

Attachment 5 –

Part A: Additional Access Road and Corridor Expansions in 2019 for the Merricourt Wind Power Project – Addendum to Merricourt Wind Power Project 2013: Cultural Resource Monitoring and Class III Cultural Resource Inventory in McIntosh County, North Dakota

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Attachment 5 - Part A: Cultural Resource Monitoring and Cultural Resources Inventory

EDF Renewable Development, Inc.

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● **Attachment 5 - Part A: Cultural Resource Monitoring and Cultural Resources Inventory**

EDF Renewable Development, Inc.

CULTURAL RESOURCES

ADDITIONAL ACCESS ROAD AND CORRIDOR EXPANSIONS IN 2019 FOR THE MERRICOURT WIND POWER PROJECT - ADDENDUM TO MERRICOURT WIND POWER PROJECT 2013:

A CLASS III CULTURAL RESOURCE INVENTORY IN DICKEY
AND MCINTOSH COUNTIES, NORTH DAKOTA

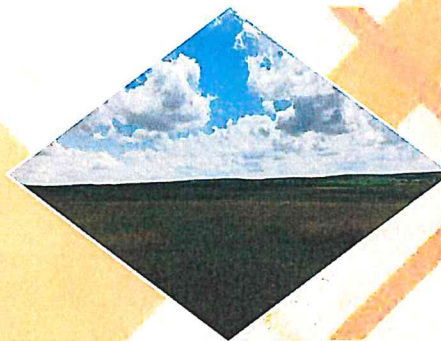
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EDF Renewable Energy
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REPORT OF INVESTIGATION: 2687

SEPTEMBER 2019



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N/A

9. **Acres:**

34.87

10. **Legal Location(s) with Historic Context Study Unit(s):**

<u>County</u>	<u>TWP</u>	<u>R</u>	<u>SEC</u>	<u>SU</u>
McIntosh	T. 130 N.	R. 67 W.	1, 3, 9, 12, 14, 15	SM
McIntosh	T. 131 N.	R. 67 W.	23, 25, 26, 32-35	SM

**ADDITIONAL ACCESS ROAD AND CORRIDOR
EXPANSIONS IN 2019 FOR THE MERRICOURT
WIND POWER PROJECT
ADDENDUM TO MERRICOURT WIND POWER PROJECT
2013: A CLASS III CULTURAL RESOURCE INVENTORY
IN DICKEY AND MCINTOSH COUNTIES, NORTH
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ABSTRACT

EDF Renewable Energy contracted KLJ in 2019 to conduct an additional Class III Cultural Resource Inventory for new access road and corridor expansions to the proposed Merricourt Wind Power Project. The proposed project would involve construction of wind turbine generators, access roads, substations, alternative access roads, crane access roads, and collector lines in Dickey and McIntosh Counties, North Dakota. The tower location corridors are 200 feet radius and the access road and other utilities proposed corridor is 200 feet. The access roads and corridor expansions were inventoried to allow EDF more flexibility in placing roads and associated utilities. The inventory in 2019 covered 34.87 acres primarily in cropland and adjacent rolling hills topography, in McIntosh County, North Dakota.

KLJ conducted continuous inventories in the project area between 2009 and 2017. Personnel for these inventories consisted of KLJ archaeologists; however, Tribal Cultural Specialists from Sisseton-Wahpeton Oyate, Turtle Mountain Band of Chippewa, Standing Rock Sioux Tribe, Northern Cheyenne Tribe, Crow Creek, and Mandan, Hidatsa & Arikara Nation Tribes participated in a 2013 tribal inventory.

KLJ conducted an updated cultural resource and manuscript search of the State Historical Society of North Dakota database on July 2, 2019. The updated search yielded 500 previously recorded cultural resources within the project's legal sections, including 202 Tribal Cultural Specialists locations recorded in 2013. The search yielded no additional manuscripts or cultural resources within the study area.

The 2019 Class III inventory was conducted on July 3 and July 11, 2019. Four previously noted features were newly recorded as archaeological sites during the Cultural Resource Inventory. In addition, two previously identified cultural heritage locations were updated.

All *unevaluated* and *Eligible* sites were given a 50-foot buffer/set back and no construction activity would occur within the buffer zone as determined by the tribes and the U.S. Fish and Wildlife Service. Due to the terrain and other limiting factors, some newly and previously recorded cultural or tribal cultural resources are located adjacent to the proposed construction zones. KLJ developed a Non-Federal Discovery and Monitoring Plan recommending fencing the sites adjacent to the construction zones and that an archaeological monitor be present for setup and, if deemed necessary, present during initial ground disturbance for those locations.

Provided all work and ground disturbance stays within areas inventoried for this project and the adjacent *unevaluated* and *Eligible* sites are fenced and/or monitored, KLJ recommends a finding of *No Significant Cultural Resources* would be impacted by the proposed Merricourt Wind Power Project as inventoried, mapped, photographed, and described herein.

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INTRODUCTION

EDF Renewable Energy (EDF) contracted KLJ in 2019 to conduct an additional Class III Cultural Resource Inventory for new access road and corridor expansions to the proposed Merricourt Wind Power Project (Merricourt). The proposed project would involve construction of wind turbine generators, access roads, substations, alternative access roads, crane access roads, and collector lines. The tower location proposed corridors are 200 feet radius and the access road and other utilities proposed corridor is 200 feet. The proposed project is located in Dickey and McIntosh Counties, North Dakota, as depicted on the Coldwater Lake NW (1982), Coldwater Lake SW (1982), Coldwater Lake NE (1982), Coldwater Lake (1982), and Merricourt NW (1971) USGS 7.5' Quadrangle maps. The 2019 inventory did not include any additional cultural inventory in Dickey County.

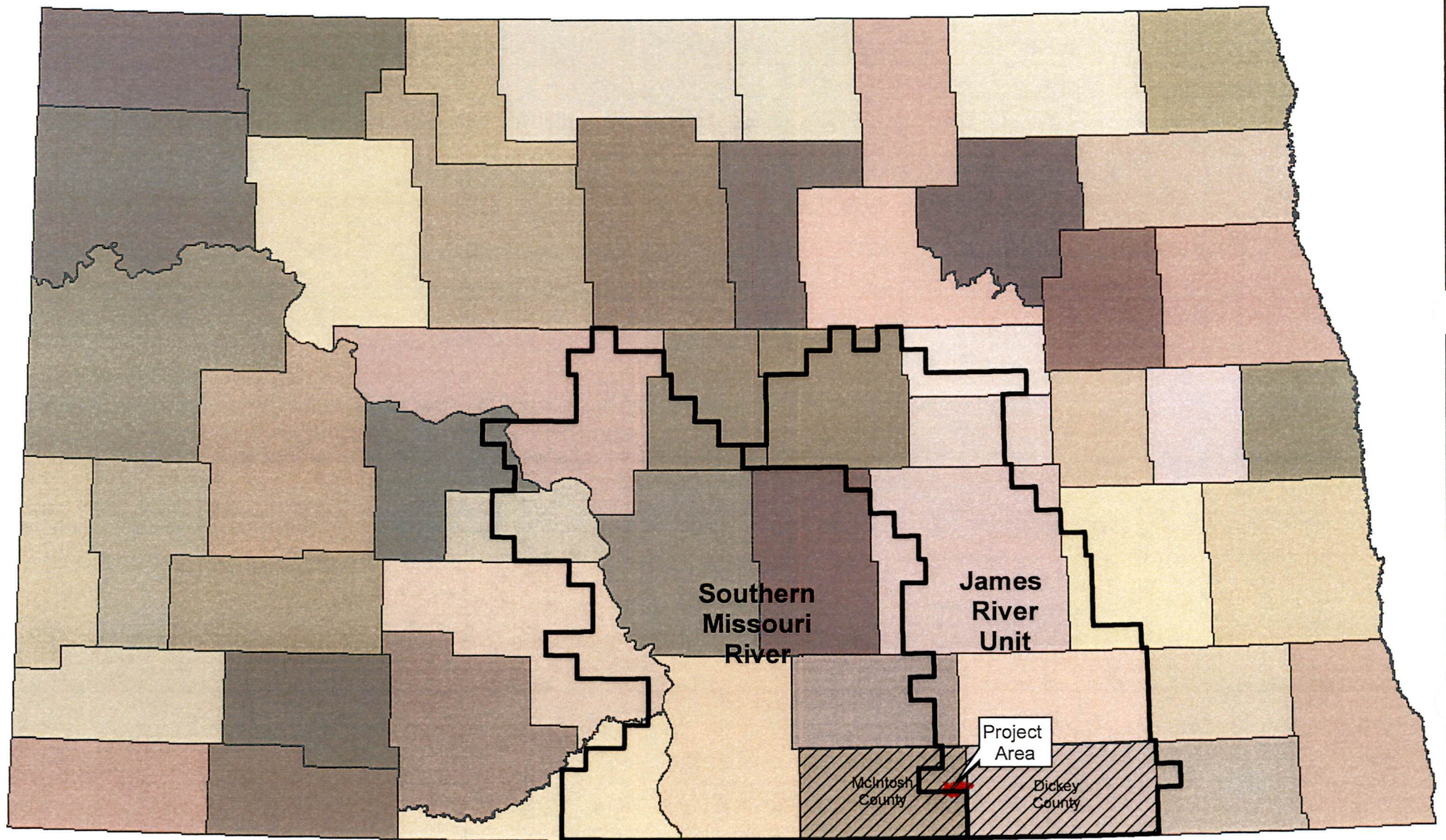
The inventory was conducted on July 3 and July 11, 2019, by KLJ archaeologist Andrew Robinson. A total of 34.87 acres were inventoried according to Class III standards for the 2019 inventory, with extra attention given to areas of high potential for cultural resources. Four previously noted features were newly recorded as archaeological sites during the Cultural Resource Inventory. In addition, two previously identified cultural heritage locations were updated.

The archaeological interpretations will be discussed in detail in the **Results** and **Summary and Management Recommendations** sections of this document. The entirety of the site forms, illustrations, maps, field notes, and photographic records relevant to the undertaking are on file at the KLJ office in Bismarck, North Dakota.

Table 1: Legal Location of 2019 Class III Inventory in McIntosh County.

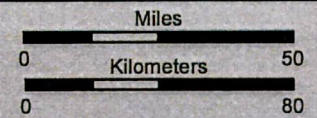
Township	Range	Section
T. 130 N.	R. 67 W.	1, 3, 9, 12, 14, 15
T. 131 N.	R. 67 W.	23, 25, 26, 32-35





Merricourt Wind Power Project ND County and Archaeological Study Unit Location Map

Figure 1

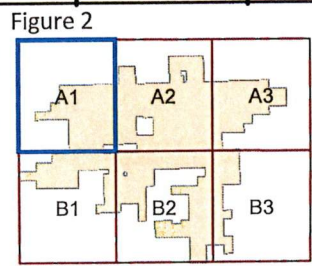
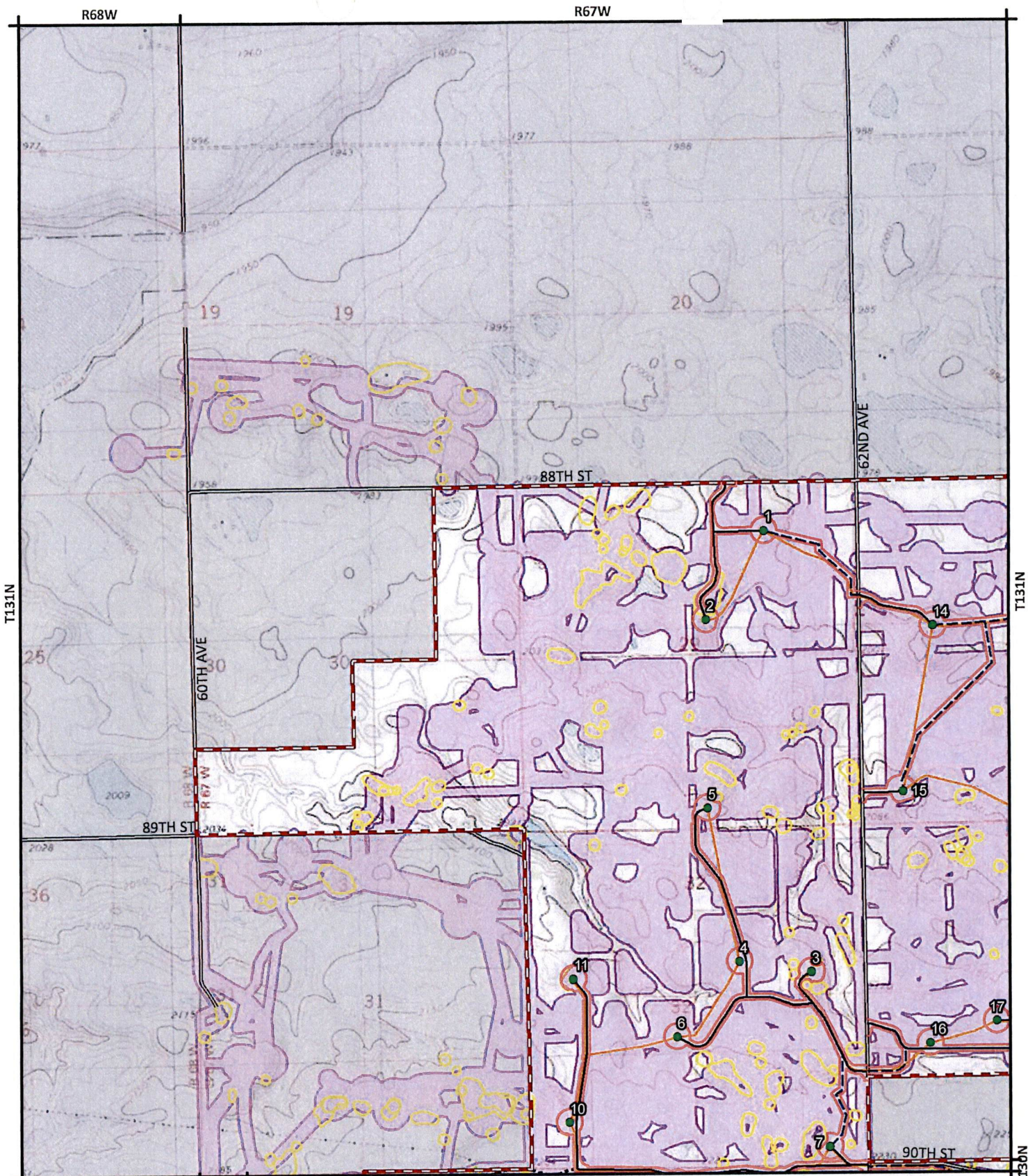


Project Area



Figure 1

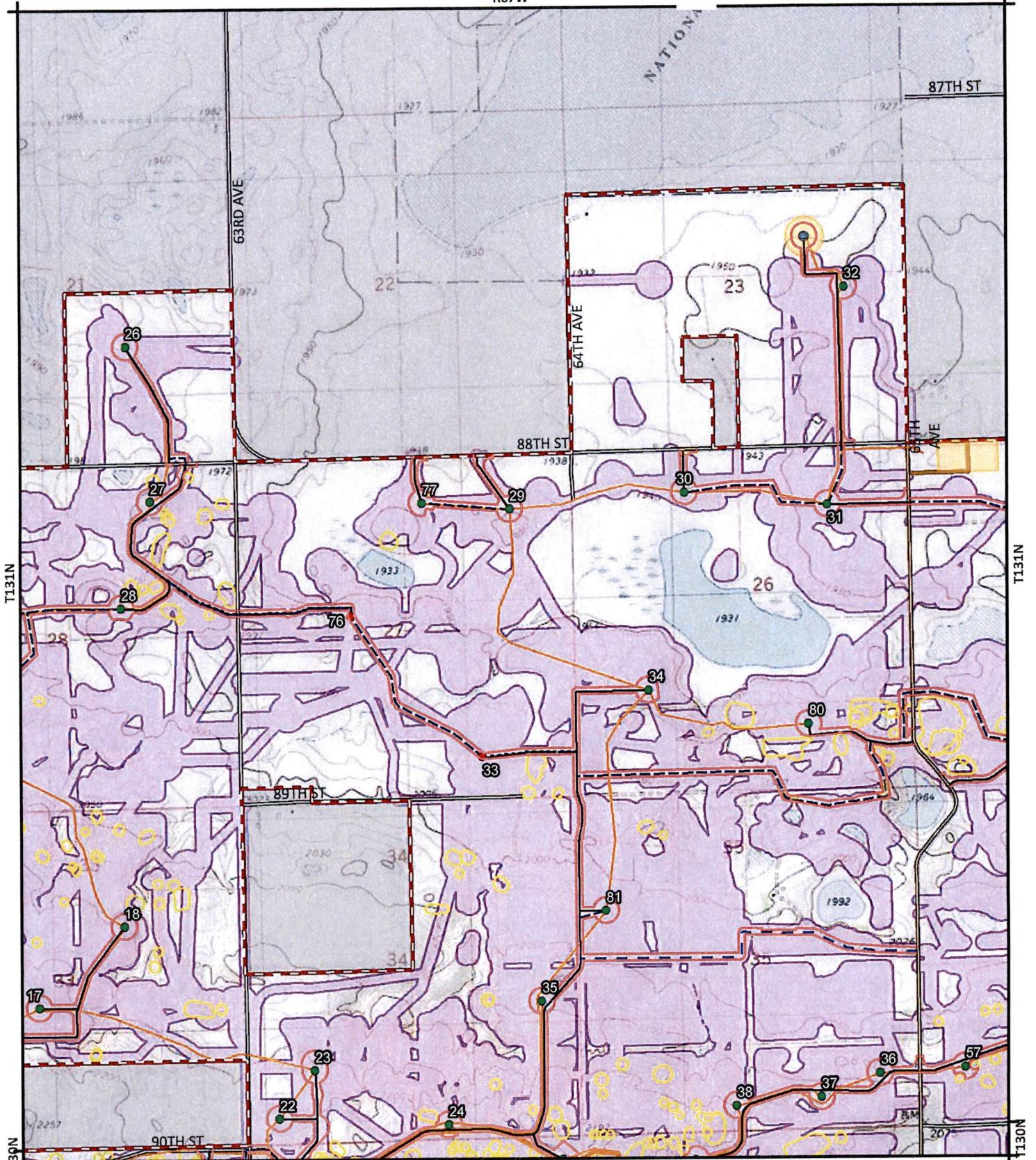
Map Scale: 1:2,200,000



Merricourt Wind Power Project
Topographic Map



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Primary Turbine Location
- - - Crane Paths
- ⋯ Alternate Access
- Primary Acces
- Collection Lines



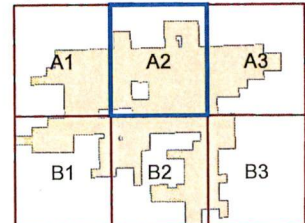
T131N

T131N

T130N

T130N

Figure 3



Merricourt Wind Power Project

Topographic Map

0 500 1,000 2,000 Feet



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Met Towers
- Primary Turbine Location
- Alternate Turbine Location
- Crane Paths
- Alternate Access
- Primary Acces
- Temporary Access
- Collection Lines

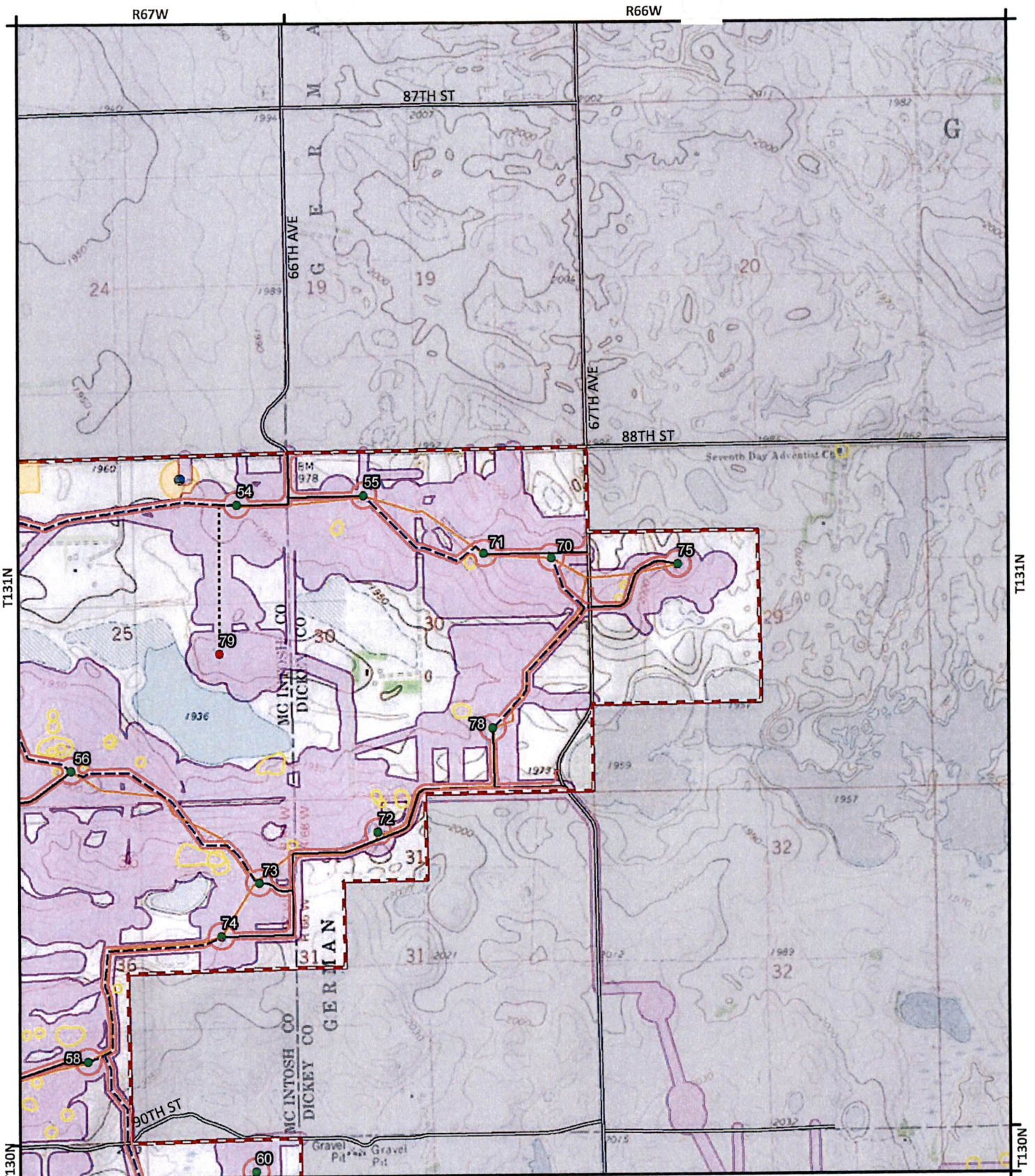
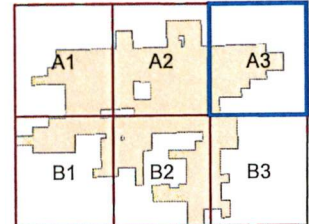


Figure 4



Merricourt Wind Power Project

Topographic Map

0 500 1,000 2,000 Feet



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Met Towers
- Primary Turbine Location
- Alternate Turbine Location
- - - Crane Paths
- - - - Alternate Access
- Primary Acces
- Collection Lines

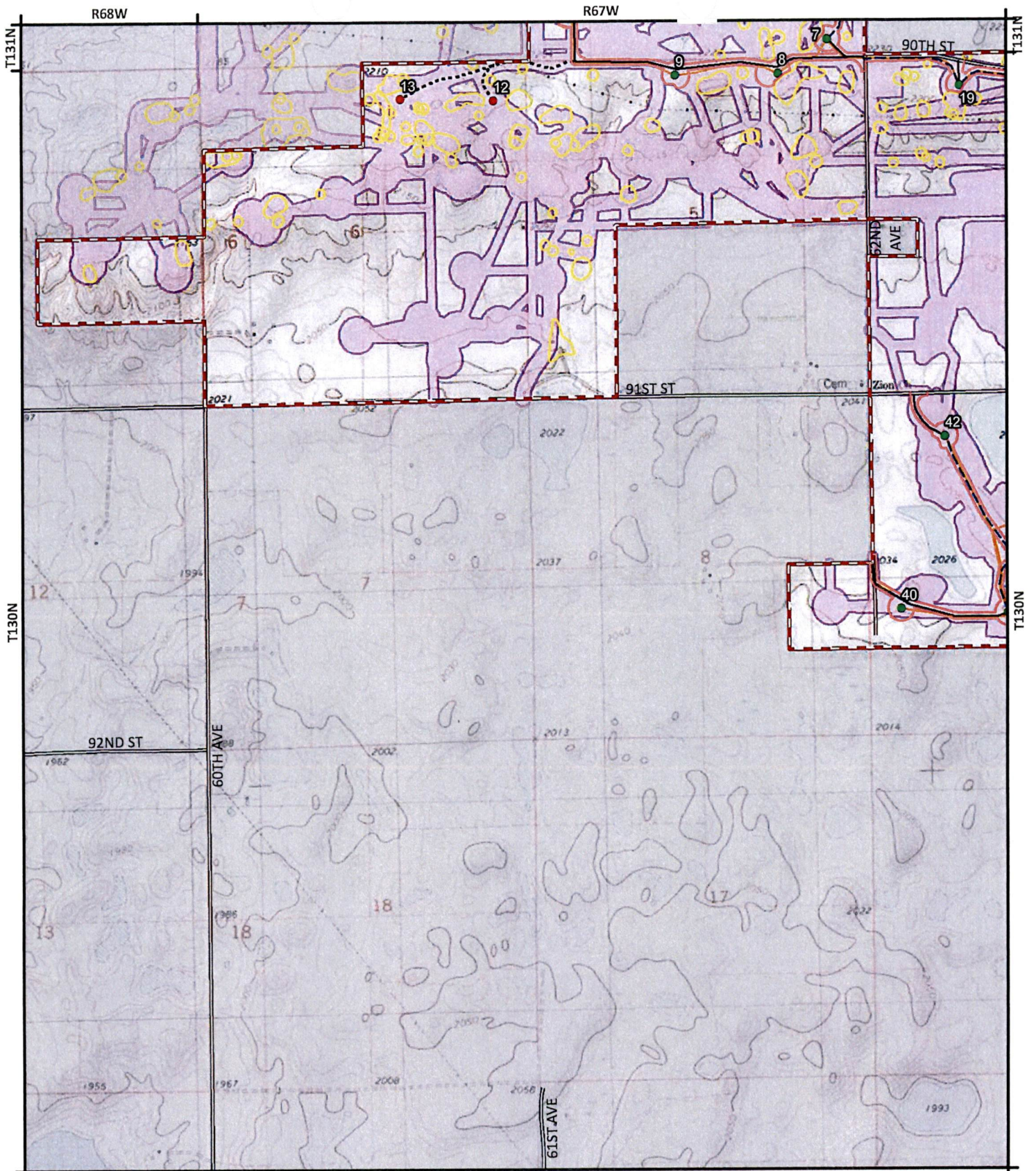
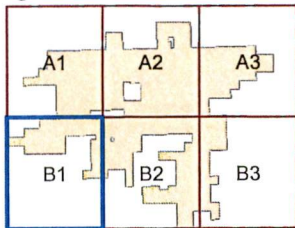


Figure 5

Merricourt Wind Power Project

Topographic Map



0 500 1,000 2,000 Feet



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Primary Turbine Location
- Alternate Turbine Location
- - - Crane Paths
- - - Alternate Access
- Primary Acces
- Collection Lines

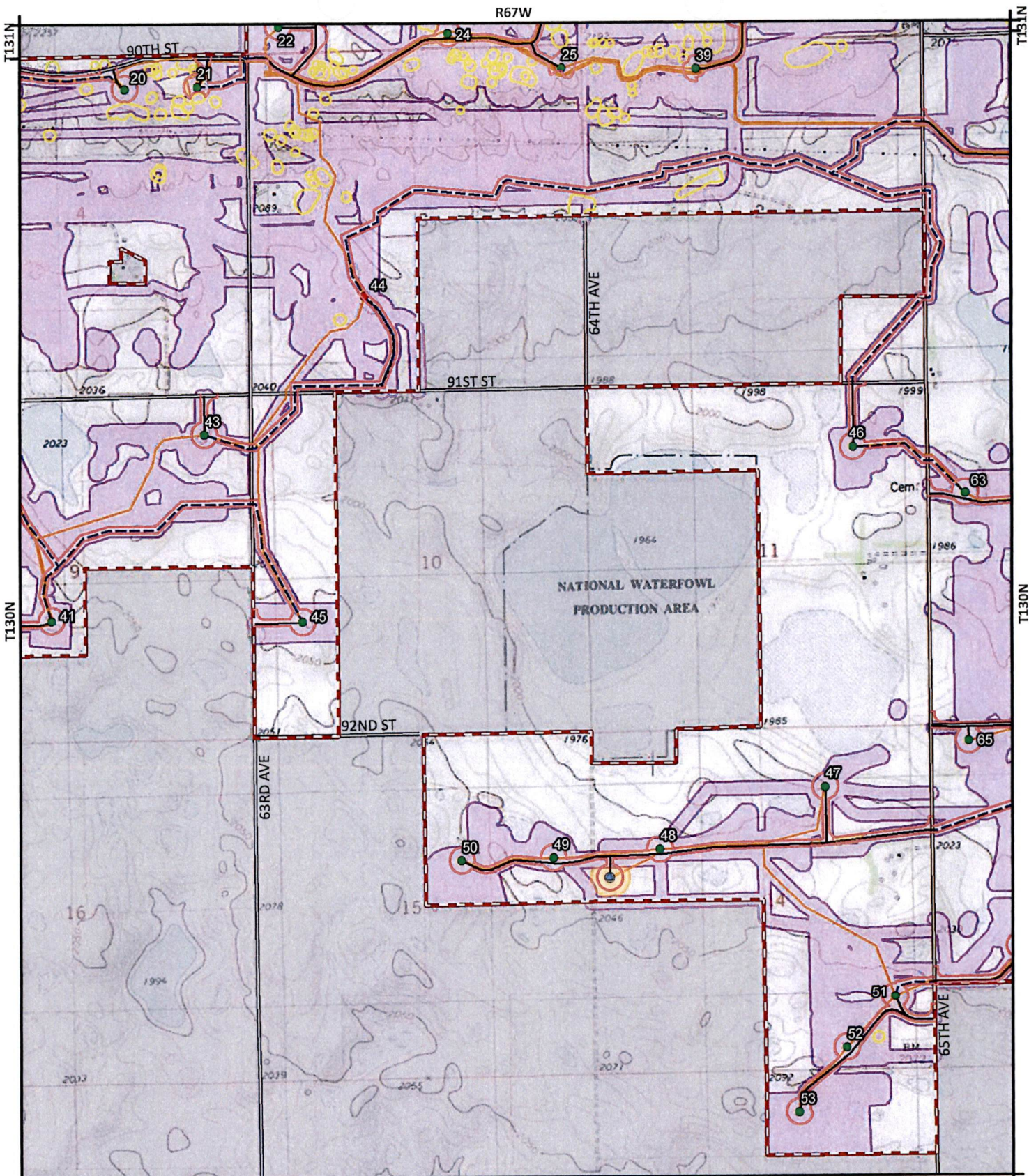
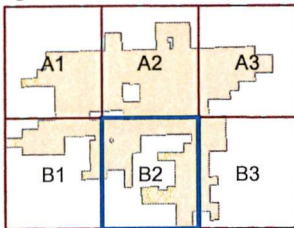


Figure 6



Merricourt Wind Power Project

Topographic Map

0 500 1,000 2,000 Feet



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Met Towers
- Primary Turbine Location
- Alternate Turbine Location
- - - Crane Paths
- - - Alternate Access
- Primary Accces
- Collection Lines

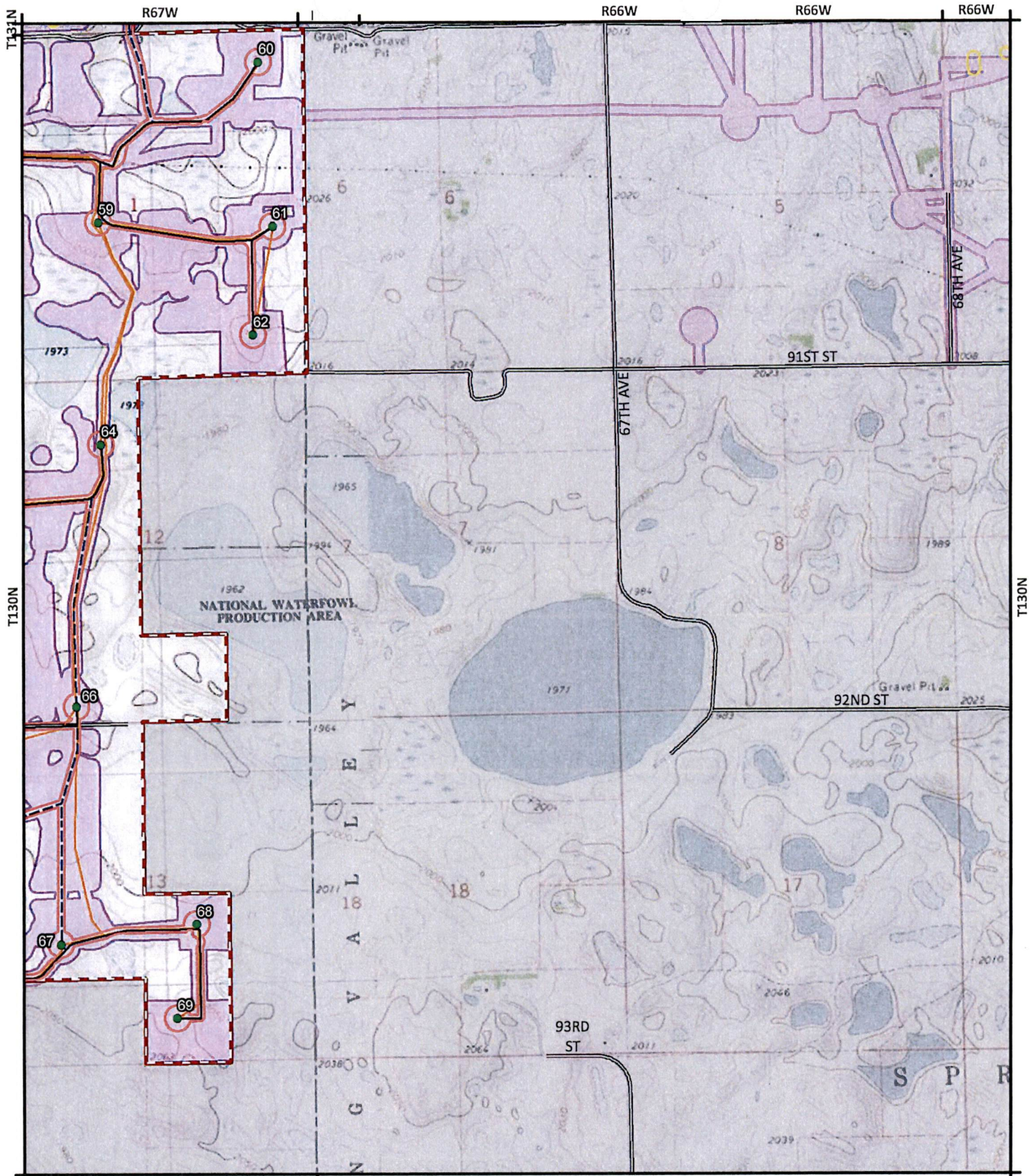
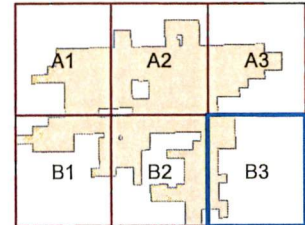


Figure 7



Merricourt Wind Power Project

Topographic Map



- Merricourt Disturbance Limits
- Final Project Boundary
- 2019 Class III Inventory Area
- Merricourt Concurred Class III Data
- Previously Recorded Cultural Resources
- Primary Turbine Location
- - - Crane Paths
- Primary Acceses
- Collection Lines

ENVIRONMENTAL SETTING

Southern Missouri River Study Unit

The 2019 additional acres inventory is located within the Southern Missouri River Study Unit (SMSU), which is located in south-central North Dakota. The Garrison, the Souris River, and the Sheyenne River study units lie to the north, the JRSU to the east, South Dakota to the south, and the Knife River, the Heart River, and the Cannonball River study units to the west. It covers approximately 9,639 mi² that includes all or parts of Burleigh, Emmons, Kidder, Logan, McIntosh, McLean, Mercer, Morton, Oliver, Sheridan, Sioux, and Stutsman counties. It is described in the 2008 SHSND documents *North Dakota Comprehensive Plan for Historic Preservation: Archaeological Component* and *The Southern Missouri River Study Unit*, which provide a generalized overview for the below summary of the physiography and previous research in the SMSU and other study units (Gregg, Bleier, and Swenson 2008).

Geographic Formation and Topography

The majority of the SMSU is located in the Northwestern Glaciated Plains ecoregion, which is a morainal landscape with heavy surface irregularity that marks the westernmost extent of continental glaciation. The SMSU is located in the Missouri Coteau, the Missouri Coteau Slope, and the Collapsed Glacial Outwash sub-ecoregions. The Missouri Coteau is a potholed, hummocky terrain full of wetland depressions that were created when the Wisconsinian glacier stalled on the Missouri escarpment. The Missouri Coteau Slope is where the Missouri Coteau descends to the Missouri River. It has a gently rolling topography and simple drainage system. The Collapsed Glacial Outwash has a high concentration of lakes and wetlands and was formed from glacial meltwater deposits (Bryce et al. 1998).

The western section of the study unit is located in the Northwestern Great Plains ecoregion, which is a semiarid rolling plain interrupted by sporadic buttes and badlands. Most of this part of the study unit is in the Missouri River Breaks sub-ecoregion, but parts are also in the Missouri Plateau and Moreau Prairie sub-ecoregions as well. The Missouri River Breaks are composed of dissected terraces and uplands that slope downward to the Missouri River and its major tributaries. The Missouri Plateau, situated west of the Missouri River, is composed of wide open spaces that were largely unaffected by glaciation. The Moreau Prairie contains a number of buttes, badlands, and salt pans throughout it. Also, some of the soil tends to be alkaline, affecting the land's productivity (Bryce et al. 1998).

Cultural History

The Paleo-Indian Period (9500 – 5500 B.C.) consists of the first people who migrated and settled in North America. This period is characterized by a hunter-gatherer lifeway, especially the exploitation of extinct Mega Fauna of the Pleistocene, which included mammoths, camels, and later, ancient (*Bison antiquus*) and modern bison. The period is also characterized by geographically extensive, interactive social networks, as evidenced by finds of non-local lithic materials. Unfortunately, there is a dearth of sites dating to this period in the SMSU.

The Archaic Period (5500 – 500 B.C.) is divided into three sub-periods, Early Archaic, Middle Archaic, and Late Archaic. There are no dated sites from the Early Archaic in the SMSU, but there are a number from the Middle and Late Archaic. This period is characterized by the regionalization of projectile point styles, a decrease in lithic tool production quality, and a decline in the range and scale of interactions between different human populations. During xeric times in the Archaic Period, the Missouri Trench might have been the only area in the state able to support permanent occupation.

The Woodland Period (550 B.C. – 1100 A.D.) is also divided into three sub-periods, Early Woodland, Middle Woodland, and Late Woodland. This period is characterized by the development of mound burial mortuary ceremonialism, production of ceramic vessels, the development of the bow and arrow, and intensified usage of seedy and grassy plants. Things changed through this period, with the level of regional interaction continuing to increase, and by the Late Woodland, the lifeway had changed to hunter-gatherer-gardener. The Missouri Trench was a focus for settlement in the SMSU.

The Plains Village Period (1200 – 1780 A.D.) is characterized by the domination of a horticultural-hunter-gatherer lifeway within North Dakota. During this period, people were able to produce dependable, storable food surpluses that led to more permanently situated earth lodge villages. The SMSU contains the lion's share of earth lodge village and other settlements of this period in North Dakota. At the end of this period, European diseases started to decimate these village communities.

The Equestrian/Fur Trade Period (1780 – 1880 A.D.) is when the horse became instrumental in the area. After the Native population had been devastated by European diseases, horse riding and pedestrian nomads became ascendant. The nomads focused almost entirely on bison for subsistence, but also exchanged for garden produce from Villagers. This period also marks the point where metal tools and implements began replacing traditional materials in earnest, as well as the gun becoming as important as the bow and arrow when it came to weaponry. However, by the late 1800's, harassment by US cavalry and significant reduction in bison herds began curtailing the nomads' power.

Fauna

Historically, the main fauna in the study unit were bison (*Bison bison*), elk (*Cervus canadensis*), pronghorn antelope (*Antilocapra americana*), white-tailed deer (*Odocoileus virginianus*), mule deer (*Odocoileus hemionus*), wolf (*Canis lupus*), fox (*Vulpes* sp.), and coyote (*Canis latrans*). Of these, bison, elk, and antelope no longer reside in the SMSU. In the rivers and waterways, a number of fish, turtle, and freshwater mussel species can be found, especially catfish (*Ictalurus* sp.). An assortment of bird species are also present, including eagles, hawks, owls, pelicans, magpies, and various waterfowl.

Flora

The flora of the SMSU consists mainly of mixed grass prairie, with some wooded areas along major rivers and drainages, as well as at major confluences and in draws. The dominant native plant species



in the prairie include green needlegrass (*Stipa viridula*), blue grama (*Bouteloua gracilis*), needle-and-thread grass (*Hesperostipa comata*), big bluestem (*Andropogon gerardii*), little bluestem (*Schizachyrium scoparium*), and western wheatgrass (*Agropyron smithii*) (Bryce et al. 1998). The wooded areas are dominated by cottonwood (*Populus* sp.), willow (*Salix* sp.), box elder (*Acer negundo*), green ash (*Fraxinus pennsylvanica*), and bur oak (*Quercus* sp.), with sedges and grasses making up the understory. Various plants utilized by native people included prairie turnip (*Psoralea esculenta*), chokecherry (*Prunus virginiana*), wild plum (*Prunus americana*), buffaloberry (*Shepherdia argentea*), goosefoot (*Chenopodium* sp.), wild grape (*Vitis riparia*), textile onion (*Allium textile*), biscuitroot (*Lomatium* sp.), and dogwood (*Cornus* sp.).

Natural Resources

The biodiversity of the SMSU supplied a wide variety of resources for food, fuel, shelter, and water. The primary locally available knappable material was Tongue River silicified sediment. In addition, granite cobbles, as well as clinker and scoria, provided for a number of uses, both practical and ceremonial.

Geology and Soils

The dominant soil order is Mollisols, but Entisols and Aridisols are also present. Some of the common soil series in the region include Amor, Bowbells, Bullock, Cabba, Chama, Flasher, Parnell, Parshall, Vebar, Williams, and Zahl. The soil's temperature and moisture regime is frigid/udic and frigid/ustic. The geology underneath the soils is predominantly sandstone and shale, often covered with glacial till and outwash (Bryce et al. 1998).

Land Use

Most of the land in this area of North Dakota is used for ranching and farming. Spring wheat is the chief agricultural crop, but other small grains, alfalfas, sunflowers, and hays are also grown to some extent. The rocky or severely sloping soils support native grasses and are used as rangeland. Some sections are also left as wetlands for wildlife (Bryce et al. 1998).

Climate

The climate is typical of the overall continental climate of the northern Great Plains, subject to long, cold winters and hot, dry summers. The SMSU is also semi-arid, with average annual precipitation of 15 to 18 inches (381 to 457 millimeters), and much of it occurring as rainfall during the growing season. The frost-free period averages 105 days and ranges from 81 to 129 days (Bryce et al. 1998).



RESEARCH GOALS/EVALUATION OF RESEARCH

Following the mandated policies implementing the National Historic Preservation Act (NHPA [Public Law 89-665]), as amended, this proposed project was inventoried to locate any historic properties within the APE. An additional goal of the inventory was to allow EDF to site the proposed undertaking to avoid any historic properties and, if not possible, to test, evaluate, and if necessary, mitigate impacts to historic properties within the proposed project area prior to construction. To accomplish this, the intent of the cultural resource work for the proposed project was to:

- 1. Identify any prehistoric, historic, or traditional cultural resources that may exist in (or near) the proposed project area that may be affected by project undertaking activities.*
- 2. Make recommendations concerning the significance and National Register of Historic Places (NRHP) eligibility of any identified cultural resources.*
- 3. Make appropriate recommendations regarding the treatment of all identified cultural resources.*
- 4. Provide a report detailing findings to the project sponsor and the Public Service Commission.*



LITERATURE REVIEW AND PREVIOUS INVENTORIES

KLJ conducted previous literature reviews for all previous inventories (Harty, et al. 2010; Klinner, 2010a; Klinner, 2010b; Harty, 2011; Bush and Klinner, 2015a; Bush and Klinner, 2015b; Hull and Robinson, 2015; Robinson 2017; Gordon and Robinson, 2018). The literature review was updated on July 2, 2019 for the current areas.

The initial literature review was conducted at the SHSND in May 2009, by KLJ staff. A total of 2,793 acres were Class III inventoried for the proposed undertaking, with 166 cultural resources being recorded. The initial inventory was conducted between August and November 2009, and May 2010, by KLJ and TCS from the Sisseton-Wahpeton Oyate (SWO) and/or Standing Rock Sioux Tribe (SRST) (Harty, et al. 2010).

Additional small-scale inventories were conducted in 2010 and 2011, including the access and location for the proposed substations. A total of 163 acres were surveyed during these inventories. One prehistoric site was recorded (Klinner, 2010; Harty, 2011).

KLJ conducted the second large scale inventory in June 2013 (Bush and Klinner, 2015a). The 2013 project area encompassed 1,907 acres. Portions of the area, however, had been previously surveyed during the 2009, 2010, and 2011 inventories. These areas were not re-inventoried, but the previously recorded sites within the new project area were revisited. As a result, a total of 1,219 acres were Class III inventoried in 2013. Two prehistoric isolated finds, two sites with historic and architectural components, 11 historic sites, and 82 prehistoric sites were encountered during the inventory.

In addition to the 2013 Class III inventory, a Tribal cultural inventory was conducted by Tribal Cultural Specialists (TCS) from SWO, Turtle Mountain Band of Chippewa, SRST, Northern Cheyenne Tribe, Crow Creek, and Mandan, Hidatsa & Arikara Nation Tribes (Bush and Klinner, 2015b). During the TCS survey, 202 locations of significance to the tribes were identified. As requested by the tribes, only limited information on the locations was noted. Of the 202 recorded locations, 32 extend into sites encountered and recorded during the 2013 Class III Cultural Resource Inventory conducted by KLJ archaeologists (Bush and Klinner, 2015a). All of the tribal locations were recommended significant and a 50-foot buffer/set back was created around those locations per coordination with the tribes and Fish and Wildlife (Harty, et al. 2010).

KLJ conducted an updated cultural resource and manuscript search of the SHSND database in October 2015 for reroutes to the project (Hull and Robinson, 2015). The search did not yield additional sites or manuscripts within the study area, indicating no cultural resource studies have occurred outside of the Merricourt Project. The 2015 search yielded 463 previously recorded cultural resources within the project's legal sections, this includes the 202 TCS locations from 2013.



KLJ conducted an updated cultural resource and manuscript search of the SHSND database in September 2016 for the expansion of buildable areas for the project (Robinson, 2017). The search did not yield additional sites or manuscripts within the study area, indicating no cultural resource studies have occurred outside the Merricourt Project. The 2016 search yielded 463 previously recorded cultural resource within the project's legal sections, including 202 TCS locations from 2013.

In 2017, the client adjusted the corridors due landowner requests and for optimal location of alternate access roads and corridor expansion for the project APE. An updated literature search was completed in November 2017 and did not yield any additional cultural resources beyond the 2016 search. One additional inventory was conducted, an electrical grid line conducted by Agassiz Archeology in 2017. The manuscript for this project is titled "Twelve Construction Work Plan Projects: 2017 Class III Cultural Resources Inventory Dakota Valley Electric Cooperative, Dickey, McIntosh, Richland, and Sargent Counties, North Dakota" (Manuscript No. 17421 on file at the NDSHS). No additional cultural resources associated with this project were located within one-mile of the 2017 project APE. Due to the continuation of the project and previous reports, this report omits the previously recorded cultural resource tables and previously inventoried areas as no additional cultural resource investigations outside of KLJ's work has occurred within the proposed study area.

In 2019, the client adjusted the corridors for optimal location of alternate access roads and corridor expansion for the project APE. An updated literature search was completed on July 2, 2019 and did not yield any additional cultural resources. No additional inventories were conducted since the previous literature review in 2017. No additional cultural resources associated with this project were located within one-mile of the 2019 project APE. Due to the continuation of the project and previous reports, this report omits the previously recorded cultural resource tables and previously inventoried areas as no additional cultural resource investigations outside of KLJ's work has occurred within the proposed study area.



FIELD METHODS/CONDITIONS

KLJ conducted a Class III Cultural Resource Inventory on July 3 and July 11, 2019 to encompass the additional areas within the new APE. The inventory was conducted in accordance with the 2017 *North Dakota SHPO Guidelines Manual for Cultural Resource Inventory Projects* and the *Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation (48_FR_44716-44742)*. Field personnel included KLJ archaeologist Andrew Robinson. The additional areas were inventoried using parallel transects spaced no more than 15 meters apart.

A total of 34.87 acres were inventoried for the access road and expanded portion of the project. The surrounding landscape consisted of a prominent east-west ridge system surrounded by croplands in the low-lying areas and has numerous drainages and small lakes across the area. Due to the sensitive nature of the area, as deemed through previous tribal interactions, no shovel probes were utilized during this inventory or any previous inventories. The vegetation within the inventory area consisted primarily of agricultural fields with minor areas of mixed prairie.

Ground surface visibility (GSV) was predominantly good in the disturbed/eroded areas and within the croplands, which varied between 40 and nearly 100 percent. The lowest GSV was in areas of thick mixed grassland vegetation, averaging between 5 and 35 percent. The weather at the time of the survey was hot and sunny, with a light breeze.



RESULTS

Four previously noted features were newly recorded as archaeological sites during the Cultural Resource Inventory. In addition, two previously identified cultural heritage locations were updated. The details of these resources are discussed below.

Newly Recorded Cultural Resources

32MT398

The stone feature was documented in 2013 as a tribal feature location, designated as CHFMT3, and upon field verification, the feature was newly recorded as an archaeological site. The site consists of a single cairn composed of approximately 20 stones. The cairn is approximately 3 meters long by 1.5 meters wide. The feature is located in a mixed grass pasture along the top of a finger ridge with some evidence of livestock grazing. The surrounding area is composed of similar rolling hills with native prairie and agricultural fields.

The site retains the locational, setting, feeling, and association aspects of integrity because the features are in their original locations. Power lines do cross over the site location. The site possesses attributes and elements, considered significant to indigenous groups it is considered Unevaluated pending further investigation under Criterion A. The site is not associated with any people that have made a significant contribution to the broad patterns of history, therefore it is Not Eligible under Criterion B. The site does not represent a unique style or distinctive characteristics of a type, period, or method of construction, therefore it is Not Eligible under Criterion C. The site has the potential to yield knowledge of the past and is Unevaluated pending further investigation under Criterion D. Therefore, under Criteria A and D the site is Unevaluated for inclusion on the NRHP.





Figure 8: Overview of feature, view to the east.



Figure 9: Overview across 32MT398, view to the east.



32MT399

The stone feature was documented in 2013 as a tribal feature location, designated as CHFMT4, and upon field verification, the feature was newly recorded as an archaeological site. The site consists of a single stone circle feature. The stone circle is round in shape, 7 meters in diameter, and composed of 37 stones with a northeast opening. The feature is located in native prairie grass along the top of a finger ridge with some evidence of livestock grazing. The surrounding area is composed of similar rolling hills with native prairie grasses, small lakes, and agricultural fields.

The site retains the locational, setting, feeling, and association aspects of integrity because the features are in their original locations. However, power lines do cross over the site location. The site possesses attributes and elements, considered significant to indigenous groups and it is considered *unevaluated* pending further investigation under Criterion A. The site is not associated with any people that have made a significant contribution to the broad patterns of history, therefore it is *Not Eligible* under Criterion B. The site does not represent a unique style or distinctive characteristics of a type, period, or method of construction, therefore it is *Not Eligible* under Criterion C. The site has the potential to yield knowledge of the past and is *unevaluated* pending further investigation under Criterion D. Therefore, under Criteria A and D the site is *unevaluated* for inclusion on the NRHP.



Figure 10: Overview of feature, view to the northeast.





Figure 11: Overview of feature, view to the southwest.



Figure 12: Overview across 32MT399, view to the south.





Figure 13: Overview across 32MT399, view to the west.



32MT400

The stone feature was documented in 2013 as a tribal feature location, designated as CHFMT5, and upon field verification, the feature was newly recorded as an archaeological site. The site consists of a single cairn. The cairn is oval in shape, approximately 1 meter by 1 meter, and composed of approximately 12 stones. The feature is located in native prairie grass along the top of finger ridge with a good open view of the surrounding area and utilized for livestock grazing. The surrounding area is composed of similar rolling hills with native prairie grasses, small lakes, and agricultural fields.

The site retains the locational, setting, feeling, and association aspects of integrity because the features are in their original locations. However, power lines do cross over the site location. The site possesses attributes and elements, considered significant to indigenous groups and it is considered *unevaluated* pending further investigation under Criterion A. The site is not associated with any people that have made a significant contribution to the broad patterns of history, therefore it is *Not Eligible* under Criterion B. The site does not represent a unique style or distinctive characteristics of a type, period, or method of construction, therefore it is *Not Eligible* under Criterion C. The site has the potential to yield knowledge of the past and is *unevaluated* pending further investigation under Criterion D. Therefore, under Criteria A and D the site is *unevaluated* for inclusion on the NRHP.



Figure 14: Overview of feature, view to the east-southeast.





Figure 15: Overview of feature, view to the east.



Figure 16: Overview across 32MT400, view to the south.



32MT401

The stone feature was documented in 2013 as a tribal feature location, designated as CHFMT6, and upon field verification, the feature was newly recorded as an archaeological site. The site consists of a single stone circle feature. The stone circle is oval in shape and 8 meters in diameter. Additional scattered stones are located outside the feature. The feature is located in native prairie grass along the top finger ridge with a good open view of the surrounding area and utilized for livestock grazing. The surrounding area is composed of similar rolling hills with native prairie grasses, small lakes, and agricultural fields.

The site retains the locational, setting, feeling, and association aspects of integrity because the features are in their original locations. However, power lines do cross over the site location. The site possesses attributes and elements, considered significant to indigenous groups and it is considered *unevaluated* pending further investigation under Criterion A. The site is not associated with any people that have made a significant contribution to the broad patterns of history, therefore it is *Not Eligible* under Criterion B. The site does not represent a unique style or distinctive characteristics of a type, period, or method of construction, therefore it is *Not Eligible* under Criterion C. The site has the potential to yield knowledge of the past and is *unevaluated* pending further investigation under Criterion D. Therefore, under Criteria A and D the site is *unevaluated* for inclusion on the NRHP.



Figure 17: Overview of feature, view to the northeast.



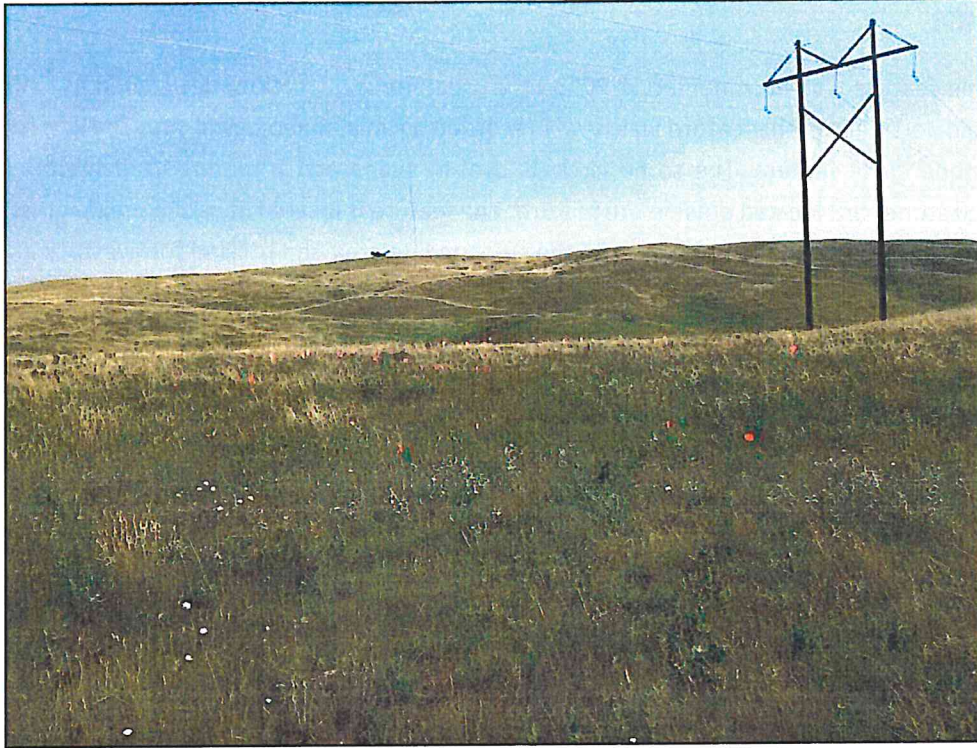


Figure 18: Overview across 32MT401, view to the east.



Cultural Heritage Form Resources

CHFMT1

This stone feature was documented in 2013 as a tribal feature location. The information was not submitted to the SHPO at the time of documentation. The feature location was updated during the 2019 cultural inventory. This feature is comprised of a spread of stones creating the feature. The feature is located in native prairie grass along the top of a finger ridge with some evidence of livestock grazing. The surrounding area is composed of similar rolling hills with native prairie grasses, small lakes, and agricultural fields. The area is deemed of importance to the representative tribes and a 50-foot avoidance buffer will be placed around the feature as determined by the tribes and the U.S. Fish and Wildlife Service (Harty, et al. 2010).



Figure 19: Overview of feature location with 32MT398 in fore ground, view to the east-northeast.



CHFMT2

This stone feature was documented in 2013 as a tribal feature location. The stone feature location was noted in 2013 as a stone feature and a burial (no physical remains encountered). The information was not submitted to the SHPO at the time of documentation. The feature location was updated during the 2019 cultural inventory. The linear stone feature with spread of stones at the northeast end is composed of 9 stones and is located in native prairie grass along the top of a finger ridge with some evidence of livestock grazing. The surrounding area is composed of similar rolling hills with native prairie grasses, small lakes, and agricultural fields. The area is deemed of importance to the representative tribes and a 50-foot avoidance buffer will be placed around the feature as determined by the tribes and the U.S. Fish and Wildlife Service (Harty, et al. 2010).



Figure 20: Overview of feature location, view to the northeast.



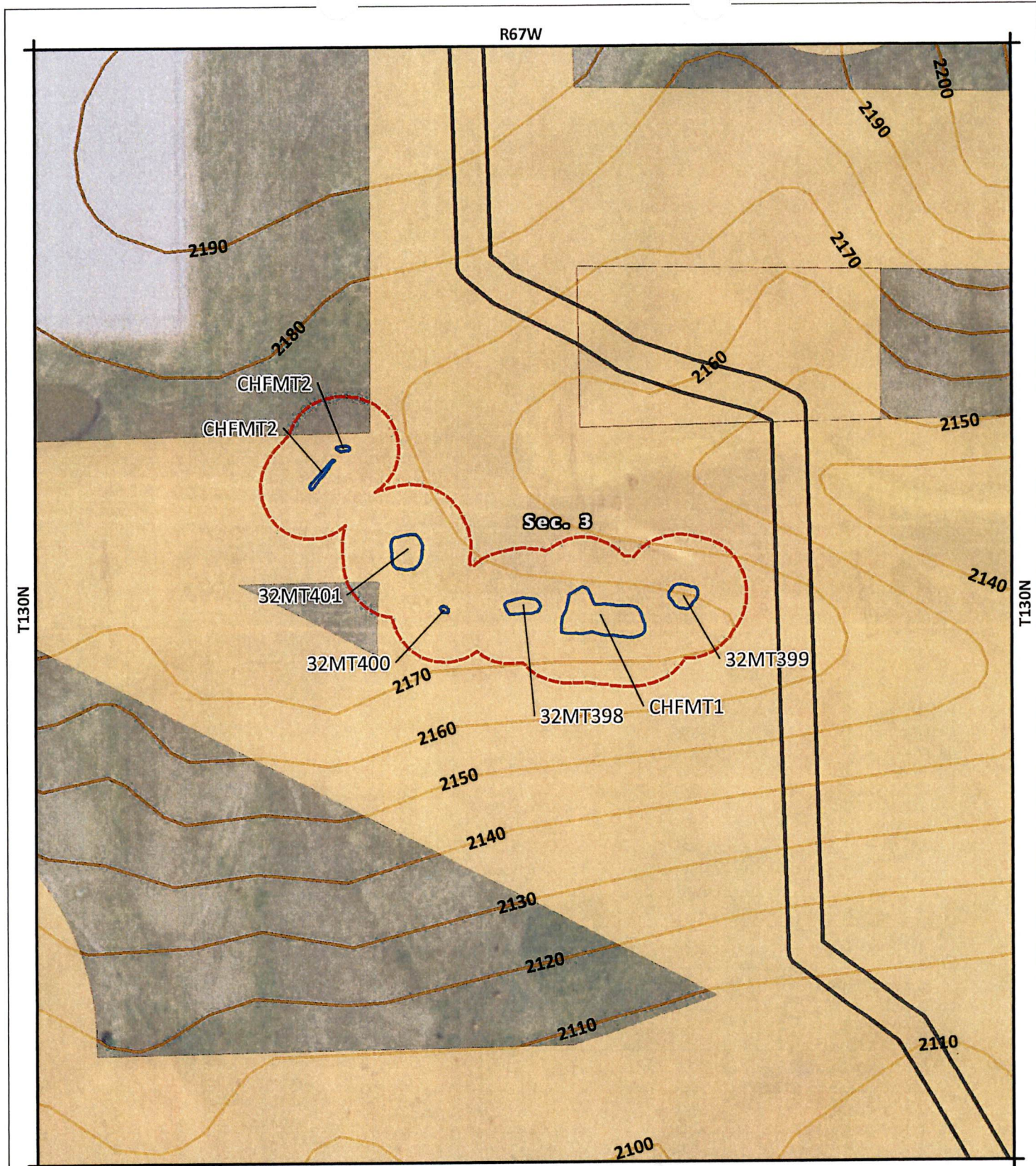


Figure 21

Restrictions:
 For Official Use Only: Disclosure
 of Cultural Site Locations Prohibited
 (43 CFR 7.18 and NDCC 55-02-07.1)

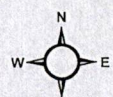
KLJ Project Number: 1609132
Date Created: 8/12/2019
Created By: andrewrobinson

Merricourt Site Locations Sketch Map

Quadrangle: Coldwater Lake

0 50 100 200
 Feet

0 25 50 100
 Meters



1:1,600

- Site Locations
- 50' Site Location Buffer
- 10' Contours
- Class III Inventory Area
- Construction Disturbance

SUMMARY AND MANAGEMENT RECOMMENDATIONS

KLJ was contracted by EDF to conduct a Class III inventory for the additional access roads and expanded areas for the proposed Merricourt Wind Power Project. The proposed project would involve construction of wind turbine generators, access roads, substations, alternative access roads, crane access roads, and collector lines. The tower location proposed corridors are 200 feet radius and the access road and other utilities proposed corridor is 200 feet. A total of 34.87 acres were inventoried for the project on July 3, 2019, by KLJ archaeologist Andrew Robinson. Two previously identified cultural heritage locations were updated. In addition, four previously noted features were newly recorded as archaeological sites during the Cultural Resource Inventory.

All *unevaluated* and *Eligible* sites were given a 50-foot buffer/set back and no construction activity would occur within the buffer zone as determined by the tribes and the U.S. Fish and Wildlife Service (Harty, et al. 2010). Due to the terrain and other limiting factors, some previously recorded cultural resources or tribal cultural sites are located adjacent to the proposed construction zones. KLJ developed a Non-Federal Discovery and Monitoring Plan, recommending fencing the sites adjacent to the construction zones and/or that an archaeological monitor be present for setup and, if deemed necessary, during initial ground disturbance for those locations.

Provided all work and ground disturbance stays within areas inventoried for this project and the adjacent *unevaluated* and *Eligible* sites are fenced and/or monitored, KLJ recommends a finding of *No Significant Cultural Resources* would be impacted by the proposed Merricourt Wind Power Project as inventoried, mapped, photographed, and described herein.

Table 2: Summary of Newly Recorded Cultural Resources.

SITS/CHF	Type	NRHP Status	Recommendation
32MT398 (CHFMT3)	Archaeological – Cairn	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities
32MT399 (CHFMT4)	Archaeological – Stone Circle	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities
32MT400 (CHFMT5)	Archaeological – Cairn	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities
32MT401 (CHFMT6)	Archaeological – Stone Circle	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities
CHFMT1	CHF – Stone Feature	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities
CHFMT2	CHF Multiple Stone Features	<i>Unevaluated</i>	Minimum 50-foot avoidance for ground disturbing activities



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APPENDIX A: PROJECT AREA PHOTOGRAPHS



Figure 22: Overview of the project area, view to the west.



Figure 23: Overview of the project area, view to the southeast.

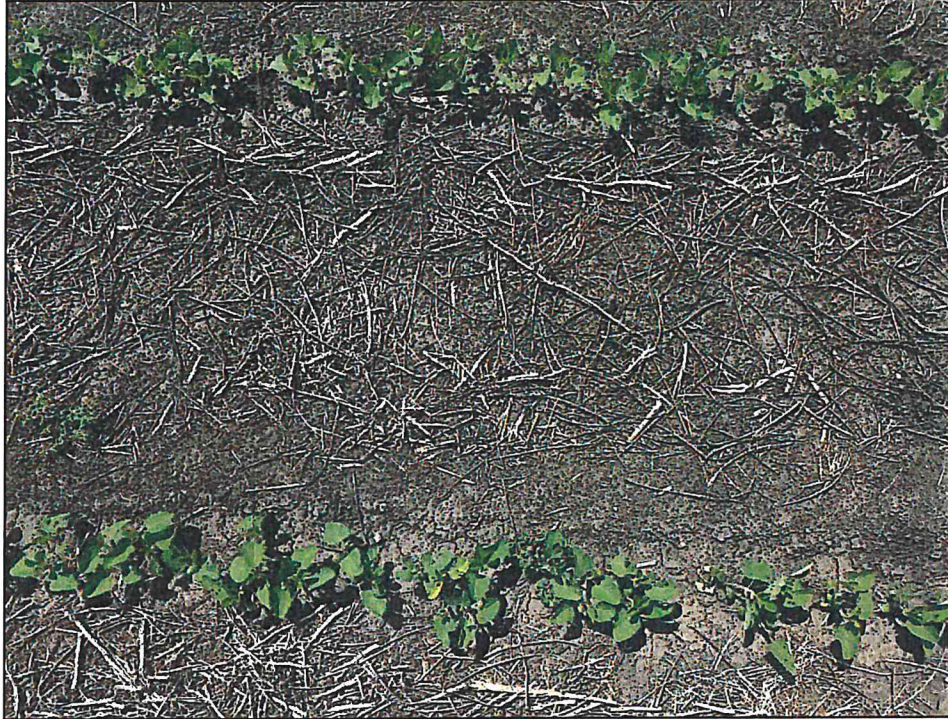


Figure 24: Sample GSV of agricultural field within project area, plan view.



Figure 25: Overview of the project area, view to the southeast.