



May 8, 2026

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

**SHSND Ref.: 25-9056 Basin Electric Power Cooperative's Proposed Tande and Wheelock to Saskatchewan 230-kV Transmission Lines Project, PU-25-283 and PU-25-284 in Burke, Divide, Mountrail, and Williams Counties, North Dakota**

Dear Sir or Madam,

Since our letter to you dated March 12, 2026 with a status update on the cultural review for cases PU-25-283 and PU-25-284, we have accepted the associated cultural resource survey reports. It is our determination that there are no significant sites adversely affected by this project if the sites on the attached lists (19 pages) are avoided as recommended, installation of avoidance fencing is monitored by a permitted cultural resources firm, avoidance of these sites are included in the long-term maintenance plan as indicated in the reports, and provided it takes place in the location and in the manner described in the documentation submitted to us.

Thank you for the opportunity to review this project under North Dakota cultural resources consultation. This letter does not serve as federal agency consultation or SHPO consultation for compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, (36 CFR Part 800), or the National Environmental Policy Act, as amended, (42 U.S.C. §§ 4321- 4347).

If you have any questions, please contact Lorna Meidinger, Lead Historic Preservationist at [lbmeidinger@nd.gov](mailto:lbmeidinger@nd.gov) or (701) 328-2089.

Sincerely,

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

Cc: Ryan King

67 PU-25-283 Filed 05/11/2026 Pages: 20  
Agency Correspondence Redacted

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

25-9056

## 7.0 Summary and Recommendations

A combined total of 1,708.92 ac (691.57 ha) was surveyed by Burns and McDonnell for the Project between June 2024 and October 2025. A total of 52 cultural resources were documented during Class III Inventory for the Project. These include 25 precontact site leads, one historical archaeological site lead, one precontact isolated find, five precontact archaeological sites, 10 historical archaeological sites, one architectural site, seven sites containing both an architectural and historical archaeological component, one multicomponent site and one site of unknown cultural affiliation. (Note: 10 precontact site leads were updated during both the 2024 and 2025 survey seasons due to small Survey Corridor expansions. These resources have only been counted once in the above numbers.) A total of 114 STPs were completed in medium to high probability areas of the Survey Corridor with low GSV or in the vicinity of surface finds.

The following management recommendations include all isolated finds, site leads, and sites recorded for the Project, regardless of the year documented, and are based on the most recent transmission line layout dated October 20, 2025.

No avoidance is recommended for 33 of the resources documented during the Project's Class III Inventory. Avoidance is recommended for 19 of the recorded resources. Recommended avoidance buffers vary and have been determined based on two primary factors: the probability, based on the nature of the resource, the topography, and the extent of STPs in the surrounding area, that the resource retains a subsurface component that extends beyond the identified boundary of the resource; and the predicted likelihood, based on the surrounding topography, that earthmoving near the resource would have the potential to indirectly contribute to damage to the resource through erosion.

### 7.1 No Avoidance – No Further Work Recommended

Burns & McDonnell is not recommending avoidance or further work for the 25 precontact site leads that were not identified within the Survey Corridor. Burns & McDonnell is also not recommending avoidance for the one precontact isolated find, one architectural site, five historical archaeological sites, and one site with both an architecture and historical archaeological component, as they were determined through pedestrian survey and/or STPs that the areas contained low artifact density with little to no potential for intact subsurface deposits. See Table 7-1 for a list of resources that are not recommended for avoidance.

**Table 7-1: No Avoidance - No Further Work Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32BKK257		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32BKK264		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32BKK278		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32BKX279		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32BK388		2024	Not Eligible	No further work is recommended.
32BK390		2024	Not Eligible	No further work is recommended.
32DVX11		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX12		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX31		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX32		2024	Unevaluated	No further work is recommended.
32DVX33		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX42		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX43		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX44		2024 & 2025	Unevaluated	No further work is recommended.
32DVX45		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX46		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX47		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX278		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX279		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DVX282		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX284		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX285		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX289		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX297		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX298		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX398		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX506		2024	Not Eligible	No further work is recommended.
32DV365		2024	Not Eligible	No further work is recommended.
32DV379		2025	Not Eligible	No further work is recommended.
32DV380		2025	Not Eligible	No further work is recommended.
32DV384		2025	Not Eligible	No further work is recommended.
32MNX485		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32MN1787		2024	Not Eligible	No further work is recommended.

## 7.2 Avoidance and Fencing Recommended – No Buffer

Burns & McDonnell is recommending avoidance and protective fencing or staking for eight of the site boundaries prior to construction. This includes one historical archaeological site, one multicomponent site, four sites with an architectural and historical archaeological component, and two newly documented historical archaeological site leads. The two newly documented historical archaeological site leads are

presently located outside the Project's Physical APE due to Project reroutes. If the Project were to shift back to within 50 ft of these sites, Burns & McDonnell is recommending avoidance and protective fencing until further work is completed to document the sites. One site with an architectural and historical archaeological component is recommended for avoidance and protective fencing with a monitor present during installation of the protective fencing or staking. One further site with an architectural and historical archaeological component is recommended for avoidance and protective fencing and an archaeological monitor is recommended during tree clearing within the site boundary. See **Table 7-2** for these resources and their avoidance recommendation.

**Table 7-2: Avoidance and Fencing Recommended – No Buffer**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DVX507		2024	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing if within 50 ft of the Physical APE.
32DV369		2024 & 2026	Unevaluated	Avoidance recommended. Clearly mark the site boundary and ROW access route under the direction of an archaeological monitor prior to construction with protective fencing.
32DV370		2024	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.
32DV371		2024 & 2025	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.
32DV372		2025 & 2026	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing. Conduct tree clearing by hand and under the supervision of an archaeological monitor.
32DV373		2024	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DV381		2025	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.
32DV383		2025	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.
32MNX1097		2025	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing if the Physical APE shifts back to within 50 ft of the site boundary.
32MN1800		2025 & 2026	Unevaluated	Avoidance recommended. Clearly mark the site boundary prior to construction with protective fencing.

The Project has been redesigned to avoid site **32DVX507**. The site is located over 1 mi from the Project ROW, and no temporary off-ROW access roads or pulling easements are proposed near site's boundary. Therefore, the integrity of the site will not be damaged by Project activities.

In addition, Basin has committed to incorporating the site's boundary into the Project's long-term maintenance plan as an unlabeled environmental avoidance area as a precaution; therefore, future operation, maintenance, and inspection of the transmission line will not impact the site. Accordingly, the integrity of the site will not be adversely affected by the Project. See **Appendix B** for a depiction of the site located outside the Project's Physical APE.

**32DV369** is located within the Project's Physical APE. To minimize ground disturbance within the site boundary, all permanent infrastructure will be placed outside the site boundary. Initially, an off-ROW access road was created and surveyed to the south to allow construction equipment to remain outside the site boundary while accessing nearby pole locations. However, the site boundary has since been expanded, based on desktop research and historic aerial imagery, to include portions of the historic farmstead to the southeast that were not accessible during fieldwork. As a result, the site boundary now encompasses the entirety of the Physical APE.

In response, several measures will be implemented during construction to prevent impacts to the portions of the site within the Physical APE. Construction traffic will be restricted to a designated path of travel within the northern portion of the site boundary. Discussions with the landowner during fieldwork indicated that the southern portion of the site was partially bulldozed in the early 2000s, while the northern portion was also disturbed in the early 2020s (Personal Communication, Gerald Brady 2024). This information is supported by aerial imagery showing extensive ground disturbance across the site in 2006 and 2023 (SWC 2026).

The construction route will remain within these previously disturbed areas and will follow an existing two-track used by the landowner to access the agricultural field west of the site. This two-track is located well away from identified features, including both those recorded during fieldwork and those identified through historic and modern aerial imagery. A portion of this route will extend within an off-ROW access corridor. The designated path of travel will be clearly staked or fenced to prevent inadvertent access by construction equipment. Installation of this protective staking or fencing will be installed under the direction of an archaeological monitor to ensure proper placement within the site.

Therefore, based on the implementation of the above avoidance and minimization measures, including the placement of all permanent infrastructure outside the site boundary, installation of protective fencing under archaeological supervision, and restriction of construction traffic to previously disturbed portions of the site, the Project is not anticipated to result in an adverse effect to 32DV369. The proposed undertaking will avoid direct impacts to identified features and will not further diminish those aspects of integrity that convey the site's significance.

**32DV370** is located along the extreme edge of an off-ROW access road easement; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site boundary within the ROW and fencing the site's boundary to prevent inadvertent access by construction equipment. Construction equipment will utilize the existing dirt two-track that travels around the site. Because the off-ROW access road is a temporary route and will not physically impact the site, no adverse effects to the site's integrity of setting, feeling, or association are anticipated as a result of the Project. No additional avoidance buffer is recommended for this site, as the off-ROW access road is designed to follow an existing two-track around the site boundary. This two-track currently provides access to the agricultural field north of the site without requiring travel through the site. Further, the presence of standing features within the western portion of the site boundary will serve as a visual and physical deterrent to construction activities, reinforcing avoidance of the site by clearly delineating sensitive areas and discouraging equipment access.

Site **32DV371** is located within the Project's Physical APE near a turning structure; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site boundary within the ROW and fencing the site's boundary to prevent inadvertent access within the site by construction equipment. Approximately 52 ft of Physical APE remains south of the site boundary, allowing construction equipment to avoid the site. No additional avoidance buffer is recommended for this site, as multiple fences lines and cattle panels create a barrier between the site and construction area. Further, numerous more modern buildings are present within the site's viewshed, and the Project is not expected to adversely affect the site's integrity of setting or feeling.

Site **32DV372** is located within the Project's Physical APE. Initially, an off-ROW access road was planned and surveyed to the north and west to allow construction equipment to remain outside the site boundary while accessing nearby pole locations. However, the site boundary has since been expanded, based on the presence of features noted during desktop research and historic aerial imagery, to include portions of the historic farmstead to the northeast and east. As a result, the site boundary now spans the entirety of the Physical APE.

Based on LiDAR data collected for the Project, roughly 250 trees within the expanded site boundary will require removal to allow the transmission line to safely span the site. As such, limited physical impacts within the site boundary will be necessary during construction, and multiple avoidance and minimization measures will be implemented to reduce the potential for adverse effects. To minimize ground disturbance, all permanent infrastructure will be placed outside the site boundary within the ROW, and tree clearing within the site boundary will be completed by hand. An archaeological monitor will be present during tree clearing.

Historic research and architectural evaluation indicate that the portion of the farmstead associated with early settlement patterns is located south of an east–west-trending dirt two-track that bisects the site. This area encompasses the southern portion of the site boundary and is located approximately 235 ft south of the closest trees requiring removal. Historic aerial imagery further indicates that the tree row proposed for clearing was established circa 1960, after the farmstead's primary period of significance.

Although not identified during fieldwork, a feature is visible in historic aerial imagery near the proposed tree clearing area. Georeferencing and comparison of historic and modern aerial imagery indicate that this feature, while in proximity, is located outside the tree row and the proposed tree clearing area. See **Appendix C** for figures depicting the proposed tree removal areas in relation to identified features and views of the tree row from within and outside the site boundary. Because the feature was not documented during pedestrian survey and is not visible in modern imagery, it is likely that no above-ground components remain. The presence of an archaeological monitor and the use of hand-clearing methods are intended to further reduce the potential for inadvertent effects to this nearby feature.

The tree row surrounding the site is dense and well established, consisting of multiple bands of vegetation of varying height and maturity. The majority of vegetation proposed for removal consists of shorter shrubs, flanked to the north and south by taller, denser, and more mature vegetation. Despite the removal of approximately 35 trees, the remaining vegetation will continue to provide a visual buffer that maintains the site's sense of enclosure and contributes to its setting. Additionally, due to the angle at which the transmission line crosses the edge of the site, the remaining vegetation will continue to partially screen the line from view.

Furthermore, the site's integrity of setting and feeling have already been diminished by the removal of many original buildings and the introduction of more recent structures. As such, the proposed tree removal is not anticipated to further diminish the characteristics that convey the site's significance.

The Project has been redesigned to avoid site **32DV373**. The site is located approximately 350 ft from the Project ROW, and no temporary off-ROW access roads or pulling easements are proposed near the site boundary. The site consists of a secondary deposit of domestic refuse, and its integrity of location and setting have already been compromised by the displacement of artifacts from their original context. Therefore, the integrity of the site will not be damaged by Project activities.

**32DV381** is located within the Project's Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's boundary within the ROW and fencing the site's boundary to prevent inadvertent access within the site by construction equipment. The site spans the northern portion of the ROW; however, a large wetland prevents access down the ROW to the south of the site boundary. Due to this, an off-ROW access road was created and surveyed to the south of the wetland to allow construction equipment to remain outside the site's boundary while accessing pole locations in the area. No additional avoidance buffer is recommended for this site, as use of the off-ROW access road eliminates the need for construction equipment to enter the portion of the ROW where the site is located. Furthermore, an existing fenceline provides an additional level of protection for the site's features by serving as a physical barrier to access.

Although the transmission line will span the site, no impacts to the site's integrity of setting, feeling, and association are anticipated as a result of the Project, as these aspects of integrity have already been compromised by the extensive alterations to the site, including loss of original structures, relocation of features within the site boundary, and alterations to the surrounding area. Therefore, the integrity of the site will not be damaged by Project activities.

**32DV383** is located approximately 0.14 mi from the Project's ROW; however, the Project is considering using the site's gravel driveway and western edge as an off-ROW access road. As currently proposed, construction equipment will travel up the site's driveway, turning to follow it west as the driveway runs between the site's modern dwelling (F.1) and a large modern equipment shed (F.16). From this point, construction access will turn north off the gravel path and continue along the western boundary of the site, at the intersection of the agricultural field and the grassy areas designating the farmstead. This off-ROW access road is not expected to impact the site's integrity as construction equipment's usage will be restricted to the existing gravel driveway through the historic portions of the site, will avoid the standing structures on site, and will minimize dirt work within the site boundary. The portions of the site where construction equipment will travel off the gravel path are more modern expansion of the site and no historic structures were documented within these areas through pedestrian survey or archival research. Further, the off-ROW access road is a temporary route, and no permanent infrastructure will be present within the site boundary. Due to this, no adverse effects to the site's integrity of setting, feeling, or association are anticipated as a result of the Project.

The Project has been redesigned to avoid site **32MNX1097**. The site is currently located on the opposite side of 101<sup>st</sup> Ave SW, a crown and ditched section line road, and no temporary off-ROW access roads or pulling easements are proposed within the site boundary. In addition, existing transmission lines and modern intrusions, including agricultural fields, fence lines, roads, distribution lines, and field-clearing piles, have already compromised the site's integrity of setting and feeling. Therefore, the integrity of the site will not be damaged by Project activities.

**32MN1800** is located within the Project's Physical APE. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site boundary within the ROW and fencing the site's boundary to prevent inadvertent access within the site by construction equipment. No additional avoidance buffer is recommended for this site, as an established fenceline and tree row separates the site boundary from areas of construction work within the Physical APE. Based on LiDAR data collected for the Project, approximately 16 trees within the site boundary will require removal to allow the transmission line to safely span the site. Due to this, limited physical impacts within the site boundary will be necessary during construction, and avoidance and minimization strategies will be implemented to reduce potential adverse effects to the site's integrity. To minimize ground disturbance within the site boundary, all permanent infrastructure will be located outside the site boundary and tree clearing within the ROW will be conducted by hand. The tree row along the northern portion of the site is sparse and not considered to contribute meaningfully to the site's integrity of setting, feeling, or association. Further, these aspects of integrity are already considered poor due to extensive alteration to the site, including the removal of all its original features, and the addition of more modern features and infrastructure. As such, the trees recommended for removal are not considered to impact the site's remaining integrity. See **Appendix C** for a figure depicting the specific areas of proposed tree removal and overviews of the tree row from within and outside the site boundary.

In addition, Basin has committed to incorporating the sites' avoidance buffers into the Project's long-term maintenance plan as unlabeled environmental avoidance areas; therefore, future operation, maintenance, and inspection of the transmission line will not impact these sites. Accordingly, the integrity of the sites will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers.

### 7.3 25 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 25 ft avoidance buffer and protective fencing or staking of the avoidance buffers prior to construction for four resources, including three historical archaeological sites and

one site of unknown cultural affiliation. See Table 7-3 for these resources and their avoidance recommendation.

**Table 7-3: Resources With 25 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DV366		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.
32DV368		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.
32DV374		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.
32MN1786		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.

**32DV366** is located within the Project's Physical APE, and the site's avoidance buffer spans the Project's ROW. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access within the site by construction equipment. An off-ROW access road was created and surveyed to the east of the site's avoidance buffer to allow construction equipment to remain outside the site's avoidance buffer while accessing pole locations in the area. Although the transmission line will span the site, no impacts to the site's integrity of setting, feeling, and association are anticipated as a result of the Project, as these aspects of integrity have already been compromised by the building's collapse, the continued dumping of modern materials on the site, and the construction of nearby crowned-and-ditched roads immediately north and west of the site. Therefore, the integrity of the site will not be damaged by Project activities.

**32DV368** is located within the Project's Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access within the site by construction equipment. Because the site spans a large section of the ROW, an off-ROW access road was created and surveyed to the west to allow construction equipment to remain outside the site's avoidance buffer while accessing pole locations in the area. Although the transmission line will span a portion of the site, the site's integrity of setting and feeling are already compromised by the nearby fence lines, agricultural fields, and a farmstead. Therefore, the integrity of the site will not be damaged by Project.

**32DV374** is located within the Project's Physical APE, and the site spans the Project's ROW. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access

within the site by construction equipment. Because the site spans the ROW, an off-ROW access road was created and surveyed to the north to allow construction equipment to remain outside the site's avoidance buffer while accessing pole locations in the area. Although the transmission line will span the site, no impacts to the site's integrity of setting, feeling, and association are anticipated as a result of the Project. The site is a secondary deposit of domestic refuse and agricultural equipment, and its integrity of setting, location, and association have already been compromised. Therefore, the integrity of the site will not be damaged by Project.

**32MN1786** is located within the Project's Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access within the site by construction equipment. There is approximately 75 ft of the Physical APE remaining to the south of the avoidance buffer for construction equipment to utilize while driving around the site. Although the transmission line will span a portion of the site, no impacts to the site's integrity of setting, feeling, and association are anticipated as a result of the Project. The site is a secondary deposit of domestic refuse and agricultural equipment, and its integrity of setting, location, and association have already been compromised by the displacement of artifacts from their original context. Therefore, the integrity of the site will not be damaged by Project activities.

In addition, Basin has committed to incorporating the sites' avoidance buffers into the Project's long-term maintenance plan as unlabeled environmental avoidance areas; therefore, future operation, maintenance, and inspection of the transmission line will not impact the sites. Accordingly, the integrity of the sites will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers.

## 7.4 50 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 50 ft avoidance buffer and protective fencing or staking of the avoidance buffers prior to construction for three precontact sites. See **Table 7-4** for these resources and their avoidance recommendation.

**Table 7-4: Resources With 50 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32BK389		2024	Unevaluated	50 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.
32DV367		2024	Unevaluated	50 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.
32DV382		2025	Unevaluated	50 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.

**32BK389** is located just outside the Project's Physical APE; however, its avoidance buffer extends into the eastern portion of the ROW. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and installing protective fencing along the avoidance buffer to prevent inadvertent access by construction equipment. Because the avoidance buffer occupies the eastern portion of the ROW and the western portion consists of steep terrain, an off-ROW access road was created and surveyed to the east to allow construction equipment to access nearby pole locations while remaining outside the avoidance buffer. Although the transmission line will be constructed in proximity to the site, numerous existing well pads, their associated infrastructure, multiple agricultural fields, and several farmsteads are already present within the site's viewshed. These existing conditions have diminished the site's integrity of setting and feeling. Therefore, the integrity of the site will not be damaged by Project.

**32DV367** is located just outside the Project's Physical APE; however, its avoidance buffer covers the western portion of the ROW. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access within the site by construction equipment. Because the site's avoidance buffer spans the western portion of the ROW and the eastern portion is located within a drainage area, an off-ROW access road was created and surveyed to the west to allow construction equipment to remain outside the site's avoidance buffer while accessing pole locations in the area. Although the transmission line will be constructed near the site, the site's integrity of setting and feeling are already compromised by the nearby fence lines, agricultural field, and a farmstead. Therefore, the integrity of the site will not be damaged by Project.

**32DV382** is presently located outside the Project's Physical APE; however, its avoidance buffer enters the southern portion of the ROW. Physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access by construction equipment. Approximately 65 ft of ROW will remain available north of the avoidance buffer to allow construction equipment to travel between transmission structures in this area without impacting the site. The transmission line will not span the site, and the site's setting has already been altered by the presence of nearby agricultural fields, modern fence lines, a nearby farmstead, and an adjacent distribution line. Therefore, the integrity of the site will not be damaged by Project.

In addition, Basin has committed to incorporating the sites' avoidance buffers into the Project's long-term maintenance plan as unlabeled environmental avoidance areas; therefore, future operation, maintenance, and inspection of the transmission line will not impact the sites. Accordingly, the integrity of the sites will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers.

## 7.5 100 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 100 ft buffer and protective fencing or staking of the avoidance buffer prior to construction for one precontact archaeological site. See **Table 7-5** for this resource and its avoidance recommendation.

**Table 7-5: Resource With 100 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DV375	[REDACTED]	2024	Unevaluated	100 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
				construction with protective fencing.

The site boundary for **32DV375** is presently located outside the Project's Physical APE due to a redesign completed during the 2024 survey; however, the site's avoidance buffer extends into the western portion of the Physical APE. Impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and fencing the site's avoidance buffer to prevent inadvertent access by construction equipment. Approximately 100 ft of ROW will remain available east of the avoidance buffer to allow construction equipment to travel between transmission structures in this area without impacting the site. The transmission line will not span the site, and the site's setting and feeling have already been altered by the presence of nearby agricultural fields, modern fence lines, a cut section line road, and an adjacent distribution line. Therefore, the integrity of the site will not be diminished by the Project.

In addition, Basin has committed to incorporating the site's avoidance buffer into the Project's long-term maintenance plan as an unlabeled environmental avoidance area; therefore, future operation, maintenance, and inspection of the transmission line will not impact the site. Accordingly, the integrity of the site will not be adversely affected by the Project. See **Appendix B** for depictions of the site and its avoidance buffer in relation to Project infrastructure.

## 7.6 150 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 150 ft buffer and protective fencing or staking of the avoidance buffer prior to construction for one precontact archaeological site. See **Table 7-5** for this resource and its avoidance recommendation.

**Table 7-6: Resource With 150 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DV376	[REDACTED]	2024	Unevaluated	150 ft avoidance buffer. Clearly mark the site's avoidance buffer prior to construction with protective fencing.

**32DV376** is located in the southern portion of the Project's Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the ROW and installing protective fencing along the avoidance buffer to prevent inadvertent access by construction equipment. Within the northern portion of the ROW, the site's avoidance buffer has been truncated at a north-south trending fenceline due to extensive disturbance documented north of the fence line, including field stripping, cultivation, land clearing, and mining. This disturbance was documented in STPs completed during field surveys in 2024 and in historic aerial imagery of the area. Although the transmission line will span the site and its avoidance buffer, no adverse effects to the site's integrity of setting, feeling, or association are anticipated as a result of the Project. These aspects of integrity have already been diminished by surrounding gravel mining operations, conversion of the area to agricultural use, and the presence of numerous modern features within the site's viewshed.

In addition, Basin has committed to incorporating the site's avoidance buffer into the Project's long-term maintenance plan as an unlabeled environmental avoidance area; therefore, future operation,

maintenance, and inspection of the transmission line will not impact the site. Accordingly, the integrity of the site will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers in relation to Project infrastructure.

## 7.7 Project Summary and Recommendation

If the recommendations above are incorporated into the final Project infrastructure, design, and construction methods, Burns & McDonnell recommends a determination of *No Adverse Effects* for the portions of the Project's Physical APE documented herein and mapped. Burns & McDonnell recommends the completion of additional Class III Inventory if any areas of Project redesign fall outside the Survey Corridor covered in this report.

## 7.0 Summary and Recommendations

A combined total of 1,477.1 ac (597.8 ha) was surveyed by Burns and McDonnell for the Project between June 2024 and October 2025. A total of 19 cultural resources were documented during Class III Inventory for the Project. These include eight precontact site leads, three precontact isolated finds, two precontact archaeology sites, one historical archaeological site lead, two historical archaeological site, one architectural site, one site with an architectural and a historical archaeological component, and one multicomponent site. (Note: two precontact site leads were updated during both the 2024 and 2025 survey seasons due to small Survey Corridor expansions. These resources have only been counted once in the above numbers.) A total of 148 STPs were completed in medium to high probability areas of the Survey Corridor with low ground surface visibility or in the vicinity of surface finds.

The following management recommendations include all isolated finds, site leads, and sites recorded for the Project, regardless of the year documented, and are based on the most recent transmission line layout dated October 20, 2025.

No avoidance is recommended for 13 of the resources documented during the Project’s Class III Inventory. Avoidance is recommended for six of the recorded resources. Recommended avoidance buffers vary and have been determined based on two primary factors: the probability, based on the nature of the resource, the topography, and the extent of STPs in the surrounding area, that the resource retains a subsurface component that extends beyond the identified boundary of the resource; and the predicted likelihood, based on the surrounding topography, that earthmoving near the resource would have the potential to indirectly contribute to damage to the resource through erosion.

### 7.1 No Avoidance – No Further Work Recommended

Burns & McDonnell is not recommending avoidance or further work for the eight precontact site leads that were not identified within the Survey Corridor. Burns & McDonnell is also not recommending avoidance for the three precontact isolated finds, one architectural site, and one historical archaeological site, as it was determined through pedestrian survey and/or STPs that the areas contained low artifact density with little to no potential for intact subsurface deposits. See **Table 7-1** for a list of resources that are not recommended for avoidance.

**Table 7-1: No Avoidance - No Further Work Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DVX69		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX70		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX219		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX220		2024	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DVX299		2024 & 2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX300		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX301		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX303		2025	Unevaluated; Not Located within the Survey Corridor	No further work is recommended.
32DVX508		2024	Not Eligible	No further work is recommended.
32DV377		2025	Not Eligible	No further work is recommended.
32DV378		2025	Not Eligible	No further work is recommended.
32WIX852		2024	Not Eligible	No further work is recommended.
32WIX853		2025	Not Eligible	No further work is recommended.

## 7.2 25 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 25 ft buffer and protective fencing or staking of the avoidance buffers for one precontact archaeological site, two historical archaeological site leads, and one site containing both an architectural and historical archaeological component. Burns & McDonnell is also recommending monitoring during construction activities at the precontact archaeological site and one historical archaeological site to supplement fencing near the site. See **Table 7-2** for these resources and their avoidance recommendation.

**Table 7-2: Resources With 25 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32DVX505		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the avoidance buffer prior to construction with protective fencing.
32WI2517		2024	Unevaluated	25 ft avoidance buffer. Clearly mark the avoidance buffer prior

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
				to construction with protective fencing.
32WI2605		2025	Unevaluated	Clearly mark the feature area within the site prior to construction; contain construction vehicular traffic to the agricultural field portion of the site; utilize hand clearing to minimize ground disturbance during tree clearing; monitor during construction activities.
32WI2606		2025	Unevaluated	25 ft avoidance buffer. Clearly mark the avoidance buffer prior to construction with protective fencing. Monitor during construction activities.

Site lead **32DVX505** is located outside the Survey Corridor and the Project Physical APE. No Project infrastructure is planned near this site; however, it is located adjacent to a temporary off-ROW access road. Therefore, the primary potential concern is vehicular traffic during construction. Protective fencing is recommended to prevent inadvertent impacts from construction traffic.

Site **32WI2517** is located within the northern portion of the Project Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site’s avoidance buffer within the ROW and fencing the site’s avoidance buffer to prevent inadvertent access within the site by construction equipment. Approximately 110 ft of Physical APE remains south of the site boundary, allowing construction equipment to avoid the site. Further, numerous existing transmission lines are present within the site’s viewshed, and the Project is not expected to adversely affect the site’s integrity of setting or feeling.

Site **32WI2605** is located within the Project’s Physical APE, and the site spans the Project’s ROW. Based on LiDAR data collected for the Project, approximately 33 trees within the site boundary will require removal to allow the transmission line to safely span the site. Due to this, limited physical impacts within the site boundary will be necessary during construction, and multiple avoidance and minimization strategies will be implemented to reduce potential adverse effects to the site’s integrity.

To minimize ground disturbance within the site boundary, all permanent infrastructure will be located outside the site’s avoidance buffer and within the ROW tree clearing will be conducted by hand and in the presence of an archaeological monitor. Because the site spans the entirety of the Physical APE, an off-ROW access road was created and surveyed to the south to allow construction equipment to remain outside the site’s avoidance buffer while accessing pole locations in the area. Discussions with the landowner are ongoing regarding use of this off-ROW access route. If the landowner denies Basin an easement extension for the off-ROW access road at this site, construction traffic will utilize a designated path of travel within the southern portion of the site boundary. This route will remain within the agricultural field portion of the site and away from identified features. The travel path will be matted prior to equipment use, and the portion of the site containing features will be fenced to prevent inadvertent access by construction equipment. See **Appendix C** for a figure depicting the specific areas of proposed tree removal.

Although the transmission line will span the site and its avoidance buffer, no adverse effects to the site’s integrity of setting, feeling, association, or location are anticipated. These aspects of integrity have already

been diminished by the conversion of the surrounding landscape to agricultural production, ongoing downslope erosion within the site boundary, and the 2024 wildfire that burned all above-ground features. The wildfire also destroyed the protective tree row surrounding the site; only scattered burned remnants remain. As such, the trees recommended for removal no longer contribute meaningfully to the site's integrity of setting or feeling. See **Appendix C** for photographs depicting the current condition of the trees proposed for removal.

If the off-ROW access route cannot be utilized due to landowner restrictions, impacts within the Physical APE will be minimized by restricting construction traffic to the agricultural field portion of the site. Pedestrian survey and review of historic documentation indicate that the historic farmstead boundary was formerly confined to the non-agricultural portion of the site. While the highest concentration of artifacts is presently located within the agricultural field, this distribution is likely attributable to erosion from the elevated knoll where the feature concentration is situated. As documented in the site narrative and site form, intact features are located on the raised, relatively level knoll, whereas the densest artifact scatter occurs within a dry drainage south and southwest of the knoll in the cultivated field.

Therefore, based on the implementation of the above avoidance and minimization measures, including placement of all permanent infrastructure outside the site boundary, hand-clearing under archaeological monitoring, use of matting and fencing where necessary, and restriction of construction traffic to previously disturbed agricultural areas, the Project is not anticipated to result in an adverse effect to 32WI2605. The proposed undertaking will avoid direct impacts to identified features and will not further diminish those aspects of integrity that convey the site's significance.

Site **32WI2606** is located within the northern portion of the Project Physical APE and is separated from the southern portion of the Physical APE by an established barbwire property fenceline. This fenceline is located on the southern slope of the landform, approximately 8.5 m south of the site boundary. Although STPs were not conducted north of the fenceline, due to the culturally sensitive nature of the site, STPs were completed on this sloped, lower-probability portion of the same landform during the 2024 field season. Access north of the property fenceline was not originally granted by the landowner in 2024, but the topography noted north of the fenceline was considered high probability. Therefore, Burns & McDonnell initially completed STPs south of the property fenceline as a precaution to determine if any subsurface portion of a potential site continued onto the lower-probability, southern slope of the landform where access was granted. No cultural materials were recovered from these STPs.

Based on these survey results, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site's avoidance buffer within the northern portion of the ROW and south of the property fenceline on the southern side of the site. This will prevent inadvertent access within the site by construction equipment in both the northern and southern sides of the ROW.

Approximately 95 ft of Physical APE remains south of the property fenceline, and, as the area south of the fenceline was tested with STPs, construction equipment can avoid impacts to the site by remaining south of this fenceline. Further, numerous existing transmission lines and modern impacts are present within the site's viewshed, and the Project is not expected to adversely affect the site's integrity of setting or feeling. However, because a transmission line pole is planned within 50 ft of the site's avoidance buffer, archaeological monitoring is recommended to supplement the protective fencing during construction.

This avoidance strategy was discussed with NDSHPO in May of 2025 and, based on the survey results surrounding the site and the above referenced avoidance, the integrity of the sites will not be damaged by Project activities. In addition, Basin has committed to incorporating the sites' avoidance buffers into the Project's long-term maintenance plan as unlabeled environmental avoidance areas; therefore, future operation, maintenance, and inspection of the transmission line will not impact the sites. Concerning site

32WI2605’s long-term maintenance plan, Burns & McDonnell will create an updated avoidance boundary to be incorporated into the environmental avoidance areas. This updated avoidance boundary will include the path of travel utilized in the agricultural field for construction. Basin commits to continuing to utilize this access corridor for maintenance activities throughout the life of the transmission line and will avoid utilizing this path when ground conditions would leave ruts or tracks.

Accordingly, the integrity of the sites will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers in relation to Project infrastructure.

### 7.3 50 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 50 ft buffer for one multicomponent archaeological site and protective fencing or staking of the avoidance buffer prior to construction. See **Table 7-4** for this resource and its avoidance recommendation.

**Table 7-3: Resources With 50 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32WI2515		2024	Unevaluated	50 ft avoidance buffer. Clearly mark prior to construction with protective fencing.

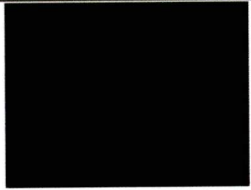
Site **32WI2515** is located within the Project’s Physical APE; however, physical impacts to the site will be avoided during construction by placing all infrastructure outside the site’s avoidance buffer within the ROW and fencing the site’s avoidance buffer to prevent inadvertent access within the site by construction equipment. Because the site spans the entirety of the Physical APE, an off-ROW access road was created and surveyed to the west to allow construction equipment to remain outside the site’s avoidance buffer while accessing pole locations in the area. Although the transmission line will span the site and its avoidance buffer, no impacts to the site’s integrity of setting, feeling, association, or location are anticipated as a result of the Project, as these aspects of integrity have already been compromised by conversion of the surrounding landscape to agricultural fields, downslope erosion within the site, and the removal of all above-ground site features from the site. Therefore, the integrity of the site will not be damaged by Project activities.

In addition, Basin has committed to incorporating the sites’ avoidance buffers into the Project’s long-term maintenance plan as unlabeled environmental avoidance areas; therefore, future operation, maintenance, and inspection of the transmission line will not impact the sites. Accordingly, the integrity of the site will not be adversely affected by the Project. See **Appendix B** for depictions of the sites and their avoidance buffers in relation to Project infrastructure.

### 7.4 150 ft Avoidance Buffer – Fencing Recommended

Burns & McDonnell is recommending a 150 ft buffer and protective fencing or staking of the avoidance buffer prior to construction for one precontact archaeological site. See **Table 7-5** for this resource and its avoidance recommendation.

**Table 7-4: Resource With 150 ft Buffer Recommendation; Protective Fencing Recommended**

SITS No.	Resource Type	Year Documented	NRHP Evaluation	Management Recommendation
32WI2516		2024	Unevaluated	150 ft avoidance buffer. Clearly mark prior to construction with protective fencing if the Physical APE shift back within 50 ft of the site boundary.

The Project has been redesigned to avoid site **32WI2516**. The site is located approximately 0.2 mi from the Project ROW, and no temporary off-ROW access roads or pulling easements are proposed within 0.1 mi of the site’s avoidance buffer. In addition, existing transmission lines and modern intrusions, including agricultural fields, fence lines, and field-clearing piles, have already slightly compromised the site’s integrity of setting and feeling. Therefore, the integrity of the site will not be damaged by Project activities.

In addition, Basin has committed to incorporating the site’s avoidance buffer into the Project’s long-term maintenance plan as an unlabeled environmental avoidance area as a precaution; therefore, future operation, maintenance, and inspection of the transmission line will not impact the site. Accordingly, the integrity of the site will not be adversely affected by the Project. See **Appendix B** for a depiction of the site and its avoidance buffer in relation to Project infrastructure.

## 7.5 Project Summary and Recommendation

If the recommendations above are incorporated into the final Project infrastructure, design, and construction methods, Burns & McDonnell recommends a determination of *No Adverse Effect* for the portions of the Project’s Physical APE documented herein and mapped. Burns & McDonnell recommends the completion of additional Class III Inventory if any areas of Project redesign fall outside the Survey Corridor covered in this report.