



January 31, 2022

Mr. Staffan Peterson
Department of Energy
Western Area Power Administration
PO Box 35800
Billings, MT 59107-5800

SECTION 106 PROJECT CONSULTATION

Project: 210111011F – Interconnection Request for the North Bend Wind Project
Location: Hughes and Hyde Counties
(WAPA)

Dear Mr. Peterson:

Thank you for the opportunity to comment on the above referenced project pursuant to 54 U.S.C. 306108, also known as Section 106 of the National Historic Preservation Act of 1966 (as amended). The South Dakota Office of the State Historic Preservation Officer (SHPO) concurs with your determination regarding the effect of the proposed undertaking on the non-renewable cultural resources of South Dakota.

On January 31, 2022, we received your letter dated January 27, 2021, containing your agency's determinations of eligibility for the properties recorded during identification efforts and the determination of effect for the proposed undertaking. Previously, in an email dated November 22, 2021, David Kluth of Western Area Power Administration supplied a digital copy of the report titled "A Level III Intensive Cultural Resource Inventory and Tribal Cultural Property Survey for the North Bend Wind Project in Hughes and Hyde Counties, South Dakota" by Amanda Baker of Beaver Creek Archaeology. Additionally, in an email dated January 25, 2021, you supplied a digital copy of the report titled "A Reconnaissance Architectural Survey and Viewshed Analysis of the North Bend Wind Project in Hughes and Hyde Counties, South Dakota" by Emilie S. Arnold and Amanda Baker of Beaver Creek Archaeology.

Ms. Baker's 2021 intensive cultural resource inventory and tribal cultural property survey report indicates that an archaeological survey was conducted in 2020 of the preliminary turbine layout followed by an archaeological and Traditional Cultural Property (TCP) survey of the finalized project alignment and ancillary features. Ms. Arnold's and Ms. Baker's architectural survey report indicates that 44 structures of historic age were identified within the Area of Potential Effects (APE). Your letter indicates that WAPA agrees with all recommendations contained within the reports regarding the eligibility of properties to the National Register of Historic Places.

Based upon the information provided, SHPO has the following comments and concurrences regarding properties recorded during the identification efforts:

- 39HU0078 was previously recorded and revisited during the preliminary 2020 survey and was not fully evaluated for listing in the National Register. 39HU0078 should be considered Unevaluated for listing in the National Register of Historic Places.
- The following 10 archaeological sites were newly recorded during the preliminary 2020 survey and should be considered Eligible for listing in the National Register of Historic Places: 39HE0091 39HE0092 39HE0093 39HE0094 39HU0452
39HU0453 39HU0454 39HU0455 39HU0458 39HU0459
- 39HU0456 and 39HU0457 were newly recorded during the preliminary 2020 survey but were not fully evaluated for listing in the National Register. 39HU0456 and 39HU0457 should be considered Unevaluated for listing in the National Register of Historic Places.
- 39HU0448 was newly recorded during the 2021 finalized layout survey and should be considered Not Eligible for listing in the National Register of Historic Places.
- The following 11 archaeological sites were newly recorded during the 2021 finalized layout survey and should be considered Eligible for listing in the National Register of Historic Places: 39HE0083 39HE0084 39HE0085 39HE0086
39HE0087 39HE0088 39HE0089 39HE0090 39HU0449
39HU0450 39HU0451

Please note that Table 1 and page 20 of Ms. Baker's 2021 report refer to 39HU0449, 39HU0450, and 39HU0451 as 39HE449, 39HE450, and 39HE451, respectively

- The following 30 Traditional Cultural Properties were newly recorded during the 2021 finalized layout survey and should be considered Eligible for listing in the National Register of Historic Places: BCA21-1304-Site2 BCA21-1304-Site5
BCA21-1304-Site5a BCA21-1304-Site6 BCA21-1304-Site7
BCA21-1304-Site8 BCA21-1304-Site9 BCA21-1304-Site12
BCA21-1304-Site14 BCA21-1304-Site14a BCA21-1304-Site16
BCA21-1304-Site17 BCA21-1304-Site18 BCA21-1304-Site18a
BCA21-1304-Site19 BCA21-1304-Site21 BCA21-1304-Site21a
BCA21-1304-Site22 BCA21-1304-Site23 BCA21-1304-Site25
BCA21-1304-Site26 BCA21-1304-Site26a BCA21-1304-Site27
BCA21-1304-Site27a BCA21-1304-Site29 BCA21-1304-Site31
BCA21-1304-Site32 BCA21-1304-Site33 BCA21-1304-Site33a
BCA21-1304-IF1

Please note that Table 1 of Ms. Baker's 2021 report lists the site numbers for the TCPs as BCA21-1333-Site# instead of BCA21-1304-Site#

- 39 structures identified in Ms. Arnold's and Ms. Baker's architectural survey report were recommended Not Eligible for listing in the National Register, while 2 structures were recommended Eligible, and 3 structures remain unevaluated. Survey data for all properties identified in the architectural survey report were entered into SHPO's architectural survey site CRGRID in the fall of 2021, and SHPO agreed with the surveyor's recommendations through the CRGRID site forms. Your letter dated January 27, 2022, agrees with the recommendations of eligibility in Ms. Arnold's and Ms. Baker's report, and SHPO concurs with your determination of eligibility for these structures.

Five architectural properties located within the APE that remain unevaluated or have been determined eligible for the National Register will not be impacted by ground disturbing activities but lie within the 1.5 mile viewshed of the proposed wind farm. Based on the information provided, HE00000009 (Bridge No. 35-010-366) has been determined eligible under criterion C for its architectural qualities, and therefore its eligibility will not be adversely affected by changes to the viewshed. The other four structures--the Misterek Farmstead Barn (HU01400002), Chad Husted Farmstead Barn (HU00000616), Paul Knox Farmstead House (HE00200002), Klebsch Farmstead Barn (HE01400003)--are individual structures located on farm sites where the historic settings have been altered by the addition of modern infrastructure. The visual impacts of the wind farm on these sites would be minimal given the already disturbed viewshed of for these structures.

Therefore, SHPO concurs with your determination of "No Adverse Effect" for the proposed undertaking, provided the following stipulations are met: 1) All archaeological properties and TCPs which are Eligible for listing in the National Register of Historic Places or are currently unevaluated for listing in the National Register of Historic Places will be avoided by a minimum of a 50-foot buffer marked with construction fencing. 2) Changes in the location or nature of project activities, such as the need to construct additional access roads or other ancillary features, will require the submission of additional documentation pursuant to 36 C.F.R. § 800.4 and 36 C.F.R. § 800.11.

Please continue to engage in meaningful consultation with our Tribal Partners regarding the proposed undertaking and its effects on historic properties. Concurrence of the SHPO does not relieve the federal agency official from consulting with other appropriate parties, as described in 36 C.F.R. § 800.2(c).

Please note that, if any properties which were recorded during the Tribal Cultural Property Survey contain archaeological components, those properties also should be recorded as archaeological sites. Ms. Baker's 2021 report indicates that BCA21-1304-Site29 and BCA21-1304-IF1 contained lithics. If these TCPs or any other TCPs do contain an archaeological component, please record the archaeological component on an Archaeological Research Center Site Form and obtain a Smithsonian Institution Trinomial site number for the property.

If historic properties are discovered or unanticipated effects on historic properties are found after the agency official has completed the Section 106 process, the agency official shall avoid, minimize or mitigate the adverse effects to such properties and notify the SHPO and Indian

tribes that might attach religious and cultural significance to the affected property within 48 hours of the discovery, pursuant to 36 C.F.R. § 800.13.

If a project-specific unanticipated discoveries plan will be developed for the North Bend Wind Project, SHPO requests the opportunity to consult and provide comment on the plan.

Should you require any additional information, please do not hesitate to contact Jenna Carlson Dietmeier at Jenna.CarlsonDietmeier@state.sd.us or at (605)773-8370.

Sincerely,

Ted M. Spencer
State Historic Preservation Officer



Jenna Carlson Dietmeier
Review & Compliance Coordinator

CC: David Kluth – Western Area Power Administration
Jon Thurber – South Dakota Public Utilities Commission
Darren Kearney – South Dakota Public Utilities Commission
Merle Marks – Tribal Historic Preservation Officer, Crow Creek Sioux Tribe
Ione Quigley - Tribal Historic Preservation Officer, Rosebud Sioux Tribe
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Jane Watts – Archaeological Research Center, Rapid City
Brian Huot - Archaeological Research Center, Rapid City