

2019 Cost-Share Proposal Form for NorthWestern Energy (NWE) Project 2188 TAC Funds

Project Title: WildTAC Cultural Resources Management Compliance

Which PM&E measure(s) in the Project 2188 License will this proposal enhance or support?

NA – This project is designed to ensure NWE-funded projects comply with the 1997 Cultural Resources Management Plan. NWE-funded projects will be screened at annual meetings to determine if they support P,M&E measures.

Proposal Submitted by: Grant Grisak

Date Submitted: November, 2020

Location of Proposed Project: Madison-Missouri River from Hebgen Dam to headwaters of Fort Peck Reservoir.

Total Project Cost: TBD at annual meeting.

TAC Funds (Cost-Share) Requested: TBD at annual meeting

I. Introduction.

NorthWestern Energy-funded projects are required to comply with the Cultural Resources Management Plan (1997) filed with FERC for License 2188.

The plan states "...In all actions, direct effects are those that may occur to cultural resources located at the specific sites of proposed actions. Indirect effects are those that may arise from actions removed in time or space from the primary action, but are essential to the primary action...NWE will be responsible for all studies and costs in cultural resources management (CRM) for all actions it proposes... Studies will be undertaken by NWE, under the four step plan detailed hereinafter, unless another party involved in an action agrees to undertake CRM studies..."

TAC applicants would traditionally integrate the costs of a CRM inventory in their applications, then facilitate having a NWE CRM consultant perform the inventory. Afterwards, NWE would forward the results of those inventories to SHPO for concurrence in findings, thus complying with the 1997 CRM Plan. TAC applicants, such as Federal Government Agencies who have CRM personnel on staff, would generally have their staff perform the CRM inventories for their projects and forward to NWE to file with SHPO for concurrence.

This proposal is to formalize the process by identifying the projects needing CRM inventories during the annual TAC meetings. Upon approval of an application, the CRM funds would be removed and integrated into one proposal (this proposal) to aid the NWE CRM consultant for tracking purposes and ease in contracting. Those Federal partners who continue to perform their own CRM inventories and reports will remain separate, except when seeking SHPO concurrence.

In 2020, the average cost of an individual CRM inventory performed by NWE consultant was \$2,300 (range \$1,100-\$3,800).

II. Objectives. Comply with the Cultural Resources Management Plan (1997) filed with FERC for License 2188.

III. Methods. Identify projects needing CRM inventories at annual meeting. Determine if CRM will be performed by another party or NWE consultant. Integrate CRM funds into one proposal for ease in tracking and contracting with NWE CRM consultant. Ensure all projects funded by NWE comply with 1997 CRM Plan.

IV. Schedule. This work is done throughout the entire field season.

V. Personnel. Grant Grisak is the NWE project leader. Assistance is provided by NWE CRM consultant, Federal staff credentialed in CRM and Any Welch, NWE, Hydro Compliance Leader.

VI. Requested Budget

TBD at annual meeting.

TOTAL

List all other funding (cost-share) sources and amounts for this project: NWE provides staff time to file CRM reports with SHPO and tracks that processes and responses through communication with a consultant and a document repository. Estimated annual cost to NWE is \$10,000 through staff time and consulting fees.

VII. Deliverables. CRM inventory reports on NWE-funded projects. SHPO concurrence for each of those reports.

VIII. Cultural Resources. Cultural Resource Management (CRM) requirements for any activity related to this Project must be completed and documented to NWE as a condition of any TAC grant. TAC funds may not be used for any land-disturbing activity, or the modification, renovation, or removal of any buildings or structures until the CRM consultation process has been completed. Agency applicants must submit a copy of the proposed project to a designated Cultural Resource Specialist for their agency. Private parties or non-governmental organizations are encouraged to submit a copy of their proposed project to a CRM consultant they may have employed. Private parties and non-governmental organizations may also contact the NWE representative for further information or assistance. Applications submitted without this section completed, will be held by the TAC, without any action, until the information has been submitted.

Summarize here how you will complete requirements for Cultural Resource Management:

This proposal is specifically designed to ensure all projects funded by NWE in 2021 will comply with the 1997 CRM Plan.

IX. Water Rights. For projects that involve development, restoration or enhancement of wetlands, please describe how the project will comply with the Montana DNRC's "Guidance for Landowners and Practitioners Engaged in Stream and Wetland Restoration Activities", issued by the Water Resources Division on 9 March 2016.

Summarize here how you will comply with Montana water rights laws, policies and guidelines: No water rights are associated with this project.

No water rights are associated with this project.

All TAC Project proposals should be 7 pages or less and emailed (as a WORD file) to each of:

- Andrew.Welch@Northwestern.com
- Jon.Hanson@Northwestern.com
- Grant.Grisak@Northwestern.com

Further questions about TAC proposals or Project 2188 license requirements or related issues may be addressed to: Andy Welch, Leader Hydro License Compliance, NorthWestern Energy, 208 N Montana Ave., Suite 205; 406-444-8115 (office); 406-565-7549 (cell); Andrew.Welch@northwestern.com.