

**Application for Site Certificate  
Exhibit S – Historic, Cultural, and Archaeological Resources  
Attachment S-9: Historic Properties Management Plan (with  
Inadvertent Discovery Plan)  
Boardman to Hemingway Transmission Line Project**

**Errata Sheet – February 2019**

Attachment S-9 (*Boardman to Hemingway Transmission Line Project, Historic Properties Management Plan for Oregon Department of Energy Compliance*) to Exhibit S provides a Historic Properties Management Plan (HPMP) regarding management of known cultural resources within the analysis area, future surveys unsurveyed portions of the analysis area, a monitoring plan for during construction, and an inadvertent discovery plan for unanticipated discoveries during construction. The HPMP is specific to the Oregon Energy Facility Siting Commission's siting standards and is considered a draft. It is anticipated to be open to revision based on continuing consultation with other involved agencies and tribes until construction begins. It is also anticipated to be incorporated into a single HPMP required under the Project's Programmatic Agreement for compliance with Section 106 of the National Historic Preservation Act. Information concerning the location of archaeological sites or objects are exempt from public disclosure under Oregon Revised Statute (ORS) 192.501(11).<sup>1</sup> Therefore, such information, including archaeological survey reports, is provided confidentially to the Oregon Department of Energy (ODOE).

Exhibit S of the ASC, including all attachments, was submitted to and accepted by ODOE in September 2018. Subsequent to ODOE's acceptance, ODOE provided Requests for Additional Information (RAIs) necessary to draft the agency's Draft Project Order (DPO). This errata sheet provides the requested information and documents associated changes to Exhibit S, Attachment S-9.

---

<sup>1</sup> OAR 345-021-0010(s) provides that "information concerning the location of archaeological sites or objects may be exempt from public disclosure under ORS 192.502(4) or ORS 192.501(11)," and that the applicant "shall 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."

**Summary of Changes in Exhibit S, Attachment S-9**

<b>Page #</b>	<b>Section #</b>	<b>Changed Text</b>
11	Section 3.1	Bullet point regarding resolving the NRHP eligibility and project effects determinations added as a pre-construction activity.
25	(new) Section 6.1.1. Add new table	New section and table on site-specific avoidance measures for Oregon Trail resources located within Site Boundary
30	Section 6.2.2	Additional information pertaining to general mitigation measures to address indirect Project effects.
31	(new) Section 6.2.3	Additional information pertaining to site-specific mitigation measures for indirect Project effects.

## Detailed Listing of Changes in Exhibit S, Attachment S-9

### Page 11, Section 3.1

**Change:** Bullet point regarding resolving the NRHP eligibility and project effects determinations added as a pre-construction activity.

**Revised Text:**

Pre-construction tasks include the following:

- This HPMP will be completed by IPC and submitted to ODOE, SHPO, involved Native American tribes, and historic societies (such as Oregon-California Trails Association), as determined by ODOE, for review;
- IPC's Cultural Resource Team (CRT) will be selected (see Section 7.1);
- IPC will provide the CRT and ODOE with maps and/or drawings of the Project final construction footprint and Visual Assessment area;
- The CRT will ensure avoidance measures (e.g., sensitive resource flagging, complete avoidance) are in place where needed (see Section 7.3);
- IPC and the CRT will resolve with SHPO NRHP-eligibility and project effects determinations for historic sites, archaeological sites, and archaeological objects within the analysis area (see Sections 5.1 and 5.2); and
- Required mitigation measures will be completed (as applicable).

### Page 25, new Section 6.1.1

**Change:** New section and table on site-specific avoidance measures for Oregon Trail resources located within Site Boundary

**New Text:** Insert the following text and table as a new Section 6.1.1.

IPC has developed site-specific measures to avoid direct impacts to Oregon Trail resources located within the Site Boundary. Table 6-1 includes avoidance measures to be employed for ten Oregon Trail-related resources. These measures include reducing or relocating Project components and/or activities, avoiding construction activities within 100 feet of the identified resource characteristics, flagging resource boundaries, and staying within existing areas of disturbance.

**Table 6-1. Site-Specific Avoidance Measures to Avoid Direct Impacts to Oregon Trail Resources**

Site #	Type	Direct Impact	Exhibit C Map	Avoidance Measures (Table S-2)
35MW227	Historic Road	Proposed Route: Structure work area; Pulling & tension site; Existing road needing 21-70% modification West of Bombing Range Road Alternatives 1 & 2: No impacts	Map C-6	<p>IPC has determined that this site is neither listed nor likely to be listed on the National Register of Historic Places. If the Council concurs with IPC's determination, it will not be considered a protected resource under the Historic, Cultural, and Archaeological Resources Standard and no avoidance will be required. However, if the Council determines the site is a protected resource, IPC will avoid Site # 35MW227 as follows:</p> <p>Proposed Route: For the structure work area and pulling &amp; tension site, IPC will relocate or reduce the size of those areas to avoid Site # 35MW227; for the existing road, all improvements will be made within the existing road prism thereby avoiding any new impacts; IPC will flag any portion of the boundary of Site # 35MW227 that occurs within 100 feet of construction activity.</p> <p>West of Bombing Range Road Alternatives 1 &amp; 2: No avoidance measures are necessary as there are no direct impacts proposed for these alternatives.</p>
5B2H-SA-01	Oregon Trail Segment	Proposed Route: Structure work area West of Bombing Range Road Alternatives 1 & 2: No impacts	Map C-6	<p>IPC will avoid Site # 5B2H-SA-01 as follows:</p> <p>Proposed Route: IPC will relocate or reduce the size of the structure work area to avoid Site # 5B2H-SA-01; IPC will flag any portion of the boundary of Site # 5B2H-SA-01 that occurs within 100 feet of construction activity.</p> <p>West of Bombing Range Road Alternatives 1 &amp; 2: No avoidance measures are necessary as there are no direct impacts proposed for these alternatives.</p>

Site #	Type	Direct Impact	Exhibit C Map	Avoidance Measures (Table S-2)
4B2H-EK-02	Oregon Trail Segment	Proposed Route: Within 250 feet of structure work area West of Bombing Range Road Alternatives 1 & 2: No impacts	Map C-6	<p>IPC will avoid Site # 4B2H-EK-02 as follows:</p> <p>Proposed Route: IPC will locate the structure work area to avoid Site # 4B2H-EK-02; IPC will flag any portion of the boundary of Site # 4B2H-EK-02 that occurs within 100 feet of construction activity.</p> <p>West of Bombing Range Road Alternatives 1 &amp; 2: No avoidance measures are necessary as there are no direct impacts proposed for these alternatives.</p>
B2H-UN-005	Oregon Trail Whisky Creek Segment	Proposed Route: Existing road needing 21-70% modification; New road, bladed Morgan Lake Alternative: No impact	Map C-49 Morgan Lake Alt Maps 5 and 6	<p>IPC has determined that this site is neither listed nor likely to be listed on the National Register of Historic Places. If the Council concurs with IPC's determination, it will not be considered a protected resource under the Historic, Cultural, and Archaeological Resources Standard and no avoidance will be required. However, if the Council determines the site is a protected resource, IPC will avoid Site # B2H-UN-005 as follows:</p> <p>Proposed Route: For the new road, IPC will relocate or reduce the size of the new road to avoid Site # B2H-UN-005; for the existing road, all improvements will be made within the existing road prism thereby avoiding any new impacts; IPC will flag any portion of the boundary of Site # B2H-UN-005 that occurs within 100 feet of construction activity.</p> <p>Morgan Lake Alternative: No avoidance measures are necessary as there are no direct impacts proposed for this alternative.</p>

Site #	Type	Direct Impact	Exhibit C Map	Avoidance Measures (Table S-2)
6B2H-RP-09	Oregon Trail	Proposed Route: Structure work area; Within 250 feet of existing road needing 21-70% improvement Morgan Lake Alternative: No impact	Map C-49	Proposed Route: For the structure work area and pulling & tension site, IPC will relocate or reduce the size of those areas to avoid Site # 6B2H-RP-09; for the existing road, IPC will flag any portion of the boundary of Site # 6B2H-RP-09 that occurs within 100 feet of construction activity.  Morgan Lake Alternative: No avoidance measures are necessary as there are no direct impacts proposed for this alternative.
35UN74	Lithic Scatter, Homestead, Grave, Campground, & Trail	Multi Use Area UN-02 Existing road needing 21-70% modification	Map-54	IPC will either:  Relocate MUA UN-02 out of Site # 35UN74 entirely;  Or Survey the relevant portions of Site # 35UN74 to verify the boundaries of the trail, campground, lithic scatter, homestead, and grave features; relocate or reduce the size of MUA UN-02 to avoid the verified boundaries of those features; and, if avoidance is not possible, provide compensatory mitigation as described in the HPMP; graves will be treated as specified in the HPMP; IPC will flag any portion of the boundary of Site # 35UN74 that occurs within 100 feet of construction activity.
B2H-BA-282	Oregon Trail Virtue Flat Segment and Flagstaff Hill	Structure work area; Existing road needing 71-100% modification	Map-C-70	For the structure work area and pulling & tension site, IPC will relocate or reduce the size of those areas to avoid Site # B2H-BA-282; for the existing road, all improvements will be made within the existing road prism thereby avoiding any new impacts; IPC will flag any portion of the boundary of Site # B2H-BA-282 that occurs within 100 feet of construction activity.

Site #	Type	Direct Impact	Exhibit C Map	Avoidance Measures (Table S-2)
B2H-BA-285	Oregon Trail (Straw Ranch: Segments 1 and 2)	BLM Straw Ranch ACEC within 125 feet of New Road, Primitive.	Map C-78	IPC will locate the new road to avoid the ACEC boundaries; IPC will flag any portion of the boundary of Site # B2H-BA-285 that occurs within 100 feet of construction activity.
3B2H-CH-05	Oregon Trail	New Road, Bladed	Map C-78	IPC will either:  Relocate the road out of Site # 3B2H-CH-05 entirely;  Or Relocate the new road to avoid Site # 3B2H-CH-05 where possible; and, if avoidance is not possible, provide compensatory mitigation as described in the HPMP; IPC will flag any portion of the boundary of Site # 3B2H-CH-05 that occurs within 100 feet of construction activity.
4B2H-EK-41	Oregon Trail Segment (Unnamed)	BLM Within 125 feet of New Road, Primitive and structure work area.	Map C-94	IPC will locate the new road and structure work area to avoid Site # 4B2H-EK-41; IPC will flag any portion of the boundary of Site # 4B2H-EK-41 that occurs within 100 feet of construction activity.

**Page 30, Section 6.2.2, 1<sup>st</sup> Paragraph**

**Change:** Additional information pertaining to general mitigation measures to address indirect Project effects.

**Revised Text:** Insert the following after the sentence ending with “EFSC standards.”  
And before “Table 6-4 lists...”

In addition to the measures noted in Table 6-3, IPC would also implement Scenic Resources Condition 1 which requires the use of dull-galvanized steel for lattice towers and non-specular conductors which would reduce the visual effect of the Project. In addition, consistent with the Vegetation Management Plan (Exhibit P1, Attachment P1-4), IPC will employ various vegetation management strategies to reduce indirect effects in areas with dense vegetation. This will reduce, but not eliminate, indirect effects to Oregon Trail segments located near or within the forested areas of the Blue Mountains. Site-specific mitigation measures would address residual indirect effects.

**Page 31, New Section 6.2.3 Site-Specific Recommended Mitigation for Indirect Significant Impacts**

**Change:** Additional information pertaining to site-specific mitigation measures for indirect project effects.

**Revised Text:** Insert the following text after the section heading:

Two site-specific mitigation measures to reduce impacts to scenic resources associated with the Oregon National Historic Trail are proposed. Scenic Resources Conditions 2 and 3, contained in Exhibit R Scenic Resources, provide mitigation measures to minimize visual impacts to the Flagstaff Hill National Historic Oregon Trail Interpretive Center (NHOTIC) and the Birch Creek Area of Critical Environmental Concern (ACEC). The measures stipulated in these conditions will reduce, but not eliminate, indirect effects to the Oregon Trail Virtue Flat Segment near Flagstaff Hill (B2H-BA-282), that portion of the Goodale’s/Sparta Trail (B2H-BA-327) that overlaps with the Virtue Flat segment, Oregon Trail ACEC – Birch Creek segment (B2H-MA-042), and an Oregon Trail Segment (4B2H-EK-41) located near the Birch Creek ACEC. The Scenic Resources Conditions 2 and 3 stipulate site-specific transmission tower heights, frame types, and materials that would collectively reduce the Project’s visual intrusions at these locations. IPC may, in consultation with ODOE and SHPO, adopt site-specific measures similar to those outlined in Conditions 2 and 3 for other Oregon Trail resources that may be adversely affected.

Residual indirect effects to the four resources noted above and other Oregon Trail-related resources listed in Table 4-2 of the HPMP, and other resources that may retain sensitive visual environments identified in Table 4-1 would be avoided, reduced, and/or mitigated consistent with the requirements of Section 6.2.2 and utilizing the site-specific measures contained in Table 6-3 and the framework outlined in Table 6-4.