

**ATTACHMENT S-9
HISTORIC PROPERTIES MANAGEMENT PLAN (WITH INADVERTENT
DISCOVERY PLAN)**

**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).¹ 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.

¹ 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

Page #	Section #	Changed Text
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 & 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 & 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 & 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 & 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, 1st 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.

BOARDMAN TO HEMINGWAY TRANSMISSION LINE PROJECT HISTORIC PROPERTIES MANAGEMENT PLAN FOR OREGON DEPARTMENT OF ENERGY COMPLIANCE

SHPO Case #: 08-2232

Prepared by:



*Idaho Power Company
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September 2018

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ABBREVIATIONS AND ACRONYMS

ACHP	Advisory Council on Historic Preservation
APE	area of potential effect
ASC	Application for Site Certificate
BLM	Bureau of Land Management
CCEM	Construction Contractor's Environmental Manager
CIC	Compliance Inspection Contractor
CRM	Cultural Resources Monitor
CRS	Cultural Resources Specialist
CRT	Cultural Resource Team
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
EFSC	Energy Facility Siting Council
HPMP	Historic Properties Management Plan
HPRCSIT	Historic Properties of Religious and Cultural Significance to Indian Tribes
IDP	Inadvertent Discovery Plan
ILS	Intensive Level Survey
IPC	Idaho Power Company
kV	kilovolt
LCIS	Legislative Commission on Indian Services
MP	Monitoring Plan
MPDF	Multiple Property Documentation Form
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act of 1966
NHT	National Historic Trail
NPS	National Park Service
NRHP	National Register of Historic Places
O&M	operation and maintenance
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statute
PA	Programmatic Agreement
Project	Boardman to Hemingway Transmission Line Project
pASC	Preliminary Application for Site Certificate
RLS	Reconnaissance Level Survey
ROW	right-of-way
SHPO	State Historic Preservation Office
THPO	Tribal Historic Preservation Office
U.S.C.	United States Code
USFS	U.S. Department of Agriculture Forest Service
VAHP	Visual Assessment of Historic Properties

DEFINITIONS

Aboveground resource: A type of cultural resource or feature with aboveground elements that has the potential to be directly or indirectly affected by the Project which includes cairns, rock alignments, shelters, and other buildings, structures, districts, objects, and sites potentially eligible for listing on the NRHP under Criterion A, B, C, or D. Also referred to in Oregon as a historic site.

Analysis area: The overall area examined for impacts by the Project in Exhibit S. Includes subset analysis areas of the direct analysis area and the Visual Assessment analysis area.

Archaeological site: A type of cultural resource consisting of a concentration of a minimum of 10 artifacts within the ground or in ruins or a feature (Oregon State Historic Preservation Office [SHPO] 2013a). 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 each other or biotic or geological remains or deposits (ORS 358.905(1)(c)).

Archaeological object: A type of cultural resource consisting of fewer than 10 artifacts. Also referred to as an isolated find (Oregon SHPO 2013a). It is part of the physical record of an indigenous or other culture found in the state or waters of the state and consists of material remains of past human life or activity that are of archaeological significance (ORS 358.905(1)(a)).

Burial: Any natural or prepared physical location whether originally below, on, or above the surface of the earth, into which, as a part of a death rite or death ceremony of a culture, human remains were deposited (ORS 358.905(1)(e)).

Construction footprint: The area within the Project Site Boundary that will be directly impacted by the Project through ground disturbance during construction.

Cultural resource: Any place where material evidence exists about the human past. Generally, 50 years or older. Physical features, both natural and human made, associated with human activity. These would include sites, structures, and objects representing events in history, architecture, or human development. Cultural resources are unique and non-renewable resources (Thomas 1998).

Cultural site boundary: The extent of a cultural resource as identified by field surveys. Typically defined as the extent of cultural materials (surface and subsurface).

Direct analysis area: The portion of the analysis area examined for direct impacts by the Project. Equivalent to the Project Site Boundary.

Funerary objects: Any artifacts or objects that, as part of a death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later (ORS 358.905(1)(f)).

Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSIT): A type of cultural resource whose significance is derived from the role it plays in an Indian Tribe's historically rooted beliefs, customs, and practices and that may be located on ancestral, aboriginal, or ceded lands of the Tribe. Also referred to as a sacred site. See also Section 101(d)(6)(A) of the NHPA and Advisory Council on Historic Preservation (ACHP) (2008).

Historic property: A type of cultural resource consisting of any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the NRHP, including artifacts, records, and remains related to and located within such a property or resource.

Historic site: A type of cultural resource inclusive of historic buildings, structures, sites, districts, and objects that would be included in the SHPO's online Historic Sites Database.

Human remains: The physical remains of a human body, including, but not limited to, bones, teeth, hair, ashes or mummified or otherwise preserved soft tissues of an individual (ORS 358.905(1)(g)).

Indian tribe: Any tribe of Indians recognized by the Secretary of the Interior or listed in the Klamath Termination Act, 25 United States Code [U.S.C.] 3564 et seq., or listed in the Western Oregon Indian Termination Act, 25 U.S.C. 3691 et seq., if the traditional cultural area of the tribe includes Oregon lands (ORS 97.740(4) [incorporated by reference in ORS 358.905(1)(d)]).

Object of cultural patrimony: An object having ongoing historical, traditional or cultural importance central to the native Indian group or culture itself, rather than property owned by an individual native Indian, and which, therefore, cannot be alienated, appropriated, or conveyed by an individual regardless of whether or not the individual is a member of the Indian tribe. The object shall have been considered inalienable by the native Indian group at the time the object was separated from such group. The term does not include unassociated arrowheads, baskets, or stone tools or portions of arrowheads, baskets, or stone tools (ORS 358.905(1)(h)(A); ORS 358.905(1)(h)(B)).

Operation footprint: The area within the Project Site Boundary that will be directly impacted by the Project during its lifetime of operation.

Professional Archaeologist: A person who has extensive formal training and experience in systematic, scientific archaeology (ORS 97.740(6)).

Project Site Boundary: The perimeter of the site of the proposed energy facility and encompassing all of its related or supporting facilities, all temporary laydown and staging areas, and all corridors and micro-siting corridors proposed by the applicant (OAR 345-001-0010(55)).

Sacred object: An archaeological object or other object that: (A) is demonstrably revered by any ethnic group, religious group or Indian tribe as holy; (B) is used in connection with the religious or spiritual service or worship of a deity or spirit power; or (C) was or is needed by traditional native Indian religious leaders for the practice of traditional native Indian religion (ORS 358.905(1)(k)).

Study Area (2-mile, 5-mile): The area examined during pre-survey cultural resource-related research efforts, including the records search and literature review. A 2-mile buffer and a 5-mile buffer on the Proposed Route and alternative routes established two subsets of the Study Area for the pedestrian cultural resources survey and the Visual Assessment of Historic Properties Study Plan (VAHP), respectively.

Traditional Cultural Property (TCP): A type of historic property that is eligible for inclusion on the NRHP because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (Parker and King 1998).

Visual Assessment analysis area: The portion of the analysis area examined for indirect impacts by the Project. The area assessed for indirect effects that extends 5 miles or to the visual horizon, whichever is closer, on either side of the centerline of the Proposed Route and alternative routes.

1.0 INTRODUCTION

This Historic Properties Management Plan (HPMP) provides a general overview of the measures that will be implemented to address the avoidance, minimization of impacts, and mitigation of impacts to cultural resources as a result of Idaho Power Company's (IPC) Boardman to Hemingway Transmission Line Project (Project). It provides a general approach to treat impact resources. When a final route is chosen, resource-specific treatment plans incorporating these general measures will be developed and implemented prior to construction activities. Implementation of the HPMP is anticipated to occur in first and second quarters of 2022. The HPMP addresses cultural resources for the purposes of meeting the Oregon Energy Facility Siting Council's (EFSC or Council) siting standards. These resources include historic properties listed on or likely to be listed on the National Register of Historic Places (NRHP) (NRHP-eligible and including sites determined significant in writing by a Native American tribe), archaeological sites on public or private land, and archaeological objects on private land within the Project Site Boundary described in Exhibit S of the Project's Application for Site Certification (ASC) submitted to the Oregon Department of Energy (ODOE). Such resources could be significantly impacted during construction, reclamation of temporary disturbance areas, or operation and maintenance (O&M). The HPMP demonstrates that the Project will comply with EFSC's Historic, Cultural, and Archaeological Resources Standard (Oregon Administrative Rules [OAR] 345-022-0090) by showing that the construction and operation of the Project, taking into account mitigation, are not likely to result in significant impacts to the cultural resources described above and considered in the EFSC standard.

It is noted that the Bureau of Land Management (BLM) is the lead agency overseeing the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) processes for the Project. As part of compliance with those regulations, a Programmatic Agreement (PA) (Attachment S-7 of the ASC) has been prepared for this Project. A separate HPMP will be prepared by the BLM in consultation with the Idaho and Oregon State Historic Preservation Offices (SHPO), Advisory Council on Historic Preservation (ACHP) and the parties to the PA, including ODOE (PA Sections IV, B and VII, A–H). A framework for the BLM's HPMP has been drafted by that agency, but a complete HPMP has not yet been completed. The framework is included as Appendix A of this document. Although the PA can support the EFSC process, the PA does not supersede the EFSC site certificate process and cannot be fully relied upon to determine compliance with EFSC's standards. Therefore, this HPMP was prepared specifically for ODOE and to comply with the EFSC certification process. It may be modified as necessary following completion of the BLM's HPMP or incorporated as appropriate into the BLM's HPMP through BLM's consultation with ODOE as a party to the PA.

1.1 Purposes of HPMP

The purposes of this HPMP are to:

- Provide a summary and overview of the Project and the Site Certificate Project Site Boundary, including a discussion of proposed facilities, location of facilities, and project location maps;
- Provide a summary of state laws and regulations that define the research, evaluation, and reporting procedures to be followed for the Project under the EFSC certification process;
- Provide a brief summary of cultural resources studies conducted for the Project and a review of the findings of those studies;

- Summarize methods for determination and documentation of effects that have been used for the Project and will be used in the event of inadvertent discoveries;
- Document the measures that IPC has already taken or will take to avoid and minimize impacts to cultural resources considered by EFSC's standards
- Document IPC's goals for managing and protecting resources subject to EFSC standards within the analysis area;
- Provide management guidelines for categories of significant impacts to cultural resources considered by EFSC's standards;
- Present a Monitoring Plan (Section 7) which includes guidelines for how avoidance and minimization measures will be implemented during construction, reclamation, and O&M; how the effectiveness of these methods will be documented; procedures for halting construction, including agency notification in the event of unanticipated discoveries during construction; and under what circumstances cultural resources monitors will be present;
- Present an Inadvertent Discovery Plan (IDP) (Section 8), which specifies the procedures to follow in the event that cultural resources are found during construction, reclamation, and O&M, which were not detected during surveys conducted prior to ground-disturbing activities; and
- Be implemented and adhered to during construction, reclamation, and O&M, per OAR 345-021-0010(1)(s)(iii)(E) and OAR 345-022-0090(1).¹

The intent of this HPMP is to specify the general terms of avoidance and monitoring, and to present a framework for mitigation planning.

1.2 Regulatory Context

The following section briefly discusses the federal and state laws and regulations applicable to the Project in regard to cultural resources.

1.2.1 EFSC Administrative Rules

1.2.1.1 Site Certificate Application Requirements

OAR 345-021-0010(1)(s) provides that IPC must include information in Exhibit S or confidential submissions of the following information regarding historic, cultural, and archeological resources:

(A) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the National Register of Historic Places.

(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.

(C) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area.

(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:

¹ Subsections (2) and (3) of the Historic, Cultural, and Archaeological Resources Standard apply to power generation facilities and special criteria facilities, respectively. Because the Project does not include a power generation or special criteria facility, subsections (2) and (3) of OAR 345-022-0090 do not apply to the Project.

(i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the State Historic Preservation Officer 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.

(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.

1.2.1.2 General Standards for Siting Facilities

Subsection (1) of the Historic, Cultural, and Archaeological Resources Standard at OAR 345-022-0090(1)² provides that IPC must demonstrate that the construction and operation of the Project, 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).

1.2.2 Applicable Oregon Revised Statutes

The following Oregon Revised Statutes are applicable to the Project, with respect to cultural resources.

1.2.2.1 Indian Graves and Protected Objects

Oregon Revised Statutes (ORS) 97.745 provides for protection of Indian graves and protected objects, including cairns, burials, human remains, funerary objects, sacred objects, and objects of cultural patrimony of any native Indian. It describes acts prohibited in relation to the above resources, the applicability of the statute, and the notification procedures for when suspected Indian human remains are discovered. The statute states:

(1) Except as provided in ORS 97.750, no person shall willfully remove, mutilate, deface, injure or destroy any cairn, burial, human remains, funerary object, sacred object or object of cultural patrimony of any native Indian. Persons disturbing native Indian cairns or burials through inadvertence, including by construction, mining, logging or agricultural activity, shall at their own expense reinter the human remains or funerary object under the supervision of the appropriate Indian tribe.

(2) Except as authorized by the appropriate Indian tribe, no person shall:

² Subsections (2) and (3) of the Historic, Cultural, and Archaeological Resources Standard apply to power generation facilities and special criteria facilities, respectively. Because the Project does not include a power generation or special criteria facility, subsections (2) and (3) of OAR 345-022-0090 do not apply to the Project.

(a) Possess any native Indian artifacts, human remains or funerary object having been taken from a native Indian cairn or burial in a manner other than that authorized under ORS 97.750.

(b) Publicly display or exhibit any native Indian human remains, funerary object, sacred object or object of cultural patrimony.

(c) Sell any native Indian artifacts, human remains or funerary object having been taken from a native Indian cairn or burial or sell any sacred object or object of cultural patrimony.

(3) This section does not apply to:

(a) The possession or sale of native Indian artifacts discovered in or taken from locations other than native Indian cairns or burials; or

(b) Actions taken in the performance of official law enforcement duties.

(4) Any discovered human remains suspected to be native Indian shall be reported to the state police, the State Historic Preservation Officer, the appropriate Indian tribe and the Commission on Indian Services.

1.2.2.2 Archaeological Objects and Sites

ORS 358.920 identifies prohibited acts on public and private lands in Oregon, relative to archaeological resources. It states that disturbances to archaeological sites or objects on public or private lands must be completed under a permit issued under ORS 390.235 and provides direction for disposition of those archaeological materials and any human remains and associated funerary objects. The section is not applicable to the disturbance of Native American cairns, which is covered by the provisions of ORS 97.740 to 97.760. The statute states:

(1)(a) A person may not excavate, injure, destroy or alter an archaeological site or object or remove an archaeological object located on public or private lands in Oregon unless that activity is authorized by a permit issued under ORS 390.235.

(b) Collection of an arrowhead from the surface of public or private land is permitted if collection can be accomplished without the use of any tool.

(c) It is prima facie evidence of a violation of this section if:

(A) A person possesses the objects described in paragraph (a) of this subsection;

(B) A person possesses any tool that could be used to remove such objects from the ground; and

(C) A person does not possess a permit required under ORS 390.235.

(2) A person may not sell, purchase, trade, barter or exchange or offer to sell, purchase, trade, barter or exchange any archaeological object that has been removed from an archaeological site on public land or obtained from private land within the State of Oregon without the written permission of the landowner.

(3)(a) A person may not sell, trade, barter or exchange or offer to sell, trade, barter or exchange any archaeological object unless the person furnishes the purchaser a certificate of origin to accompany the object that is being sold or offered. The certificate shall include:

(A) For objects obtained from public land:

(i) A statement that the object was originally acquired before October 15, 1983.

(ii) The location from which the object was obtained and a brief cumulative description of how the object had come into the possession of the current owner in accordance with the provisions of ORS 358.905 to 358.961 and 390.235.

(iii) A statement that the object is not human remains, a funerary object, sacred object or object of cultural patrimony.

(B) For objects obtained from private land:

(i) A statement that the object is not human remains, a funerary object, sacred object or object of cultural patrimony.

(ii) A copy of the written permission of the landowner to acquire the object.

(b) As used in this subsection, "certificate of origin" means a signed and notarized statement that meets the requirements of paragraph (a) of this subsection.

(4)(a) If the archaeological object was acquired after October 15, 1983, from public lands, any object not described in paragraph (b) of this subsection is under the stewardship of the state and shall be delivered to the Oregon State Museum of Anthropology. The museum shall work with the appropriate Indian tribe and other interested parties to develop appropriate curatorial facilities for artifacts and other material records, photographs and documents relating to the cultural or historic properties in this state. Generally, artifacts shall be curated as close to the community of their origin as their proper care allows. If it is not feasible to curate artifacts within this state, the museum may after consultation with the appropriate Indian tribe or tribes enter into agreements with organizations outside this state to provide curatorial services; and

(b) If the object is human remains, a funerary object, a sacred object or an object of cultural patrimony, it shall be dealt with according to ORS 97.740, 97.745 and 97.750.

(5) A person may not excavate an archaeological site on privately owned property unless that person has the property owner's written permission.

(6) If human remains are encountered during excavations of an archaeological site on privately owned property, the person shall stop all excavations and report the find to the landowner, the state police, the State Historic Preservation Officer and the Commission on Indian Services. All funerary objects relating to the burial shall be delivered as required by ORS 358.940.

(7) This section does not apply to a person who disturbs an Indian cairn or burial. Any person who disturbs an Indian cairn or burial for any reason shall comply with the provisions of ORS 97.740 to 97.760.

(8) Violation of the provisions of this section is a Class B misdemeanor.

1.2.2.3 Archaeological Sites and Historical Material

ORS 390.235 sets forth the permit requirements and rules for excavation or removal of archaeological or historical materials as follows:

(1)(a) A person may not excavate or alter an archaeological site on public lands, make an exploratory excavation on public lands to determine the presence of an archaeological site or remove from public lands any material of an archaeological, historical, prehistorical or anthropological nature without first obtaining a permit issued by the State Parks and Recreation Department.

(b) If a person who obtains a permit under this section intends to curate or arrange for alternate curation of an archaeological object that is uncovered during an archaeological investigation, the person must submit evidence to the State Historic Preservation Officer that the Oregon State Museum of Anthropology and the appropriate Indian tribe have approved the applicant's curatorial facilities.

(c) No permit shall be effective without the approval of the state agency or local governing body charged with management of the public land on which the excavation is to be made, and without the approval of the appropriate Indian tribe.

(d) The State Parks and Recreation Director, with the advice of the Oregon Indian tribes and Executive Officer of the Commission on Indian Services, shall adopt rules governing the issuance of permits.

(e) Disputes under paragraphs (b) and (c) of this subsection shall be resolved in accordance with ORS 390.240.

(f) Before issuing a permit, the State Parks and Recreation Director shall consult with:

(A) The landowning or land managing agency; and

(B) If the archaeological site in question is associated with a prehistoric or historic native Indian culture:

(i) The Commission on Indian Services; and

(ii) The most appropriate Indian tribe.

(2) The State Parks and Recreation Department may issue a permit under subsection (1) of this section under the following circumstances:

(a) To a person conducting an excavation, examination or gathering of such material for the benefit of a recognized scientific or educational institution with a view to promoting the knowledge of archaeology or anthropology;

(b) To a qualified archaeologist to salvage such material from unavoidable destruction; or

(c) To a qualified archaeologist sponsored by a recognized institution of higher learning, private firm or an Indian tribe as defined in ORS 97.740.

(3) Any archaeological materials, with the exception of Indian human remains, funerary objects, sacred objects and objects of cultural patrimony, recovered by a person granted

a permit under subsection (2) of this section shall be under the stewardship of the State of Oregon to be curated by the Oregon State Museum of Anthropology unless:

(a) The Oregon State Museum of Anthropology with the approval from the appropriate Indian tribe approves the alternate curatorial facilities selected by the permittee;

(b) The materials are made available for nondestructive research by scholars;
and

(c)(A) The material is retained by a recognized scientific, educational or Indian tribal institution for whose benefit a permit was issued under subsection (2)(a) of this section;

(B) The governing board of a public university listed in ORS 352.002, with the concurrence of the appropriate Indian tribe, grants approval for material to be curated by an educational facility other than the institution that collected the material pursuant to a permit issued under subsection (2)(a) of this section; or

(C) The sponsoring institution or firm under subsection (2)(c) of this section furnishes the Oregon State Museum of Anthropology with a complete catalog of the material within six months after the material is collected.

(4) The Oregon State Museum of Anthropology shall have the authority to transfer permanent possessory rights in subject material to an appropriate Indian tribe.

(5) Except for sites containing human remains, funerary objects and objects of cultural patrimony as defined in ORS 358.905, or objects associated with a prehistoric Indian tribal culture, the permit required by subsection (1) of this section or by ORS 358.920 shall not be required for forestry operations on private lands for which notice has been filed with the State Forester under ORS 527.670.

(6) As used in this section:

(a) "Private firm" means any legal entity that:

(A) Has as a member of its staff a qualified archaeologist; or

(B) Contracts with a qualified archaeologist who acts as a consultant to the entity and provides the entity with archaeological expertise.

(b) "Qualified archaeologist" means a person who has the following qualifications:

(A) A post-graduate degree in archaeology, anthropology, history, classics or other germane discipline with a specialization in archaeology, or a documented equivalency of such a degree;

(B) Twelve weeks of supervised experience in basic archaeological field research, including both survey and excavation and four weeks of laboratory analysis or curating; and

(C) Has designed and executed an archaeological study, as evidenced by a Master of Arts or Master of Science thesis, or report equivalent in scope and quality, dealing with archaeological field research.

(7) Violation of the provisions of subsection (1)(a) of this section is a Class B misdemeanor.

Any subsurface archaeological excavation (as applicable) on non-federal public lands, inclusive of any state, county, or municipal lands, will be conducted under a State of Oregon Archaeological Excavation Permit per ORS 390.235(1)(a) and OAR 736-051-0080 to -0090.

1.2.3 Additional Regulatory Context

A substantial portion of the Project is located on private lands (69 percent or 186 miles) with little State lands involved (0.4 percent or 1.1 miles). However, the Project also crosses significant stretches of federally-managed land (24 percent or 65.4 miles across BLM-managed land; 0.2 percent or 0.5-mile across Bureau of Reclamation-managed lands; 4 percent or 10.5 miles across Department of Defense/U.S. Army Corps of Engineers-managed lands; and 3 percent or 7.1 miles on National Forest System lands). BLM is the lead federal agency responsible for completing the NEPA environmental analysis and for compliance with Section 106 of the NHPA.

1.2.3.1 Section 106 Cultural Resources Working Group and Consulting Parties

ODOE is a participant in the BLM's Cultural Resources Working Group for the Project. Consistent with Section 106, the BLM has convened a cultural resources working group, comprising representatives of the Oregon State Office and Vale District Office of the BLM and its contractor; U.S. Department of Agriculture Forest Service (USFS); Bonneville Power Administration; the ACHP; Oregon and Idaho SHPOs; ODOE; Confederated Tribes of the Umatilla Indian Reservation (CTUIR); CTUIR Tribal Historic Preservation Officer (THPO); Shoshone Paiute Tribe; Shoshone Bannock Tribe; Malheur, Baker, Union, Umatilla, and Morrow Counties; Oregon Commission on Historic Trails; Oregon-California Trails Association; Stop Idaho Power; and IPC. In addition to the working group, 32 consulting parties have been identified for the Project, including federal, state, and local agencies; IPC; tribes; historic preservation groups; and, public community groups and individuals with an interest in the Project. These are listed below:

- BLM
- U.S. Army Corps of Engineers
- U.S. Department of the Navy, Naval Weapons Training Facility Boardman
- U.S. Forest Service, Regional Office
- U.S. National Park Service (NPS), Ice Age Floods National Geologic Trail
- NPS, Pacific Northwest Region
- Idaho SHPO
- Washington SHPO
- Burns Paiute Tribe
- Shoshone-Bannock Tribes of Fort Hall
- Baker County
- Union County
- National Trust for Historic Preservation
- Oregon Historic Trails Advisory Council
- Bonneville Power Administration
- Bureau of Reclamation
- U.S. Fish and Wildlife Service, Umatilla National Wildlife Refuge
- USFS, Wallowa-Whitman National Forest
- NPS National Lewis and Clark Trail Offices
- ACHP
- Oregon SHPO
- ODOE³
- CTUIR
- Shoshone-Paiute Tribes of the Duck Valley Indian Reservation
- Morrow County
- Lewis and Clark Trail Heritage Foundation
- Oregon-California Trails Association
- City of Baker City

³ ODOE's involvement in the Section 106 Cultural Resources Working Group was intended to facilitate the use of the federal Section 106 for compliance with ODOE's state regulatory requirements.

- IPC
- Halt Idaho Power
- Private Individual
- Poison Creek Neighborhood Group

To date, the Cultural Resources Working Group has provided an open forum for identifying and resolving issues related to cultural resources. Through in-person meetings and conference calls, the cultural resources working group defined the size and boundaries of the area of potential effect for the Project under Section 106; reviewed, commented upon, and/or approved cultural resources and viewshed assessment study plans; and prepared a PA.

1.2.3.2 Programmatic Agreement

A PA for managing historic properties that may be affected by the Project was prepared by BLM, acting as the designated lead federal agency and in consultation with the Section 106 Cultural Resources Working Group. The intent and applicability of the PA is for compliance with the NHPA and Section 106; however, studies and consultations completed under the direction of the PA may support the EFSC permitting process.

The PA allows for identification of cultural resources as well as NRHP eligibility evaluation and effect determinations on the Proposed Route and all alternative routes considered during the permitting process. The PA allows for the final determinations of Project effects to historic properties (including NRHP-listed, -eligible, and unevaluated resources) and the resolution of adverse effects under Section 106 to be outlined in a HPMP. Although the HPMP required by the PA will be submitted by BLM for review by all PA parties, including ODOE, it is anticipated to be specific to compliance with Section 106 of the NHPA. In order to comply with the EFSC permitting process, this ODOE-specific HPMP has been drafted. Although the HPMP dictated by the PA has not been completed as of the drafting of this document, approaches to identification and effect determinations are expected to be similar between the two HPMPs; however, this ODOE-specific HPMP also addresses archaeological resources and objects on private lands, regardless of NRHP-eligibility status. A framework of the BLM's anticipated Section 106 HPMP is included in Appendix A.

1.3 Organization of the HPMP

Section 1 of this HPMP provides an introduction to the document, describes its purpose, and provides a state regulatory context for the Project. Section 2 describes the Project and the Project's Site Boundary included in the Site Certificate. Section 3 outlines the sequence of Project-related tasks that will occur in order to avoid, minimize, or mitigate significant impacts on cultural resources considered under EFSC's siting standards for cultural resources. Section 4 summarizes the cultural resource studies completed for the Project and their results. Section 5 discusses the methods for determination of NRHP eligibility and other cultural resources considered under EFSC's siting standards and assessment of effects. Section 6 outlines IPC's proposed avoidance and mitigation plan for the Project, as pertains to cultural resources considered under EFSC's siting standards. Sections 7 and 8 provide a general Monitoring Plan and an IDP, respectively. Section 9 is a list of references cited in this HPMP.

2.0 PROJECT DESCRIPTION

This section provides a brief Project description and defines the Project's Site Boundary included in the site certificate. The Project Site Boundary guides what resources are considered in this HPMP.

2.1 Project Description

The Project consists of an approximately 296.6-mile-long single-circuit 500-kilovolt (kV) transmission line between Boardman, Oregon and the Hemingway Substation located near Melba, Idaho (Project). In the state of Oregon, the Project includes 270.8 miles of single-circuit 500-kV transmission line, removal of 12 miles of existing 69-kV transmission line, rebuilding of 0.9 mile of a 230-kV transmission line, and rebuilding of 1.1 miles of an existing 138-kV transmission line along a new right-of-way (ROW). The proposed transmission line will be constructed on federal, state, and private land in portions of two states and six counties: Morrow, Umatilla, Union, Baker, and Malheur Counties, Oregon, and Owyhee County, Idaho. This HPMP is applicable to the 284 miles of transmission line and associated Project components within the state of Oregon.

The Project requires a site certificate from the EFSC, as well as approval from federal land management agencies (for portions of the project on federal land). IPC submitted a Notice of Intent to the ODOE on July 15, 2010, to file an ASC for the Project. On February 27, 2013, IPC submitted a preliminary ASC (pASC) to ODOE, and amended the application in May of 2013 to include BLM alternatives not previously included in the pASC. An amended Project Order was provided by the Council on December 22, 2014. If issued, the Site Certificate would authorize the construction of the transmission lines, a switching station near the Port of Morrow, Oregon, communication stations, related and supporting facilities, and temporary features.

2.2 Project Site Boundary

The Project Site Boundary includes the construction footprint and is the area within which the Project may be built. Although alternative transmission line routes and attendant roads and facilities are included in the Project Site Boundary, this HPMP will only be implemented at the Project components selected for construction. The Project Site Boundary includes the following facilities in Oregon:

- The Proposed Route, consisting of 270.8 miles of new 500-kV electric transmission line, removal of 12 miles of existing 69-kV transmission line, rebuild of 0.9 mile of a 230-kV transmission line, and rebuild of 1.1 miles of an existing 138-kV transmission line;
- Four alternatives that each could replace a portion of the Proposed Route, including the West of Bombing Range Road Alternative 1 (3.7 miles), West of Bombing Range Road Alternative 2 (3.7 miles), Morgan Lake Alternative (18.5 miles), and Double Mountain Alternative (7.4 miles);
- One proposed 20-acre station (Longhorn Station);
- Ten communication station sites of less than 0.25-acre each and two alternative communication station sites;
- Permanent access roads for the Proposed Route, including 206.3 miles of new roads and 223.2 of existing roads requiring substantial modification and for the Alternative Routes including 30.2 miles of new roads and 22.7 miles of existing roads requiring substantial modification; and
- Thirty temporary multi-use areas and 299 pulling and tensioning sites of which four will have light-duty fly yards within the pulling and tensioning sites.

2.3 Visual Assessment Area

In addition to the Project Site Boundary, this HPMP considers historic properties and other cultural resources within 5 miles of the Proposed Route centerline and with a view of the Project. "Other" cultural resources include non-historic properties with aboveground components (such as standing buildings, cairns, hunting blinds, etc.) or other qualities wherein the viewshed is a significant quality of the resource. The Visual Assessment area was determined through a Geographic Information System viewshed analysis of the Project features in the Project Site Boundary described above. Areas within 5 miles of the Proposed Route centerline and with a view of Project features were included in the Visual Assessment area as well as the Project Site Boundary.

3.0 SEQUENCE OF PROJECT-RELATED TASKS

There are a series of tasks that will be completed to ensure that cultural resources considered by EFSC site certificate standards are avoided or Project impacts to them minimized or mitigated to less than significant. These tasks are identified as those that must take place before construction, during construction, and after construction/during reclamation and O&M, as applicable.

3.1 Pre-Construction Tasks

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); and
- Required mitigation measures will be completed (as applicable).

In addition to the above tasks, IPC will develop and implement a cultural resource training program as part of the overall environmental training program for all Project staff (construction workers, supervisors, etc.) and those who will access the Project area. As part of the cultural resource training program, a local tribal representative(s) will be invited to participate in the environmental training to discuss or provide context from a tribal cultural perspective regarding the cultural resources within the Project Site Boundary and/or the Visual Assessment area, and how these resources have traditional religious and cultural importance to Native American tribes (as appropriate). The presentation will have the goal of ensuring the appropriate and respectful treatment of such resources within or near the Project or upon their inadvertent discovery. The training program will be prepared and presented at the pre-construction meeting by the CRT and the Native American Representative (as appropriate) and will include a discussion of the following:

- All applicable laws and penalties pertaining to cultural resources;
- A brief discussion of the prehistoric and historic regional context of the area, including local Native American beliefs, how those beliefs are related to cultural resources that

may be found in the area, and appropriate and respectful behavior regarding such resources;

- Types of prehistoric and historic deposits/artifacts found in the area and what they look like on the ground surface, partially buried, buried, and/or freshly exposed as a result of construction activities;
- Explanation of the responsibilities of workers during construction of the Project and during O&M regarding cultural resources;
- Instruction that Project workers will avoid identified sensitive areas within the Project footprint and halt construction or an O&M activity if a cultural resource is inadvertently discovered; and
- Review of this HPMP and the protocols and procedures that will be implemented during construction and O&M activities, such as applicable cultural resource laws, Project/construction personnel, CRT staff and Native American monitor roles and responsibilities, monitoring activities and signage, inadvertent and human remain discovery procedures, stop work procedures, etc.

Presentation of the cultural resource training to Project workers will be a one-time in-person presentation by the CRT lead in coordination with the Native American Tribal Representative(s). Thereafter, the Project's construction contractor's environmental compliance manager can provide the training to additional new staff/personnel in the form of a training video. The training video will include visual examples of environmentally sensitive areas (examples of exclusion zone signage or flagging) and images/footage of prehistoric and historic artifacts and/or deposits that are demonstrative of cultural resource finds in the area and evocative of the sensitive nature of these resources. Staff receiving the training will be required to acknowledge the training by signing a training log which will be maintained by the on-site Project compliance manager, and each worker will receive a training sticker that must be displayed and easily visible on their hard hat.

3.2 Construction Phase Tasks

Construction phase tasks to be completed by the CRT include, but are not limited to, the following:

- Provide ongoing environmental training for newly hired construction staff. The training may be a previously recorded video and may not require additional CRT support, unless requested. The CRT will ensure on-site construction personnel are in compliance and have the appropriate required training sticker displayed on their hard hats;
- Construction monitoring as described in Section 7 of this plan; and
- Conduct testing or data recovery or other types of mitigation for any inadvertent discoveries as described in Section 7 of this plan, as necessary.

Additional construction phase tasks may also include site certificate amendments, if any. The CRT will consult and provide support, as needed, for any Project amendment. During construction, the need may arise for changes to Project construction procedures, approved mitigation measures or other stipulations, and/or the Project Site Boundary or construction footprint. Under these or similar circumstances, an amendment to the Site Certificate will need to be filed and approved by EFSC, to stay in compliance with all conditions of Site Certification. The ODOE will consult with the SHPO, as appropriate, and the CRT will conduct any additional studies deemed necessary.

3.3 Post-Construction Phase Tasks

Post-construction phase tasks to be completed by the CRT include completing test investigations or data recovery analysis (as necessary), preparing artifacts for curation (as applicable), transferring these materials to the approved curation facility or appropriate land owner (if requested), and preparing final reports. The CRT will also prepare and finalize the mitigation and monitoring report.

3.3.1 Operation and Maintenance Phase

O&M activities include transmission line patrols, climbing inspections, structure and wire maintenance, insulator washing (as needed), inspection and maintenance of stations and communication facilities, access road repairs, vegetation management activities to maintain conductor to vegetation clearances, and keeping structures clear of vegetation. Most normal O&M of the Project would not involve any new ground disturbance outside of the construction footprint, and therefore no impacts to previously known cultural resources subject to the EFSC standard would be expected. However, some O&M activities, specifically vegetation management, ground disturbing repairs, etc., within or near cultural resources subject to the EFSC standard may result in significant impacts. The IDP in Section 8 of this HPMP will be followed during O&M activities to ensure the continued protection of such resources. The IDP contains procedures that reference construction personnel specific to the construction phase of the Project; however, the general practices contained within the IDP will be followed by IPC's O&M personnel or contractor(s). IPC's O&M staff and contractor(s) will notify the applicable land-managing agency personnel of any discovery and afford said discovery with the applicable protections.

O&M phase tasks to be completed by IPC's O&M staff and contractor(s) include, but are not limited to, the following:

- On-going employee environmental training annually and for newly hired staff, including provision of post-training informational materials;
- Follow procedures contained in this HPMP and the IDP provided in Section 8, as applicable;
- Coordinate activities with the applicable land-managing agency and, as appropriate, tribe(s) regarding how best to avoid, minimize, or mitigate impacts to cultural resources subject to the EFSC standard and in accordance with the applicable procedures outlined in this HPMP. ODOE and SHPO will be consulted regarding all measures to be conducted;
- Coordinate with tribe(s) regarding the scheduling of O&M activities to be conducted within 5 miles of Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSIT) (e.g. sacred sites, traditional use areas, etc.). Regular O&M activities will be scheduled so as to not coincide with or impact use of these sites. Further, vegetation management activities, such as the application of herbicides, will avoid impacting species of concern to tribe(s); and
- Monitoring requirements as described in Section 3.3.3.

IPC's O&M staff will continue to coordinate and consult with ODOE, SHPO, and tribes, as necessary.

3.3.2 Reclamation Phase

Once construction is completed, various reclamation treatments will be applied to reclaim Project areas to a condition agreed upon by the landowner, tenant, or land-managing agency. Reclamation activities may require 4x4 trucks, 2-ton trucks, bulldozers, motor graders, dump trucks, front-end loaders, and water trucks. Reclamation treatments that involve ground-disturbing activities within previously undisturbed soils may have the potential to significant impact cultural resources subject to the EFSC standards.

Table 3-1, below, shows typical reclamation activities and general monitoring requirements, but is not a comprehensive list of mitigation measures that may be required. Resource-specific measures will be provided in future resource-specific mitigations and treatment plans. Measures to be applied to resources of concern to tribes will be determined through consultation with those tribes. Such measures may include avoidance of reclamation activities during tribal use of cultural resources subject to the EFSC standards. Reclamation activities may require monitoring and avoidance measures by the CRT. The HPMP will be adhered to during the Reclamation Phase.

Table 3-1. Examples of Reclamation Activities

Reclamation Activity	Description of Activity	Possible Equipment	Monitoring Requirements
Management of Waste Materials	Cleanup of debris from construction area, such as scrap metals, oil, wood, etc.	4x4 trucks, dump trucks, front-end loaders	None.
Earthworks	Re-establishment of slope and surface stability and recontouring.	4x4 trucks, dump trucks, front-end loaders, motor graders, bulldozers	Monitoring of new ground disturbance is anticipated and/or if work takes place near the boundary of a known cultural resource subject to EFSC standards.
Topsoil Replacement	Reclamation of construction disturbance to pre-construction landscape conditions: replacement of soils, re-contouring, etc.	4x4 trucks, front loader, motor grader	Monitoring of new ground disturbance is anticipated and/or if the work takes place near the boundary of a known cultural resource subject to the EFSC standards.
Seeding	Planting new seeds of indigenous native species.	4x4 trucks	None. No ground disturbance within undisturbed soils.
Alternative Seeding	Seeding of annual grasses or forbs.	4x4 trucks	None. No ground disturbance within undisturbed soils.
Vertical Mulch Replacement	Vegetation previously cleared will be replaced back onto site.	4x4 trucks, front loader, motor grader	None. No ground disturbance within undisturbed soils.

Reclamation Activity	Description of Activity	Possible Equipment	Monitoring Requirements
Visual Composition	Enhancement restoration to mitigate visual impacts. Plan to be developed.	4x4 trucks, front loader, motor grader	May require monitoring if activity is near a known cultural resource subject to EFSC standards.

NOTE: Resource-specific measures, including monitoring where needed, will be developed in coordination with the ODOE, SHPO, and tribe(s), as applicable, for cultural resources subject to the EFSC standards. The measures will be provided in the final Reclamation Plan included in the ASC.

3.3.3 Operation and Maintenance Activities

Routine O&M activities will be conducted within the Project Site Boundary as defined in the Project Order. They will range from routine equipment inspections (no new ground disturbance outside of the Project’s permitted area as defined by site certification) performed by relatively small crews to ground-disturbing activities such as pole replacement or access road maintenance performed by larger crews with heavy equipment. Activities that result in new ground disturbance have the potential to cultural resources subject to the EFSC standards. Table 3-2 below lists some of the typical routine O&M activities and generalized monitoring requirements, but is not a comprehensive list of mitigation measures that may be required for O&M activities. Resource-specific measures will be provided in future resource-specific mitigations and treatment plans. Measures to be applied to resources of concern to tribes will be determined through consultation with those tribes. Such measures may include avoidance of reclamation activities during tribal use of cultural resources subject to the EFSC standards. Additional detail of routine O&M activities is contained in Exhibit B of the ASC.

Table 3-2. Operation and Maintenance Activities

Operation and Maintenance Activity	Description of Activity	Schedule, Crew, Equipment	Monitoring Requirements
Transmission Line Maintenance	Ground and aerial inspections of transmission line and nearby vegetation to determine if repairs are necessary.	Semi-annually/Crew of 3 to 4, aerial inspection uses helicopter, ground crew uses 4x4 trucks or all-terrain vehicles.	None.
Hardware Maintenance Repairs	Repair or replacement of individual components (no new ground disturbance outside of right-of-way [ROW]).	Schedule depends on inspection results; crew may use 4x4 trucks, material truck (flatbed), bucket trucks (low reach), boom trucks (high reach), or personal lift.	None.

Operation and Maintenance Activity	Description of Activity	Schedule, Crew, Equipment	Monitoring Requirements
Access Road and Work Repair	Grading or repair of existing maintenance access roads and work areas, spot repair of sites subject to flooding or scouring.	Schedule depends on inspections or response to emergency; crews may use a grader, backhoe, four-wheel-drive pickup truck, and a tracked-loader, or bulldozer.	Monitoring of new ground disturbance is anticipated and/or if the work takes place near the boundary of a known cultural resource subject to EFSC standards.
Vegetation Management	Within the ROW under the wires and to 10 feet outside outermost conductor, vegetation maintained under 5 feet tall. From this zone to the edge of the ROW, vegetation maintained up to 25 feet in height or as needed to ensure safe operations.	Schedule depends on inspections; crew size varies, and vegetation will be removed using chain saws, weed trimmers, rakes, shovels, mowers, and brush hooks. Clearing efforts in heavy growth areas will use a Hydro-Ax or similar equipment.	Monitoring of new ground disturbance is anticipated and/or if the work takes place near the boundary of a known cultural resource subject to EFSC standards.
Station and Communication Station Maintenance	Equipment testing, monitoring and repair, emergency and routine procedures for service continuity and preventive maintenance of remote surveillance system.	Scheduled once monthly or as needed; crew of 2-4 persons, use light utility truck.	None.
Emergency Response	Activities necessary to repair natural hazard, fire, or human-caused damages to line.	Equipment is similar to conducting routine maintenance, with use of similar equipment to complete repairs (e.g., helicopters for quick response)	Monitoring of new ground disturbance is anticipated and/or if the work takes place near the boundary of a known cultural resource subject to EFSC standards.

Operation and Maintenance Activity	Description of Activity	Schedule, Crew, Equipment	Monitoring Requirements
Fire Protection	All federal, state, and county laws, ordinances, rules, and regulations pertaining to fire prevention and suppression will be strictly adhered to.	Typical practices include brush clearing prior to work, stationing a water truck at the job site to keep the ground and vegetation moist in extreme fire conditions, enforcing red flag warnings, providing “fire behavior” training to all pertinent personnel, and keeping vehicles on or within designated roads or work areas.	Monitoring of new ground disturbance is anticipated and/or if the work takes place near the boundary of a known cultural resource subject to EFSC standards.

Note: Resource-specific measures, including monitoring where needed, will be developed in coordination with the ODOE, SHPO, and tribe(s), as applicable, for cultural resources subject to EFSC standards. The measures will be amended to the HPMP.

4.0 PREVIOUS RESEARCH AND CULTURAL RESOURCE TYPES IDENTIFIED WITHIN THE PROJECT AREA

This section discusses the identification of cultural resources during the Project’s planning and permitting phase. It also summarizes the cultural resource types identified within the Project area. Studies completed include a literature and records review, cultural resources pedestrian survey of the Project Site Boundary, a Visual Assessment of Historic Properties (VAHP), and ethnographic studies completed by the CTUIR and Shoshone-Paiute tribes. (At the time of this publication, the ethnographic studies are considered confidential and are unavailable to IPC.) The cultural resources pedestrian survey (Anderson et al. 2018) and the VAHP study (AECOM 2018) both include extensive cultural and historic contexts for the Project. Both studies are included as confidential attachments to Exhibit S of the ASC. An Enhanced Archaeological Survey, consisting of survey of inaccessible parcels, shovel probing, and testing, will occur after publication of this HPMP and receipt of the Site Certificate, but prior to construction activities.

4.1 Literature Review and Cultural Resources Pedestrian Survey

Prior to the initiation of cultural resource pedestrian surveys, a literature and records review was conducted of the analysis area. Available existing records of previously conducted surveys and recorded sites were retrieved from the Oregon SHPO’s inventory and site database, the CTUIR, THPO, the USFS, and applicable BLM field offices. The literature review presented in the technical report (confidential Attachment S-6) for the Project provides an in-depth discussion of the environmental and cultural contexts of the analysis area, including an overview of prehistory, ethnography, and history.

A series of cultural resource pedestrian surveys were conducted in an effort to field check and examine previously recorded resources and identify any unrecorded cultural resources within the Site Boundary. The entire Project Site Boundary has been inventoried except for areas to

which access has been denied, or with development precluding ground surface visibility (e.g., paved roads and highways, parking lots, and lawns), areas deemed hazardous (e.g., loose talus slopes, slippery bedrock exposures, deep streams, and electrical substations), or excessively steep (35 degree and greater) slopes. The latter areas (hazardous and steep areas) were examined visually from a safe distance, however, particularly for resources such as rock art, rock shelters, cairns, and any other apparent cultural resource or feature. Six pedestrian survey sessions of accessible private and public lands were conducted between the spring of 2011 and the summer of 2016. Areas of denied access will be subject to complete pedestrian survey during the Enhanced Archaeological Survey to be conducted after receipt of the site certificate, prior to facility construction.

4.2 Ethnographic Studies

To identify and protect contemporary and ongoing tribal use of culturally significant areas and/or sites, general information about sacred sites and other places of traditional cultural or religious importance to Native Americans or other cultural groups has been researched as part of the completion of the cultural context for the Project as well as the VAHP. The BLM has completed separate ethnographic studies of the direct analysis area in coordination with the CTUIR and Shoshone-Paiute Tribes of the Duck Valley Indian Reservation. The Burns Paiute Tribe is in the process of conducting a third ethnographic study. The confidential traditional use study completed by CTUIR in 2014 through the Section 106 process was provided to IPC on May 3, 2018 during an in-person meeting between ODOE, SHPO, CTUIR, and IPC regarding the EFSC site certificate process. The study (Engum 2014a, 2014b) has been incorporated, as appropriate, into the assessment of Project impacts. Additional formal and informal phone conversations have occurred between CTUIR and IPC since the May 3, 2018 meeting to further IPC's coordination efforts.

Many HPRCSITs and other cultural resources that could potentially be HPRCSITs were identified by Project studies as being crossed by the direct analysis area. Two formally evaluated HPRCSITs crossed by the direct analysis area are Sand Hollow Battleground and Sisupa (Engum 2014a, 2014b). Sand Hollow Battleground is the site of the largest battle of the Cayuse War, involving the First Oregon Rifle Regiment and the Umatilla, Cayuse, Palouse, and Walla Walla tribes and holds other aspects of significant to the CTUIR that are unrelated to the battle that occurred there (Engum 2014a, 2014b; Minthorn 2006; Mitchell 2003). Sisupa is the site of a campsite between the Columbia River and Lone (Engum 2014a, 2014b; Hunn et al. 2015). These two resources were determined eligible for the NRHP by the U.S. Department of Defense (DOD 2015) and are historic properties subject to the EFSC standards.

Nisxt is a third formally evaluated HPRCSIT located on the Columbia River east of the Port of Morrow. This site was identified in a Traditional Use Study completed by the Yakama Nation under contract to the U.S. Army Corps of Engineers (Meninick, et al. 2014). The site is identified as a permanent winter village named for the greasewood found there. The U.S. Army Corps of Engineers determined that one component of the site is NRHP eligible. The site is located within the indirect analysis area.

IPC will continue to coordinate with interested tribes to determine any necessity to address conflicts with HPRCSITs or other traditional use sites that are subject to EFSC standards.

4.3 Visual Assessment of Historic Properties

A VAHP study was completed in a phased approach, including a reconnaissance level survey (RLS), completed in September 2015, and an intensive level survey (ILS), completed in

February 2018. The RLS and ILS are primarily designed to identify potential effects to built environment or aboveground resources. Fieldwork for the ILS was conducted between October 2014 and October 2016. Additional RLS and ILS work remains on CTUIR lands. The entire Project Site Boundary and viewshed have been inventoried except for areas to which access has been denied and CTUIR lands. Areas of denied access and the CTUIR lands will be subject to complete survey after receipt of the site certificate, but prior to facility construction and only if access is granted from the applicable property owners. The ILS analyzes those properties from the RLS that have sufficient integrity, for which an NRHP criterion might apply, and that have the potential to be affected by the Project (i.e. the Project would be visible from the resource). The history of each property in the ILS was documented and then comparatively analyzed against the historic context of the Project. This provides a framework for determining whether the resource meets any of the NRHP Criteria for Evaluation.

The RLS fieldwork identified 764 built environment resources in Oregon, including multiple crossings of historic trails and pre-contact resources, such as quarries and cairns. The ILS study addressed 229 of these resources. These resources included NRHP-listed resources as well as resources that were recommended for additional study or NRHP evaluation, or were unevaluated resources, archaeological sites with aboveground features, or were newly identified following an updated literature search and data gap analysis to cover portions of the Project that were not previously identified in the RLS. Of the 229 resources, potential adverse effects are anticipated for 39 resources. Fourteen of the 39 resources require further consultation and research before making a recommendation on Project effect avoidance, minimization, and/or mitigation strategies. The Project will cross three historic properties with the potential for direct adverse effects. A list of sites with potential adverse effects is provided in Table 4-1. The majority of potential adverse effects could occur to stacked rock features/cairns. Due to the difficulty in dating and attributing cultural origin, additional consultation with ODOE, SHPO, and tribes will be conducted as an interim step towards determining if mitigation would be appropriate. Resource-specific management and/or treatment plans will be developed as needed as a result of consultations.

Table 4-1. Project Effects to Aboveground Resources

ID Number	Resource Name	Effect
CFR 1064	Vey Ranch	Potential Adverse Effect
35MW1	Midden	Further research and consultation necessary with Tribes and/or Federal Agency
35MW2	Camp, shell midden, lithic scatter	Further research and consultation necessary with Tribes and/or Federal Agency
35MW11	Midden	Further research and consultation necessary with Tribes and/or Federal Agency
SL-MO-001, SL-MO-005	Sand Hollow Battle Ground - (Associated Report #26196)	Further research and consultation with CTUIR; off-site mitigation
35MW248	Rock Cairns	Potential Adverse Effect

ID Number	Resource Name	Effect
SL-MO-003	Map A2: Nisxt (Associated Report #26592)	Further research and consultation with Confederated Tribes of Yakam Nation necessary
SL-MO-004	Map B2, C2, C3: Sisupa (Associated Report #26196)	Further research and consultation with CTUIR necessary
UP-102	Two Log Cabins	Further research and consultation with CTUIR necessary
UP-103	Buckhorn Cabin	Further research and consultation with CTUIR necessary
UP-106	Historic Cabin	Further research and consultation with CTUIR necessary
SL-UM-010	Historic Lookout Tower	Further research and consultation with CTUIR necessary
Range Unit 12 Site 1	Rock Cairn	Further research and consultation with CTUIR necessary
Range Unit 12 Site 2	Rock Cairn	Further research and consultation with CTUIR necessary
B2H-UM-006	Daly Wagon Road	Potential Adverse Effect
35UN459	Rock Cairn	Potential Adverse Effect
35UN493	Rock Cairn	Potential Adverse Effect
B2H-BA-282	Oregon Trail ACEC - Virtue Flat segment and Flagstaff Hill	Potential Adverse Effect
B2H-BA-285 (3B2H-CH-05)	Oregon Trail ACEC - Straw Ranch 1 and 2	Potential Adverse Effect
3B2H-CH-05	Oregon Trail Segment	Potential Adverse Effect
B2H-BA-327	Goodale's/Sparta Trail	Potential Adverse Effect
0503050334SI	Rock cairn, rock alignment	Potential Adverse Effect
14S44E14-2	Rock cairns, rock alignment, lithic scatter; Three Stone Rock Stacks	Potential Adverse Effect
35BA372	Rock Cairn	Potential Adverse Effect
35BA388	Rock Alignment	Potential Adverse Effect
35BA1423	Hunting blind rock stacks. Identified by CTUIR informant near ODOT borrow pit	Potential Adverse Effect
B2H-MA-041	Oregon Trail ACEC - Alkali Springs Segment	Potential Adverse Effect
B2H-MA-042	Oregon Trail ACEC-Birch Creek segment	Potential Adverse Effect
4B2H-EK-31	Benson Reservoir	Potential Adverse Effect
4B2H-EK-41	Oregon Trail Segment	Potential Adverse Effect
6B2H-RP-09	Oregon Trail Segment	Potential Adverse Effect
35ML550	Ali-Alk Rock shelter	Potential Adverse Effect
35ML1549	SM Site-2 (Stacked Rock Feature)	Potential Adverse Effect

ID Number	Resource Name	Effect
35ML1550	SM Site-3 (Stacked Rock Feature)	Potential Adverse Effect
35ML1552	SM Site-5 (Stacked Rock Feature)	Potential Adverse Effect
35ML1553	SM Site-6 (Stacked Rock Feature)	Potential Adverse Effect
35ML552	Ali-Alk Stacked Stone Rings	Potential Adverse Effect
35ML1959	Rock Cairn	Potential Adverse Effect
35ML1960	Rock Cairn	Potential Adverse Effect

4.3.1.1 Oregon Trail

This section provides an overview of resources identified by the ILS as associated with the Oregon Trail. Some of the resources discussed in this section are also mentioned in the VAHP section above, but are presented in summary form here to provide a unified discussion of this significant resource.

The evaluation of segments, sites, and side trails associated with the Oregon Trail was performed consistent with the currently proposed Multiple Property Documentation Form (MPDF) for the Oregon Trail, Oregon 1840-1880 as well as *Guidance for Recording and Evaluating Linear Cultural Resources* (Oregon SHPO 2013). The MPDF has been approved by the Oregon State Advisory Commission on Historic Preservation, but has yet to be approved by the Keeper of the National Register. The draft MPDF provides a framework for evaluating the various property types associated with the Oregon Trail in the State of Oregon that could be buildings, structures, objects, or sites, as well as districts. The MPDF also considers the Oregon Trail a linear historic district (in its totality) that contains contributing and non-contributing resources located within its historic boundaries. The Oregon Trail is also considered to be significant at the national level and has been designated as a National Historic Trail (NHT).

The MPDF discusses several Property Types associated with the Oregon Trail and specifically discusses the associated resources that fall under this typology. The following is a list of MPDF Property Types and associated resources located within the Visual Assessment analysis area: river crossings, fords, and ferries; intersecting routes; Indian agencies/reservations; Euro-American towns; springs; mountain ascents and descents; valleys; landmarks; battle sites; and important camping sites.

A total of 37 resources associated with the Oregon Trail were assessed during the VAHP studies. Of the 37 Oregon Trail resources, eleven were identified as being within the Project Site Boundary (3B2H-CH-05, 4B2H-EK-02, 4B2H-EK-41, 6B2H-RP-09 , 5B2H-SA-01, B2H-UN-005, B2H-BA-282, 35MW227, 35UN74, B2H-MA-003, B2H-MA-007). Twenty-eight NRHP-eligible Oregon Trail-related resources were recommended for the visual impacts assessment and following that analysis eight had the potential to be adversely affected by the Project. Table 4-2 summarizes the adversely impacted resources. Resource-specific mitigation and/or treatment plans will be determined, as necessary, in consultation with ODOE and SHPO.

Table 4-2. Project Impacts to Oregon Trail Resources

Temporary Resource Number	Resource Name	Effect
SL-MO-001, SL-MO-005	Sand Hollow Battle Ground (Associated SHPO Report #26196) (for its associations with Oregon Trail)	Potential Adverse Effect

Temporary Resource Number	Resource Name	Effect
B2H-BA-282	Oregon Trail ACEC - Virtue Flat segment and Flagstaff Hill (Flagstaff Hill component affected)	Potential Adverse Effect
3B2H-CH-05	Oregon Trail ACEC - Straw Ranch 1 and 2	Potential Adverse Effect
B2H-BA-285	Oregon Trail Segment (near Straw Ranch)	Potential Adverse Effect (Project Site Boundary)
B2H-BA-327	Goodale's/Sparta Trail	Potential Adverse Effect
B2H-MA-041	Oregon Trail ACEC - Alkali Springs Segment	Potential Adverse Effect
6B2H-RP-09	Oregon Trail Segment	Potential Adverse Effect (Project Site Boundary)
B2H-MA-042	Oregon Trail ACEC - Birch Creek segment	Potential Adverse Effect
4B2H-EK-41	Oregon Trail Segment	Potential Adverse Effect (Project Site Boundary)

In addition to considering the potential for resourced-specific impacts, an analysis that considers the potential cumulative impacts to Oregon Trail resources was prepared.

As an overview of the cumulative impacts analysis, of the 177.97 miles of the Congressionally Designated Route of the Oregon NHT, 43.89 miles would have a potential view that is within 0.5 mile of the Project Site Boundary. For "Contributing Trail Segments" or segments of the Oregon Trail that have been previously identified by surveys or listed on the NRHP, approximately 89.35 miles of these segments lies within the 5 miles of the Project centerline and about 27.43 miles would have a potential view that is within 0.5 mile of the Project Site Boundary.

While the cumulative effect data provide a general indication of the magnitude for indirect impacts, the resource-specific analysis performed during the ILS is more precise in its assessment of impacts to contributing resources associated with the Oregon Trail and informs Project planning in an effort to avoid, reduce, or mitigate impacts.

4.4 Cultural Resources Types Identified by Surveys

Table 4-3 provides a summary of the different cultural resources found by the Project's surveys in Oregon. These definitions have been developed in coordination with the BLM as part of the Project's Section 106 process and conform to the agency's GIS requirements. Studies conducted under the Project's Section 106 compliance efforts have been used to support analyses for the EFSC process.

Table 4-3. Cultural Resources Identified within the Direct Analysis Area

Resource Type	#	Resource Type	#
Pre-Contact Archaeological Sites		Historic/Aboveground Sites	
Cairn(s)	16	Railroad – UPRR (3 segments) ²	1
Cairn(s) & Hunting Blind	3	Ranching	1
Cairn(s) & Lithic Scatter	1	Road	1
Cairn(s) & Lithic/Tool Scatter	1	Survey Marker	3
Hunting Blind	1	Utility Line	1
Lithic Scatter	9	Utility Line & Water Conveyance	1
Lithic/Tool Scatter	23	Water Conveyance	7
Quarry	7	Water Conveyance – South Canal (1 segment) ³	1
Temporary Camp	1	Water Conveyance – Vale Oregon Main Canal (2 segments) ³	1
Multicomponent Archaeological Sites		Undetermined Archaeological Sites	
Cairn(s), Quarry, & Homestead	1	Cairn(s)	1
Lithic Scatter & Refuse Scatter	2	Rock Alignment	1
Lithic/Tool Scatter & Refuse Scatter	1	Pre-Contact Archaeological Objects	
Lithic/Tool Scatter, Homestead, & Refuse Scatter	1	Biface(s)	4
Lithic/Tool Scatter, Ranching, Water Conveyance	1	Biface(s) & Debitage	3
Quarry & Refuse Scatter	1	Core(s)	6
Quarry, Refuse Scatter, & Water Conveyance	1	Core(s) & Debitage	2
Temporary Camp & Ranching	1	Core(s), Debitage, & Tested Cobble(s)	1
Historic Archaeological Sites		Core(s), Debitage, & Utilized Flake(s)	2
Agriculture	6	Debitage	40
Agriculture & Other	1	Debitage & Tested Cobble(s)	1
Agriculture, Ranching	1	Debitage & Tool(s)	2
Cairn(s)	1	Debitage & Utilized Flake(s)	2
Cairn(s) & Trail	1	Other	1
Farmstead (in Ruin)	1	Projectile Point(s)	7
Homestead (in Ruin)	4	Utilized Flake(s)	6
Logging/Railroad (Abandoned)	1	Multicomponent Archaeological Objects	
Mining	9	Debitage & Refuse	2
Railroad – UPRR (2 segments) (in Ruin) ²	1	Debitage, Preform(s), & Refuse	1
Ranching	5	Debitage, Tested Cobble(s), & Refuse	1
Refuse Scatter	14	Historic Archaeological Objects	
Refuse Scatter & Structure (in Ruin)	1	Agriculture	5
Road (Abandoned)	6	Other	1
Structure (in Ruin)	1	Refuse	22
Trail – Oregon Trail (5 segments) ³	1		
Utility Line	3		
Water Conveyance (Abandoned)	5		

5.0 METHODS FOR DETERMINATION OF NRHP ELIGIBILITY AND EFFECTS

This section discusses the methods to be used to determine NRHP-eligibility and Project effects to resources. Per EFSC standards, significant effects may occur as a result of impacts on historic properties (NRHP-listed or -eligible resources), archaeological sites on private or state lands, or archaeological objects (also referred to here as isolated finds) on private lands. These same methods will be used if any previously unidentified cultural resources are discovered within the Project Site Boundary.

5.1 Determination of NRHP Eligibility

The cultural resources studies completed to date by IPC contain recommendations for NRHP eligibility for resources in the Project Site Boundary and Visual Assessment analysis area. These recommendations will be reviewed and accepted or modified by SHPO. For each resource that is within the Project Site Boundary and Visual Assessment analysis area, the SHPO will determine NRHP eligibility based on the recommendations. It should be noted that for sites that may be significant to tribes, IPC will coordinate with the affiliated tribe to make an appropriate NRHP eligibility recommendation. IPC will treat all unevaluated cultural resources as though they are NRHP-eligible and will try to avoid all unevaluated sites. If avoidance is not feasible, resource eligibility will be evaluated, which may require subsurface testing, additional research, and/or consultation with tribes or historic preservation groups to determine the significance of the site.

The CRT will make NRHP-eligibility recommendations for cultural resources identified during the construction or post-construction phases using the same criteria outlined in the Project's studies (Anderson et al. 2018; AECOM 2018).

5.2 Determination of Effects

Each historic property, archaeological site, and archaeological object subject to the EFSC standards has been or will be evaluated to determine if the Project will have a significant impact on the resource. Direct impacts may occur as a result of direct disturbance of NRHP-listed or -eligible cultural resources or archaeological sites within the direct analysis area or archaeological objects on private lands within the direct analysis area. Given the non-renewable nature of cultural resources, these impacts that occur through ground disturbance would be permanent. Indirect impacts may occur as a result of new construction within the viewshed of NRHP-listed or -eligible cultural resources with aboveground component or cultural resources where the surrounding viewshed plays an integral role in the expressing the resource's significance or in its use. This includes resources such as trails, buildings, and cairns, as well as TCPs. Impacts will only occur for those resources where the viewshed, setting, and landscape contributes to the significance or quality of use of the resource.

While IPC may make recommendations of NRHP eligibility and impact significance, the SHPO will make such determinations. For resources that may have significance to tribes, the CRT and IPC will coordinate with the appropriate tribe(s) to make eligibility and impact significance recommendations. IPC will provide consulted parties with the results of the finding. In addition, the ODOE will utilize the impact methodologies discussed in Attachments S-2, S-7, and S-10 to Exhibit S to determine the indirect visual effects of the proposed Project on cultural resources meeting the EFSC standards and with aboveground features or are of traditional significance to tribes. In addition, IPC in coordination with appropriate tribes will broadly assess cumulative effects in order to identify reasonably foreseeable, potentially adverse effects as a result of the proposed Project.

The determinations of effects to cultural resources subject to the EFSC standards will serve as the basis for IPC's development of resource-specific avoidance, minimization, or mitigation measures presented for review and approval in future resource-specific treatment and/or mitigation plans.

6.0 AVOIDANCE AND PROPOSED MITIGATION PLAN

Cultural resources meeting the EFSC standards (historic properties, archaeological sites on state or private lands, and archaeological objects on private lands) will be avoided, protected, and/or mitigated if avoidance is not possible. Justification for not avoiding any such resources will be provided to ODOE. If impacts are unavoidable, efforts will be aimed at reducing or compensating for those impacts. Impacted resources will require mitigation to reduce impacts to less than significant. The appropriate mitigation measure(s) depends on a number of factors, including the applicable criteria for NRHP eligibility and significance to a tribe(s). Following the identification of impacts and the development of appropriate mitigation measures, resource-specific mitigation plans will be prepared and included as Appendix B to this HPMP.

This section provides a generalized framework and approach IPC will assume for minimizing and mitigating significant impacts to cultural resources subject to the EFSC standards.

6.1 Avoidance

IPC has designed the Project to avoid significant cultural resources to the extent feasible. Cultural resources were identified within or near the Project area early in Project planning through literature reviews and Project-specific surveys. The Project design has been altered where feasible to avoid effects to significant cultural resources identified by the studies completed for the Project, and IPC is committed to a similar process for unanticipated or inadvertent discoveries during construction. Resource-specific treatment and mitigation plans will be developed in consultation with the ODOE and SHPO, and in coordination with appropriate tribe(s), so as to reduce the impacts to less than significant (see Appendix B).

In many cases, direct effects to significant cultural resources identified during the Project planning phase were avoided by relocating a Project facility, but the proposed facility may be installed near the resource. In order to avoid physical damage to the resource during construction, it and a buffer will be marked for avoidance by flagging, fencing, or staking. The buffer will be established on a resource-specific and basis determined through consultation with ODOE and SHPO, and when necessary, the appropriate tribes. In some cases, with large sites, complexes of sites, or districts/landscapes, only that part of the site near the construction activities will need to be marked for avoidance.

Construction monitoring to ensure successful site avoidance as planned and to watch for subsurface discoveries during grading, blading, excavation, and other initial mechanical ground-disturbing activities, will be conducted as detailed in the Monitoring Plan (see Section 7).

During Project construction, reclamation, and O&M activities, it is possible that surface and/or subsurface resources, not identified during pedestrian surveys, could be discovered. Section 8, the IDP, details the required response to such a discovery.

6.2 General Recommended Mitigation Measures for Cultural Resources Subject to the EFSC Standards

Based on the results of the archaeological and above ground resource surveys and avoidance efforts, it is unlikely that significant impacts to NRHP-eligible and listed historic properties can be entirely avoided by this Project. Even if the Project could be redesigned to avoid all direct effects

through ground disturbance, the substantial change in the setting of some important resources where setting is an aspect of integrity, including NHTs, cannot be entirely avoided and has already been identified in the survey reports. In addition, there may be resources that due to their critical location or size cannot be entirely avoided. The mitigation measures discussed in this section offer general guidance but do not hinder alternative approaches, site-specific mitigation for historic properties will be developed in coordination with the ODOE, SHPO, the tribe(s), and/or historic preservation societies (as applicable).

6.2.1 General Recommended Mitigation for Direct Significant Impacts

The Project has been designed to avoid direct effects to resources recommended eligible for or listed on the NRHP, including significant archaeological sites, historic buildings, and trails. Resource-specific mitigation measures for significant impacts will be addressed through resource-specific treatment and/or mitigation plans (Appendix B). However, this section provides a generalized approach to mitigate for direct significant impacts. These mitigation measures may or may not be appropriate for all directly impacted resources. Appropriate resource-specific mitigation will be determined through consultation with ODOE and SHPO, as well as tribes and historic preservation societies as appropriate.

The most common anticipated direct impact on cultural resources subject to the EFSC standards consists of direct disturbance of archaeological resources within the construction footprint. After all reasonable avoidance and minimization measures have been implemented and a significant impact is still considered probable, mitigation would likely include data recovery. This may include excavation, research, and analysis, as summarized in Table 6-1. Appropriate alternative methods may be developed in coordination with ODOE, SHPO, tribe(s), and/or historic preservation societies.

Table 6-1. Example Data Recovery Methods for Unavoidable Direct Impacts*

Time Period of Resource	Example Resource Types	Potential Data Recovery for Resources without a Subsurface Component	Potential Data Recovery for Resources with Subsurface Component(s)
Pre-contact	Lithic scatters, campsites, hearths, and quarries	<ul style="list-style-type: none"> • Surface collection or in-field artifact analysis and recording • Detailed surface mapping • Geomorphological studies • Photo documentation • Curation 	<ul style="list-style-type: none"> • Surface collection or in-field artifact analysis and recording • Detailed surface mapping • Geomorphological studies • Controlled excavation • Laboratory analysis • Photo documentation • Curation
Historic Era	Refuse scatters, mining sites, homesteads	<ul style="list-style-type: none"> • Archival research • Surface collection or in-field artifact analysis • Detailed surface mapping • Photo documentation 	<ul style="list-style-type: none"> • Archival research • Surface collection or in-field artifact analysis • Detailed surface mapping • Controlled scientific excavation • Laboratory analysis • Photo documentation

* Table intended as starting point for consultations to determine appropriate mitigation measures to reduce impacts. Resource types listed are not exhaustive.

When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering scientific information from and about the resource, will be prepared. Such plans will be drafted in coordination with ODOE, SHPO, and appropriate tribe(s). Planning for data recovery excavation to mitigate the loss of substantial and significant archaeological resources will be guided by data gathered during the test investigations and by the research design. Data recovery activities as management for

unavoidable direct impacts on cultural resources subject to the EFSC standards would be confined to the construction footprint. The appropriate state permits will be acquired to conduct all field work.

The data recovery plan will also include excavation, analysis, collection, and cataloging methods. Once data recovery and analysis are completed, the results will be provided in a report prepared by the Cultural Resources Specialist (CRS; see Section 7.1.1 for reporting and review).

In addition to data recovery, off-site mitigation may also be proposed and approved. Typical off-site mitigation measures can include methods described below for indirect effects (see Section 6.2.2).

6.2.1.1 General Recommended Mitigation Measures for Direct Impacts to Specific Resource Types

Based on the cultural resource pedestrian survey conducted for the Project (Anderson et al. 2018), the following site types (Table 6-2) have been identified within the construction footprint or Project Site Boundary. If avoidance is not feasible, minimization and/or mitigation measures will be implemented. This section presents a general framework for such strategies by cultural resource site type. Resource-specific mitigation or treatment plans will be guided by the Oregon SHPO's *Guidelines for Conducting Field Archaeology in Oregon* (2013) and developed in coordination with ODOE, SHPO, tribe(s), and/or historic preservation societies, as applicable. Table 6-2 lists potential minimization and mitigation measures for direct effects to the specific resource site types identified by Anderson et al. (2018). This list is not all-inclusive and other resource-specific mitigation measures may be appropriate. The example mitigation measures noted in this table would be deployed for direct significant impacts to cultural resources subject to the EFSC standard.

Table 6-2. Framework for Potential Minimization and Mitigation of Direct Impacts to Specific Cultural Resource Site Types Identified within the Direct Analysis Area

Site Type	Potential Minimization/Mitigation Measure
Pre-Contact Sites	
Lithic Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Lithic/Tool Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Quarry	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Temporary Camp	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Multicomponent Sites	
Lithic Scatter & Refuse Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Lithic/Tool Scatter & Refuse Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).

Site Type	Potential Minimization/Mitigation Measure
Lithic/Tool Scatter, Ranching Complex, Water Conveyance	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Possible Rock Art, Utility Line, and Water Conveyance	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Quarry & Refuse Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Quarry, Water Conveyance, & Refuse Scatter	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Temporary Camp & Water Conveyance	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Temporary Camp, Lithic/Tool Scatter, Refuse Scatter, and Ranching	Data recovery (controlled excavation), or in-place preservation/protection (capping with clean fill). Off-Site: publish research-focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Historic-Era Sites	
Agriculture	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Bridge	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Homestead	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Homestead/Ranching	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Logging/Railroad	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Mining	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Railroad	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Railroad & Utility Line	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Ranching	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Refuse Scatter	Update recordation (if necessary), data recovery (if applicable). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).

Site Type	Potential Minimization/Mitigation Measure
Road	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Structure	Update recordation (if necessary, HABS/HAER/HALS documentation, repair, rehabilitation, or restoration (if applicable)). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Survey Marker	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Survey Marker & Refuse	Update recordation (if necessary, data recovery (if applicable)). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Trail Segment	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.), rehabilitation of off-site trail segment.
Trail Segment & Utility Line	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.), rehabilitation of off-site trail segment.
Utility Line	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Utility Line & Water Conveyance	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Water Conveyance	Update recordation (if necessary). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Water Conveyance & Bridge	Update recordation (if necessary, HABS/HAER/HALS documentation, repair, rehabilitation, or restoration (if applicable)). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).
Undetermined Sites	
Rock Circle	Update recordation (if necessary, data recovery (if applicable)). Off-Site: publish research focus article or professional society presentation, or public education and outreach (e.g., website, kiosk, etc.).

6.2.2 General Recommended Mitigation for Indirect Significant Impacts

Mitigation of cultural resources subject to the EFSC standards that are significantly indirectly impacted by the construction, reclamation, or O&M of the Project may include historic documentation, photographic documentation (modern and historic), collection of oral histories, or architectural, landscape, or engineering documentation. As with significant direct impacts, resource-specific mitigation measures for significant indirect impacts will be addressed through resource-specific treatment and/or mitigation plans (Appendix B). However, this section provides a generalized approach to mitigate for significant indirect impacts. These mitigations may or may not be appropriate to all indirectly impacted resources. Appropriate resource-specific mitigation will be determined through consultation with ODOE and SHPO, as well as tribes and historic preservation societies as appropriate.

The most common anticipated indirect impact on cultural resources subject to the EFSC standards consists of visual intrusion in a resource’s landscape (where that landscape or view contributes to resource’s significance). Table 6-3 lists potential management methods for

unavoidable indirect effects to cultural resources subject to the EFSC standards. Table 6-4 lists potential minimization and mitigation measures for indirect effects to the specific aboveground resource site types identified by AECOM (2017). Actual management will be determined through coordination with ODOE, SHPO, appropriate tribe(s), and/or historic preservation societies.

Table 6-3. Example Management Methods for Significant Indirect Impacts

Resource Category*	Example Resource Types*	Potential Management Methods for Significant Indirect Impacts
Trails (NHT, stage trails, freight roads, etc.)	<ul style="list-style-type: none"> Trail remnants/ segments Associated trail sites or features (stations, burials, inscriptions) 	<ul style="list-style-type: none"> Recording—including HABS/HAER/HALS Additional literature or archival review (e.g. historic maps, local papers) Remote sensing Purchase of conservation easement or other land protection where trail traces exist Historic trails restoration within and outside Project area Public signage, publication/print/media, and/or interpretive plans Design Modification
Historic Buildings and Structures	<ul style="list-style-type: none"> Farm and ranch sites/homesteads Historic districts Utility lines Water conveyance systems Mining sites Bridges, etc. 	<ul style="list-style-type: none"> Photo documentation and scale drawings National Register Nomination (if owner consents) HABS/HAER/HALS documentation Additional archival and literature review Restoration of historic building or structure Relocation of historic building or structure Public interpretation (with owner permission)
Historic Property of Religious or Cultural Significance to Indian Tribes (TCPs; limited to those subject to EFSC standards)	<ul style="list-style-type: none"> Ceremonial areas Vision quest sites Hunting and gathering areas 	<ul style="list-style-type: none"> Additional literature/archival review Ethnographic documentation Oral histories Public archaeology funding As recommended by impacted tribes

* Resource categories and types listed is not an exhaustive list.

HABS – Historic American Building Survey; HAER – Historic American Engineering Record; HALS – Historic American Landscape Survey

Table 6-4. Framework for Potential Minimization and Mitigation for Indirect and Direct Impacts to Specific Aboveground Site Types Identified within the Analysis Area

Built Environment Resource Type	Potential Minimization/ Mitigation (indirect and direct impacts)
Trails (Oregon NHT, Lewis and Clark NHT, stage trails, freight roads, etc.)	Recordation in HABS/HAER/HALS; metal detector surveys, additional historical research, information pamphlets, trail segment management plans; conservation easements; land acquisition; National Register nomination
Historic Buildings (Store, bank, Cabins, Homestead, etc.)	Recordation in HABS/HAER/HALS; restoration of historic building; relocation of historic building; oral histories; public interpretation; print publication; video media publication; National Register nomination

Built Environment Resource Type	Potential Minimization/ Mitigation (indirect and direct impacts)
Historic Structures (Railroad, mining, resources, bridge, utility lines, water conveyance, etc.)	Recordation in HABS/HAER/HALS; restoration of historic structure; relocation of historic structure; oral histories; public interpretation; print/media publication; National Register nomination
Historic Districts (residential, commercial, industrial, agricultural)	Historic district design guidelines for utilities, repair and maintenance guidelines, print publication, video media publication (website/podcast/video); National Register nomination
Archaeological resources with above ground features (Cemeteries, cairns, rock alignments, house pits, hunting blinds, middens, camp, quarry, rock art, rock shelter	Ethnographic documentation; resource management plan; recordation in HABS/HAER/HALS (if appropriate); partnership and funding for public archaeology projects; print publication, video media publication (website/podcast/video)
Traditional Cultural Properties (Ceremonial areas, vision quest, or gathering areas, etc.)	Ethnographic documentation; resource management plan; recordation; oral histories, etc.

Note: Resource-specific mitigation will be developed as appropriate in coordination with tribe(s), ODOE, and SHPO to resolve adverse impacts to sites that may not fall under the categories above. HABS – Historic American Building Survey; HAER – Historic American Engineering Record; HALS – Historic American Landscape Survey

7.0 MONITORING PLAN

This Monitoring Plan (MP) specifically addresses monitoring of cultural resources subject to the EFSC standards and provides details regarding roles and responsibilities of various personnel in the field. OAR 345-021-0010(1)(s)(E) requires the development of this MP as part of the HPMP for implementation during the Project phases. This section presents the roles and responsibilities of the CRT and specifies the monitoring procedures to be followed during construction activities.

The purpose of this MP is to specify:

- How avoidance of known resources will be ensured and documented;
- How monitors will interact with other environmental compliance staff and construction personnel; and
- How monitors will employ the IDP.

This MP, as part of the Project-wide HPMP, will be supplemented with a set of confidential Project maps of the selected route and design (Appendix C – Confidential Project Maps) that will illustrate resource-specific avoidance details, including monitoring of areas determined to have a high probability for buried cultural deposits.

7.1 Cultural Resources Team

The CRT is a part of IPC’s environmental inspection team and will report to and coordinate with the Construction Contractor’s Environmental Manager (CCEM).

The CRT will conduct cultural resource field monitoring, ensure compliance with requirements within the HPMP, and implement treatments, as applicable. Such activities will be inspected and coordinated by IPC and reported to ODOE, SHPO, and, as necessary, appropriate tribe(s) and/or historical societies.

The following sections describe the qualifications, roles, and responsibilities of each member of the CRT.

7.1.1 Cultural Resources Specialist (Principal Investigator)

Qualifications—The Cultural Resources Specialist (CRS) must have a graduate degree in anthropology/archaeology or a closely related field, and meet the Secretary of the Interior's Professional Qualifications Standards for archaeology, history, or architectural history as published in Title 36 Code of Federal Regulations 61. In addition, the CRS must have:

- At least 5 years of archaeological resource mitigation and field experience; and
- At least 3 years of experience in a decision-making capacity regarding cultural resources on construction projects, and the appropriate training and experience to knowledgeably make recommendations regarding the significance of cultural resources.

IPC will provide written documentation, such as a resume, on the qualifications of the CRS to the SHPO, ODOE, Compliance Inspection Contractor (CIC), and IPC's Environmental Manager(s) no less than 75 days prior to the start of ground disturbance. At least 15 days prior to ground disturbance, the CRS will provide a letter to the CIC naming Cultural Resource Monitors (CRMs), including sufficient alternates to account for absences, for the Project demonstrating that the identified CRMs meet the minimum qualifications for cultural resource monitoring.

Responsibilities—The CRS will be the primary point of contact for the CRT. The CRS will coordinate directly with the ODOE and CCEM and with the CIC. The CIC will act as the conduit to the ODOE. The CRS will be responsible for cultural resource-related notifications to the ODOE and CCEM, who will be responsible for notifying IPC. IPC will coordinate with the appropriate tribe(s) regarding applicable finds (i.e., pre-contact resources, Native American burials). The CRS will be responsible for the analysis and the overall quality of the monitoring reports and discovery reports, if any. The CRS is responsible for the planning, execution, completion, and quality of the cultural resources monitoring tasks undertaken prior to and during the Project construction.

The CRS will be responsible for obtaining construction plans and schedules from the Construction Contractor, for tasking field personnel to monitor construction, and for evaluation or conduct of data recovery (e.g., excavations) for any unanticipated or inadvertent discoveries during construction.

The CRS will direct the preparations for and execution of day-to-day construction monitoring activities, which will include the following actions:

- Present the cultural resources section of the environmental training program (an employee training program for all construction personnel prior to ground-disturbing activities). Cultural resource training, developed in consultation with the ODOE and in coordination with the tribe(s), will include the proper procedures to follow if cultural resources are encountered during Project ground disturbance. The environmental training program may include an approved video, training pamphlets, and/or other media resources.
- Direct the CRM(s) regarding where and when to monitor Project construction activities.
- Review the CRM's daily monitoring log(s).
- Prepare a monthly summary report during active construction on the progress or status of cultural resources-related activities and submit to the CIC, who will submit the report to the ODOE and, if requested, affiliated tribes. The summary will include any new

cultural resource forms for any finds identified under the monitoring program (see Appendix D).

- Notify the CCEM, the CIC, ODOE, and, as requested, affiliated tribes by telephone or email of unanticipated or inadvertent discoveries of cultural resources within 24 hours of becoming aware of the situation.
- Notify the CCEM, the CIC, ODOE, and, as requested, affiliated tribes by telephone or email of any incidents of noncompliance related to cultural resources within 24 hours of becoming aware of the situation, and recommend corrective action to resolve the problem or achieve compliance.
- Obtain additional technical specialists or additional monitors, if warranted or required.
- Oversee the implementation and/or implement the IDP (Section 8).
- Oversee the completion of resource forms and other appropriate documentation of discoveries by members of the CRT.
- If a discovered cultural resource is determined eligible for the NRHP, the CRS will consult with the ODOE and the CCEM. The CCEM will be responsible for coordinating with IPC's Environmental Manager(s). The CRS will develop a treatment plan for the historic property if it is not covered by the HPMP. The ODOE will be responsible for coordinating with SHPO. IPC will be responsible for coordinating with the appropriate tribe if the resource is determined to be associated with Native Americans (pre-contact or historic).
- Determine the scope, methods, and techniques to be used for test investigations or data recovery and analysis of artifacts and other materials, as applicable.
- Oversee the completion of any required test excavations or data recovery excavations, and any curation.
- Oversee the completion of field analysis, curation, and reports of tests excavations, data recovery excavations, and ensure that the reports meet state requirements and the appropriate SHPO standards for completeness and quality.
- Oversee the completion of the final mitigation and monitoring report, post-construction.

7.1.2 Cultural Resource Monitors

A Lead CRM will be assigned by the CRS to direct daily monitoring activities of other CRMs. CRMs will conduct the daily cultural resource construction monitoring as specified in the HPMP. Preference will be given to monitors who are familiar with the types of historic and pre-contact resources in the area. The qualifications and responsibilities of the CRM are as follows.

Qualifications—The Lead CRM will have a graduate degree in anthropology/archaeology or a closely related field; at least 2 years of experience conducting archaeological fieldwork under direction of a Professional Archaeologist with at least 3 months of archaeological construction field and monitoring experience in the region. Other CRMs will have an undergraduate degree, be under the direct supervision of the Lead CRM and CRS, and have at least 2 years of experience conducting archaeological fieldwork under direction of a Professional Archaeologist with at least 3 months of archaeological construction field and monitoring experience in the region.

Responsibilities—The Lead CRM will be present full time at the Project construction site, as directed by the CRS, to oversee and direct the daily monitoring task of the CRMs. The CRMs will watch ground-disturbing construction activities and inspect cleared ground and excavation areas for signs of previously undiscovered cultural resources during construction as indicated in the HPMP or until monitoring reduction has been approved by the ODOE.

Prior to the start of construction or beginning of monitoring duties, all CRM staff will be trained in the consistent and accurate identification and recording of historic trails (e.g., Oregon NHT) and other local resource types within the Project region.

The CRM will provide daily documentation of construction activities and any findings. The monitor will prepare a daily monitoring log (see Appendix E) briefly describing the field conditions, construction progress and activities, non-compliance activities, and record of any finds of archaeological material.

The CRM will be responsible for implementing the requirements outlined in the environmental training program, HPMP, and IDP. If the CRM or other construction personnel discover cultural resource finds during construction, the CRM will have authority to halt construction in the vicinity of the find and will notify the CRS.

7.2 Potential Additional Cultural Support Staff

If the CRS and/or CRM(s) are needed in other areas where construction is continuing and ongoing, and/or in an effort to complete the work within a scheduled amount of time, it may be necessary for IPC to acquire additional field staff in the event of an unexpected data recovery effort or resource-specific treatment. The following additional staff may be acquired, so as to avoid removing CRMs from their monitoring duties. All field crews will work under the supervision of the CRS.

7.2.1 Field Director

Qualifications—The Field Director will have a graduate degree in Anthropology/Archaeology, or a closely related field, and meet the requirements of the appropriate Oregon state permit for Qualified Archaeologists. Additionally, the Field Director should have at least 1 year of experience directing field work with at least 3 months of experience in the region and 4 months of experience with comparable cultural resource types and in similar cultural contexts and environmental settings.

Responsibilities—The Field Director, under the supervision of the CRS, will be responsible for the day-to-day activities of the testing and data recovery investigations, including management of field personnel and coordination of crews. The Field Director will also be responsible for compiling and ensuring the quality of the field data on a daily basis. Additionally, the Field Director will coordinate the work of any sub-consultants or other contractors participating in the cultural resources field investigations, and will be responsible for implementing the requirements of the environmental training for the crew, including daily safety briefings.

7.2.2 Crew Chiefs

Qualifications—The Crew Chief(s) will have an undergraduate degree in anthropology/archaeology, or a related field, and at least 1 year of experience as an archaeological crew chief with at least 3 months of experience in the region and 4 months of experience with comparable cultural resources in similar cultural contexts and environmental settings.

Responsibilities—The Crew Chief(s), in consultation with the Field Director, will be responsible for implementing the field strategies at individual resources. The Crew Chief will direct the field crew, lay out excavations, and compile collections and field documentation on a daily basis. Additionally, the Crew Chief will be responsible for implementing on-site safety procedures and/or environmental training.

7.2.3 Field Crew

Qualifications—Field crew members for any field recording or excavation activities will have an undergraduate degree in anthropology/archaeology, or a related field, and/or have attended a field school.

Responsibilities—Field crew members will conduct surface examinations and hand excavations, and monitor mechanical test investigation excavations. Each crew member will operate under the direct supervision of the Crew Chief and will conduct basic documentation of field operations, including the completion of excavation-level records, bag labeling, and trench monitoring forms.

7.2.4 Laboratory Director

Qualifications—The Laboratory Director will have an undergraduate degree in anthropology/archaeology, or a closely related field, and field school experience.

Responsibilities—The Laboratory Director will be responsible for directing all phases of laboratory processing of the data recovery and/or monitoring collections, including check-in, cleaning, sorting, cataloguing, analyzing, distributing special samples, and preparing for curation. The Laboratory Director will coordinate closely with the CRS to ensure that the appropriate data are documented and compiled.

7.3 Monitoring and Avoidance Procedures

This section describes the monitoring procedures that will apply Project-wide. Resource-specific monitoring and avoidance procedures will be included in resource-specific mitigation and/or treatment plans. The objectives of monitoring are to ensure and document avoidance of cultural resources subject to EFSC standards, to identify at the time of discovery any cultural resources exposed during ground disturbance, and to protect such resources from damage while recommendations of likely NRHP-eligibility are reviewed and approved by the SHPO (in consultation with ODOE and other appropriate parties, including appropriate tribes).

7.3.1 Cultural Resource Construction Monitoring

Cultural resource monitoring for the Project will be conducted Project-wide, unless otherwise specified by the ODOE or SHPO. For the purposes of this HPMP, cultural resource construction monitoring is defined as on-the-ground, close-up observation by a CRS or CRM meeting the qualifications prescribed in Section 7.1.

The CRS and/or CRM will be present during mechanical scraping, grading, excavating, and other ground disturbing activities (as applicable). Cultural resource monitoring will not be required once all surface and subsurface ground disturbance in a construction area is completed or if equipment or vehicles are traveling over previously disturbed surfaces. Routine travel on existing or disturbed roads or across disturbed transmission structure pads will not be monitored for cultural resources. However, additional blading or excavating at a depth beyond the previously disturbed area will be monitored for cultural resources, even within previously graded or bladed areas. A CRM will be required when sensitive resources barriers are installed to protect cultural resources subject to EFSC standards. The CRM will ensure that the barrier is erected in the proper place. The barriers or sensitive resource signage will be removed once construction is completed in that area.

The CRM will maintain daily monitoring logs (Appendix E – Monitoring Log) of Project-related construction monitoring activities. Logs will reflect the daily monitoring activities and will include:

- Date, time of work, and amount of time spent at a construction monitoring location;
- Area of work (defined by segment, tower structure number, and or milepost);

- Type of work, equipment present, and name of construction crew being monitored
- Construction activities being performed (e.g., grading, excavation, etc.);
- Documentation of successful resource avoidance;
- Activities for which there are cultural resource problems, non-compliances, or other concerns;
- Identification of an unanticipated discovery, steps taken to protect the discovery, and documentation of notifications (name, agency, time, and notes); and/or
- Color digital photographs (as appropriate) to document construction and monitoring activities and submitted as attachments to the daily log.

CRMs will prepare and provide their monitoring logs daily to the CRS via e-mail (original hard copies for Project records will be provided to the CRS in bulk at intervals determined by the CRS). The CRS will prepare and provide IPC monthly summary reports on the progress or status of cultural resources-related activities during active construction. The monthly reports will summarize construction progress, monitoring (monitor name, dates worked, finds, issues, etc.), and status of cultural resource-related issues. These reports will also include the appropriate state cultural resource forms for finds identified under the monitoring program (see Section 8). IPC will submit the reports to the ODOE to ensure compliance with the Site Certificate.

The CRS will direct the preparation and distribution of a Cultural Resources Monitoring Results report, or any other outstanding report actions (e.g., mitigation) under the HPMP, no later than 3 years after the completion of the relevant Project work element. All reports will be submitted to the ODOE, SHPO, and tribes. For additional survey reporting and review times during construction, see Section 7.4.1 below.

7.3.2 Change in Full-Time Monitoring Status

If the CRS determines that full-time monitoring is not necessary in certain construction locations or that monitoring will be conducted on an “as needed” intermittent schedule, the CRS will provide in writing (via email) to the ODOE, SHPO, and, if requested, tribes, explaining the decision to reduce the level of monitoring. Notification must be provided at least 14 days prior to implementing any change. The ODOE will provide written approval to the CRS and CIC via email within 10 days of receiving notice to reduce monitoring.

7.3.3 Inadvertent Discoveries

If a discovery is made in Oregon, the notification procedures found in the IDP (see Section 8) shall be followed.

The CRS will send the requesting tribes a notification (via letter or email) following the discovery of Native American cultural materials other than those considered isolated finds or archaeological objects (unless otherwise specified).

The CRS and the CRM(s) will have the authority to temporarily halt construction operations within a 200-foot radius of a find or exposed resource to determine if cultural resources subject to EFSC standards are present and if they will be significantly impacted by continuing construction operations. The CRS or CRM will be responsible for delineating the area within which construction will halt using flagging tape, rope, or some other means as necessary.

7.3.4 Flagging, Fencing, and Signage Measures

For Project construction activities, the CRM will flag, fence, or provide signage for previously recorded and newly identified culturally sensitive areas (i.e., significant cultural resources) that are within 200 feet of Project construction, to ensure such resources are avoided and that ground-disturbing construction activities do not impact flagged resource boundaries or

inadvertent discoveries. “Environmentally Sensitive Area” signage will be used for such areas during construction. The signage will be posted, with a buffer, around the cultural resource by the CRM one day prior (as practical) to construction in the area, to avoid drawing attention to the area prior to construction.

The CRS and/or a CRM will field check and maintain signage and ensure that it remains in place while construction activities in the vicinity are active. The CRS or CRM will remove the flagging and/or signs following the completion of Project-related construction activities in the vicinity.

7.3.5 Monitoring Locations and Schedule

The CRS and/or Lead CRM and CRM(s) will observe ground disturbance as specified in Section 7.3.1. The CRS will obtain a construction schedule from the Construction Contractor at least 2 weeks prior to the start of ground-disturbing activities to ensure proper CRM staffing and confirm monitoring locations. The CRS and/or Lead CRM will then establish a schedule for the CRM(s) to follow and a protocol for communication with the CIC and the CCEM, who will confer with the CRS on any changes to construction dates. Daily updates or changes to the construction schedule will be provided by the Construction Contractor to the CRS and the CIC, as appropriate.

7.4 Construction Compliance

The CRS and Lead CRM will coordinate with the CIC to monitor and report problem areas and any non-compliance issues to the ODOE. The CRS will then notify the CCEM, who will notify IPC’s Environmental Manager(s).

Non-compliance procedures will be specified in the Conditions of Site Certification and will be followed. If the non-compliance includes unauthorized or unmonitored ground disturbance, cultural resource surveys to determine presence of or damage to cultural resources will be required. An effects determination and mitigation may also be required. A written notice from the SHPO and ODOE will be required before construction will be allowed to continue in the non-compliance area. It should be noted that non-compliance regarding cultural resources can result in criminal and civil penalties. Disturbance of human remains or associated objects is considered a Class C Felony with fines (ORS 91.740-9760), and disturbance to archaeological sites can result in a Class B misdemeanor and fines (ORS 358.905-358.961).

7.4.1 Construction Change Management-Site Certificate Amendment

During the construction and O&M phases of the Project, unforeseen or unavoidable site conditions can result in the need for changes from approved mitigation measures and construction and O&M procedures. Additionally, the need for route realignments, extra workspaces, or access roads outside of the previously approved and certified Project Site Boundary may arise (e.g., to avoid an inadvertent discovery), resulting in the need to prepare an amendment to the Site Certificate (see Section 3.2). The CIC will consult with the CRS for any amendment(s) requested by IPC to ensure cultural resource compliance. All applicable procedures as specified in this HPMP and Conditions of Site Certification will be followed.

If a new area outside the previously surveyed Project Site Boundary is proposed for ground disturbance, a survey for cultural resources must be conducted and a report documenting presence or lack of surface resources submitted as part of the amendment approval process. If cultural resources are found, NRHP eligibility, effects determinations, and any applicable mitigation must be completed before ground disturbance can be permitted. Mitigation is only necessary for resources subject to EFSC standards.

IPC will submit copies of the draft inventory report to ODOE, SHPO, and requesting tribes for a review and comment period to be determined between IPC and ODOE. If the SHPO accepts the findings of the report, the ODOE can assume concurrence and issue the amendment or other applicable authorization to proceed with construction. If not, the report will be revised by the CRS and resubmitted to the same parties.

8.0 INADVERTENT DISCOVERY PLAN

This section provides guidance on the process that will be followed if previously undocumented cultural material or human remains are discovered during the construction and O&M phases of the Project. Inadvertent discovery procedures as presented below are designed to ensure compliance with the following:

- ORS 358.905-955, archaeological sites and objects;
- ORS 390.235, Permits and Conditions for Excavation and Removal of Archaeological or Historical Material; Rules; Criminal Penalty and its associated OAR 736-051-0080 to 0090; and
- ORS Chapter 91.740 to 97.760, Indian Graves and Protected Objects; Treatment of Native American Human Remains Discovered Inadvertently or Through Criminal Investigations on Private and Public and State-Owned Lands In Oregon created by the Government to Government Cultural Resources Cluster Group formed under Executive Order 96-30.

8.1 Inadvertent Discovery Procedures

This section provides detailed guidance for Project personnel to follow if cultural resource materials are inadvertently discovered. The procedures differ depending on whether unanticipated cultural materials (Section 8.1.1) or human remains (Section 8.1.2) are encountered. Key contacts are provided in Section 8.2.

8.1.1 Inadvertent Discovery of Cultural Materials

In the case of an inadvertent discovery of general cultural materials (i.e., archaeological sites), the following procedures will be followed and all notification will occur within 24 hours:

- The CRS or CRM(s) will have the authority to halt construction operations within a 200-foot radius of a find or exposed resource to access the find and determine whether the find is likely significant and would be affected by continuing construction operations, or if the find is non-cultural. Construction activities can continue outside the established 200-foot radius exclusion zone/no-work zone once the CRS or CRM(s) have determined the full horizontal extent of the resource either through surface observations or subsurface probes (as determined by the CRS).
- The CRM will inspect the area for additional resources. The CRM will use flagging tape, rope, or some other means necessary to delineate the area of the find within which construction will halt. This may also include off-site dirt or rock spoil from that area.
- The CRM will immediately notify the CRS (if not present) of the discovery, and provide the CRS with the Global Positioning System coordinates, photographs, and description of the observed cultural material.
- If an inadvertent discovery is identified by construction personnel, and a CRS or CRM is not present, the individual that identified the find must halt construction in the area of the find and contact the CRS immediately.

- The CRS will notify the ODOE, Oregon SHPO State Archaeologist or Assistant State Archaeologist, CCEM, IPC, the CIC, and any tribes that have requested notification, as appropriate, of the discovery. IPC will contact the appropriate landowner.
- ODOE will coordinate and consult with the SHPO State Archaeologist or Assistant State Archaeologist, landowner, and the appropriate tribe(s).
- The CRS will be responsible to notify and coordinate with the IPC's Environmental Manager(s) of the find and of the stop work activity, as applicable.
- The CRS will prepare a preliminary summary report containing detailed information regarding the observed cultural material, type (e.g., isolated find/archaeological object or site), period, Universal Transverse Mercator coordinates, legal description and location map, photographs, and recommendations regarding likely NRHP eligibility.
- The SHPO, in consultation with the ODOE and tribe(s), as appropriate, will determine the likely NRHP eligibility, the Project effects on the discovery, and the treatment of the discovery, based on the recommendations contained in the summary report provided by the CRS. Landowner approval will be required for any determined treatment.
 - If the discovery cannot be avoided, and more data are required to make a determination of NRHP-eligibility, IPC will direct the CRS to prepare and submit a testing plan to the SHPO, ODOE, landowner, and tribe(s), as appropriate, for review. Upon SHPO and landowner approval (and as applicable, the appropriate tribe(s)), IPC's CRS will execute the testing plan. Any excavation will be conducted under a state archaeological permit granted under ORS 390.235.
 - If the discovery is determined to be subject to the EFSC standards and the Project will have a significant impact on the resource, IPC will direct the CRS to prepare a treatment plan for review and approval by the SHPO (in consultation with ODOE and in coordination with the parties noted above), in an effort to reduce impacts to less than significant. The treatment plan will include (but not be limited to) a resource-specific research design, methods, analysis, disposition of any collected artifacts and curation (as applicable), and a schedule for completing work and report submittals.
 - Once the treatment plan is approved by the SHPO in writing (via email), IPC can direct the CRS to execute the treatment plan. Any excavation (testing/data recovery) on state lands will be conducted under a state archaeological permit granted by the State Parks and Recreation Department under ORS 390.235 (includes approval by state agency and the appropriate Native American tribe(s)) and OAR 736-051-0080, and on private land under OAR 736-051-0090 (includes ORS 390.235, and landowner's written permission).
 - Within one week of completion of mitigation, IPC will submit a preliminary report containing the results of the mitigation. A final mitigation report will be prepared and submitted to SHPO, ODOE, landowner, and tribe(s), as appropriate, within the timeframe as specified in the treatment plan.
- If the SHPO, in consultation with the ODOE and tribe(s), as applicable, determines the discovery will not be significantly impacted, the SHPO will contact IPC by telephone and in writing (via email) indicating that construction may resume. No further consultation will be necessary.
- No archaeological testing/excavation will occur and no artifacts will be collected without approval from ODOE, SHPO, landowner, and tribe(s), as applicable, and acquisition of appropriate state permit(s).

8.1.2 Inadvertent Discovery of Human Remains

In Oregon, the treatment of human remains will follow the protocol developed by the State of Oregon's Tribal/State Agency Government to Government Cultural Resource Cluster Group in 2006 (updated August 2014): *Treatment of Native American Human Remains Discovered Inadvertently or Through Criminal Investigations on Private and Public, State-Owned Lands In Oregon* (see Appendix F). Native American ancestral remains, funerary objects, sacred objects and objects of cultural patrimony associated with Oregon Tribes are protected under Oregon state law, including criminal penalties (ORS 97.740-.994 and 358.905-.961)

If human remains (including physical remains-bones, teeth, hair, ashes, or mummified or otherwise preserved soft issues of a human), burial, funerary objects, sacred objects, or objects of cultural patrimony are inadvertently discovered during Project construction, **ALL** human remains and associated burial associated material will be treated with dignity and respect, and the following procedures will apply:

PROTOCOL FOR THE IDENTIFICATION OF HUMAN REMAINS:

- **STOP CONSTRUCTION ACTIVITIES**
 - Immediately halt construction within 200 feet radius of the remains.
 - Ensure the area is protected from additional disturbance with flagging, fencing, or by posting a CRM or other project personnel.
 - Ensure that the remains will be treated respectfully, and are not touched, moved, photographed, discussed on social media sources (e.g., Instagram, Facebook, Twitter, etc.), or further disturbed.
 - Stop Construction will remain in effect and construction will not proceed within a 200-foot radius around the discovery until the appropriate approvals are obtained.
- **NOTIFICATION:** Immediately notify the Oregon State Police and the CRS (if not on site). The CRS will immediately notify the SHPO, Legislative Commission on Indian Services (LCIS), ODOE, landowner, and IPC via telephone and in writing. The LCIS will determine the appropriate Native American tribe(s) to notify. Once identified by the LCIS, the appropriate Native American tribe(s) will be notified immediately by the CRS. See Section 8.2 below for contact information.
- For any human remains discovered on state or private lands in Oregon, ORS Section 97.740 through 97.760 will apply. Oregon laws (ORS 146.090 and .095) outline the types of deaths that require investigation and the accompanying responsibilities for that investigation. The law enforcement official, district medical examiner, and the district attorney for the county where the death occurs are responsible for deaths requiring investigation. Deaths that require investigation include those occurring under suspicious or unknown circumstances.
- If the human remains **are not clearly modern**, then there is a high potential that the remains are Native American and therefore ORS 97.745(4) applies, which requires immediate notification of State Police, SHPO, LCIS, and appropriate Native American Tribe(s) (as noted above).
- As noted above, human remains will be treated with respect, protected, and secured from further disturbance. The human remains and any associated artifacts should not be disturbed, manipulated, or transported from the original location until a plan is developed in consultation with the above named parties. These actions will help ensure compliance with Oregon state law that prohibits any person willfully removing human remains and/or objects of cultural significance from its original location, as defined in ORS 97.745.

- If the human remains are found to be Native American, the State Police, SHPO, ODOE, landowner, LCIS, CRS, and appropriate Native American Tribe(s) will consult and implement a culturally sensitive plan for reburial (if the remains cannot be avoided by the Project and/or if desired by the tribe(s)).
- If the human remains are found not to be of Native American descent, historic in nature, and are not part of a crime investigation, IPC will consult with the SHPO, ODOE, CRS, and landowner to develop and implement a plan for removal and reburial (if the remains cannot be avoided by the Project and/or if desired by the landowner).
- For all human remains, reburial plans (and any type of excavation) will follow Oregon state laws and will be developed and approved by the appropriate parties. Reburial plan(s) will be specific to each inadvertent discovery of human remains.
 - Per ORS 97.750, excavation by a Professional Archaeologist of a Native American cairn or burial [human remains] and associated material shall be initiated only after prior written notification to the SHPO and State Police, as defined in ORS 358.905, and with the prior written consent of the appropriate Indian (Native American) tribe(s) in the vicinity of the intended action. Failure of a tribe(s) to respond to a request for permission [to excavate] within 30 days of its mailing shall be deemed consent.
 - Per ORS 97.750 and 97.745, and as noted above, the LCIS will designate the appropriate tribe(s).

8.2 Key Contacts

Contact information for key state agency, tribal, IPC, and CRT members in the event of an unanticipated or inadvertent discovery is provided in Table 8-1.

Table 8-1. Key Project Contacts

Organization	Name	Role	Phone Numbers	Email
Oregon State Police	Chris Allori	Sergeant: identification of human remains	503-731-4717 (o) 503-708-6461 (c) 503-731-3030 (d)	TBD
ODOE	Kellen Tardaewether	Senior Siting Analyst; Lead state agency	503-373-0214 (o) 503-586-6551 (c)	Kellen.Tardaewether@oregon.gov
Oregon SHPO	Dennis Griffin	State Archaeologist	503-986-0674 (o) 503-881-5038 (c)	Dennis.griffin@state.or.us
Oregon SHPO	John Pouley	Assistant Archaeologist	503-986-0675 (o) 503-480-9164 (c)	John.pouley@state.or.us
Oregon SHPO	Jessica Gabriel	Historian	503.986.0677	Jessica.Gabriel@oregon.gov
LCIS	Karen Quigley	Executive Director; Identifies appropriate Native American Tribe(s) for Project.	503-986-1067 (o)	karen.m.quigley@state.or.us
IPC	Shane Baker	Senior Archaeologist	208-388-2925 (o)	sbaker@idahopower.com
IPC	Dave Valentine	Project Archaeologist	208-388-2855 (o)	dvalentine@idahopower.com
Project CRS	TBD	TBD	TBD	TBD
Project CCEM	TBD	TBD	TBD	TBD
CTUIR	Carey Miller	THPO	541-429-7234 (o)	careymiller@CTUIR.org
Burns Paiute Tribal Council	TBD			
Confederated Tribes of the Colville Reservation	TBD			
Confederated Tribes of the Warm Springs Reservation	TBD			
Fort McDermitt Shoshone-Paiute Tribes	TBD			
Klamath Tribes	TBD			
Nez Perce Tribe	TBD			
Shoshone-Bannock Tribes of the Fort Hall Indian Reservation	TBD			

c=cell, o=office, d=dispatch; TBD=to be determined.

9.0 REFERENCES CITED

Anderson, Stephen, Erin King, and Jenna Farrell

- 2018 *Boardman to Hemingway Transmission Line Project, Cultural Resource Technical Report, Morrow, Umatilla, Union, Baker, and Malheur Counties, Oregon*. Prepared by Tetra Tech, Inc. Golden, CO. Submitted to Idaho Power Company, Boise, ID and Oregon Energy Facility Siting Commission. Contract No. CM-3901.

AECOM (AECOM, Inc.)

- 2018 Intensive Level Survey – Visual Assessment of Historic Properties Report, Boardman to Hemingway Transmission Line Project. Prepared by AECOM, Inc., Portland, OR. Submitted to Idaho Power Company, Boise, ID,

APPENDIX A
BLM HPMP FRAMEWORK

Appendix B5
Historic Properties Management Plan Framework

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Acronyms and Abbreviations

APE	Areas of Potential Effect
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
HPMP	Historic Properties Management Plan
NAGPRA	Native American Graves Protection and Repatriation Act
NRHP	National Register of Historic Places
Project	Boardman to Hemingway Transmission Line Project
PSMP	Property-specific Mitigation Plans
SHPO	State Historic Preservation Officers
THPO	Tribal Historic Preservation Officers

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APPENDIX B5 – HISTORIC PROPERTIES MANAGEMENT PLAN FRAMEWORK

HISTORIC PROPERTIES MANAGEMENT PLAN DRAFT ANNOTATED OUTLINE

1.0 INTRODUCTION

- 1.1 Purpose of the Historic Properties Management Plan (HPMP)
This section addresses the purpose of the HPMP, which is to provide a project-wide set of plans and procedures to avoid, minimize, or mitigate adverse effects on historic properties.
- 1.2 Property-specific Mitigation Plans (PSMPs)
This section addresses the intent and purpose of the PSMPs, which is to specify the general terms of avoidance, monitoring, and a framework for mitigating adverse effects. The purpose of each PSMP is to supplement this HPMP with property-specific information, including treatment and mitigation for unavoidable direct and indirect effects.
- 1.3 Laws and Regulations
This section briefly addresses the federal and state laws and regulations applicable to the project with regard to cultural resources.
 - 1.3.1 Federal
 - 1.3.2 State
 - 1.3.3 Tribal
- 1.4 Organization
This section briefly outlines the organization and structure of the HPMP by section.

2.0 PROJECT AND AREA OF POTENTIAL EFFECTS DESCRIPTION

This section provides a project description and defines the areas of potential effect (APE) as established in the Programmatic Agreement for the project.

- 2.1 Project Description
This section provides a brief project description.
- 2.2 Area of Potential Effect
This section provides a definition of the APE as a baseline for survey and inventory.
 - 2.2.1 Direct Effects
This section discusses the direct-effects APE
 - 2.2.2 Indirect Effects
This section discusses the indirect-effects APE

3.0 SEQUENCE OF PROJECT-RELATED TASKS

This section addresses the various tasks that will be completed to ensure that historic properties eligible for or listed on the National Register of Historic Places (NRHP) are avoided or project impacts are minimized or mitigated and the sequence in which these tasks will occur during each phase of the project as listed below.

- 3.1 Pre-construction
Tasks include completion, submittal, and approval of the HPMP and resource specific monitoring plans.

- 3.2 Construction
Tasks include ongoing environmental training of construction staff, construction monitoring, mitigation of inadvertent discoveries, completion of work associated with PSMPs required during construction.
- 3.3 Post-construction
Tasks include completion of test investigation or data recovery analysis, preparation of artifacts for curation, transfer of materials to curation facility or appropriate land owner, and preparation of final reports
- 3.4 Reclamation
Tasks include monitoring of various reclamation treatments applied to reclaim temporary use areas.
- 3.5 Operation and Maintenance
Tasks include transmission line patrols, climbing inspections, structure and wire maintenance, insulator washing, inspection and maintenance of stations and communication facilities, access road repairs, and vegetation management activities.

4.0 PREVIOUS RESEARCH AND CULTURAL RESOURCE TYPES IDENTIFIED WITHIN THE PROJECT AREA

This section addresses the identification of resources and previous literature review, pedestrian field surveys, and research conducted for the project and identifies known cultural resource types within the project area.

- 4.1 Identification and Evaluation of Historic Properties
This section addresses the identification and evaluation of historic properties for the project. The HPMP is based on the results of cultural resource inventories consisting of background records and literature research, and pedestrian surveys. The Programmatic Agreement outlines the requirements for cultural resources inventory and identification of historic properties for the project
 - 4.1.1 Archival Research and Results
This section addresses the parameters and results of the archival research conducted for the project.
 - 4.1.2 Field Survey Methods and Results
This section addresses the parameters and results of the field surveys conducted for the project.
- 4.2 Ethnographic Studies
This section addresses the ethnographic studies prepared for the project.
- 4.3 Definition of Cultural Resources Site Types
This section provides a summary of the different cultural resource site types found in Oregon and Idaho in table format.
 - 4.3.1 Pre-contact Resources
 - 4.3.2 Historic Resources
 - 4.3.3 Multicomponent Resources

5.0 METHODS FOR DETERMINATION OF ELIGIBILITY AND EFFECTS

This section addresses the methods to be used to determine eligibility and project effects on sites within the project APEs.

- 5.1 Determination of Eligibility
This section addresses how determination of eligibility will be established by BLM, in consultation with tribes, Tribal Historic Preservation Officers (THPOs), State Historic Preservation Officers (SHPOs), and appropriate Concurring Parties to the

Programmatic Agreement, for sites within the project APEs based upon criteria contained in 36 CFR 60.4.

5.2 Determinations of Effects

This section addresses how historic properties will be evaluated to determine if the project has an adverse effect.

6.0 AVOIDANCE AND PROPOSED MITIGATION PLAN

This section presents a general framework for resolution of adverse effects from the project on historic properties.

6.1 Avoidance

6.2 General Mitigation Measures

Due to the scale of the project, it is unlikely that adverse effects to historic properties can be avoided entirely. This section provides mitigation options for unavoidable impacts.

6.2.1 Mitigation for Direct Adverse Effects

6.2.2 Mitigation for Indirect Effects

7.0 MONITORING PLAN

This section addresses monitoring for cultural resources during construction of the project. This plan provides details regarding roles and responsibilities of various personnel in the field in coordination with the project-wide Environmental Compliance Monitoring Plan that will be prepared as a part of the project Plan of Development.

7.1 Cultural Resources Team

This section addresses the role and responsibilities of the Cultural Resources Team as part of the Construction Contractors environmental inspection team.

7.2 Construction Compliance

7.2.1 Monitoring and Avoidance Procedures

This section addresses the monitoring procedures that will be applied project-wide including cultural resource construction monitoring, intermittent monitoring, inadvertent discoveries, and flagging, fencing, and signage measures.

7.2.2 Variances and Amendments

This section addresses the procedure to be followed when a variance or amendment is required due to changes in the project footprint.

8.0 REFERENCES CITED

APPENDICES

- A Inadvertent Discovery Plan
- B NAGPRA Plan of Action
- C Subsurface Investigation Strategy

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**APPENDIX B
RESOURCE-SPECIFIC MITIGATION PLANS
(TO BE DETERMINED)**

APPENDIX B – RESOURCE-SPECIFIC MITIGATION PLANS

To be completed following selection of final route and implemented Spring 2021.

**APPENDIX C
CONFIDENTIAL PROJECT MAPS
(TO BE DETERMINED)**

APPENDIX C – CONFIDENTIAL PROJECT MAPS

To be completed following selection of final route.

APPENDIX D
OREGON CULTURAL RESOURCE FORMS

Site Identification

Enter New Site Identifying information

* = Required Field
Smithsonian Trinomial To be assigned
Agency/Field ID *
Site Name
Recording Date *

Administrative Information

* = Required Field
Managing Office

Owners	
Owner	Former Owner?

Site Ownership/Management Notes

National Register Status Statements			
<i>Each Reviewing organization - including the field organization - can enter a status statement</i>			
Status	Role	Date	Statement Author

Site Type

* = Required Field		
Dimensions		
Length *	Width *	Units
Calculated Area		
Depth of cultural deposit *		
Site Type *		
Features		
Cultural Periods *		
General Age *		

Location

* = Required Field

For sites in urban setting, give appropriate address in access description

County *

Cadastral Locations

Township * Range * Sec # 1/4 1/4 1/4 DLC# Meridian

Map References

Map Name * Revision Year *

UTM Coordinates *

Type * East * North * Method * Zone * Datum *

Describe access to site from permanent feature and how to find primary datum:

Environmental Information

* = Required Field Depositional Environment					
Soil Description:					
Culturally Significant Vegetation:					
Culturally Significant Vegetation Description:					
Water Sources					
Name of Water Body	Type	Stream Type	Stream Class	Distance	Direction
Site Setting <i>Discuss environmental setting of site relevant to site location, including on-site vegetation, topography, dated landforms and formation processes):</i>					
Province/Basin					
Province		Elev From (ft) *	Elev to (ft) *	Aspect	
Basin		Subbasin			
Drainage Name					

Site Description

<p>* = Required Field</p> <p>Site Description and Site Function * <i>Include discussion of site condition, found artifacts and other relevant information</i></p>					
<p>Date(s) of use <i>(Be as specific as possible. 0 if unknown, may not leave blank.)</i></p> <p>From * To * BC/AD/BP * Dating Method *</p>					
<p>Site Observations <i>The following were observed:</i></p> <table style="width: 100%; border: none;"> <tr> <td style="width: 60%;">Artifacts Present *</td> <td style="width: 40%; text-align: right;">Quantity *</td> </tr> </table>				Artifacts Present *	Quantity *
Artifacts Present *	Quantity *				
<p>Estimated Counts</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 45%;">Historic</td> <td style="width: 50%; text-align: center;">Prehistoric</td> </tr> </table>				Historic	Prehistoric
Historic	Prehistoric				
<p>Rock Art</p> <p>Rock Art Present</p>					

Rock Art

* = Required Field	
Number of Loci: *	Number of Panels: *
Panels are Situated on:	Panel Description
Panel Aspects	
Type of Rock:	Formation name if known and additional information
Degree of Patination	
Category and Techniques Petroglyphs	Pictographs
Colors	Color Description
Rock Art Superimposed?	Superimposed art description
Natural Destructive Agents	Natural Destructive Agents Description
Other Destructive Agents	Other Destructive Agents Description
Detailed Description	

Site Condition

<p>* = Required Field</p> <p>Visit Date *</p>
<p>Site Condition *</p>
<p>Recorder <i>(Name and Organization)</i></p>
<p>Artifacts or Samples Collected?</p>
<p>Activities/Work Performed *</p>
<p>Impacts and Impact Agents</p>
<p>Protective Measures Recommended/Present Use & Expected</p>

Bibliographic References

Bibliographic References				
Author	Publication Year	Title	Agency	Primary Reference?

OREGON STATE CULTURAL RESOURCE ISOLATE FORM

ADMINISTRATIVE DATA

CR_ISOLATE NUMBER:

OWNER:

COUNTY:

LOCATIONAL DATA

LEGAL DESCRIPTION: ___1/4 ___1/4 ___1/4 of SECTION ___ TOWNSHIP ___ RANGE ___

DLC ___ UTM **ZONE:** **EASTING:** **NORTHING:** GPS (Y/N):

USGS QUAD(S) NAME: SERIES: DATE:

ENVIRONMENTAL DATA

ELEVATION:

SLOPE:

ASPECT:

ITEM DESCRIPTION (Narrative, drawings, sketch map, photo):

Collected? Yes ___ No ___

Recorder:

Date:

ATTACH USGS TOPOGRAPHIC MAP:

**APPENDIX E
MONITORING LOG**

<div style="border: 1px solid black; padding: 2px;"> Report # _____ </div>	<h2 style="margin: 0;">Boardman to Hemingway Transmission Line Cultural Resource Monitor Daily Report</h2>	Date ____ / ____ / ____
--	---	-------------------------

Cultural Resource Monitor: _____ Project Segment: _____ Location (GPS): _____ Construction Company: _____ Equipment Used/Operator Name: _____ Current Weather : _____ Ground Conditions: _____	Check all that apply: No Culture Resource findings: <input type="checkbox"/> Inadvertent Discovery: <input type="checkbox"/> Non-Compliance Issue: <input type="checkbox"/> Incident Reports: <input type="checkbox"/> (attached form as appropriate) Variances: <input type="checkbox"/> (attach to variance form)
--	--

Areas Inspected

Location: _____	Time : _____	Activity : _____
Location: _____	Time : _____	Activity : _____
Location: _____	Time : _____	Activity : _____
Location: _____	Time : _____	Activity : _____
Location: _____	Time : _____	Activity : _____
Location: _____	Time : _____	Activity : _____

Item	Yes	No	N/A	Comments (if no then location)
------	-----	----	-----	--------------------------------

Monitors and Sensitive Resources

Monitoring near existing Archaeological site (exclusion area)? If yes, list site number and approximate distance from construction activity in comment section.				
All exclusion areas marked and avoided?				
Inadvertent discoveries of cultural resources? If yes, explain and document identified cultural material type and steps taken on continuation sheet.				
Impacts to existing cultural resource sensitive area(s)? If yes, Non-compliance, explain and document steps taken on continuation sheet.				
Native American Monitor present, as applicable?				

Photographs

Filename:	Filename:
Direction:	Direction:
Description:	Description:
Filename:	Filename:
Direction:	Direction:
Description:	Description:

**APPENDIX F
TREATMENT OF NATIVE AMERICAN HUMAN REMAINS DISCOVERED
INADVERTENTLY OR THROUGH CRIMINAL INVESTIGATIONS ON
PRIVATE AND PUBLIC, STATE-OWNED LANDS IN OREGON**

Treatment of Native American Human Remains Discovered Inadvertently or Through Criminal Investigations on Private and Public, State-Owned Lands in Oregon

Native American burial sites are not simply artifacts of the tribe's cultural past, but are considered sacred and represent a continuing connection with their ancestors. Native American ancestral remains, funerary objects, sacred objects and objects of cultural patrimony associated with Oregon Tribes are protected under state law, including criminal penalties (ORS 97.740-.994 and 358.905-.961). The laws recognize and codify the Tribes' rights in the decision-making process regarding ancestral remains and associated objects. Therefore both the discovered ancestral remains and their associated objects should be treated in a sensitive and respectful manner by all parties involved.

Identification of Human Remains

- Oregon laws (ORS 146.090 & .095) outline the types of deaths that require investigation and the accompanying responsibilities for that investigation. The law enforcement official, district medical examiner, and the district attorney for the county where the death occurs are responsible for deaths requiring investigation. Deaths that require investigation include those *occurring under suspicious or unknown circumstances*.
- If human remains that are inadvertently discovered or discovered through criminal investigations **are not clearly modern**, then there is high probability that the remains are Native American and therefore ORS 97.745(4) applies, which requires immediate notification with State Police, State Historic Preservation Office, Commission on Indian Services, and all appropriate Native American Tribes. To determine who the "appropriate Native American Tribe" is, the responsible parties should contact the Legislative Commission on Indian Services (CIS). To determine whether the human remains are Native American, the responsible parties should contact the appropriate Native American Tribes at the initial discovery. It should be noted that there may be more than one appropriate Native American Tribe to be contacted.
- If the human remains are possibly Native American then the area should be secured from further disturbance. The human remains and associated objects **should not be disturbed, manipulated, or transported from the original location until a plan is developed in consultation with the above named parties**. These actions will help ensure compliance with Oregon state law that prohibits any person willfully removing human remains and/or objects of cultural significance from its original location (ORS 97.745).
- All parties involved and the appropriate Native American Tribes shall implement a culturally sensitive plan for reburial.

Notification

- State law [ORS 97.745 (4)] requires that any discovered human remains suspected to be Native American shall be reported to -
 1. State Police
 - Sgt. Chris Allori, Office (503) 731-4717, Cell (503) 708-6461, Dispatch (503) 731-3030

2. State Historic Preservation Office (SHPO)
 - Primary contact = Dennis Griffin, State Archaeologist, office phone (503) 986-0674, cell phone (503) 881-5038
3. Legislative Commission on Indian Services (LCIS)
 - Contact = Karen Quigley, Director, office phone (503) 986-1067. Karen will provide the list of appropriate Native American Tribes
4. All appropriate Native American Tribes provided by LCIS
 - Burns Paiute Tribe - Agnes Castronuevo (541) 573-8089
 - Confederated Tribes of Coos, Lower Umpqua and Siuslaw - Stacy Scott, M.A. (541) 888-7513, Cell (541) 297-5543
 - Confederated Tribes of Grand Ronde - David Harrelson (503) 879-1630
 - Confederated Tribes of Siletz - Robert Kentta (541) 444-8244
 - Confederated Tribes of the Umatilla Indian Reservation - Teara Farrow Ferman (541) 276-3447; secondary contact Catherine Dickson (541) 966-2338 or (541) 429-7231
 - Confederated Tribes of Warm Springs - Sally Bird (541) 553-3555
 - Coquille Indian Tribe – Bridgett Wheeler (541) 756-0904
 - Cow Creek Band of Umpqua Indians - Jessie Plueard (541) 677-5575 ext. 5577
 - Klamath Tribes - Perry Chocktoot, Culture & Heritage Director (541) 783-2219