



January 23, 2019

State Historical Society of North Dakota
Attn: Susan Quinnell
Review and Compliance Coordinator
612 East Boulevard Ave.
Bismark, ND 58505

Re: Review Request for Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota and Historic-Age Resource Reconnaissance Survey for the Aurora Wind Project, Williams and Divide Counties, North Dakota, SHPO Reference #18-0224

Dear Ms. Quinnell:

Aurora Wind Project, LLC (Aurora Wind) is proposing to construct a wind project (Project) that will generate up to 300 megawatts in Williams and Mountrail Counties, North Dakota. The Project will result in the construction of up to 121 wind turbine locations, access roads, crane paths, underground collection lines, an approximately 20-mile-long overhead transmission line, one substation, and associated facilities and infrastructure. Construction is anticipated to begin in the second quarter of 2019 with commercial operation by the end of this year. Currently the Project does not require a Federal permit or compliance with Section 106 of the National Historic Preservation Act (NHPA); however, State preservation legislation requires consideration of both direct and indirect effects to National Register of Historic Places (NRHP)-listed or eligible sites, buildings, structures, objects, districts, etc. (North Dakota Century Code [55-03-01]).

Prior to construction, a Class II Historic-Age Resource Reconnaissance Survey and a Class III Cultural Resources Inventory were conducted. The work was completed in 2018, and the reports are included herein along with the completed Manuscript Data Record Forms (one for each report). The Project has committed to avoidance of direct impacts to *significant* and *unevaluated* cultural resources during construction through the use of a 50-foot buffer around all identified archaeological sites meeting those criteria. Burns & McDonnell Engineering, Inc. (Burns & McDonnell) and Aurora Wind developed an Unanticipated Discovery and Monitoring Plan that addresses proper discovery procedures in the event any previously unidentified resources are encountered during Project construction. The Unanticipated Discovery and Monitoring Plan can be found in Appendix D of *Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota*.

A total of 23 newly identified archaeological sites and three isolated finds were identified during the Cultural Resource Inventory Survey, which encompassed 4,436 acres. Twenty-one of the sites and the three isolated finds are recommended as not eligible for inclusion in the NRHP. The remaining two sites, 32WI2316 and 32WI2325, remain unevaluated against the NRHP criteria of significance and are recommended for avoidance by the Project.

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The Historic-Age Resource Reconnaissance Survey identified and recorded 416 historic-age non-archaeological resources on 128 properties in the Area of Potential Effects (APE). Twenty-one of the properties containing resources identified as historic-age were not accessible from the public right-of-way (ROW). Although some of these resources have unknown eligibility, none would be subject to direct or otherwise adverse effects from the Project. Of the accessible resources, none are currently listed on the NRHP, but 13 properties contain resources that appear to meet NRHP eligibility criteria. The remaining resources lack historical associations and/or architectural integrity and are not recommended for NRHP inclusion. None of the NRHP-listed or eligible resources would be directly or otherwise adversely affected by the Project. Thus, no further consideration of historic-age non-archaeological resources is recommended for this Project.

We ask that you please review the accompanying reports and provide concurrence that the Project will not impact significant resources under North Dakota Century Code, Chapter 55-03. We also request your approval of the Project's Unanticipated Discovery and Monitoring Plan found in Appendix D of the Class III Cultural Resources Inventory report. Should the Project design change to outside of the completed survey corridor, additional survey will be required, and an addendum report will follow. If you have any questions or require any additional information, please contact me at 517-425-1338 or mlatham@burnsmcd.com

Sincerely,



Mark A. Latham
Sr. Cultural Resources Specialist/Archaeologist



Brandy Harris
Sr. Cultural Resources Specialist/Historian

Enclosure:

Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota
Historic-Age Resource Reconnaissance Survey for the Aurora Wind Project, Williams and Divide Counties, North Dakota
Manuscript Data Record Forms (one per report)
Review Fee

cc:

Jennifer Dean, Tradewind Energy, Inc.
Justin Bailey, Burns & McDonnell