



September 26, 2019

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

ND SHPO Ref: 18-0244 "Additional Aurora Wind Project Class III Cultural Resource Inventory Mountrail and Williams Counties, North Dakota" in portions of [T159N R97W Sections 22, 24-28, & 33-36] [T159N R96W Sections 19, 30, 31] [T158N R97W Sections 1- 3, 9-15, 22, 23-25, &36] [T158N R96W Sections 5, 6, 8, 9, 15-20, 22-24, 26, 30, 31, & 34-36] [T157N R97W Sections 1, 12, 13] [T157N R96W Sections 3-9] & [T157N R94W Section 20]

Dear Mr. Latham,

We reviewed ND SHPO Ref: 18-0244 "Additional Aurora Wind Project Class III Cultural Resource Inventory Mountrail and Williams Counties, North Dakota" in portions of [T159N R97W Sections 22, 24-28, & 33-36] [T159N R96W Sections 19, 30, 31] [T158N R97W Sections 1- 3, 9-15, 22, 23-25, &36] [T158N R96W Sections 5, 6, 8, 9, 15-20, 22-24, 26, 30, 31, & 34-36] [T157N R97W Sections 1, 12, 13] [T157N R96W Sections 3-9] & [T157N R94W Section 20] and find the report by Mark Latham acceptable. We find that there has been a good faith effort to avoid impacts to significant sites.

Thank you for the opportunity to review this project under North Dakota cultural resources consultation. This letter does not serve as federal agency consultation or SHPO consultation for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, (36 CFR Part 800), or the National Environmental Policy Act, as amended, (42 U.S.C. §§ 4321- 4347).

If you have any questions please contact Lisa Steckler, Historic Preservation Specialist at (701) 328-3577 or lsteckler@nd.gov

Sincerely,

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

18-0244



September 12, 2019

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

Re: Review Request for Additional 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:

We submitted a Class III survey report and a historic-age resource reconnaissance survey for the Aurora Wind Project, LLC (Aurora Wind) wind project (Project) in Williams and Mountrail Counties, North Dakota. Reroutes and other alterations of the Project footprint were added after the original report was submitted. The revised footprint did not change the defined indirect area of potential effect and there no additional historic-age resource survey was conducted. However, the additional 1,006 acres added to the footprint was subjected to a Class III survey. The enclosed report presents the results of this survey.

Construction is anticipated to begin soon and 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]).

The Class III was completed in July 2019, and the report is included herein along with the completed Manuscript Data Record Form. 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 the *Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota* submitted in January 2019.

A total of 4 newly identified archaeological sites were identified during the Class III survey, which encompassed 1,006 acres. All 4 sites are recommended as not eligible for inclusion in the NRHP.

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We ask that you please review the accompanying report and provide concurrence that the Project will not impact significant resources under North Dakota Century Code, Chapter 55-03. Should the Project design change to outside of the completed survey corridor, additional survey will be required, and 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,

A handwritten signature in cursive script that reads "Mark A. Latham".

Mark A. Latham
Sr. Cultural Resources Specialist/Archaeologist

Enclosure:

Additional Aurora Wind Project: A Class III Cultural Resources Inventory, Mountrail and Williams Counties, North Dakota
Manuscript Data Record Form

cc:

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