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OF NORTH DAKOTA**

Doug Burgum
Governor of North Dakota

February 1, 2019

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Mr. Mark A. Latham
Sr. Cultural Resources Specialist/Archaeologist
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114

ND SHPO Ref: 18-0244 ND PSC "Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota"

Dear Mr. Latham,

We reviewed ND SHPO Ref: 18-0244 ND PSC "Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota," and find this Class III report, (Latham: Jan. 2019) acceptable. We concur with a "No Significant Sites Affected" determination for the archaeological portion of the project, provided sites 32WI2316 and 32WI2325 are avoided. The unanticipated discovery plan included in this report is also acceptable.

Thank you for the opportunity to review the archaeological portion of this project. Please include the ND SHPO reference number listed above in any further correspondence for this specific project. If you have any questions, please contact Susan Quinnell at (701) 328-3576 or squinnell@nd.gov.

Sincerely,

Claudia J. Berg
Director, State Historical Society of North Dakota

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Exhibit 17 - State Historic Society of ND Correspondence

Aurora Wind Project, LLC

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Exhibit 17 - State Historic Society of ND Correspondence

Aurora Wind Project, LLC

North



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February 5, 2019

Mr. Mark A. Latham
Sr. Cultural Resources Specialist/Archaeologist
Burns & McDonnell
9400 Ward Parkway
Kansas City, MO 64114

ND SHPO Ref: 18-0244 ND PSC "Historic-Age Resource Reconnaissance Survey for the Aurora Wind Project, Williams and Divide Counties, North Dakota"

Dear Mr. Latham,

We reviewed ND SHPO Ref: 18-0244 ND PSC "Historic-Age Resource Reconnaissance Survey for the Aurora Wind Project, Williams and Divide Counties, North Dakota," and find this Class II (reconnaissance) report, (Harris: Jan. 2019) acceptable. We concur with a "Significant Sites Affected" determination for the historic age portion of the project. We propose a journal-length article as mitigation for visual effects to buildings and structures in sites:

- 32WI2308 Feature 2 Barn
- 32WI0887 Bethel Lutheran Church
- 32WI2311 2 barn features
- 32WI2312 Barn feature
- 32WI880 Rainbow Valley Lutheran Church
- 32WI926 Warren Pony Truss road bridge
- 32WI2313 Gothic arch barn and a granary
- 32WI2185 One-room schoolhouse Big Meadow Township School
- 32WI2186 One-room schoolhouse New Home Township School

Thank you for the opportunity to review the historic age portion of this project. I have been in preliminary contact with Brandy harris regarding this project. If you have any questions, please contact Susan Quinnell at (701) 328-3576 or squinnell@nd.gov.

Sincerely,


Claudia J. Berg
Director, State Historical Society of North Dakota

Subject: letter on Aurora Wind - historic age Reconnaissance survey

From: Quinnell, Susan L. <squinnell@nd.gov>
Sent: Tuesday, February 5, 2019 11:38 AM
To: Harris, Brandy M <bmharris@burnsmcd.com>; Latham, Mark <mlatham@burnsmcd.com>
Cc: Picha, Paul R. <ppicha@nd.gov>; Swenson, Fern E. <fswenson@nd.gov>
Subject: letter on Aurora Wind - historic age Reconnaissance survey

Hi Mark and Brandy,

We are sending a "significant sites affected" letter (attached) for this portion of the Aurora Wind project with suggested mitigation a journal-length article on historic architecture in Williams County. For example the requirement for *North Dakota History: Journal of the Northern Plains*, (which is our journal) is 5,000 to 6,000 words, excluding footnotes.

I'm putting the hard copy of this PDF in today's mail to Mark.

By the way, the citation for the authority for us to require review, survey, and mitigation for wind turbine projects and other energy related projects is in the Public Service Commission's portion of the ND Century Code and Administrative Code, [69-06-08](#) and [49-22-09](#). It is not 55-02-07, in our section, where you might think it would be. The mitigation project itself does not need to be completed for our ok for this project, just that there is an understanding that the article will be completed. I would expect it to take a couple of years for the article to be finished.

Best Regards,

Susan Quinnell
Review and Compliance Coordinator
Acting Architectural Historian
ND State Historic Preservation Office
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck ND 58505-0830

701-328-3576 Office

<http://www.history.nd.gov/hp/>

Blog: <http://blog.statemuseum.nd.gov/users/susan-quinnell>

From: Harris, Brandy M [<mailto:bmharris@burnsmcd.com>]

Sent: Tuesday, February 5, 2019 10:36 AM

To: Quinnell, Susan L.

Subject: RE: potential journal article project as mitigation for visual effects to eligible properties near the Aurora Wind turbines

CAUTION: This email originated from an outside source. Do not click links or open attachments unless you know they are safe.

Thanks Susan! When do you anticipate sending a formal review letter outlining that this mitigation is required that I can share with the client?

Brandy

Brandy Harris \ Burns & McDonnell
Senior Cultural Resources Specialist \ Historian
o 512-872-7135 \ m 512-558-2884
bmharris@burnsmcd.com \ burnsmcd.com
8911 Capital of Texas Highway \ Building 3, Suite 3100 \ Austin, TX 78759

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From: Quinnell, Susan L. <squinnell@nd.gov>
Sent: Tuesday, February 5, 2019 9:29 AM
To: Harris, Brandy M <bmharris@burnsmcd.com>
Subject: potential journal article project as mitigation for visual effects to eligible properties near the Aurora Wind turbines

Hi Brandy,

Here is the list of architectural sites with eligible buildings that we believe warrant mitigation for visual effects for the Aurora Wind project.

32WI2308	Feature 2 Barn
32WI0887	Bethel Lutheran Church
32WI2311	2 barn features
32WI2312	Barn feature
32WI880	Rainbow Valley Lutheran Church
32WI926	Warren Pony Truss road bridge
32WI2313	Gothic arch barn and granary
32WI2185	One-room schoolhouse Big Meadow Township School
32WI2186	One-room schoolhouse New Home Township School

You are welcome to touch on any of these topics (barns, farmsteads, churches, granaries, schools). I started an excel sheet (attached) to organize some preliminary thoughts, but of course you don't have to use it.

The submission guidelines for North Dakota History: Journal of the Northern Plains are here:
<http://www.history.nd.gov/publications/ndhistory.html> I can't guarantee publication, but they are always looking for good articles.

Kathy Wilner is our volunteer extraordinaire who documented over 500 one-room school houses in the state. kjwilner@gmail.com 320-905-1846 is her cell number. She would probably have valuable contacts in Williams County regarding local history.

This is the link to her one-room schoolhouses webpage:

<http://www.history.nd.gov/hp/schools/>

I can forward batches of site forms if you like or you can stop by to do more research.

Please let me know what else we can do to facilitate this potential journal article project.

Best regards,

Susan Quinnell
Review and Compliance Coordinator
Acting Architectural Historian
ND State Historic Preservation Office
State Historical Society of North Dakota
North Dakota Heritage Center
612 East Boulevard Avenue
Bismarck ND 58505-0830

701-328-3576 Office

701-226-5359 Cell

<http://www.history.nd.gov/hp/>

Blog: <http://blog.statemuseum.nd.gov/users/susan-quinnell>



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*.

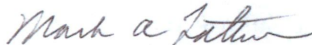
A total of 23 newly identified archaeological sites and three isolated finds were identified during the Cultural Resource Inventory Survey, which encompassed 4,436 acres. Twenty-one of the sites and the three isolated finds are recommended as not eligible for inclusion in the NRHP. The remaining two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

January 23, 2019
Page 2

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