

Attachment G – Agency Coordination



ENVIRONMENTAL CONSULTANTS

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201 Slate Drive, Suite 8
Bismarck, North Dakota 58503
Tel 701.258.6622 Fax 701.258.5957
www.swca.com

September 1, 2023

Lorna Meidinger, Lead Historic Preservationist
State Historical Society of North Dakota
612 East Boulevard Avenue
Bismarck, North Dakota 58505

Re: Rugby Wind Repower Project in Pierce County, North Dakota

Dear Ms. Meidinger:

Rugby Wind LLC (Rugby Wind), a wholly owned subsidiary of Avangrid Renewables, LLC, is proposing to repower the Rugby Wind Farm (project). The Rugby Wind Farm began commercial operations in 2009 and is located in Pierce County, North Dakota (Figure 1, Table 1). The existing Rugby Wind Farm has a nameplate capacity of 149 megawatts (MW) and consists of 71 wind generating turbines with a capacity of 2.1 MW each, access roads, buried and overhead electrical collection lines, an electrical substation, an operations and maintenance building, a meteorological tower, and an aircraft detection lighting system (Figure 2). Additionally, a 9.5-mile-long, 230-kilovolt (kV) transmission line runs from the Rugby Wind Farm Substation to the existing Rugby Substation.

Table 1. Rugby Wind Farm Township, Range, and Section

County	Township	Range	Section
Pierce	158N	73W	1, 12-14, 25, 36
Pierce	158N	72W	1-36
Pierce	158N	71W	6, 7, 18, 28-32
Pierce	157N	72W	1-6, 12
Pierce	158N	73W	1, 12-14, 25, 36

BACKGROUND

Rugby Wind received a Certificate of Site Compatibility (Certificate) from the North Dakota Public Service Commission (ND PSC or Commission) on October 3, 2005, in Case Number PU-05-47. The Certificate was reissued on August 27, 2008, and the final layout was approved by the Commission on May 22, 2009. A Class I cultural resources inventory (CRI), a Class III cultural resources survey, and consultation with the North Dakota State Historic Preservation Office (SHPO) was conducted during that process to comply with ND PSC and SHPO requirements. Archaeological investigations were conducted in compliance with the North Dakota Century Code and the Secretary of the Interior’s Standards and Guidelines for Archaeology and Historic Preservation.

The North Dakota SHPO was originally contacted in December 2004 to request a review of potential project-related impacts on known or suspected cultural resources. In response to the SHPO’s comments, a

Class I CRI was completed in June 2005 to identify previously conducted cultural resources investigations and the location of known archaeological sites. Three resource areas were identified in the Class I CRI as areas to avoid.

In fall 2005, the project contracted HDR Engineering, Inc. (HDR) to complete a Class III cultural resources investigation for the project (Palmer et al 2005¹; Palmer and Madson 2006²). Investigators considered the impact to high probability cultural areas from access roads, electrical cabling, transmission line placement, and turbine construction. High probability areas were identified during previous surveys by analyzing known site locations and landform types (Palmer and Madson 2006). In 2008, HDR completed additional surveys to accommodate revisions due to meteorological, engineering, environmental, and cultural recommendations. The final 2008 Supplemental Class III CRI Report was submitted to the North Dakota SHPO in March 2009 under North Dakota SHPO Review and Compliance Number 05-0240.

The North Dakota SHPO concurred with HDR's report recommendations and also concurred with a "No Historic Properties Affected" determination and a "No Significant Sites Affected" determination. The project avoided impacts to all archaeological sites possibly eligible for listing on the National Register of Historic Places (NRHP) during the original construction in 2009.

REPOWERING SCOPE OF WORK

Rugby Wind is proposing to retrofit the facility for the purpose of improving wind turbine efficiency, energy output, and prolonging the useful life of the wind farm. This process is known as repowering. The repower scope includes

- replacing the rotors (nose cone, hub, and blades) and increasing the rotor diameter of all existing turbines from 88 meters (m) up to 120 m;
- replacing the nacelle and its interior elements (such as the gearbox, oil cooler, drive shaft, and pitch drive);
- refurbishing generators from 2.1 MW to 2.2 MW;
- reinforcing foundations, as needed; and
- upgrading collector lines, as needed.

There will be no changes to the wind farm boundary, existing turbine locations, turbine towers, meteorological tower, transmission line, or the collection substation. Table 2 provides a summary of the proposed wind turbine modifications compared to the existing wind turbines.

¹ Palmer, Erika, Julie Kloss, and Michael Madson. 2005. *Class III Cultural Resource Inventory for the Rugby Wind Farm Transmission Line Project, Pierce County, North Dakota*. HDR Engineering, Inc., Minneapolis, Minnesota.

² Palmer, Erika, and Michael Madson. 2006. *Class III Cultural Resource Inventory for the Rugby Wind Farm Project, Pierce County, North Dakota*. HDR Engineering, Inc., Minneapolis, Minnesota.

Table 2. Rugby Wind Farm Existing and Proposed Turbine Dimensions

Design Parameter	Existing	Proposed	Change
Hub height	79 m	79 m	-
Rotor diameter	88 m	120 m	32 m
Total tip height	124 m	139 m	15 m
Nameplate capacity	149.1 MW	156.2 MW	7.1 MW

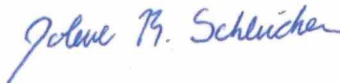
Rugby Wind is still in the process of confirming construction limits but expects temporary ground disturbance to be limited to previously disturbed facilities and construction corridors such as turbine pads, electrical collection line easements, and access roads. A temporary laydown yard will also be required to support equipment parking, staging areas, and construction trailers. Construction and equipment delivery may begin as soon as the second quarter of 2024 once all relevant permits and approvals have been obtained.

Rugby Wind has contracted SWCA Environmental Consultants to complete a Class I cultural resources literature review for the repower to ascertain if any newly discovered resources or changes to the project could potentially impact cultural resources. Rugby Wind anticipates that all development for the repower activities will take place in the previously surveyed areas; however, should construction limits impact areas outside of previously surveyed areas, we recommend that additional cultural resources survey and consultation with the North Dakota SHPO be completed prior to any ground disturbance. Rugby Wind anticipates completing Class III cultural resource surveys in the fall of 2023 for new survey areas.

Currently, no impacts are anticipated to known cultural resources in the site. Rugby Wind is committed to minimize impacts to archaeological sites possibly eligible for listing in the NRHP and will avoid these and any additional NRHP-eligible or potentially eligible resources identified throughout the review process. Rugby Wind will also develop an unanticipated discovery plan to be in place should previously unknown archaeological resources or human remains be inadvertently encountered during the construction period.

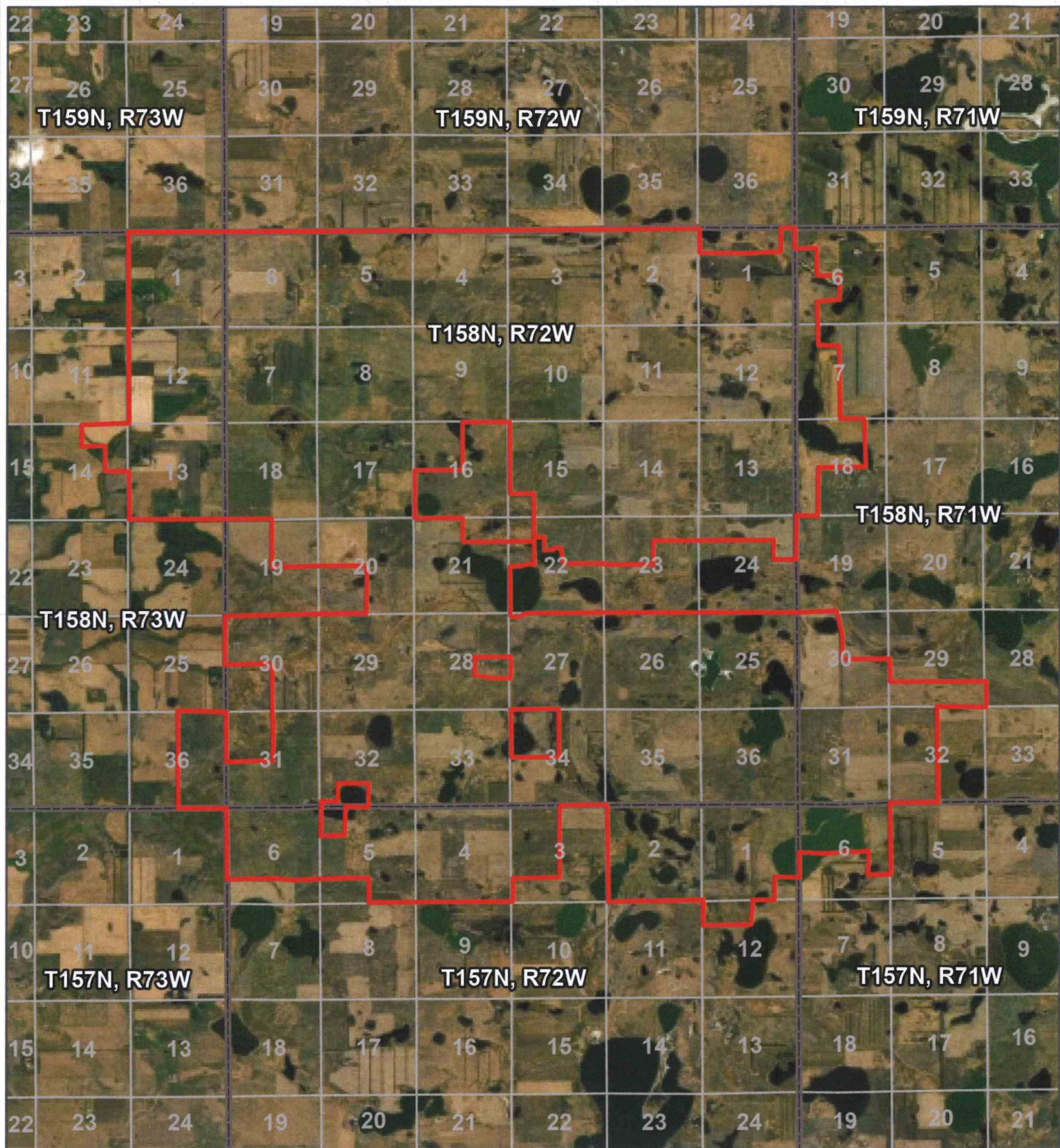
As Rugby Wind continues to progress in determining its construction limits, we would appreciate any comments your agency may have regarding the repowering project. Please contact me by email at jschleicher@swca.com or by phone at 701-409-9398 to discuss the project further or schedule a project meeting.




Sincerely,



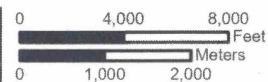
Jolene Schleicher
Cultural Resources Team Lead

Enclosure: Project Maps
cc: Manuela Elizondo, Avangrid Renewables

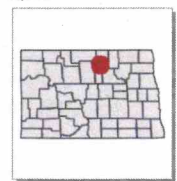


-  Project Area
-  Township/Range Boundary
-  Section Boundary

Pierce County, ND
 NAD 1983 2011 StatePlane
 North Dakota North FIPS 3301
 Ft
 48.4926°N 99.9447°W

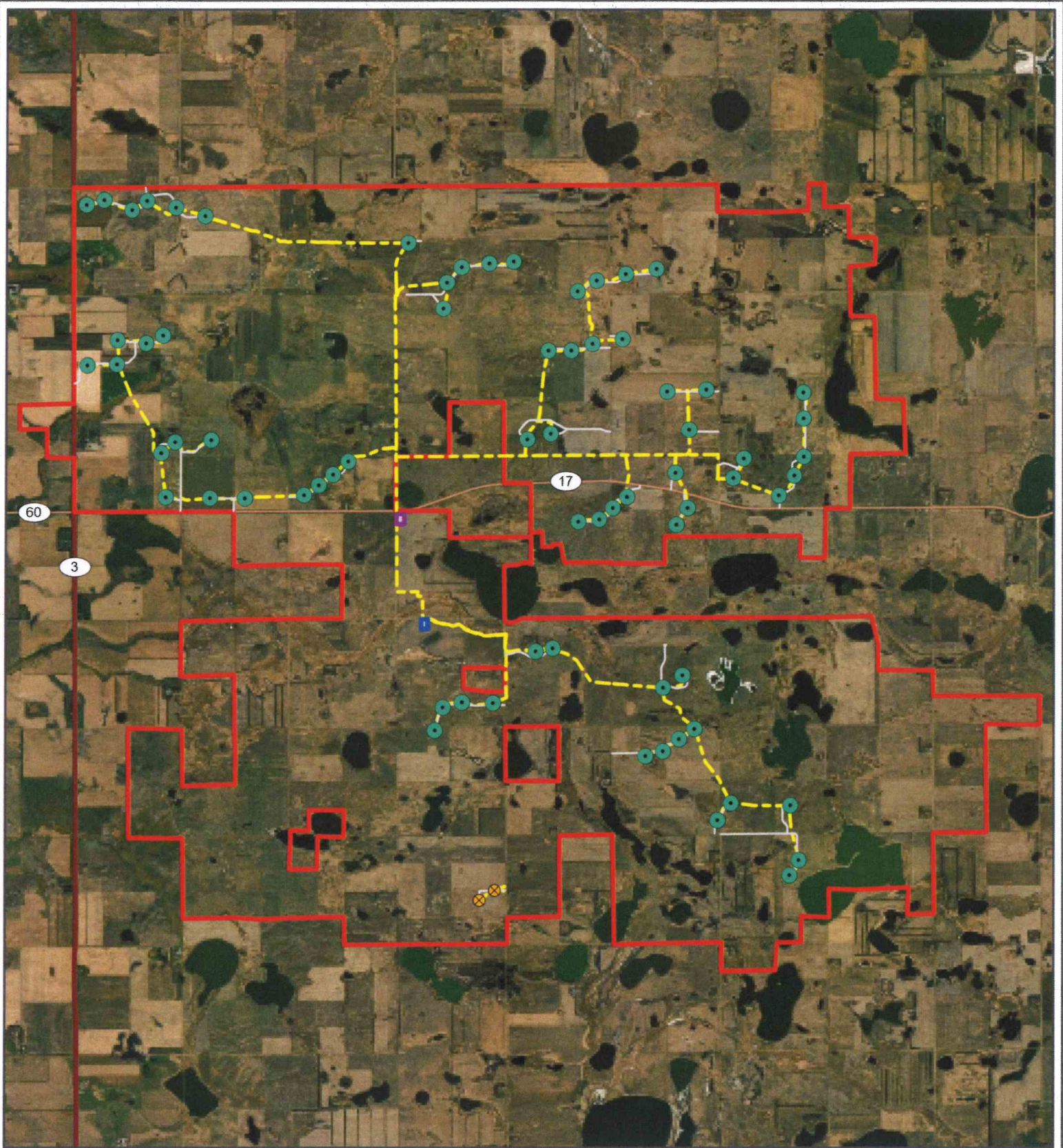


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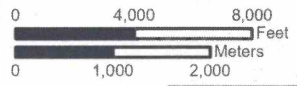
Base Map: Esri ArcGIS Online,
 accessed August 2023
 Updated: 8/30/2023
 Project No. 77797
 Layout: 77797_projectLocation
 Aprx: 77797_rugbyWind

SWCA
 ENVIRONMENTAL CONSULTANTS



- Turbine Location
- ⊗ MET Tower Location
- Existing Collection Line
- Access Road
- O&M Facility
- Substation
- Highway
- Major Road
- Project Area

Pierce County, ND
 NAD 1983 2011 StatePlane
 North Dakota North FIPS 3301
 Ft
 48.4926°N 99.9447°W



1:97,000



North Dakota

Base Map: Esri ArcGIS Online,
 accessed August 2023
 Updated: 8/30/2023
 Project No. 77797
 Layout: 77797_infrastructureOverview
 Aprx: 77797_rugbyWind



ELIZONDO, MANUELA

From: Madsen, Kelly B <kelly_madsen@fws.gov>
Sent: Wednesday, June 28, 2023 4:39 PM
To: ELIZONDO, MANUELA
Cc: SCHWITZER, LUKE; Takala, John
Subject: Re: [EXTERNAL] J. Clark Salyer Wetland Management District - Rugby Wind Farm Repower
Attachments: Updated Easement Maps.zip

EXTERNAL SENDER: Be cautious, especially with links and attachments. Report phishing if suspicious.

Manuela,

Thank you for contacting our office to check with us before making updates to your wind farm.

Here are a few thoughts and explanations regarding our easements.

- The Exhibit-A map package that was sent to you back in 2008 appears to be missing some of the maps associated with the scope of the project. The easement maps missing are easements signed before 1976. Those contracts never had an exhibit-A map with them but recently we have made new colored supplemental maps that depict the wetland basins protected for those older easements. Its possible the person from this office back then recognized this and addressed that at that given time. Either way, I have added those new maps so you will have a good idea where the wetland basins lay in comparison to the areas you plan to work.
- The maps you have already remain unchanged. Unfortunately, they will still remain in black and white but the wetlands are delineated on the map so if you have a person that's good with GIS you could georeference them onto a color map or make a shapefile of them if you so desired.
- I briefly scanned through the project area and couldn't find any areas of real concern, however if you are updating/extending the site pads or roads you'll have to make sure that isn't going to affect any of the protected wetlands on the map that may be in close proximity. Try and keep equipment and materials out of those small seasonal/temporary type wetlands (Those usually labeled <0.1 Acres on the map). It's hard to say what the weather will be like around that time frame but many of the wetlands might be dry which will make them harder to identify.
- We haven't acquired any new easements in the project area since well before 2008, so if you're not expanding past your current areas, you will have all current documents necessary.
- At any time if you would like me to come out and stake out a wetland or offer some on the ground advice, I'd be happy to meet up.

Any other questions or concerns feel free to reach out to us.

Thanks.

From: ELIZONDO, MANUELA <manuela.elizondo@avangrid.com>
Sent: Tuesday, June 27, 2023 10:56 AM
To: Madsen, Kelly B <kelly_madsen@fws.gov>
Cc: SCHWITZER, LUKE <luke.schwitzer@avangrid.com>
Subject: [EXTERNAL] J. Clark Salyer Wetland Management District - Rugby Wind Farm Repower

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hi Kelly,

Thank you for returning my call today. As discussed, my name is Manuela Elizondo and I work as a permitting manager for Avangrid Renewables. We are reviewing the potential to repower the Rugby Wind Farm located near Rugby in Pierce County, ND. The facility began commercial operation in December 2009 and consists of 71 Suzlon wind turbines, each capable of generating 2.1 MW of electricity. We are proposing to conduct facility upgrades for the purposes of increasing the wind energy facility efficiency, energy output and prolonging the useful life of the site. The proposed repower upgrades consist of the following activities:

- Replacing the rotor (nose cone, hub, and blades) and increasing the tip height of turbines from 407ft up to 456ft;
- Replacing the nacelle and its interior elements (such as the gearbox, oil cooler, drive shaft, and pitch drive),
- Reinforcing foundations,
- Upgrading collector lines, and
- Potential to decommission up to 3 turbines.

There would be no changes to turbine locations, existing tower hub height, or other existing components such as the generation tie line or collector substation. I have attached the original wetland easement USFWS data from 2008 as well as a shapefile that includes existing turbine locations, substation, electrical lines, access roads and the overall site boundary. Construction may begin as early as Q3 of 2024 with commercial operation as early as 2025. We are still in the process of determining all of our construction work areas and would appreciate any updates you may have regrading wetland and grassland easements in the project's site boundary. We look forward to working with J. Clark Salyer Wetland Management District. Please feel free to contact me with any questions.

Thank you,



Manuela Elizondo

Sr. Permitting Manager / Permitting & Environmental Affairs

Cell 612.760.8506

manuela.elizondo@avangrid.com

Remote Office Minneapolis, MN

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ELIZONDO, MANUELA

From: Pierce County Emergency Management <pierceem@nd.gov>
Sent: Tuesday, March 14, 2023 8:46 AM
To: ELIZONDO, MANUELA
Subject: RE: Rugby Wind Farm- Pierce County, ND

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Good Morning,

I spoke with my States Attorney regarding the work and we do not feel that a permit will be required for the described work.

From: ELIZONDO, MANUELA <manuela.elizondo@avangrid.com>
Sent: Monday, March 6, 2023 9:54 AM
To: Pierce County Emergency Management <pierceem@nd.gov>
Cc: SCHWITZER, LUKE <luke.schwitzer@avangrid.com>; REINKEMEYER,JEFFREY <jeffrey.reinkemeyer@avangrid.com>
Subject: RE: Rugby Wind Farm- Pierce County, ND

You don't often get email from manuela.elizondo@avangrid.com. [Learn why this is important](#)

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Kelsey-

Thank you for your time this morning. As discussed, we are currently assessing the potential to repower the Rugby Wind Farm located in Pierce County, ND. At this time, the repower would include replacing the turbine nacelles (generator/gearbox), replacing blades to a maximum tip height of 476 feet, and replacing collector lines. There would be no changes to turbine locations, existing tower hub height, nameplate capacity, or other existing components such as the generation tie line or collector substation.

Please let me know if you have any other questions as you discuss with the State's Attorney.

Best,

Manuela Elizondo
Sr. Permitting & Environmental Manager
Cell 612.760.8506
manuela.elizondo@avangrid.com
She/her/Ms.

From: ELIZONDO, MANUELA
Sent: Wednesday, February 22, 2023 3:24 PM
To: pierceem@nd.gov
Cc: SCHWITZER, LUKE <luke.schwitzer@avangrid.com>; Reinkemeyer, Jeff <jeffrey.reinkemeyer@avangrid.com>
Subject: Rugby Wind Farm- Pierce County, ND

Good afternoon,

My name is Manuela Elizondo and I work as a permitting manager for Avangrid Renewables. We are reviewing the potential to repower the Rugby Wind Farm located near Rugby in Pierce County, ND. The facility began commercial operation in December 2009. Pierce County granted a Conditional Use Permit (2005-001) on July 12, 2005 and was updated on September 3, 2008 prior

to construction. Rugby received a Certificate of Site Compatibility from North Dakota Public Service Commission under Case No. PU-05-47. Rugby's Aircraft Detection Lighting System (ADLS) light mitigation system was required per N.D.C.C. Chapter 69-06-01. As a result, the facility was granted a Pierce County Conditional Use Permit (#2021-13) on September 7, 2021.

The repower would include replacing the turbine nacelles (generator/gearbox) and blades. There would be no changes to turbine locations, existing tower hub height, nameplate capacity, or other existing components such as the generation tie line, underground collector system, or collector substation. As we are still in the early phases of review, we would like to setup a conference call with your office to discuss permitting needs for the County.

Please propose a few times that would work with your schedule and we would be happy to send a meeting invitation.

Thank you,

Manuela Elizondo



Manuela Elizondo
Sr. Permitting and Environmental Manager

Cell 612.760.8506
manuela.elizondo@avangrid.com
she/her/Ms.



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