKx422 and 32SKx457) located within the Survey Corridor, and the two newly documented sites (32SK1161 and 32SK1194) that are no longer within the Survey Corridor. If these resources and their associated avoidance buffers can be avoided during construction, then Tetra Tech recommends, per NDCC 49-22-09(9), that no archaeological sites will be affected by the Project.

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 within or adjacent to the construction easement with high-visibility snow fencing prior to construction. Such fencing will reduce the potential for inadvertent disturbance to the resources during construction. An unanticipated discoveries plan has been developed to accommodate any archaeological materials that

may be unearthed during the construction of the proposed facilities. If areas beyond the Survey Corridor are to be used during construction, then Tetra Tech recommends that an addendum Class III cultural resource survey be conducted to determine the presence or absence of cultural resources within these areas.