

Exhibit S

Historic, Cultural, and Archaeological Resources

**Biglow Canyon Wind Farm
February 2025**

Prepared for



Portland General Electric Company

Prepared by



TETRA TECH

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Attachment S-1. Cultural Resources Survey Report (**Confidential – provided under separate cover**)

Attachment S-2. Inadvertent Discovery Plan

Acronyms and Abbreviations

AC	alternating current
BCWF or Existing Facility	Biglow Canyon Wind Farm
BIGL or Project Developer	BIGL bn, LLC
Certificate Holder or PGE	Portland General Electric Company
Council or EFSC	Energy Facility Siting Council
IDP	Inadvertent Discovery Plan
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
SHPO	State Historic Preservation Office
Site Certificate	Site Certificate on Amendment 3
Solar Components	photovoltaic solar energy generation and battery storage
WSGV	Warm Springs GeoVisions

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 4 to the Site Certificate on Amendment 3, issued October 31, 2008 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Existing Facility) to add photovoltaic solar energy generation and battery storage (Solar Components) to the operating BCWF.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 2.5 miles northeast of the town of Wasco in Sherman County, Oregon. The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy (ODOE). BCWF currently consists of 217 wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW).

In RFA 4, PGE proposes to add up to 385 MW alternating current (AC) generating capacity from photovoltaic solar arrays and 375 MW in battery storage capacity. RFA 4 seeks to expand the BCWF site boundary to include the Solar Components in portions of the existing site boundary and in the proposed expanded site boundary (together, Solar Micrositing Area or RFA 4 Site Boundary¹).

The Solar Micrositing Area is approximately 3,980 acres and provides a conservative estimate of the maximum area needed for development, micrositing, and temporary disturbances from the Solar Components during construction, rather than the anticipated disturbance footprint. Solar Components will include solar arrays, inverters, battery energy storage system facilities and their subcomponents (i.e., inverters), two collector substations, a total of approximately 3 miles of 230-kilovolt generation tie transmission lines, medium voltage collector lines, operations and maintenance structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The maximum generating capacity from the Solar Components will be 385 MW AC and construction may take place in phases.

PGE will own and operate the Solar Components as a part of the BCWF (together, Amended Facility or Facility), which, to date, have been developed by BIGL bn, LLC (BIGL or Project Developer). BIGL, in its capacity as the project developer, supports PGE in this RFA 4 and may construct and temporarily operate the Solar Components on behalf of PGE under a Build-Transfer Agreement.

The Council previously found the Certificate Holder has demonstrated an ability to construct, operate, and retire the Facility in compliance with Council standards and conditions of the Site Certificate. The Council previously relied on cultural resources surveys conducted by Archaeological Investigations Northwest, Inc. (Sharma et al. 2006, 2007) and CH2M Hill (2005) and conditions imposed in the amended Site Certificate to address the Facility's compliance with the Historic, Cultural, and Archaeological Resources Standard. Conditions applicable to cultural resources include Conditions 69 through 73. No new conditions are proposed; however, alterations

¹ Note, as described in further detail in Section 4.1.1.2 of the RFA 4 Division 27 document, the Solar Micrositing Area is the equivalent of the RFA 4 Site Boundary.

are redlined below. The Site Certificate describes the conditions for historic, cultural, and archaeological resources (Conditions 69 through 73). These conditions require the following:

- (69) Before beginning construction of any phase of the facility, the certificate holder shall provide to the Department a map showing the final design locations of all components of that phase of the facility and areas that would be temporarily disturbed during construction and also showing the areas surveyed by CH2M Hill and Archaeological Investigations Northwest, Inc. (AINW) in preparing the Cultural Resources Surveys for Biglow Canyon Wind Farm included in the site certificate application as Attachment S-1 and in Request for Amendment #2 as Attachment 15. The certificate holder shall hire qualified personnel to conduct field investigation of all areas of permanent or temporary disturbance that CH2M Hill and AINW did not previously survey and shall provide to the ~~Department~~ **Council** a written report of the field investigation. If any significant historic, cultural or archaeological resources are found during the field investigation, the certificate holder shall ensure that construction and operation of the facility will have no impact on the resources. The certificate holder shall instruct all construction personnel to avoid areas where the resources were found and shall implement other appropriate measures to protect the resources. [Amendment #2]
- (70) Prior to construction, the certificate holder shall ensure that ~~a~~ **an approved Inadvertent Discovery Plan (IDP) is in place during construction. The approved final IDP will be consulted upon with Tribes and SHPO and submitted to the Council. The IDP should stipulate that a tribal monitor or** ~~qualified person~~ **archaeologist** instructs construction personnel in the identification of cultural resources and the information provided in the IDP, prior to construction.
- (71) The certificate holder shall ensure that a qualified archaeologist is present on site during any ground-disturbing activities, including grading and graveling; or, the certificate holder shall implement an alternate monitoring ~~procedure~~ **plan**, ~~including a testing strategy,~~ as agreed to in consultation with the Department, SHPO, and the tribes.
- (72) The certificate holder shall ensure that construction personnel cease all ground-disturbing activities in the immediate area if any archaeological or cultural resources are found during construction of the facility **in compliance with the approved IDP.** ~~until a qualified archaeologist can evaluate the significance of the find. The certificate holder shall notify the Department and the State Historic Preservation Office (SHPO) of the find. If the archaeologist determines that the resource is significant, the certificate holder shall make recommendations to the Council for mitigation, including avoidance or data recovery, in consultation with the Department, SHPO, and other appropriate parties. The certificate holder shall not restart work in the affected area until the certificate holder has demonstrated to the Department that it has complied with the archaeological permit requirements administered by SHPO.~~
- (73) The certificate holder shall ensure that construction personnel proceed carefully in the vicinity of the mapped alignment of the Oregon Trail. If any intact physical evidence of the trail is discovered, the certificate holder shall avoid any disturbance to the intact

segments, by redesign, re-engineering or restricting the area of construction activity. The certificate holder shall promptly notify the Department and SHPO of the discovery, **in compliance with** the approved IDP. ~~The certificate holder shall consult with the Department and with SHPO to determine appropriate mitigation measures.~~

Exhibit S provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(s) in support of RFA 4. Exhibit S provides an analysis of potential significant impacts of RFA 4 to historic, cultural, and archaeological resources.

Analysis in this exhibit incorporates and/or relies on reference information, analysis, and findings from previous cultural resource studies and investigations performed for the areas within the Amended Site Boundary in addition to new cultural resource surveys completed in the Solar Micrositing Area to demonstrate that the Facility, as modified by RFA 4, continues to comply with applicable Site Certificate Conditions and applicable laws, standards, and rules, providing evidence to support findings by the Council as required by OAR 345-022-0090. Specifically, OAR 345-022-0090 states that:

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

(a) Historic, cultural, or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;

(b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and

(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).

Although OAR 345-022-0090 allows the Council to issue a site certificate without making the findings above, the Council may apply these requirements to impose conditions on the site certificate. Nevertheless, this section provides evidence that will allow the Council to determine that the design, construction, and operation of the proposed Solar Components will not have a significant adverse impact on historic, cultural, or archaeological resources that have been listed on, or will likely be listed on the National Register of Historic Places (NRHP); for a facility on private land, archaeological objects, as defined in Oregon Revised Statutes (ORS) 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and for a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c). Pursuant to OAR 345-021-0010(1)(s), this exhibit provides information about historic, cultural, and archaeological surveys conducted for RFA 4 by Warm Springs GeoVisions (WSGV; WSGV 2025) on behalf of the Certificate Holder and general findings of those surveys. The survey report is provided as confidential Attachment S-1. Cultural resource survey reports are confidential documents, which are exempt from public disclosure under ORS 192.345(11); Attachment S-1 is provided to ODOE under separate cover.

2.0 Analysis Area

Pursuant to OAR 345-001-0010, the analysis area for historic, cultural, and archaeological resources consists of both direct and indirect analysis areas. The direct analysis area is defined as the area within the RFA 4 site boundary. The indirect analysis area includes the RFA 4 site boundary and a 1-mile buffer to account for auditory and visual impacts to historic sites (i.e., historic buildings, structures, or objects) and Historic Properties of Religious or Cultural Significance to Indian Tribes. The analysis area is shown on Figure S-1. The direct analysis area is located on private land.

3.0 Historic and Cultural Resources within the Analysis Area

The entirety of the direct analysis area was surveyed by WSGV in 2024 (see Attachment S-1). WSGV reviewed the Oregon State Historic Preservation Office's (SHPO) Online Archaeological Records Remote Access and Historic Sites databases to identify previously conducted surveys and recorded cultural resources within the analysis area. Additionally, historic maps of the RFA 4 site boundary were reviewed to inform the survey. The records review found that 21 previous cultural resource studies had been performed within the overall analysis area (direct and indirect). Nine of the previous surveys covered small linear portions within the direct analysis area (Table S-1). These were all linear or block surveys that were primarily completed for wind farm projects, including the original construction of the Existing Facility.

Nineteen archaeological sites and isolates were previously recorded in the overall analysis area. The sites included historic structures *in ruin*, historic refuse scatters, and precontact lithic scatters. The isolates include a historic-era wooden wagon axle and several pre-contact lithic flakes and biface fragments. Three of the previously recorded resources are located within the RFA 4 site boundary. These include two archaeological sites (35SH00173 and 35SH00188) and one isolate (the historic-era wooden axle). The alignment of the National Park Service–managed Oregon National Historic Trail also crosses the analysis area. It is important to note that the alignment is limited to an administrative alignment for management purposes only, and no trail ruts or interpretive sites associated with the Oregon Trail were identified in the analysis area.

On August 9, 2024, the Certificate Holder consulted with the Legislative Commission on Indian Services, requesting assistance in identifying appropriate Tribes to conduct outreach with regarding the RFA. The Legislative Commission on Indian Services identified the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Burns Paiute Tribe. On October 10, 2024, the Certificate Holder sent informal outreach letters via email to representatives of each of these Tribes. These letters described the Existing Facility and the proposed modifications under RFA 4 and requested input regarding the potential impacts on resources of concern to the Tribes. No responses have been received.

WSGV conducted a non-collection, archaeological survey of the direct analysis area between May 8 and November 3, 2024 (confidential Attachment S-1). Additional investigations, including NRHP-eligibility testing and evaluation of a selection of identified archaeological resources, as well as a reconnaissance survey of the indirect analysis area for aboveground resources, will be completed in 2025 and results provided to ODOE, SHPO, and Tribes.

Surveys conducted to date within the direct analysis area have identified a total of 19 cultural resources (Table S-1). The locations of these are depicted on confidential Figure S-2. The resources include 11 archaeological sites and 8 isolates. Seven of the archaeological sites and one of the isolates have been left unevaluated for NRHP eligibility. The remaining resources have been recommended ineligible for listing on the NRHP.

Table S-1. Cultural Resources in the Direct Analysis Area

Temporary ID (Trinomial)	Period	General Resource Description	NRHP Recommendation	Applicable Siting Standard	Distance to Disturbance (meters)	Management Recommendations
BCW-4 (35SH00173)	Historic	Debris scatter/ concentration	Unevaluated	OAR 345-022-0090(1)(a)(b)	0	Avoidance
06/1365-D2 (35SH00188)	Historic	Homestead; historic debris scatter/concentration	Unevaluated	OAR 345-022-0090(1)(a)(b)	18	Avoidance
BSP-1-S01	Multicomponent	Precontact lithics; historic debris scatter/concentration	Unevaluated	OAR 345-022-0090(1)(a)(b)	18	Avoidance
BSP-1-S02	Multicomponent	Precontact Lithic; Historic Debris Scatter/Concentration	Unevaluated	OAR 345-022-0090(1)(a)(b)	28	Avoidance
BSP-1-S03	Historic	Debris Scatter/ Concentration	Not Eligible	none	0	Pending SHPO concurrence, no further management
BSP-1-S04	Historic	Residential structure; debris scatter/ concentration	Unevaluated	OAR 345-022-0090(1)	0	Avoidance
BSP-1-S05	Historic	Debris scatter/ concentration	Not Eligible	none	0	Pending SHPO concurrence, no further management
BSP-1-S06	Historic	Debris scatter/concentration	Not Eligible	none	438	Pending SHPO concurrence, no further management
BSP-1-S09	Historic	Mining quarry; historic debris scatter/ concentration	Not Eligible	none	19	Pending SHPO concurrence, no further management
BSP-1-S10	Historic	Homestead in-ruin	Unevaluated	OAR 345-022-0090(1)(a)(b)	0	Avoidance
BSP-1-S12	Multicomponent	Precontact lithic; historic debris concentration/scatter	Unevaluated	OAR 345-022-0090(1)(a)(b)	20	Avoidance
BCWI-JS-1	Historic	Wooden wagon axle	Not Eligible	none	40	Pending SHPO concurrence, no further management

Temporary ID (Trinomial)	Period	General Resource Description	NRHP Recommendation	Applicable Siting Standard	Distance to Disturbance (meters)	Management Recommendations
BSP-1-I01	Historic	Harrow	Not Eligible	none	0	Pending SHPO concurrence, no further management
BSP-1-I02	Historic	Prince Albert tobacco tin	Not Eligible	none	50	Pending SHPO concurrence, no further management
BSP-1-I03	Historic	Liggett & Myers Tobacco Company Velvet pipe and cigarette pocket-tin	Not Eligible	none	49	Pending SHPO concurrence, no further management
BSP-1-I04	Precontact	Obsidian biface fragment	Unevaluated	OAR 345-022-0090(1)(a)(b)	6	Avoidance
BSP-1-I05	Historic	Steel fastener	Not Eligible	none	0	Pending SHPO concurrence, no further management
BSP-1-I06	Historic	Aqua bottle glass fragment	Not Eligible	none	9	Pending SHPO concurrence, no further management
BSP-1-I07	Historic	Soil compactor	Not Eligible	none	142	Pending SHPO concurrence, no further management

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

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

OAR 345-021-0010(1)(s)(A) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the National Register of Historic Places.

Response: A total of seven archaeological sites (35SH00173, 35SH00188, BSP-1-S01, BSP-1-S02, BSP-1-S04, BSP-1-S10, and BSP-1-S12) and one archaeological isolate (BSP-1-I04) within the direct analysis area are unevaluated for NRHP eligibility. These resources are treated as listed or likely eligible for listing on the NRHP (see Table S-1). Unless further testing reveals that these sites lack significance or integrity for listing on the NRHP, these sites will be avoided.

Currently, disturbance is planned within 0 to 28 meters of all eight resources protected by Siting Standards A and B (Table S-1). All of the archaeological sites and objects could be potentially impacted due to their proximity to the Solar Components. Potential impacts could occur at three historic sites (35SH00173, BSP-1-S04, and BSP-1-S10). All of these sites are located within the fence line where facility elements are planned. Historic site 35SH00188 is located within 18 meters of the fence line, and three multicomponent sites (BSP-1-S01, BSP-1-S02, and BSP-1-S12) are located at 18, 20, and 28 meters, respectively, from the proposed fence line surrounding potential impact areas. The Certificate Holder will take into account these resource locations during subsequent design efforts and plan for avoidance.

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

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

Response: A total of 11 archaeological sites and 8 archaeological isolates have been identified within the direct analysis area (Table S-1). As noted above, 7 of the sites and 1 of the isolates are unevaluated for NRHP eligibility. These resources are treated as listed or likely eligible for listing on the NRHP. Unless further testing reveals that these resources lack significance or integrity for listing on the NRHP, these sites and objects will be avoided.

The remainder of the archaeological resources are considered not eligible for listing on the NRHP.

Archaeological objects are defined in ORS 358.905(1)(a) as objects that are a) at least 75 years old; b) part of the physical record of an indigenous or other culture found in the state or waters of the state; and c) material remains of past human life or activity that are of *archaeological significance* [emphasis added]. “Archaeological significance” is accepted as resources that are listed on, eligible for listing on, or potentially eligible for listing on the NRHP, or resources that are indicated as such in writing by a Tribe. Archaeological sites are defined in ORS 358.905(1)(c) as geographic localities in Oregon that contain *archaeological objects* [emphasis added] and the contextual associations of the archaeological objects with each other or biotic or geological remains or deposits.

The NRHP ineligibility of BSP-1-S03, BSP-1-S05, BSP-1-S06, BSP-1-S09, BCWI-JS-1, BSP-1-I01, BSP-1-I02, BSP-1-I03, BSP-1-I05, BSP-1-I06, and BSP-1-107 indicates a lack of archaeological significance and that they do not meet the definition of archaeological objects or archaeological sites (the definition of which is based on the inclusion of archaeological objects), as required for protection under OAR 345-022-0090(b). As a result, only those resources described above as protected under OAR 345-022-0090(a) (Section 4.1) are protected under OAR 345-022-0090(b). Impacts are therefore the same as described under Section 4.1 for OAR 345-022-0090(a).

4.3 Archaeological Sites on Public Lands within the Analysis Area – OAR 345-021-0010(1)(s)(C)

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

Response: There are no public lands within the direct analysis area. As such, OAR 345-021-0010(1)(s)(c) is not applicable.

5.0 Measures Designed to Prevent the Destruction of Historic, Cultural, and Archaeological Resources – OAR 345-021-0010(1)(s)(D)(iii)

OAR 345-021-0010(1)(s)(D)(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.

Response: The Certificate Holder will adhere to Site Conditions 69 through 73 for historic, cultural, and archaeological resources. All NRHP-eligible, -listed, and unevaluated cultural resources will be physically avoided by the Solar Components by a minimum buffer of 20 meters. If disturbance could not be avoided within this buffer, but would be outside a resource boundary, that disturbance would be monitored. If the resource boundary of such a resource cannot be avoided, the Certificate Holder will consult with ODOE, SHPO, and Tribes to determine appropriate mitigation (Site Conditions 72 and 73). An Inadvertent Discovery Plan (IDP) is included in Attachment S-1 and

provided separately in Attachment S-2. This document will be updated prior to construction of the Solar Components.

Although the Certificate Holder has conducted preliminary outreach to Tribes, no response has been received. The Certificate Holder relies on ODOE and the Council's government-to-government consultation process to assist with facilitating those discussions to ensure cultural resources significant to the Tribes are not impacted.

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

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

Response: To satisfy Site Conditions 69 through 73, a monitoring plan will be established in consultation with the Council and Tribes. Disturbance will not occur within 20 meters of any NRHP-eligible, -listed, or unevaluated cultural resources. If disturbance is planned within an avoidance buffer, the Certificate holder will consult with the Council and Tribes, and an archaeological or Tribal monitor must be present. All impacts to significant cultural resources will be avoided through Solar Components design.

7.0 References

CH2M Hill. 2005. Cultural Resources Survey for Biglow Canyon Wind Farm Facility. CH2M Hill. OR SHPO Report Number 20230.

Sharma, Mini, David V. Ellis, Todd Ogle, and Elizabeth J. O'Brien. 2007. Cultural Resource Survey for the Biglow Canyon Wind Project - Phase 1, Sherman County, Oregon Supplement 2. OR SHPO Report Number 26640. Archaeological Investigations Northwest, Inc., Portland, OR.

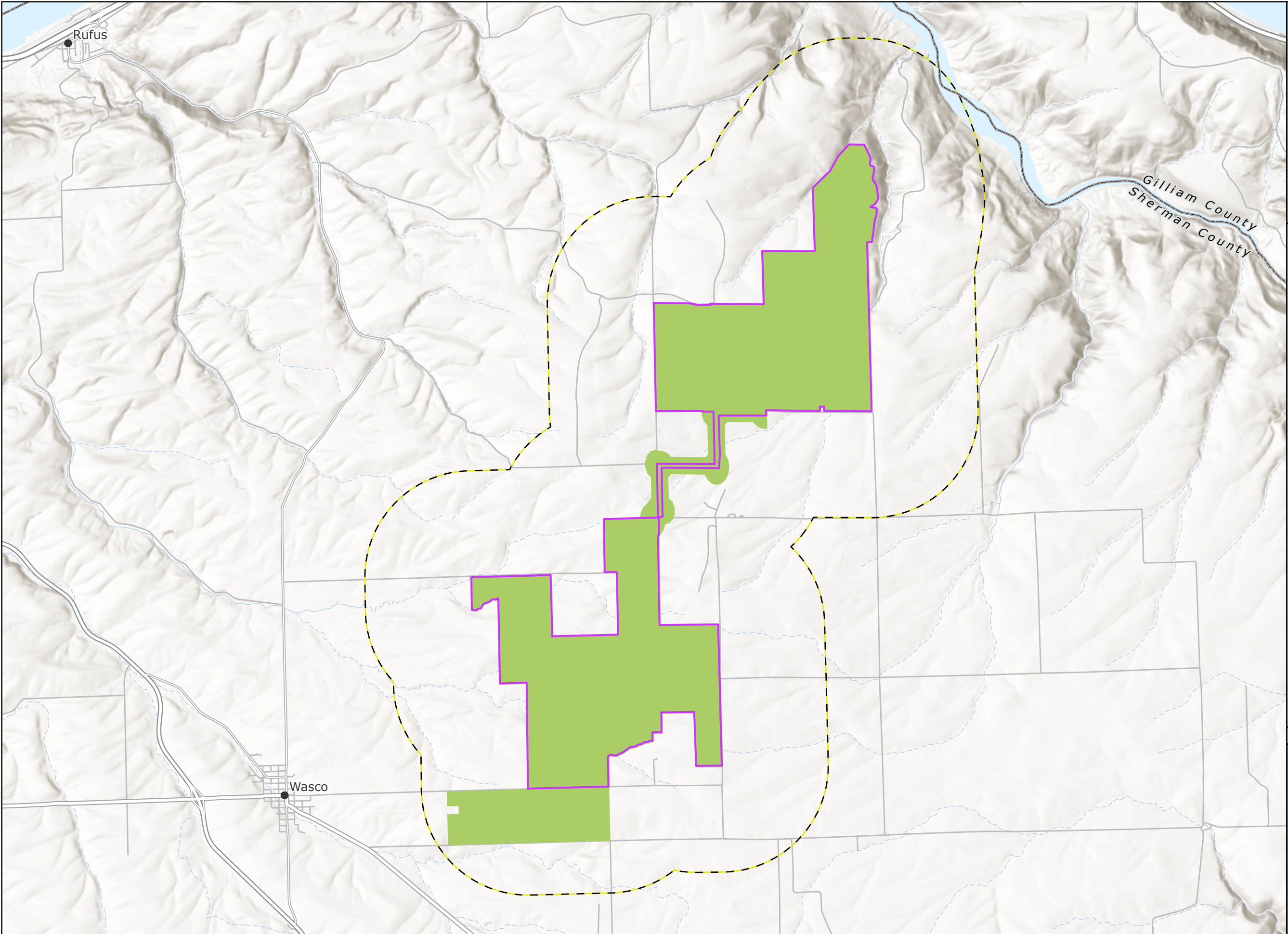
Sharma, Mini, David V. Ellis, Todd Ogle, and Michele Punke. 2006. Cultural Resource Survey for the Biglow Canyon Wind Project, Sherman County, Oregon: Supplement I. OR SHPO Report Number 26627. Archaeological Investigations Northwest, Inc., Portland, OR.

WSGV (Warm Springs GeoVisions). 2024. Draft Cultural Resource Survey of the Biglow Canyon Project. Prepared for BIGL bn, LLC.

Figures

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




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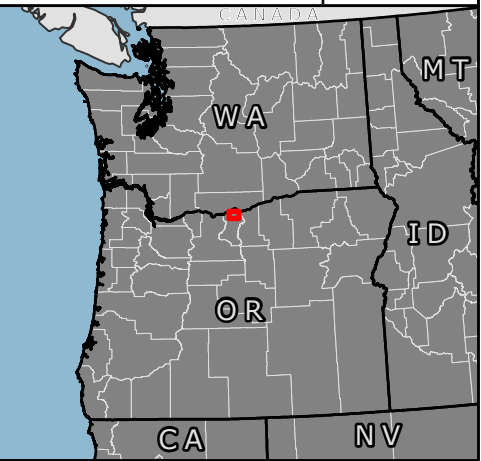
**Figure S-1
Analysis Area**

SHERMAN COUNTY, OR

-  Solar Micrositing Area
-  Direct Analysis Area
-  Indirect Analysis Area
-  County Boundary
-  City/Town



Reference Map



1:55,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION

Attachment S-1: Cultural Resources Survey Report (Confidential)

This document contains confidential information and will be provided under separate cover.

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Attachment S-2: Inadvertent Discovery Plan

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ARCHAEOLOGICAL AND HUMAN REMAINS INADVERTENT DISCOVERY PLAN (IDP)

Biglow Solar Project

[Project Manager] [Landowner Agency] [Date] [SHPO case number]

This document outlines procedures and protocols to be followed if archaeological objects or features, or human remains are encountered in the course of work. These procedures are intended for circumstances where there is not an expectation or anticipation of encountering cultural resources or human remains. **This is not a replacement for due diligence, robust project design, and consultation with appropriate Native American Tribes.**¹ Prior to undertaking project work, an assessment of the likelihood for disturbance to cultural resources and tribal heritage should be completed. All personnel will be briefed on all procedures and reporting structures before the start of any work.

CONTENTS OF THIS DOCUMENT

- A. Procedures for archaeological features and materials
 - B. Procedures for human remains, burials, funerary objects, sacred objects, and objects of cultural patrimony
 - C. Roles and responsibilities
 - D. Contact information
 - E. Confidentiality statement
 - F. Procedure flow chart
 - G. Visual reference guide for archaeology and tribal heritage items
-

A. PROCEDURES FOR INADVERTENT DISCOVERY OF ARCHAEOLOGICAL FEATURES AND MATERIALS (DOES **NOT** INCLUDE HUMAN REMAINS, BURIALS, FUNERARY OBJECTS, OBJECTS OF CULTURAL PATRIMONY, OR SPIRITUAL OBJECTS)

It is expected that ALL artifacts, features, structural elements, and other cultural items that are identified will be reported to required project, agency, and Tribal contacts, and accounted for as soon as possible. It is understood that there will be a single project point of contact to coordinate with the project archaeologist, SHPO, LCIS, and appropriate Native American Tribes.

Step 1. Stop work (immediately after discovery)

¹ Appropriate Native American Tribes identified by LCIS are Confederated Tribes of the Warm Springs Reservation (CTWSR), Confederated Tribes of the Umatilla Indian Reservation (CTUIR), and the Burns Paiute Tribe (BPT)

If any person believes that they have located an archaeological object² or site³, all work must stop immediately.

Discovery made in field _____(date/time) _____ (initials of discoverer)

Step 2. Secure and protect the area (within first hour after discovery)

Establish a **minimum** 30 meter/100-foot area of protection, or more if necessary, around the find(s). Exclude all vehicle traffic and non-essential foot traffic. Non-ground-disturbing work may continue outside of the area of protection with caution until the situation is assessed by a qualified archaeologist.⁴

Buffer established _____ (time) _____ (initials of person responsible)

Step 3. Notify (within first hour after discovery)

Notify the project manager, representative of the CTWSR, CTUIR, and BPT, agency official, and project archaeologist. There must be an archaeologist on-site, for all ground disturbing activity and all activity within 20 meters of archaeological sites.

Project Manager contacted	_____ (time)	_____ (initials of contactor)
Representative of the CTWSR	_____ (time)	_____ (initials of contactor)
Representative of the CTUIR	_____ (time)	_____ (initials of contactor)
Representative of the BPT	_____ (time)	_____ (initials of contactor)
Agency Official contacted	_____ (time)	_____ (initials of contactor)
Project Archaeologist contacted	_____ (time)	_____ (initials of contactor)

Step 4. Identify and Follow Guidance (timeline variable, as soon as possible)

If the archaeologist determines the find is an archaeological feature or object, or other cultural item or feature, OR if no qualified archaeologist can be contacted within the first hour of discovery, the **State Historic Preservation Office (SHPO) and appropriate Native American Tribes must be contacted**, and their guidance must be followed. SHPO, Native American Tribes, and project and agency personnel will determine in consultation how or if work may continue at the site. If the discovery is determined to *not* be archaeological or a cultural item, you may continue work. This determination should be confirmed in writing to the project manager and agency official.

² "Archaeological object" means an object that is at least 75 years old (or 50 years if there is a federal nexus), is part of the physical record of an indigenous or other culture found in the state or waters of the state, and is material remains of past human life or activity that are of archaeological significance including, but not limited to, monuments, symbols, tools, facilities, technological by-products and dietary by-products (ORS 358.905).

³ "Archaeological site" means a geographic locality in Oregon 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).

⁴ Ground-disturbing work on different landforms distant from the find and outside of the buffer may continue.

SHPO contacted _____ (time) _____ (initials of contactor)
Appropriate Native American Tribes⁵ _____ (time) _____ (initials of contactor)

B. PROCEDURES FOR INADVERTENT DISCOVERY OF HUMAN REMAINS

(INCLUDES HUMAN REMAINS, BURIALS, FUNERARY OBJECTS, OBJECTS OF CULTURAL PATRIMONY, AND SPIRITUAL OBJECTS)

It is expected that ALL potential human remains, burials, funerary objects, or objects of cultural patrimony that are identified will be reported and accounted for within 3 hours of discovery.⁶ It is understood that there will be a single project point of contact to coordinate with the project archaeologist, SHPO, LCIS, OSP and appropriate Native American Tribes.

Step 1: Stop work (immediately after discovery)

If any person believes that they have located human remains⁷, ALL work will stop immediately. Any human remains, regardless of antiquity or ethnic origin, will always be treated with dignity and respect.

Step 2. Secure and protect the area (as soon as possible, within c. 10 min)

Secure and protect the area of inadvertent discovery with a **minimum** of 100 meter/300 foot buffer, or more if necessary. The location and other information about the find should be treated as confidential and shared on a **need to know basis only**. Prevent all vehicle traffic and unauthorized foot traffic from entry. Block remains from view and protect them from damage or exposure without touching or disturbing the remains, and leave them in place.

Do not take photographs unless approved by the appropriate Native American Tribes and Oregon Legislative Commission on Indian Services (LCIS), and only for the purpose of identification. **Do not speak to the media or public** or post any information about the find on social media. Non-ground-disturbing work may continue outside of the buffer with caution.⁸

Buffer established _____ (time) _____ (initials of person responsible)

Step 3. Notify (within first hour after discovery) – see contact list below (section D)

1. Project Manager _____ (time) _____ (initials)
2. Agency Official _____ (time) _____ (initials)

⁵ ALL Tribes designated by LCIS must be notified. Contacting one or some of the Tribes does not fulfill the obligation to notify.

⁶ Modifications to reporting timelines can be made in consultation with SHPO and Tribes.

⁷ Bone may be fragmented, weathered, or otherwise modified to make it difficult to identify, so when in doubt, stop work and call it in.

⁸ Ground-disturbing work on different landforms distant from the find and outside of the buffer may continue.

3. Oregon State Police⁹ **DO NOT CALL 911** _____ (time) _____ (initials)
4. State Historic Preservation Office (SHPO) _____ (time) _____ (initials)
5. Commission on Indian Services (LCIS) _____ (time) _____ (initials)
6. Representative of CTWSR _____ (time) _____ (initials)
7. Representative of CTUIR _____ (time) _____ (initials)
8. Representative of BPT _____ (time) _____ (initials)

Name of Tribe(s) Contacted and Individual(s):

Step 4. Follow guidance (timeline variable, may be up to several days)

If the site is determined not to be a crime scene by the Oregon State Police, **do not move anything!** The remains will continue to be *secured in place* along with any associated funerary objects, and protected from weather, water runoff, and shielded from view. Follow all guidance provided by OSP, LCIS, SHPO, and appropriate Native American Tribes.

Continue to maintain the work stoppage within the buffer until a plan is developed and carried out between the Oregon State Police, SHPO, LCIS, and appropriate Native American Tribes and you are directed in writing by the project manager that work may proceed.

C. ROLES AND RESPONSIBILITIES

Person Responsible	Responsibility
[Name]: [555-555-5555] will...	Notify the Project Manager Todd Ellwood: 408-839-2402
[Name]: [555-555-5555] will...	Notify the Agency Official [Name]: [555-555-5555]
[Name]: [555-555-5555] will...	Notify the Contracted Archaeologist [Name]: [555-555-5555]
[Name]: [555-555-5555] will...	Notify the State Agencies (OSP, LCIS, SHPO)
[Name]: [555-555-5555] will...	Notify the Native American Tribes identified by LCIS
[Name]: [555-555-5555] will...	Enforce the work stoppage and buffer

⁹ OSP will be responsible for contacting the county or state medical examiner's office as appropriate.

D. CONTACT INFORMATION¹⁰

Agency	Position/Contact	Contact Information
BrightNight Project Manager	Todd Ellwood todd.ellwood@brightnightpower.com	408-839-2402
EFSC (title)	[Name]	[555-555-5555]
Contracted Archaeologist	[Name]	[555-555-5555]
Legislative Commission in Indian Services (LCIS)	Primary Contact: Dr. Elissa Bullion, State Physical Anthropologist	971-707-1372
	Secondary Contact: LCIS Office	503-986-1067
Oregon State Police (OSP)	Primary Contact: Sgt. Ryan Tague	541-576-4393
	Secondary Contact: Dispatch	503-731-3030
State Historic Preservation Office (SHPO)	[SHPO archaeologist who reviewed submission]	[555-555-5555]
	Primary Contact: John Pouley, State Archaeologist	503-480-9164
	Secondary Contact: Jamie French, Asst. State Archaeologist	503-979-7580
Native American Tribes	Confederated Tribes of the Warm Springs Reservation: Bobby Brunoe THPO & NAGPRA Coordinator	541-553-2002
	Austin L Smith Jr General Manager of the Dept. of Natural Resources	541-553-2001
	Confederated Tribes of the Umatilla Indian Reservation: Teara Farrow Ferman Cultural Resources Program Manager, Dept. of Natural Resources	541-276-3447
	Bambi Rodriguez	541-429-7203
	Burns Paiute Tribe: Diane Teeman Culture and Heritage Director dlteeman.burns.paiute@gmail.com	541-413-1190

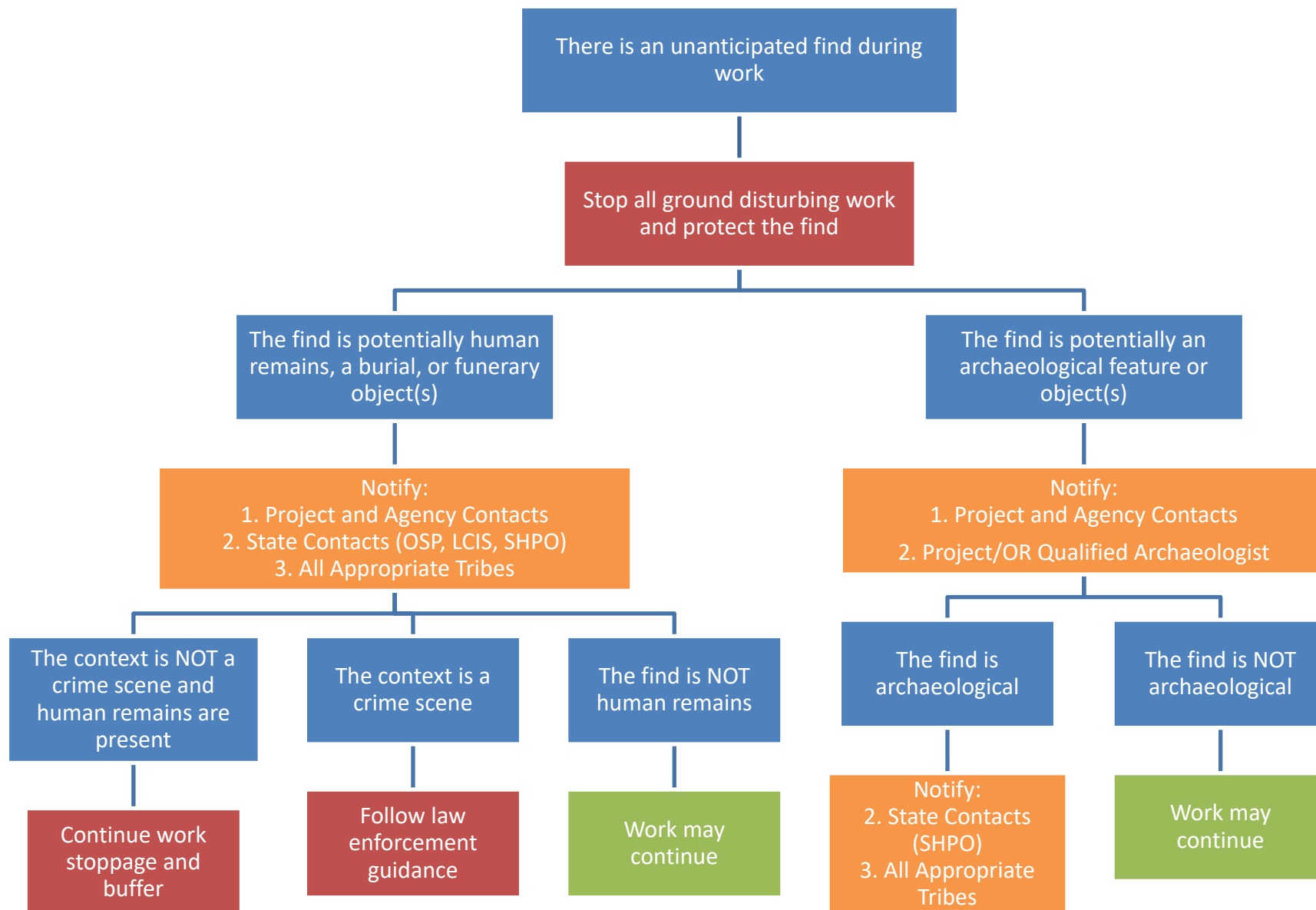
E. CONFIDENTIALITY

¹⁰ ***Contact information should be regularly updated for all individuals. Up to date contacts for LCIS, OSP, SHPO, and Native American Tribes can be found on the LCIS cultural resources page: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](http://Commission on Indian Services archaeology (oregonlegislature.gov))

The Biglow Solar Project and employees shall make their best efforts, in accordance with federal and state law, to ensure that its personnel and contractors keep the discovery confidential. The media, or any third-party member or members of the public are not to be contacted or have information regarding the discovery, and any public or media inquiry is to be reported to [lead agency]. Photos shall not be taken except for when authorized by LCIS, SHPO, and Native American Tribes for identification purposes, and no photos will be circulated publicly or on social media. Prior to any release, the responsible agencies and Tribes shall concur on the amount of information, if any, to be released to the public.

To protect fragile, vulnerable, or threatened sites, the National Historic Preservation Act, as amended (Section 304 [16 U.S.C. 470s-3]), and Oregon State law (ORS 192.501(11)) establishes that the location of archaeological sites, both on land and underwater, shall be confidential.

F. PROCEDURE FLOW CHART



G. Visual Reference Guide for Archaeology in Oregon (Modify based on region/context)

Lithics and stone tools



Figure 1. Stone flakes



Figure 2. Stone projectile points

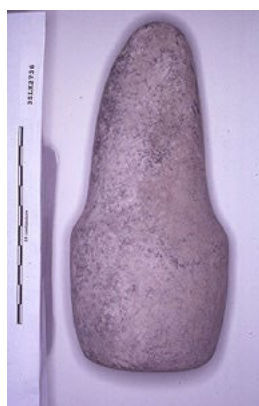


Figure 3. Ground stone tools: (left) pestle, (right) net weights,

Basketry/Cordage



Figure 4. Open diagonal twine basket fragments from Fort Rock Cave (UOMNCH).



Figure 5. Three-strand braid, sagebrush bark from Paisley Caves (UOMNCH).

Shell Middens



Figure 6.



Figure 7. Dentalium shell beads (UOMNCH).

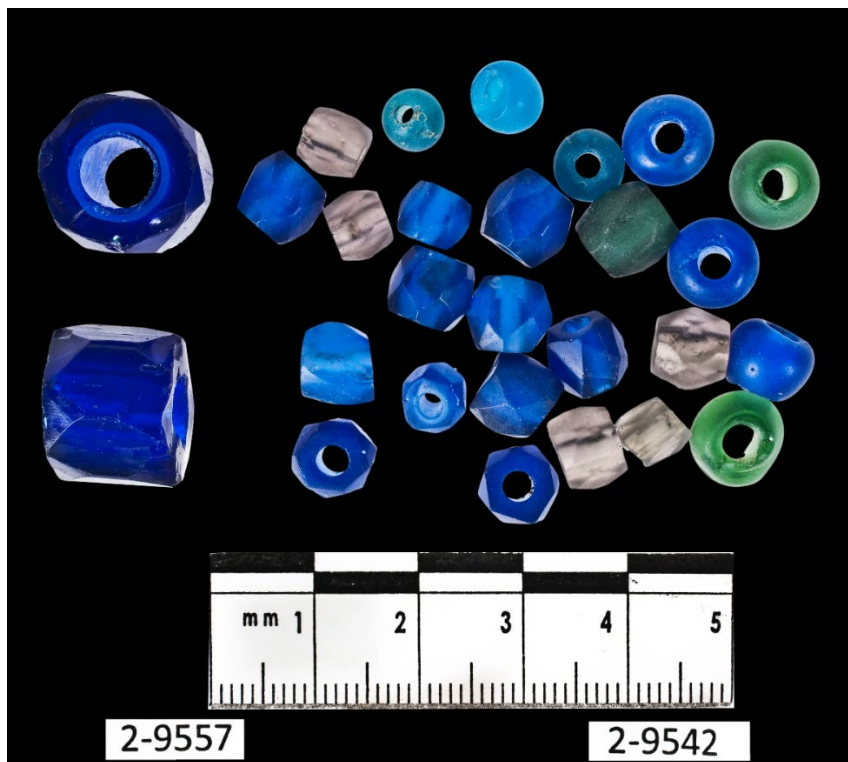


Figure 8. Glass trade beads, Upper Columbia River (UOMNCH).



Figure 9. Wooden fish weir (Scott Byram, 2010)

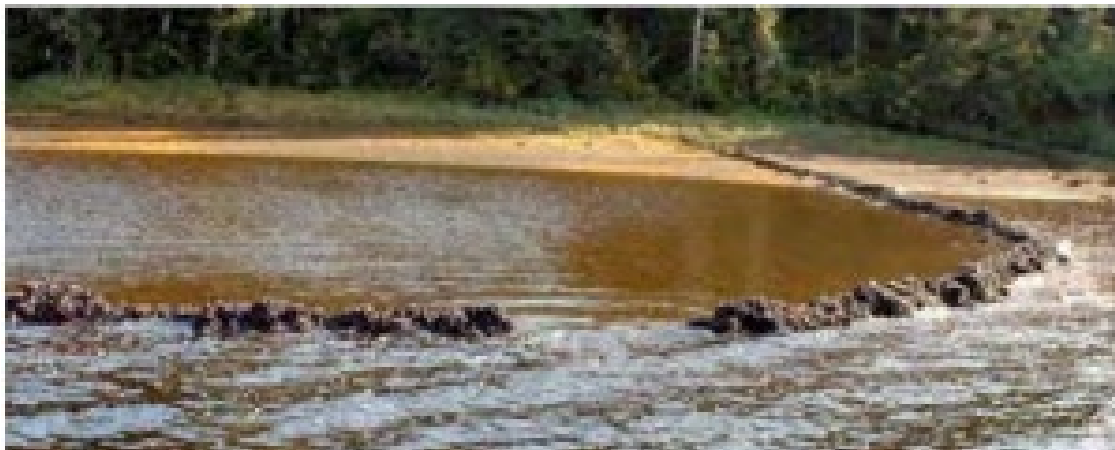


Figure 10. Stone fish weir (Brown and Brown, 2009)



Figure 11. Example of peeled pine.



Figure 12. Arborglyph on aspen tree



Figure 13. Historical glass

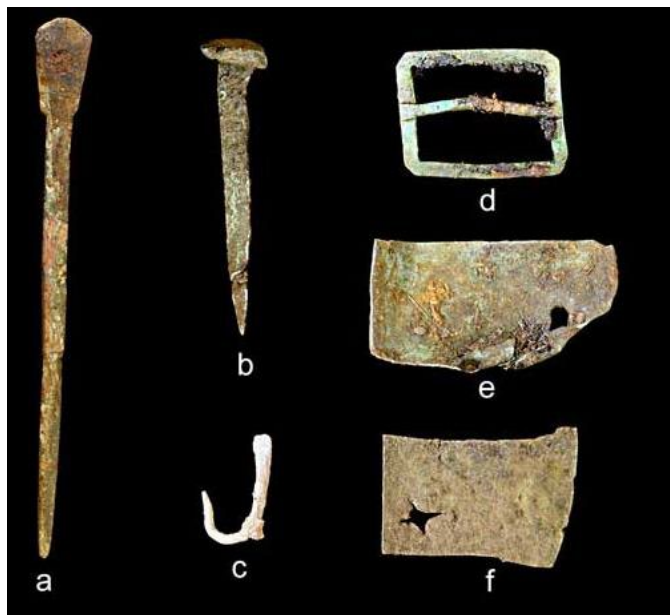


Figure 14. Historical metal artifacts