

# **Exhibit S**

## **Historic, Cultural, and Archaeological Resources**

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**West End Solar Project  
September 2022**

**Prepared for  
EE West End Solar LLC**

**Prepared by**



**Tetra Tech, Inc.**

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## Acronyms and Abbreviations

Applicant	EE West End Solar LLC
BPA	Bonneville Power Administration
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
EFSC	Energy Facility Siting Council
GLO	General Land Office
kV	kilovolt
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
Project	West End Solar Project
SHPO	State Historic Preservation Office
Tetra Tech	Tetra Tech, Inc.

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## 1.0 Introduction

EE West End Solar LLC (Applicant), a subsidiary of Eurus Energy America Corporation, proposes to construct the West End Solar Project (Project), a solar energy generation facility and related or supporting facilities in Umatilla County, Oregon. Exhibit S was prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(1)(s).

Exhibit S provides information on the historic, cultural, and archaeological resources that may potentially be impacted by the Project. The information in Exhibit S demonstrates that the Project will comply with the Oregon Energy Facility Siting Council's (EFSC) Historic, Cultural, and Archaeological Resources Standard, OAR 345-022-0090. The exhibit shows that the construction and operation of the Project, taking into account mitigation, is unlikely to result in significant adverse impacts to historic and cultural resources that are listed or eligible for listing on the National Register of Historic Places (NRHP; historic properties); archaeological objects on private lands; or archaeological sites on private or state lands.

The Project will be within the approximately 324-acre Site Boundary which is also the micrositing corridor. The solar array will be up to 16 feet tall (at full tilt) and will include up to approximately 180,000 solar modules, depending on the final technology and layout selected. Strings of solar modules will be supported by tracker systems that in turn will be supported by steel posts, typically installed 4 to 8 feet into the ground. The Project will interconnect to the regional grid via either the existing Bonneville Power Administration's (BPA) McNary to Roundup 230-kilovolt (kV) line or the PacifiCorp's Pendleton to Hermiston 69-kv line (both run southeast to northwest through the Site Boundary) or the Umatilla Electric Cooperative 115-kv line that parallels the eastern edge of the Site Boundary. Other Project components include electrical collection lines, an energy storage system, site access roads, one collection substation (with structures up to 30 feet tall), one switchyard substation, one operations and maintenance enclosure (up to 20 feet tall), temporary staging areas, and an 10-foot perimeter fence. These facilities are all described in greater detail in Exhibit B.

Information concerning the location of archaeological sites or objects is exempt from public disclosure under Oregon Revised Statute (ORS) 192.501(11). Therefore, such information, including archaeological survey reports, is provided confidentially to the Oregon Department of Energy (ODOE).

## 2.0 Analysis Area

The Analysis Area for Exhibit S includes all cultural resource survey corridors within the Project Site Boundary (as described in Exhibit B). The Analysis Area encompasses the surfaces that may be disturbed by construction and operation within the Project Site Boundary. The Analysis Area is depicted on Figure S-1.

### 3.0 Cultural Resources Inventory – OAR 345-021-0010(1)(s)(A) through (C)

*OAR 345-021-0010(1)(s). Information about historic, cultural and archaeological resources. Information concerning the location of archaeological sites or objects may be exempt from public disclosure under ORS 192.345(11). The applicant must submit such information separately, clearly marked as “confidential,” and shall request that the Department and the Council keep the information confidential to the extent permitted by law. The applicant must include information in Exhibit S or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including*

*OAR 345-021-0010(1)(s)(A) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the NRHP;*

*OAR 345-021-0010(1)(s)(B) For private lands, archaeological objects, as defined in ORS 358.905(1)(a), and archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;*

*OAR 345-021-0010(1)(s)(C) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;*

Subsection (1) of the Historic, Cultural, and Archaeological Resources Standard at OAR 345-022-0090(1) provides the Applicant must demonstrate that the construction and operation of the Project, taking into account mitigation, is unlikely to result in significant adverse impacts to identified resources. Note that under Section (2) of this standard, EFSC is not required to make a finding that the Project complies with OAR 345-022-0090(1). Nonetheless, the Applicant provides evidence here that the standard is met.

#### **OAR 345-022-0090**

*(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to:*

- a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;*
- b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and*
- c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).*

*(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.*



“Archaeological site” is defined at ORS 358.905(1)(c) as a geographic locality in Oregon, including but not limited to submerged and submersible lands and the bed of the sea within the state’s jurisdiction, that contains archaeological objects and the contextual associations of the archaeological objects with: (i) each other; or (ii) biotic or geological remains or deposits. Examples of archaeological sites by this definition include, but are not limited to, shipwrecks, lithic quarries, house pit villages, camps, burials, lithic scatters, homesteads, and townsites.

“Archaeological objects” are defined at ORS 358.905(1)(a) as an object that: (A) is at least 75 years old; (B) is part of the physical record of an indigenous or other culture found in the state or waters of the state; and (C) is material remains of past human life or activity that are of archaeological significance including, but not limited to, monuments, symbols, tools, facilities, technological by-products, and dietary by-products. For the purposes of this analysis, isolated finds are considered archaeological objects.

### **3.1 Cultural Resources Inventory Methodology**

The effort to complete the Applicant’s cultural resources inventory is guided by four main goals aimed at ensuring compliance with the EFSC standards. These goals include (1) identification of cultural resources within the Analysis Area (as defined in Section 2); (2) interpretation of those identified resources within a regional context; (3) evaluation of identified resources for protection under the Cultural Resources standards (OAR 345-022-0090); and (4) assessment of potential Project impacts on protected resources. In addition to tribal coordination, the Applicant has completed one primary study of cultural resources within the proposed Site Boundary (Analysis Area): a pedestrian cultural resources survey by Tetra Tech, Inc. (Tetra Tech; Attachment S-1). This study included the entirety of the Analysis Area. A description of the discovery measures, such as the survey and inventories, that the Applicant has undertaken is described in detail in the sections below. The cultural resources survey report is a confidential document that is exempt from public disclosure under ORS 192.501(11) and is provided separately as Attachment S-1.

#### **3.1.1 Records Review**

Tetra Tech conducted a records search that focused on the overall Project Analysis Area and a 1-mile buffer (Study Area; see Section 3.2.1). Data was derived from the files and databases of the State Historic Preservation Office (SHPO; e.g., Oregon Archaeological Records Remote Access and Oregon Historic Sites Database), and historic maps and aerial photographs. In addition to these sources, input from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) was also considered. Efforts focused on collecting information concerning previously recorded cultural resources within the Study Area, as well as previously conducted surveys within this area.

To adequately evaluate potential indirect impacts to the setting (e.g. visual/audial) of historic, built environment resources from the proposed facility, Tetra Tech conducted a desktop review to identify historic buildings within the Study Area. This desktop review included review of aerial photographs, SHPO Historic Sites database, review of the Umatilla County Tax Assessor website to determine the age of buildings, and review of historic maps to identify previous and current

ownership of each parcel. These included the General Land Office cadastral maps, the 1914 Ogle map, and the 1934 Metsker map. A total of eight tax parcels were identified as containing historic buildings.

### **3.1.2 Field Surveys**

Tetra Tech conducted a “non-collection” Phase I pedestrian survey of the Analysis Area/Site Boundary totaling 324 acres between April 6 and 10, 2020. Given the extensive prior disturbance by agricultural activities within the Analysis Area and the depositional environment of the soils present (see confidential Attachment S-1), the potential for subsurface resources within the Analysis Area is considered low. Results of prior surveys in the Study Area and the very low density of previously recorded archaeological resources in the Study Area support this (see Section 3.2.1). As such, no subsurface probing during the survey was warranted.

The inventory was conducted in accordance with state standards for Oregon by Tetra Tech’s professional archaeologists, under the supervision of a Principal Investigator who meets the Secretary of Interior Standards.

Crews walked and observed the ground, spread out in line at 20-meter intervals (i.e., transects), working under the guidance of the Field Director. Ground surface visibility varied between fair (greater than 30 percent) and excellent (greater than 75 percent) throughout the Analysis Area. Weather conditions during surveys were warm to very warm and dry. Spatial control was maintained through the use of 1:24,000 scale maps and Global Positioning System units with sub-meter accuracy. The Field Director completed daily field notes, documenting beginning and ending survey locations, environmental conditions, findings, and any issues concerning landowners and health and safety. No part of the Analysis Area was inaccessible.

Specific to the historic properties inventory survey, Tetra Tech conducted a field survey in April 2022 of the tax parcels identified in the desktop review as having historic buildings. All fieldwork was conducted from the public right-of-way. The resources were photographed and recorded on photograph logs. Documentation included photographic documentation of at least one elevation, a physical description, and a concise statement of significance relative to the building’s eligibility for listing on the NRHP (36 CFR Part 60.4).

### **3.1.3 Native American Consultations**

A meeting between the Applicant and CTUIR staff (natural and cultural resources) occurred on October 19, 2020 to introduce the Project. The Project Site Boundary was provided to CTUIR on November 11, 2020. A draft copy of the survey report (Attachment S-1) was provided to CTUIR for review and comment on May 12, 2021. Other tribes have not expressed interest in the Project.

## **3.2 Cultural Resources Inventory Results**

The following sections describe results of the records reviews and the cultural resources pedestrian survey conducted within the Study Area. The cultural resources pedestrian surveys of the Analysis

Area are included as confidential Attachment S-1 and the resource locations are included in confidential Figure S-2.

**3.2.1 Records Review**

The databases reviewed as part of the records search revealed that the entirety of the Project Analysis Area had been previously surveyed for cultural resources prior to the field surveys conducted for the Project. Additionally, a majority of the surrounding 1-mile area around the Project Site Boundary had been surveyed as well. Table S-1 summarizes the previous survey coverage of the Study Area. All portions of the Project Site Boundary that were previously surveyed were surveyed again in 2020 and are included in the report provided as confidential Attachment S-1.

**Table S-1. Previously Conducted Surveys within the Project Study Area**

<b>Survey No.</b>	<b>Author(s) &amp; Affiliation</b>	<b>Year</b>	<b>Report Title</b>	<b>Nearest Distance to Analysis Area</b>
N/A	Unknown	Unknown (pre-2021) <sup>1</sup>	Unknown	Adjacent to western boundary
344	David R. Brauner, PhD (Oregon State University)	1977	Letter to SHPO re: Surface Reconnaissance for the Replacement Stanfield Sewage Treatment Plant	In (covers entirety of Analysis Area)
653	Julia A. Follansbee and Ellen B. Mays (Consultants for BPA)	1979	<i>A Preliminary Cultural Resource Overview for the Brownlee - Slatt and Buckley - Malin Corridors, Oregon</i>	In (passes northwest-southeast through Analysis Area)
3406	R. M. Pettigrew (Oregon State Museum of Anthropology, University of Oregon)	1981	Letter Report: Report on the Archaeological Survey of the Proposed Improvements of the Hermiston-Stanfield North City Limits Section, US Highway 395, Umatilla County	0.9-mile southwest of southwest corner
14776	Albert C. Oetting (Heritage Research Associates)	1993	<i>Cultural Resources Survey of Facilities for the Hermiston Power Project, Umatilla County, Oregon</i>	In (passes northwest-southeast through Analysis Area)
17251	Julie Schablitsky, Judith S. Chapman, Matt F. Goodwin, Terry L. Ozbun, and John L. Fagan (Archaeological Investigations Northwest, Inc.)	2000	<i>Cultural Resources Survey of Route Modifications and Shovel Testing of Sites for Level 3's Proposed Fiber Optic Line from Seattle to Boise: Northeast Oregon Reroutes</i>	0.9-mile southwest of southwest corner
18805	Kirsten J. Anderson (Oregon Department of Transportation)	2004	<i>Archaeology Survey Report US 395: SE 4th St (Hermiston) - I 84 Umatilla-Stanfield Highway, Umatilla County</i>	0.9-mile southwest of southwest corner

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<b>Survey No.</b>	<b>Author(s) &amp; Affiliation</b>	<b>Year</b>	<b>Report Title</b>	<b>Nearest Distance to Analysis Area</b>
29885	Pamela McKenney, Stephen Emerson, and Stan Gough (Archaeological and Historical Services, Eastern Washington University)	2009	<i>A Cultural Resources Survey of Bonneville Power Administration's Tri-Cities District FY09 Wood Pole Replacement Project, Benton, Franklin, and Walla Walla Counties, Washington, Umatilla County, Oregon</i>	0.2-mile northwest of northwest corner
28066	Melissa Teoh (Consultant for BPA)	2016	<i>Cultural Resources Survey for 2016 Pasco District Wood Pole Replacement Project in Umatilla County, Oregon</i>	0.9-mile northwest of northwest corner
1. Although this survey is mapped in the Oregon Archaeological Records Remote Access, the database does not provide any detailed information about it or the associated survey report.				

Two previously recorded cultural resources were identified by the records review as within the Study Area, both of which are within approximately 0.5-miles of the Analysis Area. These resources are listed in Table S-2.

**Table S-2. Previously Recorded or Noted Cultural Resources within Study Area**

<b>Resource ID</b>	<b>Resource Description</b>	<b>Resource Type</b>	<b>NRHP-Eligibility</b>	<b>Nearest Distance to Analysis Area</b>
HPP-H-2	Historic Refuse Scatter	Archaeological Site	Unevaluated	0.5-mile south of southwest corner
35UM 00399	Historic Irrigation Ditch ("Furnish Ditch")	Historic Site <sup>1</sup>	Unevaluated (possibly eligible under NRHP Criteria A-C)	0.5-mile northwest of the northwest corner
1. Although the historic Furnish Ditch is listed in Oregon Archaeological Records Remote Access and has been assigned a State trinomial number for an archaeological site, it is a functioning irrigation ditch. SHPO considers functioning historic irrigation ditches to be historic sites, not archaeological sites (SHPO 2016: Appendix C). As such, it is presented here as a historic site.				

Table S-3 summarizes the historic maps and aerial photographs of the Analysis Area that were reviewed. Review of U.S. General Land Office (GLO) plats for found that that the two existing transmission lines that pass through the Analysis Area, BPA's McNary to Roundup 230-kV line and PacifiCorp's Pendleton to Hermiston 69-kV line, are historic alignments. Both lines appear on the earliest reviewed historic aerial photograph (1952), but did not appear on the preceding 1908 U.S. Geological Survey Umatilla 1:125,000 quadrangle. Other than agriculture, no other activities in or near the Analysis Area were observed in the reviewed maps and photographs.

**Table S-3. Reviewed Historic Maps and Aerial Photographs of the Analysis Area**

Description	Year
<b>GLO Plats</b>	
Township 4 North/Range 29 East	1861
<b>U.S. Geological Survey Quadrangles</b>	
Umatilla 1:125,000	1908
Pendleton 1:250,000	1953
Stanfield 1:24,000	1962
Hermiston 1:100,000	1984
Stanfield 1:24,000	1993
<b>Metsker Maps</b>	
Umatilla County 1:62,500	1932 and 1934
<b>Geo. A. Ogle &amp; Company</b>	
Umatilla County 1:125,000	1914
<b>Aerial Photographs (U.S. Geological Survey Earth Explorer)</b>	
<ul style="list-style-type: none"> <li>• 1952</li> <li>• 1958</li> <li>• 1970</li> <li>• 1977</li> </ul>	

Specific to the historic properties inventory survey, a comprehensive study of each property was completed to evaluate the significance of each building for listing on the NRHP. Archival sources such as historic maps and historic newspapers were reviewed online to develop a chain of title for the property and identify whether the properties are associated with an important individual or event in local, state, or national history. In addition, local libraries were visited. Tetra Tech also evaluated the viewshed of each property based on its distance to the project and the topography between the property and the Project. No documented properties were found to be potentially eligible for NRHP. See the attached Historic Properties Inventory Report (Attachment S-2) for a detailed evaluation of each property.

**3.2.2 Field Surveys**

As described above in Section 3.2.1, the entire Analysis Area has been surveyed for cultural resources (Figure S-1). Tetra Tech identified a total of three cultural resources within the Analysis Area: one archaeological site and two historic structures (transmission lines) (Attachment S-1). Of these resources, both historic structures have been reviewed and determined by Tetra Tech to be potentially eligible for or listed on the NRHP. However, NRHP-eligibility recommendations for these resources may be revised in response to SHPO’s comments on the draft of Attachment S-1. The

NRHP-eligibility recommendations made in Attachment S-1 are used to determine applicable EFSC siting standards and evaluate potential project impacts.

Both historic structures are transmission lines: the BPA McNary to Roundup 230-kv Transmission line and the Pendleton to Hermiston 69-kv Transmission Line. Both lines were included in the preliminary records search as a known historic utility corridors observed on historic cartographic references (see Section 3.2.1). No artifacts were observed to be associated with either transmission line corridor. The BPA McNary line was constructed in 1952 and the Pendleton line was constructed in 1941. Both lines are still operational and were recommended as eligible for listing in the NRHP under Criterion A for their significant association with early rural electrification in eastern Oregon. Neither line was recommended for listing in the NRHP under criteria B through D. See confidential Attachment S-1 for further details.

Archaeological site EWE-BB-01 consists of a historic refuse scatter including two abandoned vehicles and two artifact concentrations (see confidential Attachment S-1 for further detail). The vehicles are both early twentieth century disarticulated vehicles without diagnostic markings or tags. The two artifact concentrations are comprised nearly entirely of domestic and automotive cans. The site represents household and auto-related artifacts typical of debris scatters from regional farming communities discarded during the early to late twentieth century. The site was not recommended for listing in the NRHP under any criteria.

Subsurface probing was deemed unwarranted due to the extensive agricultural disturbance within the Analysis Area and the depositional environment of the soils present (see confidential Attachment S-1), and the potential for subsurface resources within the Analysis Area is considered low. Further, good ground visibility was experienced during the survey. Results of prior surveys in the Study Area and the very low density of previously recorded archaeological resources in the Study Area also support this (see Section 3.2.1).

Specific to the historic properties inventory survey, a total of eight tax parcels containing historic buildings were investigated in the field and resources were photographed and recorded on photograph logs. Each of the properties and the buildings that were visible from the public right-of-way are described in the attached Historic Properties Inventory Report (Attachment S-2).

### **3.3 Cultural Resources Subject to EFSC Standards**

The following sections discuss those resources that are subject to the siting standards outlined at the beginning of this section: historic properties, archaeological sites on private or state lands, and archaeological objects (i.e., isolated finds) on private lands. (The entirety of the Analysis Area is on private lands; therefore, Standard C regarding public lands is not applicable.) Table S-4 lists the cultural resources identified by the field surveys as occurring within the Analysis Area. The table also demonstrates the extent of direct avoidance of identified resources by the Project.

Table S-4. Cultural Resources Identified in the Analysis Area

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	Project Effect	Applicable EFSC Siting Standard
<b>Archaeological Sites</b>						
TBD	EWE-BB-01	Historic	Historic Refuse Scatter	Not Eligible	Solar arrays will be placed in the site area. No significant impacts anticipated due to the NRHP ineligibility status.	b) Archaeological site on private land.
<b>Historic Sites/Historic Built Environment</b>						
BPA McNary to Roundup 230-kV Transmission Line	N/A	Historic	Historic Utility Line	Eligible	Direct impacts avoided if line is not selected for interconnection. If selected for interconnection, the effect is not expected to be significant as it will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. Note that development of the Project beneath the lines and around the structures would not be considered a significant impact.	a) Potential Historic Property; property likely to be listed on NRHP
Pendleton to Hermiston 69-kV Transmission Line	N/A	Historic	Historic Utility Line	Eligible	Direct impacts avoided if line is not selected for interconnection. If selected for interconnection, the effect is not expected to be significant as it will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. Note that development of the Project beneath the lines and around the structures would not be considered a significant impact.	a) Potential Historic Property; property likely to be listed on NRHP

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**3.3.1 Historic and Cultural Resources Listed, or Likely Eligible for Listing, on the National Register of Historic Places (OAR 345-021-0010(1)(s)(A))**

The identification efforts described above have identified two historic sites that are recommended to be NRHP-eligible or listed. Table S-5 lists the known historic and cultural resources listed that are likely eligible for listing or listed on the NRHP within the Analysis Area (see also Table S-4 and Attachment S-1). Locations of these resources are illustrated in confidential Figure S-2 and confidential Attachment S-1. Additional historic properties or potential historic properties are not likely to occur in the Analysis Area due to the low resource density and expansive survey coverage in the records search Study Area, the extensive agricultural disturbance of the Analysis Area since at least 1952, and the soils profiles documented as within the Analysis Area. The historic properties inventory survey (see Attachment S-2) found that none of the documented historic buildings within the Analysis Area were found to be potentially eligible for NRHP. Therefore, there will be no direct or indirect impacts to historic built environment resources potentially eligible for NRHP as a result of Project construction, operation, or maintenance.

**Table S-5. Historic and Cultural Resources Likely Eligible or Listed on the NRHP within the Analysis Area**

Resource	Resource Type
BPA McNary to Roundup 230-kV Transmission Line	Historic Site
Pendleton to Hermiston 69-kV Transmission Line	Historic Site

**3.3.2 Archaeological Objects and Sites on Private Lands within the Analysis Area (OAR 345-021-0010(1)(s)(B))**

The efforts described above have identified one archaeological site on private land. Table S-6 lists the known archaeological site on private lands within the Analysis Area. (Additional details of this resource can be obtained in Table S-4 above or in confidential Attachment S-1.) The location of this resource is illustrated in confidential Figure S-2 and confidential Attachment S-1. Additional archaeological objects or sites are not likely to occur in the Analysis Area due to the low resource density and expansive survey coverage in the records search Study Area, the extensive agricultural disturbance of the Analysis Area since at least 1952, and the soils profiles documented as within the Analysis Area.

**Table S-6. Archaeological Sites on Private Land within the Analysis Area**

Resource	NRHP Recommendation
EWE-BB-01	Not Eligible

### **3.3.3 Archaeological Sites on Public Lands within the Analysis Area (OAR 345-021-0010(1)(s)(C))**

There are no public lands within the Analysis Area.

## **4.0 Significant Potential Impacts of Construction and Operation, and Retirement of the Facility on Historic, Cultural, and Archaeological Resources – OAR 345-021-0010(1)(s)(D)**

### **4.1 Avoidance and Mitigation of Potential Impacts**

*ORS 345-021-0010(1)(s)(D) The significant potential impacts, if any, of the construction, operation and retirement of the proposed facility on the resources described in paragraphs (A), (B) and (C) and a plan for protection of those resources that includes at least the following:*

*(i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the SHPO or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying and assessing the significance of resources listed in paragraphs (A), (B) and (C);*

*(ii) The results of the discovery measures described in subparagraph (i), together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended;*

*(iii) A list of measures to prevent destruction of the resources identified during surveys, inventories and subsurface testing referred to in subparagraph (i) or discovered during construction;*

The Project, taking into account mitigation, has been designed to avoid significant impacts on historic, cultural, and archaeological resources identified within the Analysis Area. The transmission line historic sites in the Analysis Area have been avoided through Project design, wherein the associated structures of the lines have been avoided (see Tables S-4 and S-7). The one identified archaeological resource (EWE-BB-01) will not be avoided, however this impact is not considered a significant impact given the site's NRHP-ineligibility. Implementation of the Inadvertent Discovery Plan (Attachment S-3) will prevent significant impacts from occurring in the event of an unanticipated discovery of additional cultural resources during construction.

**Table S-7. Cultural Resources Management Recommendations**

Recommendation	Description
Avoidance of Significant and Potentially Significant Resources in Final Design	Disturbance areas in the final design will avoid resources that have been recommended as NRHP-eligible, assuming the resources are not selected for interconnection purposes (BPA McNary to Roundup 230-kv Transmission Line and the Pendleton to Hermiston 69-kv Transmission Line). Avoidance includes developing outside of the right-of-way, with the exception of access roads. If avoidance is infeasible, the Applicant will enter consultations with SHPO and the owning company (BPA and/or PacifiCorp) to determine appropriate mitigation for significant impacts.
Implement Inadvertent Discovery Plan	A plan outlining the procedures for inadvertent discoveries during construction has been drafted and is being reviewed by CTUIR as part of their review of Attachment S-1. It is included in confidential Attachment S-1 as Appendix B as well as in Attachment S-3. The plan includes minimum avoidance buffers/markers around cultural resources, construction monitoring requirements, and procedures to follow in the unlikely event of a discovery of an archaeological resource during construction. It will be updated as necessary following by CTUIR.
Continued Coordination with Native Americans	The Applicant will continue their coordination and open communications with the CTUIR and other interested tribes throughout the Project to avoid impacting cultural resources. Tribal coordination will occur outside of the EFSC process.

Based on the current Project design, the Project may interconnect to one of the two NRHP-eligible transmission line resources. Right-of-way corridor avoidance (except for access roads) is recommended if the transmission lines are not selected for interconnection. If either of the lines are selected for interconnection, the impact of the interconnection would be assessed separately and in consultation with the owning company (BPA or PacifiCorp). However, for both lines, an interconnect is not expected to result in a significant impact. An interconnection will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. This use is expressly allowed for in BPA’s Pacific Northwest Transmission System multiple property resource (Kramer 2012). Note that development under the lines and around their associated utility pole structures will not cause significant impacts to the resources. The sites will be flagged for avoidance during construction to ensure significant impacts are avoided. These actions along with the measures listed in Table S-7 will prevent significant impacts to this resource.

The single identified resource meeting siting standard B (archaeological site on private land will not be avoided (see Table S-4). Based on the current Project design, solar arrays are planned for the area of the EWE-BB-01 resource. The resource has been recommended as not eligible for listing on the NRHP. Any impacts to the site are considered not significant given its NRHP-ineligibility recommendation. The recording and research of this resource, as documented in confidential Attachment S-1, have mitigated any potential significant impact that would occur.

## 4.2 Measures Designed to Prevent the Destruction of Historic, Cultural, and Archaeological Resources

As noted above, the Project has been designed to avoid significant impacts to cultural resources where feasible. Several measures to prevent the destruction of historic, cultural, and archaeological resources have been identified by the Applicant. These are outlined in Table S-7 and are described in confidential Attachment S-1.

## 5.0 Proposed Monitoring Plan – OAR 345-021-0010(1)(s)(E)

*OAR 345-021-0010(1)(s)(E) The applicant's proposed monitoring program, if any, for impacts to historic, cultural and archaeological resources during construction and operation of the proposed facility.*

Construction monitoring is not recommended for the proposed Project, due to the generally low potential for unidentified cultural resources in the Analysis Area. As stated above, an Inadvertent Discovery Plan for the Project is being drafted in coordination with the CTUIR (draft included in Appendix B of confidential Attachment S-1 and in Attachment S-3). Avoidance measures in combination with the Inadvertent Discovery Plan will be implemented to ensure that the potential for significant impacts on cultural resources is minimized.

## 6.0 Conclusion

Based on the evidence presented in this exhibit, in accordance with OAR 345-022-0090, EFSC may find that the construction, operation, and retirement of the Project, taking into account mitigation, are not likely to result in significant adverse impacts to historic, cultural, or archaeological resources that are eligible or potentially eligible for listing on the NRHP.

## 7.0 References

- Kramer, George. 2012. Bonneville Power Administration [BPA] Pacific Northwest Transmission System. U.S. Department of the Interior. National Parks Service. National Register of Historic Places Multiple Property Documentation Form.
- SHPO (Oregon State Historic Preservation Office). 2016. *Guidelines for Conducting Field Archaeology in Oregon*. November 2013, Minor Revision January 2016. Oregon State Historic Preservation Office, Salem, Oregon.

## Figures




**(Note that Figure S-2 is confidential and provided under separate cover.)**

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# West End Solar Project

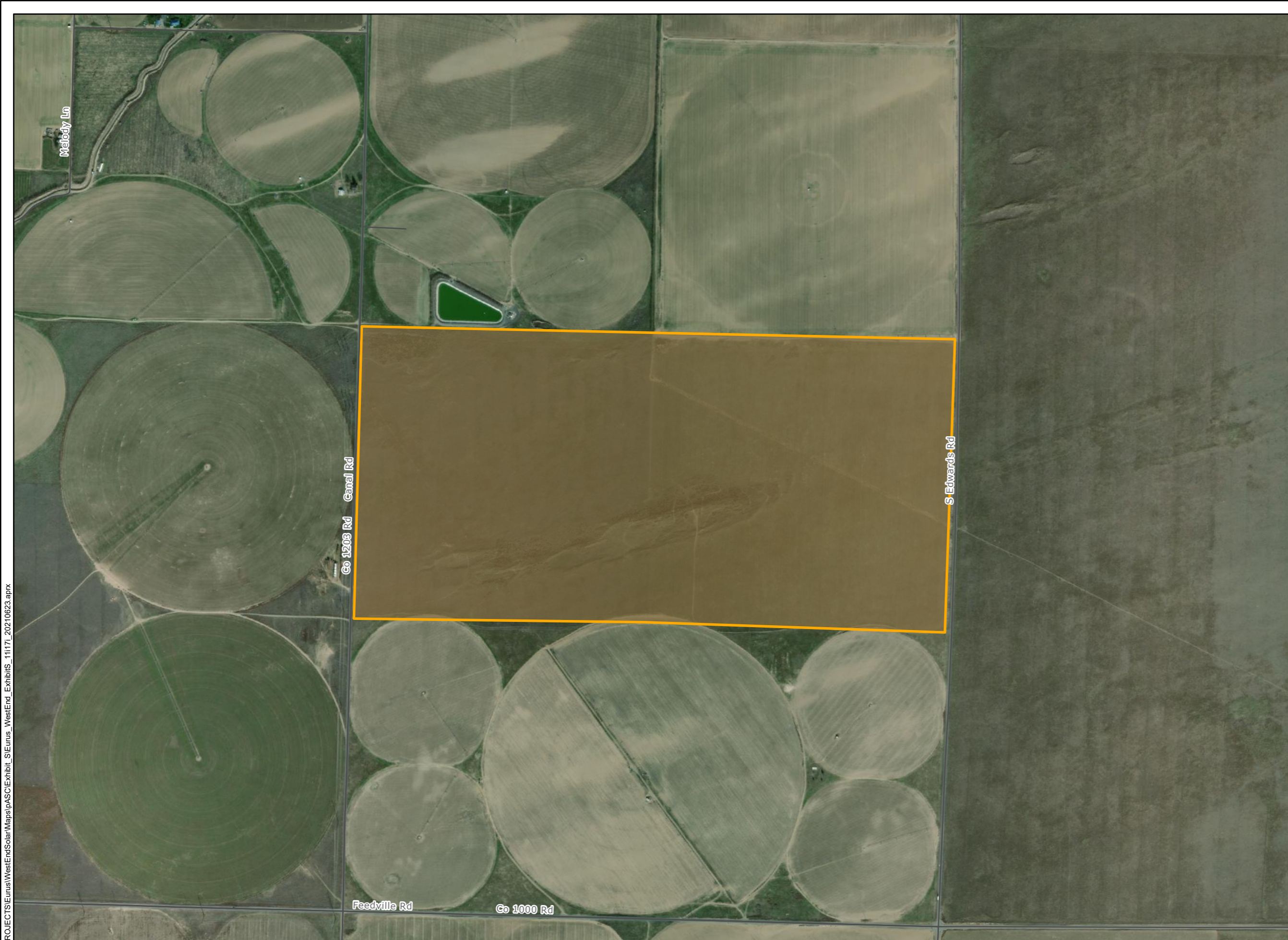
## Figure S-1 Cultural Resource Survey Area

UMATILLA COUNTY, OR

-  Proposed Site Boundary
-  Survey Area
-  Local Roads



Reference Map

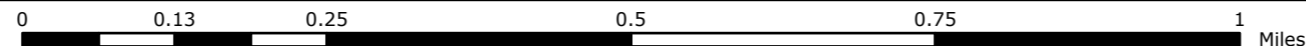


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WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

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**Attachment S-1. Cultural Resources  
Inventory and Evaluation Report**  
**(Confidential, provided under separate cover.)**

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# **Attachment S-2. Historic Properties Inventory Report**

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# **Historic Properties Inventory Report for the West End Solar Project**

**Umatilla County, Oregon**

**Prepared for:**

**EE West End Solar LLC  
9255 Towne Centre Drive, Suite 840  
San Diego, CA 92121**

**Prepared by:**



Bothell, Washington  
Project #194-6606  
SHPO Case No: 21-1537

**Author:**

**Lara Rooke, MA, RPA and Kaley Brown, MA.**

**April 2022**

## **Abstract**

Tetra Tech, Inc., completed an historic properties inventory for the West End Solar Facility (Facility) in Umatilla County, Oregon. Eight tax parcels were identified that contained historic buildings. Each of these parcels was surveyed from the public right of way to document the buildings and evaluate their significance and eligibility for listing on the National Register of Historic Places (NRHP). None of the buildings that were documented were found to be individually eligible for NRHP listing. No further work is recommended.

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## Acronyms and Abbreviations

BLM	Bureau of Land Management
CFR	Code of Federal Regulations
EFSC	Oregon Energy Facility Siting Council
Facility	West End Solar Project
MW	megawatt
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
RFA	Request for Amendment
SHPO	State Historic Preservation Office
Tetra Tech	Tetra Tech, Inc.

## 1.0 Introduction

This summary report presents the methods and results for the 2022 historic property inventory conducted by Tetra Tech, Inc. (Tetra Tech) for the West End Solar Project (Project) (Figure 1). The Project is located near Hermiston in Umatilla County, Oregon (Figure 1 and 2). The Project will be sited within the approximately 324-acre Site Boundary which is also the Analysis Area for Exhibit S of the Application for Site Certificate (Figure 2).

The purpose of the historic property inventory, conducted in April 2022, was two-fold. First to document the presence of historic properties<sup>1</sup> within the Analysis Area and within the viewshed that was designated by the State Historic Preservation Office (SHPO) as a one-mile buffer surrounding the Analysis Area. Second, to identify any significant potential impacts to such resources that would result from the construction, operation, and retirement of the proposed Facility.

### 1.1 Project Description

EE West End Solar LLC, a subsidiary of Eurus Energy America Corporation, proposes to develop the solar Project on 324 acres (Site Boundary) covering Tax Lots 4N29C00000500 and 4N29C00000200. The Project will be a photovoltaic solar energy facility with an estimated nominal and average generating capacity<sup>2</sup> of 50 megawatts (MW) of alternating current (AC). The Project may include an energy storage system with a capacity of up to 70 MW.

The solar array will be up to 16 feet tall (at full tilt) and will include up to approximately 180,000 solar modules, depending on the final technology and layout selected. Strings of solar modules will be supported by tracker systems that in turn will be supported by steel posts, typically installed 4 to 8 feet into the ground. The Project will interconnect to the regional grid via either the existing Bonneville Power Administration's (BPA) McNary to Roundup 230-kilovolt (kV) line or the PacifiCorp's Pendleton to Hermiston 69-kv line (both run southeast to northwest through the Site Boundary) or the Umatilla Electric Cooperative 115-kv line that parallels the eastern edge of the Site Boundary. Other Project components include electrical collection lines, an energy storage system, site access roads, one collection substation (with structures up to 30 feet tall), one switchyard substation, one operations and maintenance enclosure (up to 20 feet tall), temporary staging areas, and an 10-foot perimeter fence.

The Site Boundary/Analysis Area is located on fallow agricultural land zoned as Exclusive Farm Use (EFU) by Umatilla County (Figure 2). The surrounding land uses include active, irrigated agriculture to the north, west, and south, and a fallow agricultural field to the east. The area is relatively flat,

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<sup>1</sup> Historic Properties are defined by the NHPA as any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register of Historic Places

<sup>2</sup> Based on Oregon Revised Statutes (ORS) 469.300(4) definition of average generating capacity for all energy facilities besides wind and geothermal.

with a gentle slope extending from approximately 650 feet above mean sea level in the southwest to approximately 700 feet above mean sea level in the northeast.

## 1.2 Survey Area

The Analysis Area for the Project includes the area that could be disturbed during construction, operation and maintenance of the Facility within the Site Boundary. It occupies portions of Township 4N/Range 29W, Section 20. The historic property inventory survey area includes the Analysis Area and a one-mile buffer surrounding that area (Figure 2). The survey was conducted from public rights-of-way.

## 2.0 Regulatory Context

EE West End Solar LLC (Applicant), is a private renewable energy developer proposing this Facility, and permitting agencies are limited to Oregon state. Development of the Facility site must comply with the Oregon Energy Facility Siting Council (EFSC) siting standards under Oregon Administrative Rule (OAR) Chapter 345, Division 22.

### 2.1 EFSC General Standards for Siting Facilities

Subsection (1) of the Historic, Cultural, and Archaeological Resources Standard at OAR 345-022-0090(1) stipulates that EFSC must find that the construction and operation of the Project, taking into account mitigation, are not likely to result in significant adverse impacts to the following:

- OAR 345-022-0090(1)(a): Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places (NRHP);
- OAR 345-022-0090(1)(b): For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and
- OAR 345-022-0090(1)(c): For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c). (*Note, the Project does not involve public lands.*)

### 2.2 EFSC Site Certificate Application Requirements

OAR 345-021-0010(1)(s) stipulates that the Applicant must include information in Exhibit S of the Application for Site Certificate or in confidential submissions evidence to support a finding by the Council as required by OAR 345-022-0090, including:

- OAR 345-021-0010(1)(s)(A) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the NRHP (see below).
- OAR 345-021-0010(1)(s)(B) For private lands, archaeological objects, as defined in Oregon Revised Statutes (ORS) 358.905(1)(a), and archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area.

- OAR 345-021-0010(1)(s)(C) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area. (*Note, the Project does not involve public lands.*)
- OAR 345-021-0010(1)(s)(D) The significant potential impacts, if any, of the construction, operation, and retirement of the proposed Facility on the resources described above and a plan for protection of those resources that includes at least the following:
  - a. A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the SHPO or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying, and assessing the significance of resources listed above.
  - b. The results of the above discovery measures, together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended.
  - c. A list of measures to prevent destruction of the resources identified during surveys, inventories, and subsurface testing or discovered during construction.
- OAR 345-021-0010(1)(s)(E) The applicant's proposed monitoring program, if any, for impacts to historic, cultural, and archaeological resources during construction and operation of the proposed facility.

### **2.3 NRHP Eligibility Criteria**

Since the Project is subject to EFSC regulatory review, it is necessary to evaluate identified resources for eligibility to be listed on a local, state, or federal historic register in order to comply with OAR 345-022-0090(1)(a) and OAR 345-021-0010(1)(s)(A).

Preliminary recommendations for eligibility are based on the following criteria codified in Title 36 Code of Federal Regulations (CFR) Part 60.4 and specified below.

*The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:*

- A. that are associated with events that have made a significant contribution to the broad patterns of our history; or*
- B. that are associated with the lives of persons significant in the past; or*
- C. that embody the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possess high artistic value, or that represent a significant or distinguishable entity whose components may lack individual distinction; or*
- D. that have yielded, or are likely to yield, information important in prehistory or history....*

*Ordinarily, cemeteries, birthplaces, or graves of historical figures; property owned by religious institutions or used for religious purposes; structures that have been removed from their original location; reconstructed historic buildings; properties that are primarily commemorative in nature; and properties that have achieved significance within the last 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria, or if they fall within the following categories:*

- *a religious property deriving primary significance from architectural or artistic distinction or historical importance; or*
- *a building or structure removed from its original location but which is significant primarily for its architecture, or which is the surviving structure most importantly associated with an historic person or event; or*
- *a birthplace or grave of an historical figure of outstanding importance if there is no other appropriate site or building directly associated with his or her productive life; or*
- *a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or*
- *a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan and when no building or structure with the same association has survived; or*
- *a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own historical significance; or*
- *a property achieving significance within the past 50 years if it is of exceptional importance.*

In addition to the four criteria of eligibility under CFR Part 60.4, architectural resources must meet some, if not all, of the following seven aspects of integrity as defined by the National Park Service (NPS 1997):

- **Location:** Location is the place where the historic property was constructed or the place where the historic event took place.
- **Design:** Design is the composition of elements that constitute the form, plan, space, structure, and style of a property.
- **Setting:** Setting is the physical environment of a historic property that illustrates the character of the place. Integrity of setting remains when the surroundings have not been subjected to radical change.
- **Materials:** Materials are the physical elements combined in a particular pattern or configuration to form the features during a period in the past. Integrity of materials determines whether or not an authentic historic resource still exists.

- **Workmanship:** Workmanship is the physical evidence of the craft of a particular culture or people during any given period of history. Workmanship is important because it can furnish evidence of the technology of the craft, illustrate the aesthetic principals of a historic period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principals.
- **Feeling:** Feeling is the quality that a historic property has in evoking the aesthetic or historic sense of a past period of time.
- **Association:** Association is the direct link between a property and the event or person for which the property is significant.

The retention of the aspects of setting, location, design, workmanship, materials, and feeling combine to convey the integrity of association.

In its January 21, 2022 letter to Ms. Kellen Tardaewether of Oregon Department of Energy, SHPO requested that the Applicant determine if there are any historic properties within 1-mile of the site boundary to adequately evaluate potential indirect impacts to the setting (e.g. visual/audial) of historic built environment resources from the proposed facility. SHPO indicated that if historic built environment resources could be impacted by the facility, field work may be needed to evaluate the likelihood of NRHP eligibility and potential impacts.

### **3.0 Historic Context**

This section provides a summary of the cultural and historic contexts of the region wherein the Project is proposed. It provides an overview of the settlement and economies of Umatilla County so that the historic buildings can be placed into the appropriate context for evaluation

#### **3.1 Emigration and settlement**

Although horses and trade goods preceded the arrival of Euro-Americans in the inland Northwest by decades via upriver trade, members of the Corps of Discovery (1805–1806) were the first Caucasians to navigate the Columbia River (Walker and Sprague 1998:141). Lewis and Clark recorded 174 Sahaptin lodges along the Columbia River as they passed downstream in October 1805 (Hunn and French 1998:391). Journals recount camping near village sites and trading for dogs, wood, and a bread made from *Lomatium* (Moulton 1983:317). When word of the resources found by Lewis and Clark spread, trappers and traders quickly organized to exploit them.

The fur trade followed closely on the heels of the early explorers, with the Hudson's Bay Company and Northwest Fur Companies vying for territory and the pelts of otter and beaver (Walker and Sprague 1998:142). Native people were drawn into the fur craze, trading beaver pelts for domestic goods, weapons, and ammunition (Stern 1998:412). Competition between Britain and America was intense: the Hudson's Bay Company's tactic to counter American competition in the Snake River country was to trap-out entire drainages, creating a "fur desert" (Wishart 1979). By the mid-1840s, the beaver had been extirpated from much of its range in the Plateau, Snake River Plain, and Great Basin.

The first Euro-Americans known to have traveled overland near the survey area were members of the Pacific Fur Company, led by W.P. Hunt, newly appointed agent of Astoria, in 1812 (Evans 1991:17). Hunt's route to Astoria followed the Snake River and then traversed the Blue Mountains and the Umatilla River to reach the Columbia River. Members of the Astoria party under Robert Stuart retraced the route in 1812 on a return trip to St. Louis. Stuart was one of the first Euro-Americans to record detailed accounts of the landscapes of eastern Oregon and western Idaho. The route traveled by the "Astorians" was soon followed by other expeditions, including trapping brigades led by Alexander Mackenzie, Peter Skene Ogden, and Nathaniel Wyeth. Wyeth would ultimately return to southeastern Idaho to establish a trading post at present-day Fort Hall, a strategic stop on the Oregon Trail, near present-day Pocatello. In 1821, the Pacific Fur Company was bought out by the Hudson's Bay Company, whose monopoly on the interior fur trade would last for another 15 years.

In 1811, the Hudson's Bay Company took over Fort Nez Perce and changed its name to Fort Walla Walla in 1821. Native Americans would bring in furs from the interior to trade for European-made goods. These furs would be shipped down the Columbia to Fort Vancouver. Fort Walla Walla was closed in 1855 due to conflicts between settlers and Native Americans (History Link 2014). This was toward the end of the intense fur trade in the Pacific Northwest. The number of fur-bearing animals was in steep decline, and a change in fashion made the pelts less profitable (Northwest Power and Conservation Council 2020).

The influx of Euro-American settlers, combined with the arrival of the horse and firearms, led to widespread conflicts as traditional Native American cultural lands and hunting territories were encroached upon by mobile aboriginals and newly introduced trappers and traders (Murphy and Murphy 1986:302).

The first wave of migration to Oregon came during the 1830s as Protestant missionaries moved west to convert native populations (Hutchison and Jones 1993). Other explorers established other routes that were eventually incorporated into the well-known Oregon Trail. The first true emigrant wagon train, the Bidwell-Bartleson party, arrived at Soda Springs in southeastern Idaho in 1841. The party split there, one group turning south down the Bear River toward California, and the remaining 34 emigrants continuing west to the Columbia River and western Oregon. The Oregon group was guided by James Sinclair of the Hudson's Bay Company (Bagley 2010; Hill 1986:10–11). The following years saw increased emigration and numerous emigrant routes cross Oregon in all directions.

The Project is about 40 miles east of the confluence of the Columbia and Snake rivers. While early emigrant trails followed these two rivers, no primary emigration route passed through the Analysis Area and one-mile buffer survey area. The early emigration trail system did bring the first European settlers to the larger region.

### **3.2 Homesteading**

The Preemption Act of 1841, the Homestead Act of 1862, Desert Land Act of 1877, and the Stock Raising Homestead Act of 1916 encouraged Euro-American settlers to settle in what later became



Umatilla County. Many of the early settlers were ranchers as much of the land at the time was unsuitable for agriculture. The Preemption Act to allow squatters to preemptively stake claims for up to 160 acres of land. The land could be purchased from the government for as little as \$1.25 an acre before it was offered up for public sale provided the claimant resided on the land for 14 months.

The Homestead Act provided a 160-acre tract of land for \$1.25 an acre to any U.S. citizen, or intended citizen, who had never borne arms against the U.S. government. Before the land could be claimed, the claimant was required to have lived on the land for 5 years, improved the land by building a dwelling at least 12 feet by 14 feet in size, and began cultivating crops. After the 5-year period, the homesteader could file for a deed of title by submitting proof of residency and completion of the required improvements to a local land office.

The Desert Land Act was signed into legislation to encourage and promote the economic development of the arid and semi-arid public lands of the western states (BLM 2009). It offered 640-acre tracts of land to a married couple who would pay \$1.25 an acre and promise to develop and irrigate the land within 3 years. A single man would receive 320 acres for the same price. The conditions required that the applicant be a naturalized citizen, head of household, or male over the age of 21 who had never been an enemy or aided an enemy of the U.S. At the time the claim was placed, the claimant was required to pay 25 cents per acre, with the remaining balance due within two years. Unlike the Homestead Act, the Desert Land Act did not include a requirement to construct a residence, but it did stipulate that title could only be transferred after 3 years if irrigation development was completed within that time.

The Stock Raising Homestead Act provided settlers with 640 acres of public land for ranching purposes. Unlike the Homestead Act of 1862 or the Enlarged Homestead Act of 1909, these parcels of land were divided into surface and subsurface land rights, resulting in what later became known as split estates. This act allowed applicants ownership of surface resources for ranching and homesteading, but also allowed the federal government to retain the right to extract subsurface resources for the good of the country. The subsurface rights, also known as mineral rights, became the foundation of future oil and gas law in the U.S. (BLM 2006).

### **3.3 Agriculture**

The introduction of irrigation canals and dam construction in the early 1900s precipitated further economic development and settlement. Soon after, native vegetation began being replaced by irrigated croplands of grains, sugar beets, potatoes, and alfalfa, which resulted in a disruption of the natural hydrologic system (Franzen 1981:228). Federal construction, canal, and dam projects through the Civilian Conservation Corps and Work Projects Administration during the Great Depression of the 1930s enabled the unemployed to find work and helped establish larger-scale irrigation in the agricultural regions of Idaho and Oregon. Many of the currently in-use canal headgates were constructed during this time.

Based partly on the mass development of agricultural lands during the early twentieth century and as a response to the environmental disturbances caused by overgrazing and deforestation, public

lands in western Idaho and eastern Oregon were set aside. This resulted in land management by federal agencies such as the Bureau of Land Management (BLM) and U.S. Forest Service (Franzen 1981:229). Though the economy has been affected by periodic droughts and depressions throughout the twentieth century, to date, western Idaho and eastern Oregon retain their agricultural economy; wheat fields, sugar beet plants, potato processing plants, dairy farms, wood product processing plants, and feedlots continue to contribute to regional development.

### **3.4 Ranching**

The ranching industry provided several basic staples for historic European populations: beef, milk, fat, and cheese. Cattle and horses also provided the necessary power for plowing agricultural fields, pulling wagons and other machinery, and leather for clothing and other purposes. The numerous watercourses and prominent grasslands of eastern Oregon, in particular bluebunch wheatgrass (*Pseudoroegneria spicata*), Idaho fescue (*Festuca idahoensis*), and Sandberg bluegrass (*Poa secunda*), provided the necessary feed and water for the cattle, sheep, and horses. Horses were initially brought to the region from the Southwest by Native Americans in the late seventeenth/early eighteenth centuries and continued to freely range throughout the region for many years. Ranchers and farmers also found domesticated horses necessary for conducting daily activities. Cattle were introduced to the region by Spaniards who brought a few head from the Hawaiian Islands in the late eighteenth century (Galbraith and Anderson 1971:7). Later, numerous herds of cattle and sheep were driven north from California and west from the Great Plains into the Willamette Valley and east of the Cascades. By 1825, cattle had begun to play a role of increased importance in the early economy of the Pacific Northwest. By the mid-nineteenth century, the Cattle Baron had arrived in the Northwest. The practice of long distance cattle drives ended in the 1880s with the creation of the Northern Pacific Railroad, the Utah and Northern Railroad, and the Oregon Short Line, which allowed for shipping cattle by rail (Galbraith and Anderson 1971:7-9; Tucker 1940:57-58).

Cattle and sheep ranching expanded into and developed more fully in eastern Oregon during the 1850s and 1860s when miners began to move into the Columbia Basin. The horses necessary to conduct ranching activities of course followed. For the most part, ranchers sold their meat and milk locally. However, this changed in the 1870s when they were forced to look beyond the Pacific Northwest to compensate for the overpopulated industry in the region. In addition to supplying areas to the east with basic goods, the cattle were also used to create base herds in the Rocky Mountains (Galbraith and Anderson 1971:8-9).

Open range ranching with an established headquarters was the accepted practice until the 1890s, when ranchers, after a series of severe winters, finally accepted that shelter and feed during the winter were necessary for a successful operation. Deteriorating range conditions as a result of overgrazing and increased interest in private landownership by homesteaders put an end to the practice of open range once and for all. Following enactment of the Homestead Act, land began to be fenced off and property lines delineated, preventing free movement of herds and established sheep and cattle drive routes. More importantly, the grasslands were turned into agricultural fields or taken over by invasive species or insect plagues. Railroads too took over their own share of land. All

of this reduced the available rangeland and cattlemen began to fight each other for land. In particular, cattle ranchers versus sheep herders led to the range wars of the 1900s, which were mostly contained to south-central Oregon (Galbraith and Anderson 1971:10–11; Tucker 1940:58).

Laws and regulations regarding ranching were enacted to quell the pervasive and complex disagreements between cattlemen and sheepherders, as well as to begin rehabilitation and conservation of rangelands. Following the Stock Raising Homestead Act, the Taylor Grazing Act was passed in 1934 as an additional effort to rehabilitate and develop rangelands. Administered by what is now the BLM, the Taylor Grazing Act regulated occupancy and use of grazing lands by preserving the land and its resources from destruction, providing orderly use of the lands, and authorizing environmental studies to better understand the necessities of rehabilitation (Galbraith and Anderson 1971:12).

### **3.5 Umatilla County**

Umatilla County is situated in the northeastern portion of Oregon state. It is bound by the Columbia River in the north which allows for irrigation and productive agricultural communities. Stock raising, wool production, and farming are the leading industries of the county (Genealogy Trails 2022). The Site Boundary is located near the town of Stanfield and the city of Hermiston.

Stanfield was once referred to as the community of Foster, named after the businessman with corporate farm holdings northeast of Echo John R. Foster. The town was renamed Stanfield in 1907 after State Representative and U.S. Senator Robert N. Stanfield, who was a prominent sheep rancher and landowner near the community (Banks 1980; McArthur 1974). Hermiston was named by a pioneer settler in the community, Colonel J. F. McNaught. McNaught chose the name Hermiston from the novel *Weir of Hermiston*, written by Robert Louis Stevenson, because it didn't duplicate any other post office listed in the U.S. at the time (McArthur 1974). The combination of the Union Pacific Railroad (UPRR) in 1869 and the Umatilla Irrigation Project in 1908 brought Hermiston and surrounding areas economic growth through production and exportation in the ranching and farming sector. Later in 1941, the Army acquired nearly 100,000 acres of land near Hermiston, which would become the Umatilla Ordnance Depot, resulting in nearly 7,000 workers moving to the area to construct the depot.

## **4.0 Methods**

EFSC must find that the construction and operation of the Project, taking into account mitigation, are not likely to result in significant adverse impacts to historic, cultural or archaeological resources that have been listed on, or would likely be listed on the NRHP. This report describes and evaluates the historic sites located within 1-mile of the Analysis Area. Historic sites are defined by the NHPA as resources consisting of standing structures 50 years of age or older.

Tetra Tech conducted a desktop survey identifying buildings on aerial photographs of the historic property inventory survey area (i.e. site boundary plus 1 mile buffer area) and reviewed the SHPO Historic Sites database. Each building was reviewed using the online County Assessors site

(Umatilla County 2022) to determine the age of the buildings. As part of the desktop survey, historic maps were also reviewed to identify previous and current ownership of each parcel. These included the General Land Office cadastral maps, the 1914 Ogle map, and the 1934 Metsker map. Once the desktop review was completed, a total of eight tax parcels were identified as containing historic buildings (Table 1).

Following the desktop survey, Tetra Tech conducted a field survey of the identified tax parcels with historic buildings. All fieldwork was conducted from the public right-of-way. The resources were photographed and recorded on photograph logs. Documentation included photographic documentation of at least one elevation, a physical description, and a concise statement of significance relative to the building's eligibility for listing on the NRHP (36 CFR Part 60.4).

To evaluate the significance of each building for listing on the NRHP, a comprehensive study of each property was completed. Archival sources such as historic maps and historic newspapers were reviewed online to develop a chain of title for the property and identify whether the properties are associated with an important individual or event in local, state, or national history. In addition, local libraries were visited.

## Historic Properties Inventory Report

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**Table 1. Desktop Survey Results**

<b>GIS Point</b>	<b>Tax Id</b>	<b>Building Construction Years</b>	<b>Owner</b>	<b>Address</b>	<b>City/State</b>
<b>B-1</b>	4N29170000500	1953, 1991, 2021, 2022	Maddox, Casey John & Tomara Louise	32654 E Highland Ext.	Stanfield, OR
<b>B-2</b>	4N29180000100	1970, 1979, 1979	Dimbat, Todd M & Mary A	32548 E Highland Ext	Stanfield, OR
<b>B-3</b>	4N29180000700	1959, c. 2000	Brown, Kenneth W	79113 Melody Lane	Stanfield, OR
<b>B-4</b>	4N29180000800	1940, 2005	Wallace, David N & Neila B	79023 Melody Lane	Stanfield, OR
<b>B-5</b>	4N29180001200	1938, 1980	Stanfield Hutterian Brethren	78910 Canal Rd.	Stanfield, OR
<b>B-6</b>	4N29180001700	1948, c. 1948, 1979, 1979, c. 2015	Reise, Sharron	78926 Melody Lane	Stanfield, OR
<b>B-7</b>	4N29180001900	1950 (non-extant)	Cason, Pearl A	2505 E Airport Rd (A)	Stanfield, OR
<b>B-8</b>	4N29180002000	1950 (non-extant)	Cason, Pearl A	2505 E Airport Rd (B)	Stanfield, OR

## 5.0 Results

The desktop survey identified a total of eight tax parcels containing historic buildings in the historic property inventory survey area (i.e. the Analysis Area plus 1-mile buffer, see Figure 3). As described in Section 4.0, Tetra Tech conducted a field survey of the identified tax parcels with historic buildings. All fieldwork was conducted from the public right-of-way. The resources were photographed and recorded on photograph logs. Each of the properties and the buildings that were visible from the public right-of-way is described below. In addition to the field survey, Tetra Tech evaluated the viewshed of each property based on its distance to the Project and the topography between the property and the Project (Figure 4).

### B-1

Property B-1 is located at 32654 E Highland Ext., Stanfield, OR on tax parcel 4N29170000500. According to the county tax assessor website (Umatilla County 2022), it consists of an equipment storage garage (2022), a residence (2021) a small utility shed (1953), and a garage (1991) (Photograph 1). There was another larger building that may have been a residence or utility building that was torn down between 2018-2021 according to satellite imagery. The property is surrounded by farmland and abuts a canal that marks the southern property boundary.



**Photograph 1. 32654 E Highland Ext., Stanfield, OR. View to the Southwest.**

The utility shed is approximately 80 sq ft with a rectangular floor plan. The shed is clad in what appears to be brown vertical vinyl siding. The building has a gabled roof covered in corrugated metal. Both the north and east elevations have small, open rectangular windows that are blocked off, possibly with insulation. The shed is not easily visible from the road, making further details more difficult to obtain. The Umatilla County Tax Assessor lists two buildings built on the property in 1953, however aerial imagery and topographic maps do not show any visible buildings on the

property until after 1970, so the shed may date from a later time and construction was not reported to the county. It exhibits no characteristics that help with further chronological identification.

**Statement of Significance**

In 1914, the land was owned by “J.W. Foster” (Ogle 1914). In 1932, it was owned by “Copeland Inv. Co” (Metsker 1932). No buildings or structures remain from this early period in the property’s history. It is currently owned by Casey John and Tomara Louise Maddox (Umatilla County 2022). The only potentially historic building that remains is not directly related to any broad patterns in national or local history (Criterion A). There is also no evidence to suggest that the building is associated with any historically significant people (Criterion B). Utility sheds are buildings of common construction and typically do not embody any particular style or demonstrate notable workmanship. This example is no exception (Criterion C). Further, there is no evidence to suggest that it could yield further historical information (Criterion D). Therefore, neither the property nor the individual historical building is eligible for inclusion on the NRHP.

**B-2**

Property B-2 is located at 32548 E Highland Ext., Stanfield, OR on tax parcel 4N29180000100. According to the county tax assessor website (Umatilla County 2022), the property consists of a residence (1979), garage (1979), and a pole barn used for potato storage (1970) (Photograph 2). The residence and garage replaced an earlier residence at the site. The property is surrounded by agricultural fields and a canal marks the southeastern property boundary.



**Photograph 2. 32548 E Highland Ext., Stanfield, OR. View to the Southwest.**

The potato storage building is a pole barn that measures about 5,400 sqft (Umatilla County 2022). The building has a low-pitched gable roof and is clad completely in corrugated metal. There are two vents on the roof ridge and a garage door on the northern elevation.

**Statement of Significance**

In 1914, the land was owned by “Thomas Towers” (Ogle 1914). In 1932 it was owned by “Stanfield Irrigation Co.” (Metsker 1932). The property is currently owned by Todd and Mary Dimbat (Umatilla County 2022). The Dimbat family is related to the Amstad family, of Amsted Produce. Amstad Produce is a large local agricultural company started in Sherwood in 1959. The company sells potatoes worldwide and works with the Hermiston Agricultural Research and Extension Center to learn about and prevent disease in crops. As of 2011, the company was the largest partner of Farmers Ending Hunger, a nonprofit that supports food banks (Beck 2011). The potato storage building is clearly related to the history of potato farming in Oregon and is part of a local agricultural legacy. However, this property is one of several that are associated with the Amstad family. Therefore, there are likely better examples of buildings that are more useful for interpreting the history of potato farming in Umatilla County. Further, there are no exterior characteristics that suggest the building’s use as potato storage. Only its record in the Umatilla County Assessor’s office defines its use. Therefore, its relationship to potato farming is not clearly discernable, making it a poor example and interpretive tool (Criterion A). This property is associated with the Amstad family, a significant agricultural family in Umatilla County. However, the potato storage building does not effectively communicate that relationship (Criterion B). The potato storage building is a pole barn, one of the most common types of agricultural buildings built in the second half of the twentieth century. It exhibits no distinguishing characteristics that differentiate it from other pole barns of the same era (Criterion C). There is no evidence to suggest that the property could provide additional historical information (Criterion D). Therefore, neither the property nor the individual building is recommended eligible for listing in the NRHP.



**B-3**

Property B-3 is located at 79113 Melody Ln., Stanfield, OR on tax lot 4N29180000700. According to the county tax assessor website (Umatilla County 2022), the property consists of a residence built in 1959 and substantially modified around 2000 (Photograph 3) as well as a large pole barn used for machinery storage constructed around the same time. The property is surrounded by agricultural fields and faces transmission lines.



**Photograph 3. 79113 Melody Ln., Stanfield, OR. View to the East.**

The residence has been significantly altered since its construction in 1959, creating a modified one-story ranch style house with a basement. Based on satellite imagery, the modification occurred between 1994-2001, and resulted in additions on the north and south ends of the original square, mid-century house. A three-car attached garage was also added onto the south wing of the house. The current east façade of the building features a gable roofed, three-car attached garage, Two double-paned gridded sliding windows, a three paned, gridded sliding picture window, a raised main entrance door, and two square double-paned sliding windows. There is a false gable above the main entrance and above the north addition, which has no windows. The north addition has one, two-paned, sliding window. The south elevation of the garage has an additional entrance door and a square two-paned sliding window. The house is clad in beige vinyl siding and the roof is covered with composite shingles. The main house has a side-gabled roof while the garage has a front-gabled roof. There is one central chimney with a stone veneer. The roof also features overhanging eaves.

**Statement of Significance**

In 1914, the land was owned by Inland Irrigation Company (Ogle 1914). In 1932, it was owned by Stanfield Irrigation Company (Metsker 1932). It is currently owned by Kenneth Brown (Umatilla County 2022). The property retains no buildings or structures from its ownership by the irrigation companies. The extant buildings on the property do not appear to relate to any significant themes in national or local history (Criterion A). The property also does not relate to any historically significant individuals or groups (Criterion B). Ranch style houses are one of the most common architectural styles of the second half of the twentieth century. Although this example is clearly recognizable as a ranch house, it has undergone significant alterations that completely obscure the original residence design. Therefore, it does not retain integrity of design, materials, or workmanship (Criterion C). There is no evidence to suggest that the property could provide additional historical information in the future (Criterion D). Therefore, neither the property nor the individual building is recommended eligible for listing in the NRHP.

**B-4**

Property B-4 is located at 79023 Melody Ln., Stanfield, OR on tax lot 4N29180000800. According to the county tax assessor website (Umatilla County 2022), the property consists of a residence (1940, remodeled 2005) (Photographs 4 and 5) and a machinery storage shed (2005 with a 2015 addition). It is surrounded by agricultural fields and a canal runs through the middle of the parcel.



**Photograph 4. 79023 Melody Ln., Stanfield, OR. View to the Northeast.**



**Photograph 5. 79023 Melody Ln., Stanfield, OR. View to the North.**

The residence was likely built in 1940 but was significantly altered in 2005 (Umatilla County 2022). The residence may have originally been recorded as a shed by the assessor and there are two sheds listed, but neither or them are visible from the road or from satellite and aerial imagery. Very little of the exterior of the original mid-century house remains; the only physical evidence it was not completely razed and replaced is a small amount of concrete block foundation visible near the main entrance. The rest of the house has a poured concrete foundation. In addition, part of the hipped roof has a ridge line that is slightly offset. The residence is clad in horizontal vinyl siding and has a blue, metal roof. The façade of the main structure features three gridded, double-sliding windows with a small double 1/1 sliding window near the main entrance. The side elevations of the residence have single-paned, double sliding windows. A similar window style also sits in the gable of the attached one car garage. The garage has a gable roof that intersects with the hipped roof of the main structure. It has a covered side entrance on its west elevation as well as a vent and skylight installed in the roof. The main entrance of the house is offset to the east and is contained within a gable roofed covered porch. Several window wells are visible along the foundation of the building, indicating the existence of a basement level.

### **Statement of Significance**

In 1914, the land was recorded as owned by a “Franson (?)” (Ogle 1914). In 1932, it was owned by “JNO. Dallman” (Metsker 1932). The property is currently owned by David and Neila Wallace who purchased the home in 2004 (Umatilla County 2022). A J. Dallman was recorded as living in Stanfield in 1958 and is likely the person who built the original house (Pendleton, Oregon City Directory 1958). The residence itself does not suggest its significance to any broad patterns of national or local history (Criterion A). There also is very little information on the Dallman family in

Stanfield, suggesting that the family was also not locally significant (Criterion B). The original residence was significantly altered in 2005, obscuring almost all of its exterior features. The building no longer maintains integrity of design, workmanship, or materials (Criterion C). There is no evidence to suggest that the property could provide additional historical (Criterion D). Therefore, neither the property nor the individual building is recommended eligible for listing in the NRHP.

**B-5**

Property B-5 is located at 78910 Canal Rd., Stanfield, OR on tax lot 4N29180001200. According to the county tax assessor website (Umatilla County 2022), the property consists of a residence (1938) and a detached two car garage (1980) (Photograph 6). A hay cover (1970) built at the west end of the property was demolished in 2021. The residence sits on the east border of the agricultural property. A canal cuts diagonally through the northwest corner of the property.



**Photograph 6. 78910 Canal Rd., Stanfield, OR. View to the Northwest.**

The residence is a one-story, vernacular minimal traditional, gable roofed house. It prominently features a ground-level concrete covered porch that wraps around the east and south elevations of the building. The southeast corner of the porch roof is curved, and the porch is supported by simple square wooden posts. The east façade contains an elevated main entrance with concrete steps, a three-paned, sliding picture window and a smaller square, two-paned sliding window. The south elevation features a raised side entrance with concrete steps and two tall rectangular double-paned sliding windows. The north elevation has two, three-paned sliding picture windows. The west elevation was not visible from the right-of-way. The house is clad in vinyl siding, arranged horizontally except around the windows where it is arranged diagonally. The gable roof is raised above the plane of the porch roof and features overhanging eaves and asphalt shingles. The

residence has likely undergone considerable alterations since its initial construction in 1938. As the poured concrete of the covered porch is at ground level, which was uncommon for the time, the covered porch is likely a later addition. Further, the Umatilla County Assessor lists the exterior covering as asbestos, which has clearly been changed to vinyl since construction. Large picture windows are often associated with mid-late 20<sup>th</sup> century ranch style houses, which post-date this construction. The multiple different sizes and styles of windows also suggest that not all of the windows are original to the building's initial construction.

### **Statement of Significance**

In 1914, the land was owned by W.H. Copeland (Ogle 1914). In 1932, it was owned by "U.S" (Metsker 1932). The land was patented by Irwin James Couch (1889-1975) in 1959 (BLM 1959). As of 2022, the property is owned by the Stanfield Hutterian Brethren, the local Hutterite community, who purchased the property in 1997 (Umatilla County 2022). Irwin Couch was recorded as living and ranching in nearby Echo, Oregon by 1938 (Oregon Death Records 1938). It is unclear who was responsible for the initial construction of the house.

The property is not clearly associated with any significant themes in national or local history (Criterion A). As the property is owned by the Hutterians, it is associated with the Hutterite diaspora in the United States. However, the group has only owned the property since 1997, and is not associated with the construction of the residence (Criterion B). The residence does not display character defining features associated with mid-twentieth century houses. In addition, it has been significantly altered, forfeiting integrity of materials, design, and workmanship (Criterion C). There is no evidence to suggest that the property could provide additional historical information (Criterion D). Therefore, neither the property nor the individual building is recommended eligible for listing in the NRHP.

### **B-6**

Property B-6 is located at 78926 Melody Ln., Stanfield, OR on tax parcel 4N29180001700. According to the county tax assessor website (Umatilla County 2022), the property consists of a residence (1948, remodeled 1979), detached garage (1979) (Photograph 7), Pump house (1979), prefabricated storage shed (recent), and a saltbox roof shed (Assessor Eff Year built 1960)

(Photograph 8). The property is surrounded by agricultural fields and the southern property line follows a canal.



**Photograph 7. 78926 Melody Ln., Stanfield, OR. View to the West.**

The residence is a gable and wing contemporary style house with a rear addition. The east façade features a prominent window wall with large, fixed pane windows that continue to the gable but do not fill the gable ends. The wing portion of the east façade features the main entrance door and a two-paned sliding window. The gable portion of the west elevation features two-paned sliding window and a sliding glass door. The remainder of the residence is obscured by foliage and the detached garage. However, there appears to be a small recessed entrance on the east elevation and potentially clerestory windows towards the rear of the house. The building is clad in red, wood board-and-batten siding. The low sloping roof is clad in composite shingles and features open, overhanging eaves. Based on aerial imagery, the house appears to have been built as a gable and wing floor plan, but a western wing was added during the 1979 remodel (Historicaerials.com). The gable roof of the newer wing is slightly offset to the north from the original roof ridge line.



**Photograph 8. 78926 Melody Ln., Stanfield, OR. View to the Southwest.**

The saltbox roof shed is difficult to distinguish from the public right-of-way as it is blocked by agricultural equipment and other buildings. The shed is open on its east elevation and is covered with wood clapboard siding on the other elevations. The roof slopes gently from west to east and is composed of mostly rafters as much of the roof covering is missing. The shape of the shed suggests it may have once been used to house livestock, but no extant fencing could be distinguished to support that theory. The Umatilla County Tax Assessor lists the effective year built for the shed as 1960, but the advanced rate of decay supports a true construction date contemporary with the original residence, if not earlier. No other evidence supporting a more definitive construction year could be found.

### **Statement of Significance**

The land was patented by Peter Akers and Edwin P. Marshall in 1908 (BLM 1908). By 1914, the land was owned by Inland Irrigation Company (Ogle 1914). In 1932, it was owned by the Stanfield Irrigation District (Metsker 1932). As of 2022, the property was owned by Sharron Reise and her son Eric (Umatilla County 2022). Sharron had owned the property with her husband Otto C. Reise Jr. (1923-2015) whom she married in 1966 (Burns Mortuary of Hermiston 2015). It is unclear when the pair moved to the home, but it is possible they are responsible for the remodel, though not the original construction. The builder of the residence could not be determined through available property records and other historic documents.

Otto Reise had been a daffodil and tulip farmer on his family's farm prior to his marriage, but there is not evidence that he continued the practice at 78926 Melody Lane (Burns Mortuary of Hermiston 2015). The property is not clearly associated with any other historical patterns or events (Criterion A). Otto also owned a water purification company, "Pure-n-soft Water", but it is not evident that his company or any other business or community ventures were associated with the buildings present

on the property or that Otto or Sharron had far reaching historical impact (Criterion B). The shed is in a state of disrepair that has obscured any character defining features of an otherwise vernacular utilitarian building. The residence has an identifiable architectural style but has been significantly modified through a non-historic addition and alterations to the siding and other exterior features. It does not have integrity of design, materials, and workmanship (Criterion C). There is no evidence to suggest that the property could provide additional historical information (Criterion D). Therefore, neither the property nor the individual building is recommended eligible for listing in the NRHP.

### **B-7 and B-8**

Property B-7 and property B-8 are located at 2505 E Airport Rd., Stanfield, OR on tax lots 4N29180001900 and 4N29180002000. According to the Umatilla County Tax Assessor, 4N29180001900 had a lean-to (1950) and 4N29180002000 had a machine shed (1950). On aerial imagery from 1970, only two buildings were present on 4N29180002000 and none on 4N29180001900 (Historicaerials.com). Topographic maps from 1963 do not indicate any buildings on either property. Through satellite imagery, it is evident that the two buildings visible in 1970 were removed from the property between 2009-2011. Therefore, there are no longer any historic buildings on the properties.

## **6.0 Conclusions**

A desktop review of historic buildings was completed for the Facility. During this review, eight tax parcels within one mile of the analysis area were identified that contained historic buildings. Each of these parcels was surveyed from the public right-of-way to document the buildings and evaluate their significance and eligibility for listing on the NRHP. No documented properties were found to be potentially eligible for NRHP. Therefore, there will be no direct or indirect impacts to historic built environment resources potentially eligible for NRHP as a result of Project construction, operation, or maintenance.

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## **Figures**

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# West End Solar Project

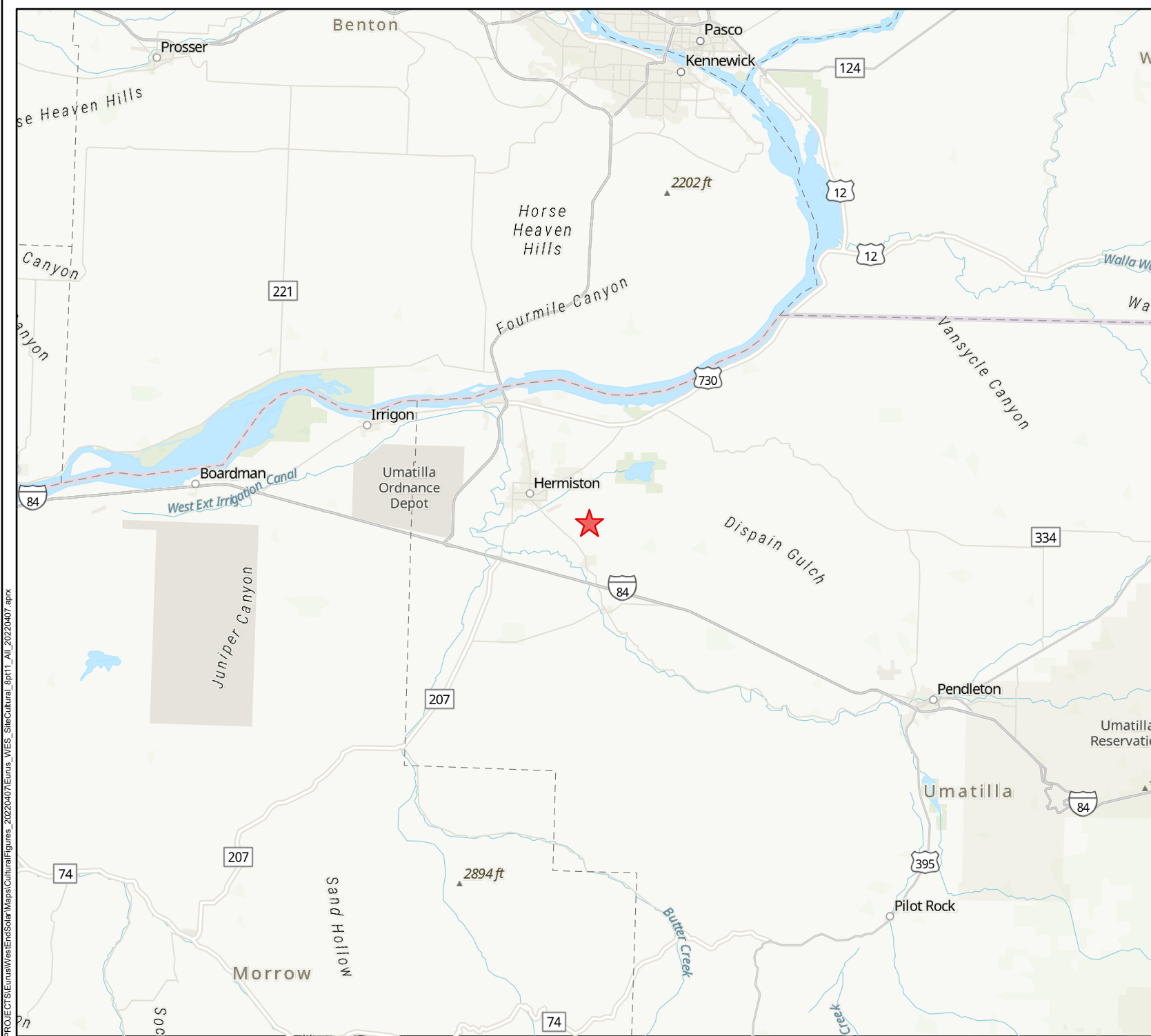
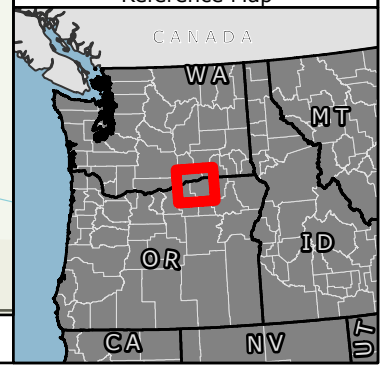
## Figure 1 Regional Overview

UMATILLA COUNTY, OR

 Analysis Area

 TETRA TECH  Eurus Energy

### Reference Map









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# West End Solar Project

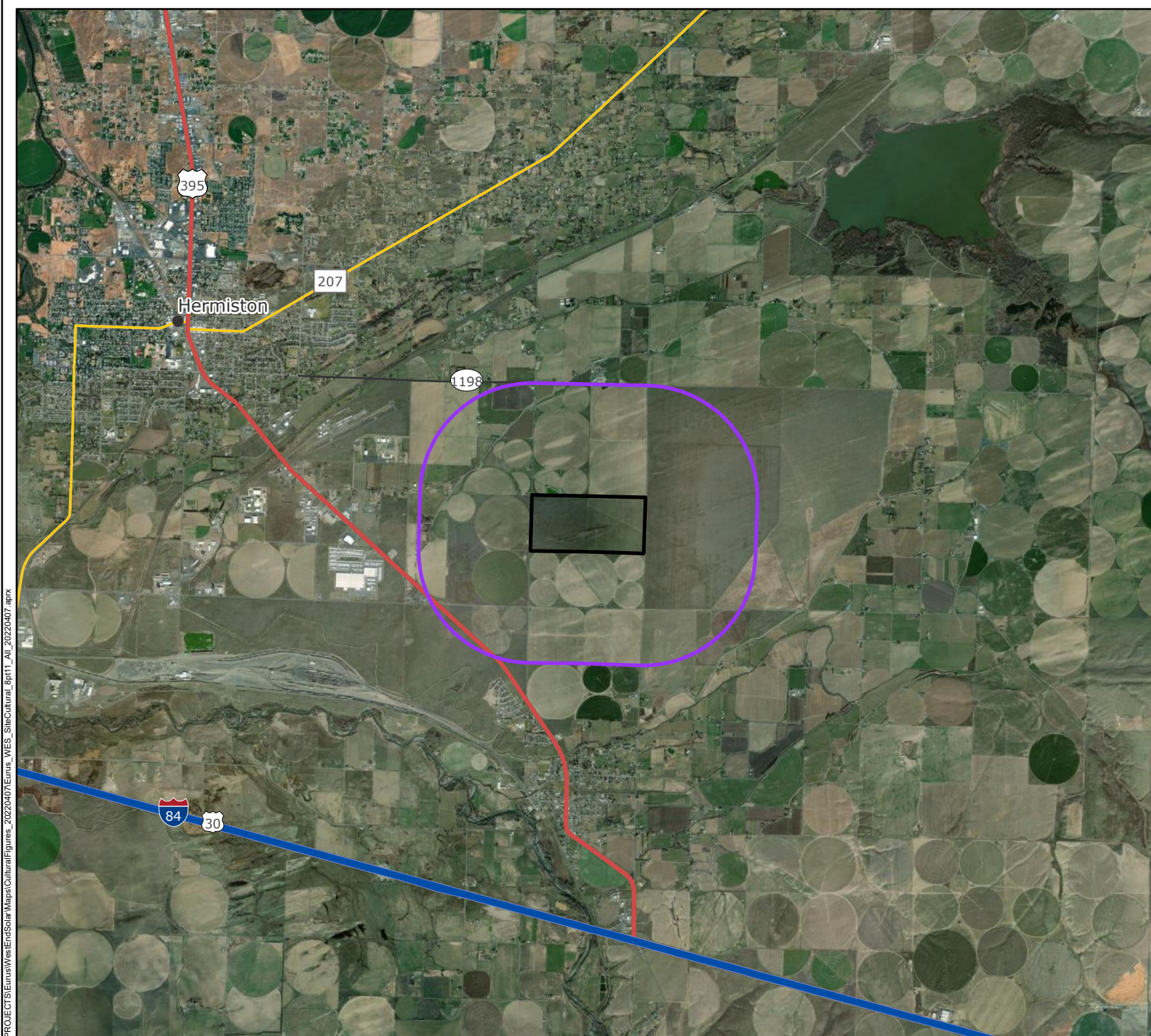
## Figure 2 Analysis Area

UMATILLA COUNTY, OR

-  Analysis Area
-  Analysis Area plus 1-mile Buffer
-  City/Town
-  Interstate Highway
-  US Highway
-  State Highway
-  County Highway



### Reference Map

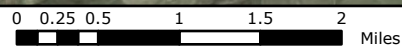


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WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION



# West End Solar Project

## Figure 3 Historic Building Locations

UMATILLA COUNTY, OR

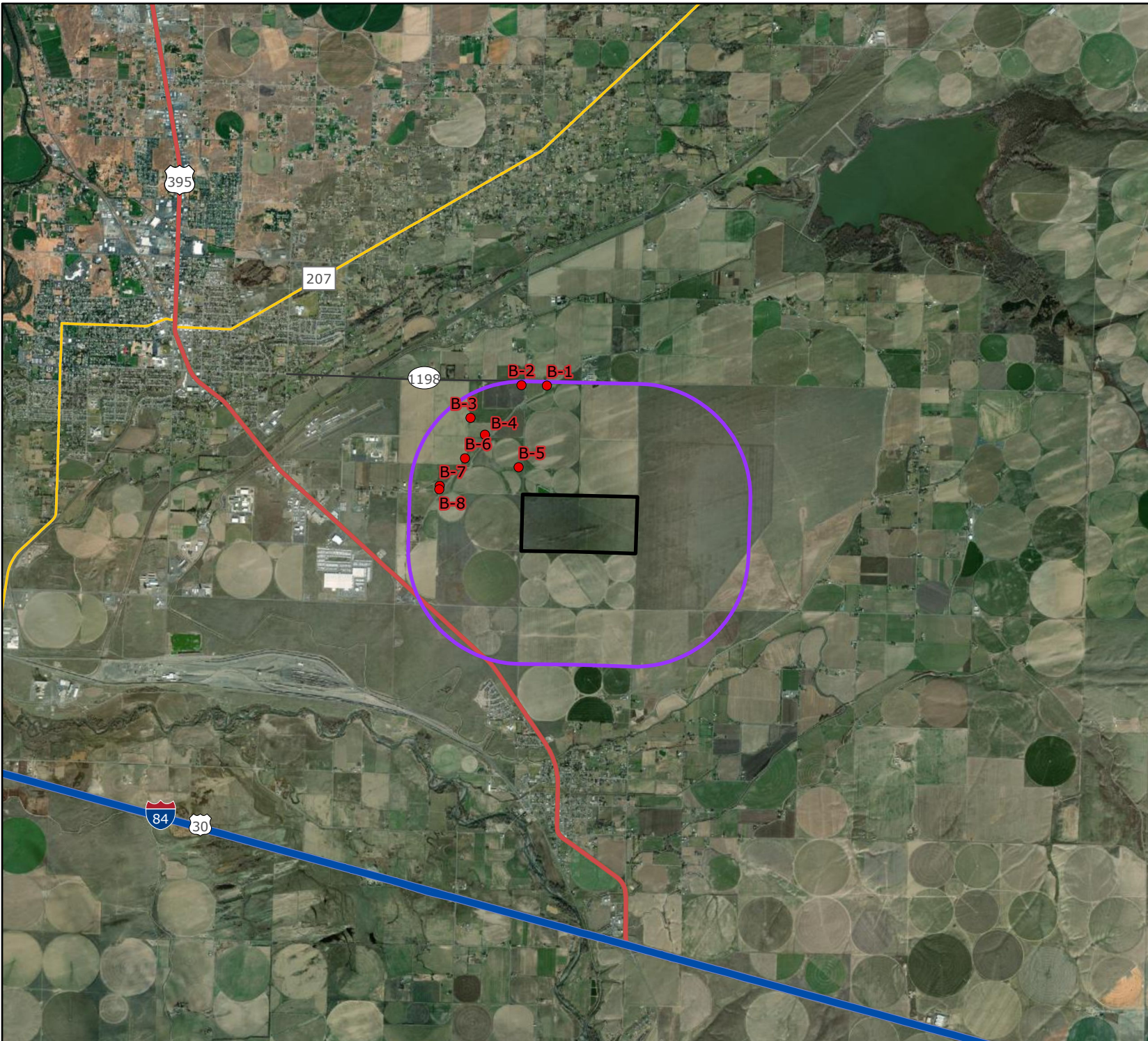
-  Analysis Area
-  Analysis Area plus 1-mile Buffer
-  Historic Building
-  Interstate Highway
-  US Highway
-  State Highway
-  County Highway



### Reference Map

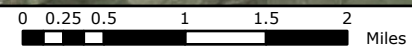


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1:75,000

WGS 1984 UTM Zone 11N




NOT FOR CONSTRUCTION

# West End Solar Project

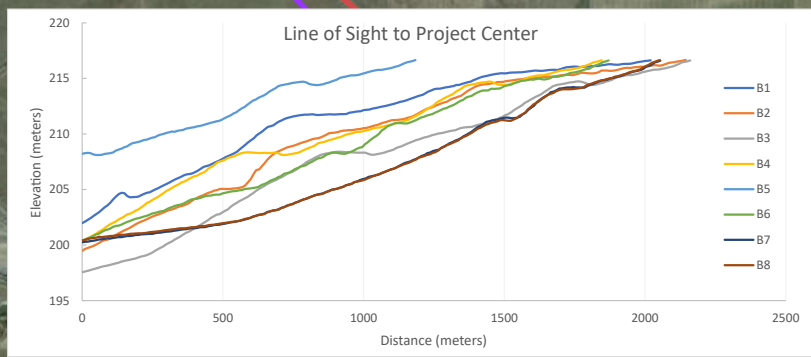
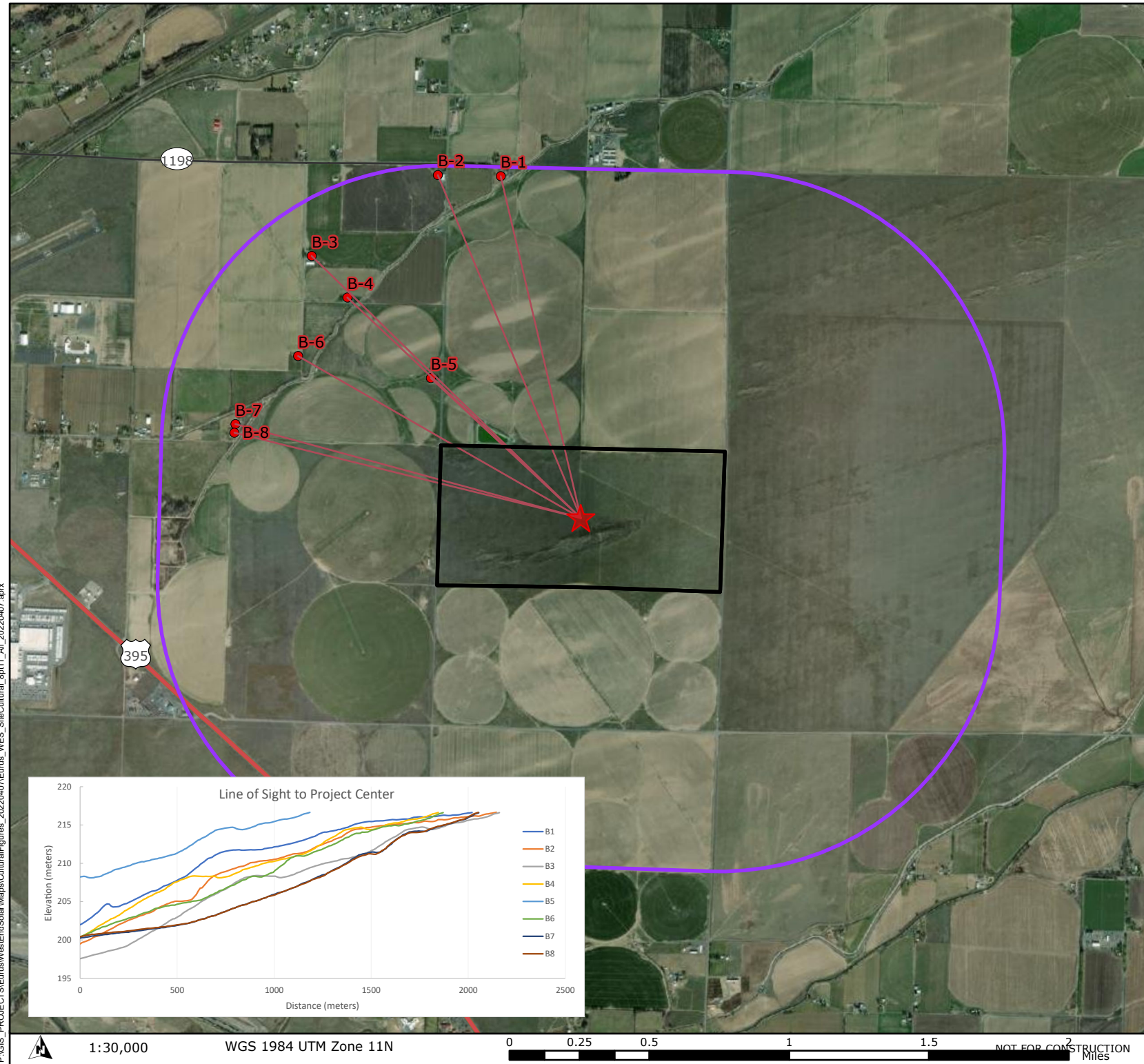
## Figure 4 Line of Sight

UMATILLA COUNTY, OR

-  Analysis Area
-  Analysis Area plus 1-mile Buffer
-  Analysis Area Center
-  Historic Building
-  Line of Sight
-  US Highway
-  County Highway



### Reference Map



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# **Attachment S-3. Inadvertent Discovery Plan**

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# Draft Inadvertent Discovery Plan for Cultural Resources

## West End Solar Project, Umatilla County, Oregon

*SHPO CASE # TBD*

The West End Solar Project (Project) is located entirely on private lands near Hermiston, in Umatilla County, Oregon. The Project Area is bound by Canal Road on the west, South Edwards Road on the east, and agricultural fields to the north and south. Eurus Energy America, LLC (Eurus) will develop the solar Project on 324 acres (Project Area) covering Tax Lots 4N29C00000500 and 4N29C00000200. The Project Area is located on fallow agricultural land zoned as Exclusive Farm Use (EFU) by Umatilla County. The Project’s regulatory compliance is limited to Oregon Department of Energy (ODOE) and Energy Facility Siting Council (EFSC) oversight.

**This Inadvertent Discovery Plan (IDP) should be followed if cultural materials including human remains are encountered during construction.**

**Protocol for Coordination in the Event of Inadvertent Discovery**

1. In the event of an inadvertent discovery of possible cultural materials, including human remains, all work will stop immediately in the vicinity of the find. For archaeological sites, a 30-meter buffer should be placed around the discovery; a 5-meter buffer around isolated finds; and a 60-meter buffer around human remains. Buffers may be marked with pin flags, wooden stakes with flagging tape, or other available markers. Work may proceed outside of this buffered area unless additional cultural materials are encountered.
2. The area will be secured and protected.
3. The Applicant's project manager or consultant for the Applicant will be notified. The project manager will notify the State Historic Preservation Office (SHPO) and Oregon Department of Energy (ODOE). If possible human remains are encountered, the Oregon State Police, the Oregon Legislative Commission on Indian Services (LCIS), SHPO, and, if determined to be Native American, appropriate Tribes will also be notified.

Role	Name	Contact Information
Construction Manager	TBD	TBD
Project Archaeologist	TBD, Eurus	TBD
	TBD, Contractor	TBD
Project Managers	TBD, Eurus	TBD
	TBD, Contractor	TBD
	TBD, Other	TBD

Role	Name	Contact Information
Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Cultural Resources Protection Program (CRPP)	Teara Farrow Ferman, CRPP Manager	Phone: (541) 276-3447 Email: TearaFarrowFerman@ctuir.org
	Shawn Steinmetz, Archaeologist	Phone: (541) 429-7963 office (541) 240-9206 cell Email: shawnsteinmetz@ctuir.org
Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO)	Roberta Kirk, Assistant THPO	Phone: (541) 553-3555 Email: Roberta.kirk@ctwsbnr.org
	Christian Nauer, Archaeologist	Phone: (541) 553-2026 Email: christian.nauer@ctwsbnr.org
Oregon State Police Contact	Chris Allori	Phone: (503) 731-4717 Cell: (503) 708-6461 Dispatch: (503) 731-3030
Oregon Legislative Commission on Indian Services	Danny Santos, Interim Director	Phone: (503) 986-1067 Email: LCIS@oregonlegislature.gov
SHPO	John Pouley, State Archaeologist	Phone: (503) 480-9164 Email: john.pouley@oregon.gov
ODOE	TBD	TBD

4. No work may resume until consultation with the SHPO, ODOE, and, for Native American-related resources, Tribes has occurred and a professional archaeologist is able to assess the discovery.
5. If human remains are encountered, do not disturb them in any way. Do not call 911. Do not speak with the media. Secure the location. Do not take photos. The location should be secured, and work will not resume in the area of discovery until all parties involved agree upon a course of action.
6. A professional archaeologist may be needed to assess the discovery and, for archaeological sites, they will consult with SHPO, ODOE, and, for Native American-related resources, appropriate Tribal Governments to determine an appropriate course of action.
7. Archaeological excavations may be required. This is handled on a case by case basis by the professional archaeologist and project manager, in consultation with SHPO, ODOE, and, for Native American-related sites, appropriate Tribes.

**When to Stop Work**

Construction work may uncover previously unidentified Native American or Euro-American artifacts. This may occur for a variety of reasons, but may be associated with deeply buried cultural material, access restrictions during project development, or if the area contains impervious

surfaces throughout most of the project area which would have prevented standard archaeological site discovery methods.

Work must stop when the following types of artifacts and/or features are encountered:

- ***Native American artifacts may include (but are not limited to):***
  - Flaked stone tools (arrowheads, knives scrapers etc.);
  - Waste flakes that resulted from the construction of flaked stone tools;
  - Ground stone tools like mortars and pestles;
  - Layers (strata) of discolored earth resulting from fire hearths. May be black, red or mottled brown and often contain discolored cracked rocks or dark soil with broken shell;
  - Human remains;
  - Structural remains – wooden beams, post holes, fish weirs.
- ***Euro-American artifacts may include (but are not limited to):***
  - Glass (from bottles, vessels, windows etc.);
  - Ceramic (from dinnerware, vessels etc.);
  - Metal (nails, drink/food cans, tobacco tins, industrial parts etc.);
  - Building materials (bricks, shingles etc.);
  - Building remains (foundations, architectural components etc.);
  - Old Wooden Posts, pilings, or planks (these may be encountered above or below water);
  - Remains of ships or sea-going vessels, marine hardware etc.;
  - Old farm equipment may indicate historic resources in the area;
  - Even what looks to be old garbage could very well be an important archaeological resource.

***When in doubt, call it in!***

### **Proceeding with Construction**

- Construction can proceed only after the proper archaeological inspections have occurred and environmental clearances are obtained. This requires close coordination with SHPO, ODOE, and, for Native American-related sites, Tribes.
  - When confirmed isolated finds are discovered and there is no potential for additional archaeological materials to be present, as determined by the professional archaeologist, construction may recommence once SHPO and ODOE have been

notified and the find is documented on an isolate form and submitted to SHPO. Isolated finds are defined as 9 artifacts or fewer with no more than 30 meters between each artifact.

- When archaeological sites are discovered, as determined by the professional archaeologist, construction may only recommence following consultations under Step 6 above with SHPO, ODOE, and, for Native American-related sites, Tribes, and any treatments have been completed. Archaeological sites are defined as 10 artifacts or more with no more than 30 meters between each artifact, or a single feature.
- After an inadvertent discovery, some areas may be specified for close monitoring or 'no work zones. Any such areas will be identified by the professional archaeologist to the Project Manager, and appropriate Contractor personnel.
- In coordination with the consulted agencies and Tribes, as appropriate, the Project Manager will verify these identified areas and be sure that the areas are clearly demarcated in the field, as needed.