



August 17, 2023

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Public Service Commission
600 E. Boulevard Ave, Dept. 408
Bismarck, ND 58505-0480

AUG 18 2023

ND SHPO Ref: 23-0258, PU-23-256 Ashtabula III Wind Upgrade Project

NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Dear Commissioners,

For wind turbine repower/upgrade projects where the original total height of the turbine was less than 400 feet, but the proposed project will result in a new total height of more than 400 feet, we recommend survey at the levels detailed below for indirect effects. Any areas of new direct effects (e.g., crane paths, laydown areas, etc.) should be surveyed at the Class III level.

- A current Class I: Literature Search to determine any previously recorded cultural resources in the project area.
- A Class II (reconnaissance) and Class III (intensive) survey by a permitted architectural historian for standing buildings and structures (including cemeteries) over 45 years old in the visual Area of Potential Effect (APE). For repower projects newly extending above the height of 400 feet, this is the area between the one-mile and two-mile radius of individual turbine locations. The purpose is to evaluate any architectural or structural features that may be eligible for nomination to the National Register of Historic Places or the State Historic Sites Registry. At least three out of the seven aspects of integrity used to evaluate historic properties could be impacted by the proposed project: the setting, feeling, and association of historic sites.

Thank you for the opportunity to review this project to date. We look forward to review of the Class II/Class III survey. Please include the ND SHPO reference number listed above in any further correspondence for this specific project. If you have any questions, please contact Lorna Meidinger, Lead Historic Preservationist, at (701) 328-2089 or lbmeidinger@nd.gov.

Sincerely,

for William D. Peterson, PhD
Director, State Historical Society of North Dakota

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William Peterson, Director

State Historical Society of North Dakota (SHS)
William Peterson, Director

23-0258