



United States Department of the Interior

NATIONAL PARK SERVICE
Knife River Indian Villages National Historic Site
P.O. Box 9
Stanton, North Dakota 58571-0009

IN REPLY REFER TO:

March 28, 2024

Chairman Randy Christmann
North Dakota Public Services Commission
600 E. Boulevard Ave., Dept 408
Bismarck, ND 58505

Re: Case Number PU-23-217 (200 MW Oliver Wind IV)

Dear Chairman Christmann:

NextEra Energy Resources, through their contractor, Burns McDonnell, contacted the National Park Service (NPS) regarding a proposed 200-megawatt wind turbine project in Oliver County, North Dakota. This project seeks to construct 70-100 wind turbines and an associated transmission line.

Through consultation with NextEra the National Park Service (NPS) requested a visual resource study to further understand how elements of the project, both turbines and transmission poles, would be visible from Knife River Indian Villages National Historic Site, a National Historic Landmark. In January 2024, Burns McDonnell provided the NPS with the results of a viewshed study for our consideration.

The report determined that while aspects of the project may be visible from key vistas within the park, there would be no adverse effect to the park's viewshed. The author concluded the turbines, although visible on the horizon, would be too distant to affect visitors. While the NPS understands how the authors of the report arrived at their conclusion, the NPS considers the placement of wind turbines associated with this project to be an impact to the cultural viewshed, especially since the turbines rotate and move, further increasing their capacity to attract visitor attention.

The NPS is aware of several design considerations NextEra Energy, and their subsidiary Oliver IV Wind LLC, are implementing, including aircraft detection lighting (ADL) and an agreement not to place lights on transmission towers. Both considerations seek to minimize intrusion to the nighttime viewshed.

The NPS respectfully requests the Commission consider two additional modifications to protect viewsheds for this significant cultural site in North Dakota. First, we request any additional wind turbines associated with this project, those not explicitly identified on the map recently provided to the NPS (enclosed) be located at least twelve (12) miles from the park. Such a stipulation would allow the project to continue as planned, while ensuring minimal cumulative effects from new turbines or expansion of the current facility.

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Second, the NPS requests the Commission limit the height permitted for each turbine's tower hub to 400 feet. This consideration would ensure a project does not need a revised viewshed analysis should future development occur as the visual impacts associated with a project would remain similar to those presented to both the NPS and Commission in the initial viewshed survey.

Thank you for your consideration for visitors from around the country who arrive in North Dakota to learn about the state's complex and fascinating cultural history.

Respectfully,

**ALISHA
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Alisha Deegan
Superintendent
Knife River Indian Villages

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