

**From:** [Gasper, Bryan R.](#)  
**To:** [Olson, Paige](#)  
**Cc:** [Shaver, Douglas E.](#); [Svedeman, Michael](#)  
**Subject:** [EXTERNAL] RE: Deuel Harvest Archaeology Survey  
**Date:** Thursday, February 07, 2019 8:40:41 AM

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Ms. Olson,

Thank you for the email and questions. I've copied your second round of questions below and provided responses.

**SHPO Inquiry:** Can you please explain the role of U.S. Fish and Wildlife in the project?

**Response:** Because the Project avoids impacts to federal lands, including USFWS Grassland, Conservation, or Wetland Easements, no federal nexus exists for the Project that would require National Environmental Policy Act (NEPA) review. Deuel Harvest coordinated closely with the USFWS and SDGFP as part of the Project planning and development process through meetings, conference calls, electronic communications, and site visits. Meetings with the USFWS South Dakota Ecological Services office were held on August 12, 2016, May 25, 2017, June 27, 2017, and February 13, 2018. Meetings with the USFWS Madison Wetlands Management District (WMD) were held on March 31, 2016 and March 7, 2018 to determine if existing grassland and wetland easements may occur in the Project Area. Deuel Harvest confirmed it is committed to minimizing impacts, especially to grasslands and wetlands, and has taken reasonable measures to set turbines back from high value environmental areas identified in coordination with the USFWS and SDGFP throughout the development process. Deuel Harvest will avoid direct impacts to land held for conservation purposes via USFWS Wetland, Grassland, and Conservation Easements. All wetlands, conservation easements, protected lands, and USFWS critical habitat will be avoided.

**SHPO Inquiry:** Also, has it been determined if the project will require permits from the U.S. Army Corps of Engineers?

**Response:** Deuel Harvest anticipates that the Project would avoid significant impact to wetland areas and streams. Wind turbines would be constructed in upland areas, avoiding the low-lying wetlands and streams. Wetland areas and streams would also generally be avoided when routing access roads and collector lines. If the final Project Facility locations were to result in unavoidable impacts to wetlands or waters of the U.S., Deuel Harvest would coordinate with the USACE to discuss if permits may be required in those scenarios. All wetlands, conservation easements, protected lands, and USFWS critical habitat will be avoided.

Please feel free to contact me (email or 816-351-5885) if there are additional questions or needs.

Thank you.

**Bryan R. Gasper** \ Burns & McDonnell  
Senior Environmental Scientist \ Project Manager  
o 816-349-6770 \ m 816-351-5885  
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**From:** Olson, Paige <Paige.Olson@state.sd.us>  
**Sent:** Tuesday, February 5, 2019 3:42 PM  
**To:** Gasper, Bryan R. <bgasper@burnsmcd.com>  
**Cc:** Shaver, Douglas E <deshaver@burnsmcd.com>; Svedeman, Michael <MSvedeman@invenergyllc.com>  
**Subject:** RE: Deuel Harvest Archaeology Survey

Mr. Gasper,

I noted on Figure A-8, labeled as Public Lands/Conservation Land, that several of the facilities fall on lands with grassland and wetland easements. Can you please explain the role of U.S. Fish and Wildlife in the project? Also, has it been determined if the project will require permits from the U.S. Army Corps of Engineers?

Please let me know if you prefer a formal letter for any additional requests for information .

Thank you providing the additional information I requested on January 15, 2019.

Paige Olson  
Review and Compliance Coordinator  
South Dakota State Historical Society

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**From:** Gasper, Bryan R. <[bgasper@burnsmcd.com](mailto:bgasper@burnsmcd.com)>  
**Sent:** Tuesday, February 5, 2019 12:37 PM  
**To:** Olson, Paige <[Paige.Olson@state.sd.us](mailto:Paige.Olson@state.sd.us)>  
**Cc:** Shaver, Douglas E <[deshaver@burnsmcd.com](mailto:deshaver@burnsmcd.com)>; Svedeman, Michael <[MSvedeman@invenergyllc.com](mailto:MSvedeman@invenergyllc.com)>  
**Subject:** RE: [EXT] Deuel Harvest Archaeology Survey

Ms. Olson,

Please find attached the responses to your inquiries for the Deuel Harvest North Wind Farm.

Please feel free to contact me (email or 816-351-5885) if there are additional questions or needs.

Thank you.

**Bryan R. Gasper** \ Burns & McDonnell  
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**From:** Olson, Paige <[Paige.Olson@state.sd.us](mailto:Paige.Olson@state.sd.us)>  
**Sent:** Tuesday, January 15, 2019 2:59 PM  
**To:** [dshaver@burnsmcd.com](mailto:dshaver@burnsmcd.com)  
**Cc:** Gasper, Bryan R. <[bgasper@burnsmcd.com](mailto:bgasper@burnsmcd.com)>  
**Subject:** Deuel Harvest Archaeology Survey

Hi Doug,

I am currently reviewing the archaeological report for the Deuel Harvest Project and have a couple of questions/ comments.

1. The survey coverage isn't consistent. Could you please explain what factors were used to predict high probability areas (HPAs) and how it was applied on the ground. For example, areas with known cultural resources, areas within ½ mile of permanent water source, previously undisturbed areas, etc.?
2. Since 39DE0021 was originally recorded in 1979, it's possible the location information on the site form isn't correct. What efforts made to relocate the site? Will project activities occur in the area just to the south of the site boundary? If so, please reevaluate the need to survey this area.
3. According to the revised State Plan for Archaeological Resources, the Northeast Lowland Archaeological Region has little survey coverage. Given the lack of survey, it seems premature to characterize the density of sites in this area.
4. Please explain if the THPOs or tribes were provided an opportunity to identify cultural resources in the project area?
5. Please provide a copy of the cover sheet signed by the PI.

Thank you,  
Paige

Paige Olson

Review and Compliance Coordinator  
South Dakota State Historical Society