



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

Project 2188 (Madison-Missouri River) License Protection, Mitigation and Enhancement (PM&E) projects are required to offset impacts to river resources from the continued operation of one or more of NWE's nine hydro developments (Hebgen, Madison, Hauser, Holter, Black Eagle, Rainbow, Cochrane, Ryan and Morony Dams). PM&E projects need to be prioritized toward in-river or on-the-ground measures that directly benefit fisheries and/or wildlife populations and their habitats:

Priority 1: 2188 License projects which meet License Article requirements and PM&E for fisheries or wildlife populations or their habitats within the main stem Madison River (Hebgen Reservoir to Three Forks) or Missouri River (Hauser Reservoir to Fort Peck Reservoir)

Priority 2: 2188 License projects which meet License Article requirements and PM&E for fisheries or wildlife populations or their habitats in primary tributaries or on adjacent lands and, in doing so, provide PM&E for Madison River (Hebgen Reservoir to Three Forks) or Missouri River (Hauser Reservoir to Fort Peck Reservoir) resources.

Priority 3: 2188 License PM&E projects which meet License Article requirements by providing scientific or other tangible PM&E benefits to Madison-Missouri River fisheries or wildlife populations or their habitats. These projects must be located in the greater Missouri River drainage upstream from Fort Peck Reservoir, but not necessarily located on the main stem Madison River or Missouri River or their adjacent lands or primary tributaries.

All TAC project proposals must include the following information:

Project Title: WildTAC Cultural Resources Management Compliance

Date: 11.13.2024

Explain how this Project addresses a specific Project 2188 License Article(s): 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.

Provide justification for Priority 1, 2 or 3 (above) that you selected: NA

Project Sponsor (submitted by): Grant Grisak – NorthWestern Energy

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

Total Project Cost: estimate \$4,500

TAC Funds (Cost-Share) Requested for Project: \$4,500

I. Introduction; brief statement of project to be completed with pertinent background information.

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.

The following proposed projects are considered for CRM review;

2024-10. In 2024 the Rowe Coulee Restoration project was approved by the WildTAC. Given the scope of the project, the consulting archaeologist for NWE recommended doing a CRM inventory and report on phase 1 for 2024. That work was completed and phase 1 was implemented. In 2025 there are two additional phases planned that would require CRM inventory of those project sites. This proposal is for that CRM inventory and report. The estimated costs for Upper Rowe Coulee CRM work is \$4,184.25.

- II. Objectives; explicit statement(s) of what is intended to be accomplished.
Comply with the Cultural Resources Management Plan (1997) filed with FERC for License 2188.
- III. Methods; description of how Project objectives will be accomplished.
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; when the Project work will begin and end. This work is done throughout the entire field season.
- V. Personnel; who will do the work? Identify Project leader or principal investigator. . Grant Grisak is the NWE project leader. Assistance is provided by NWE CRM consultant, Federal staff credentialed in CRM and Andy Welch, NWE, Hydro Compliance Leader.
- VI. Project budget must include amounts for the following: NA

***NorthWestern Energy TAC funds will not be used for agency overhead on projects that do not fund personnel. Applications for materials and equipment should not contain overhead.**

- VII. Deliverables; describe work product (reports, habitat restoration, etc.) which will result from this Project. How will “success” for this project be monitored or demonstrated? 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: NA

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

Manager, Hydro License Compliance

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