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## Archaeological Survey Report Summary

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To	Northern Divide Wind, LLC
Subject	Northern Divide Wind Energy Center Class III: Intensive Archaeological Resources Inventory Burke and Divide Counties, North Dakota
From	AECOM
Date	February 3, 2020

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### Introduction and Purpose

Northern Divide Wind, LLC (Northern Divide Wind), a wholly owned, indirect subsidiary of NextEra Energy Resources, LLC, proposes to construct the Northern Divide Wind Energy Center (Project), located approximately four miles (mi) (6.4 kilometer [km]) southwest of the city of Larson in Burke County, North Dakota. The Project consists of up to 78 turbines, access roads, underground electrical collection systems, collection substations, an operations and maintenance building, meteorological evaluation (Met) towers, a construction laydown area, and a batch plant.

The Project will require a Certificate of Site Compatibility from the North Dakota Public Service Commission (Commission) (Case No.: PU-19-376); therefore, the Project is subject to review by the State Historical Society of North Dakota (SHSND) under North Dakota Century Code 49-22-09. The purpose of this investigation is to provide the necessary information for the SHSND review by confirming the presence or absence of archaeological sites within the Survey Corridor, as more particularly described below.

AECOM completed a Class III Intensive Cultural Resource Inventory of approximately 1,218 acres between December 2017 and November 2018 (see North Dakota State Historic Preservation Office (NDSHPO) manuscript number 18240 for details (NDSHPO Reference No. 18-0733). The report for these inventories received SHSND concurrence in February 2019 (Attachment A).

The current Survey Corridor includes all changes since February 2019 that may be permanently or temporarily affected during construction of the Project and is based on:

- The turbine layout dated October 24, 2019;
- The service road layout dated November 18, 2019;
- The electrical collection line route layout dated November 18, 2019;
- The Met tower layout dated August 21, 2019; and,
- The crane path layout dated November 18, 2019.

For these Project facilities, AECOM surveyed:

- A 600-foot (ft) (182.88 meter [m]) diameter circular area centered on the proposed turbine locations;

- A 232 ft (70.7 m) corridor for the service roads;
- A 50 to 100 ft (15.24 m) corridor for the collection lines; and,
- A 600-ft (182.88 m) diameter circular area centered on the proposed Met tower locations.

Small shifts to previously surveyed access roads, collection lines, and turbines were also covered under this survey, which occurred between April 2019 and November 2019 and covered approximately 676 ac (1,668.4 ha). The combined Class III Intensive Cultural Resource Inventory is shown in Figure 1.

## Results

The literature review identified 23 previously recorded archaeological sites or site leads within the current Survey Corridor. All of these resources are archaeological or historical archaeological site leads; none of these site leads have been formally evaluated for NRHP eligibility.

During the Class III Intensive Cultural Resource Survey, AECOM documented 12 archaeological sites including one Native American site, four Native American isolated finds, three Euro-American artifact scatters, and four Euro-American isolated finds. A total of 122 shovel test probes were completed in medium to high probability areas of the Survey Corridor with low ground surface visibility.

A survey for Sites of Religious and Cultural Significance to Tribes (SRCSTT) was also undertaken for the updated Project by Traditional Cultural Surveyors (TCS) from the Rosebud Sioux, the Spirit Lake of Fort Totten, and the Turtle Mountain Chippewa Tribes. Four SRCSTT were documented and recorded on NDSHPO Cultural Heritage Forms by AECOM on behalf of the participating tribes.

## Recommendations

AECOM recommends avoidance of all cultural resources that are potentially eligible for listing on the National Register of Historic Places (NRHP), sites deemed culturally sensitive, or sites that have not been evaluated for eligibility following the guidelines outlined by the NDSHPO. For this investigation, Northern Divide Wind has committed to avoiding effects to archaeological resources that could be considered archaeologically or culturally significant. In the absence of a formal evaluation of the significance of the identified archaeological resources, AECOM recommends that resources, with the exception of isolated finds, be avoided. It is AECOM's understanding that the current proposed infrastructure incorporates all recommended avoidance buffers. If the Project is redesigned in such a way that a resource cannot be avoided, AECOM recommends additional investigation that would constitute formal evaluation of site significance.

AECOM is not recommending avoidance for all four Native American isolated finds (Table 1), all four historic Euro-American isolated finds (Table 2), and all three historic Euro-American artifact scatters (Table 3), as it was determined through pedestrian survey and shovel test probes that the areas contained low artifact density with little to no potential to produce intact subsurface deposits or important information.

Table 1: Native American Isolated Finds Not Recommended for Avoidance

32BKX1057	32BKX1058	32BKX1065	32BKX1066
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Table 2: Historic Isolated Finds Not Recommended for Avoidance

32BKX1059	32BKX1061	32BKX1062	32BKX1063
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Table 3: Historic Artifact Scatters Not Recommended for Avoidance

32BK286	32BK287	32BK291
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AECOM is recommending a 50-foot avoidance buffer for one Native American site (Table 4).

Table 4: Native American Site Recommended for a 50-foot Avoidance Buffer

32BK288
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Per the recommendation of the participating tribes, all SRCSTT should be considered eligible for the NRHP; avoidance is recommended (Table 5).

Table 5: SRCSTT Recommended for Avoidance

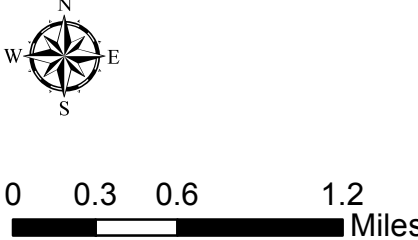
CHFBK128	CHFBK129	CHFBK130	CHFBK131
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If these sites and their associated avoidance buffers can be avoided during construction, then AECOM recommends a determination of No Historic Properties Affected as documented and mapped in the current Class III: Intensive Cultural Resources Inventory report. If areas beyond the combined Survey Corridor are to be used during construction, AECOM recommends completion of an addendum Class III cultural resources inventory to determine the presence or absence of cultural resources within these areas. The Class III report will be submitted to NDSHPO and concurrence will be obtained prior to construction of the Project. Once the NDSHPO concurrence letter is received it will be submitted to the Commission.

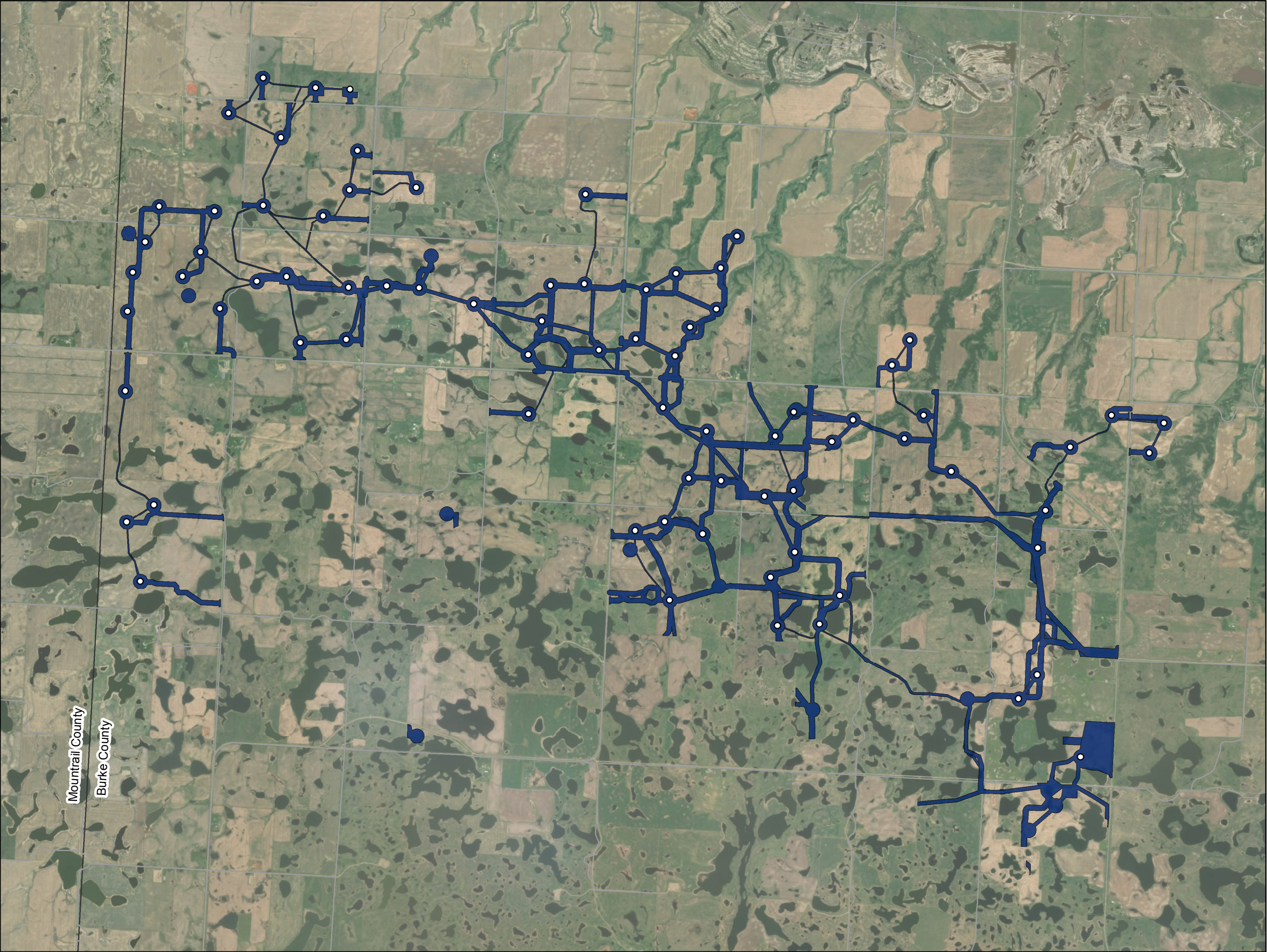


**Legend**

- Turbines
- County Road
- County Boundary
- Survey Corridor



**Figure 1**  
**Cultural Survey Corridor**  
**Northern Divide Wind**  
**Cultural Resources Inventory**  
**Burke County, ND**





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February 22, 2019

Ms. Melinda McCarthy, MA, RPA  
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AECOM  
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**ND SHPO Ref: 18-0733 PSC "Burke County Wind Energy Center: A Class III Cultural Resource Inventory in Burke County, North Dakota"**

Dear Ms. McCarthy,

We reviewed ND SHPO Ref: 18-0733 PSC "Burke County Wind Energy Center: A Class III Cultural Resource Inventory in Burke County, North Dakota," and find it acceptable. We concur with a "No Significant Sites Affected" determination for this project, provided the project remains as mapped and described in your AECOM report dated February 2019, and provided sites recommend for avoidance are avoided and monitored when needed.

Thank you for the opportunity to review 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 Paul Picha at (701)-328-3574 or Susan Quinnell at (701) 328-3576 or squinnell@nd.gov.

Sincerely,

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