

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA**

**IN THE MATTER OF THE APPLICATION BY ENGIE NORTH AMERICA, INC. FOR
A PERMIT FOR A WIND ENERGY FACILITY IN HUGHES & HYDE COUNTIES,
SOUTH DAKOTA, FOR NORTH BEND WIND FARM**

SD PUC DOCKET EL 21-018

**PRE-FILED DIRECT TESTIMONY OF WADE BURNS, CULTURAL RESOURCES
BEAVER CREEK ARCHAEOLOGY, ON BEHALF OF ENGIE NORTH AMERICA, INC.**

9/30/2022

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1 **Q. Please state your name, employer and business address for the record.**

2 A. Wade Burns, Beaver Creek Archaeology, Inc., 1632 Capitol Way, Bismarck, NND 58501

3 **Q. Briefly describe your educational background.**

4 A. I have a Bachelor's and Master's degree in archaeology. I graduated with my Master's
5 degree in 2004 from NDSU. In addition, I also hold a degree in GIS mapping which is utilized in
6 archaeological surveys for projects such as this.

7 **Q. Briefly describe your professional experience.**

8 A. I have been a professional archaeologist for the past 23 years, of which I have owned my
9 own company for the past 16 years. During that time frame I and my staff have worked
10 extensively in the Dakotas.

11 **Q. Have you attached a resume or CV.**

12 A. Yes, my resume is attached.

13 **Q. Have you previously submitted or prepared testimony in this proceeding in South
14 Dakota?**

15 A. No.

16 **Q. What is the purpose of your direct testimony?**

17 A. The purpose of my testimony is to provide documentation that ENGIE NORTH
18 AMERICA, INC. has, is, and will continue to comply with the South Dakota Public Utilities
19 Commission Standards for cultural resource studies, as well as follow the guidelines set out in
20 Section 106 of the National Historic Preservation Act (NHPA).

21 **Q. Which sections of the application are you responsible for?**

22 A. I am responsible for the Cultural Resource Management section (16.4) of this document.

23 **Q. Did you perform surveys of cultural resources for the project and if so, what did you**

24 learn?

25 A. The Level I records search for the proposed project area revealed one unevaluated prehistoric site and five architectural sites located within a 1.5-mile radius of the preliminary project area. None of the previously recorded cultural resources were documented within the currently proposed project area.

26 During the 2020 preliminary pedestrian inventory of 359 acres, one previously recorded resource was updated and 12 new cultural resources were documented, including 10 prehistoric stone feature sites and two historic archaeological sites. Each of the stone feature sites has been recommended as eligible for nomination to the NRHP, while the two historic sites have been recommended as unevaluated for nomination to the NRHP. Avoidance measures are recommended for each of these sites.

27 Following the completion of the 2020 survey, the Proponent provided a revised layout for the proposed project that was designed to accommodate site avoidance of all 13 cultural resources documented within the preliminary project layout. The vast majority of the revised 2021 layout is different from the area surveyed under the 2020 surveyed area, and these sites were avoided by well over 100' in the updated layout; therefore, no specific avoidance measures are recommended for these sites.

28 During the 2021 intensive pedestrian survey of 2,034 acres for the revised project alignment, 13 new cultural resources were encountered, including 11 prehistoric stone feature sites and two architectural sites. Each of the stone feature sites has been recommended as eligible for nomination to the NRHP and avoidance measures are recommended. The two architectural sites have been recommended as ineligible for nomination to the NRHP and no specific avoidance measures are recommended.

29 Additionally, 30 Traditional Cultural Properties (TCP) were identified by tribal representatives during the TCP inventory, including both physical and non-physical surface expressions and an isolated find. Each of these have been documented on a TCP form and submitted to the South Dakota SHPO for their records.

30 The Proponent has rerouted or moved proposed project elements in order to avoid each stone feature site or TCP by a minimum of 50'. Additionally, BCA recommends placing avoidance fencing along the edge of the survey corridor near each of the stone feature sites and TCPs during construction activities.

31 BCA conducted an additional survey in 2022 that covered approximately 36 acres for minor changes to the 2021 design. During the addendum survey one historic cultural resource was encountered. The site has been recommended as ineligible for listing in the NRHP. As the site has been recommended as ineligible, no specific avoidance measures are recommended.

32 Dated this 30th day of September, 2022

33 /S/ 

34 Wade Burns, President of Beaver Creek Archaeology, Inc.