

# **Exhibit S**

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

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**Biglow Canyon Wind Farm  
December 2025**

**Prepared for**



**Portland General Electric Company**

**Prepared by**



**TETRA TECH**

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## 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
CTWSRO	Confederated Tribes of the Warm Springs Reservation of Oregon
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 4.5 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 125 MW alternating current (AC) generating capacity from photovoltaic solar arrays and 125 MW in battery storage capacity (Solar Components) in approximately 1,445 acres of land (Solar Area) sited within the existing BCWF site boundary Solar Micrositing Area (RFA 4 Site Boundary<sup>1</sup>).

The Solar Micrositing Area is approximately 1,924 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 temporary and permanent disturbance footprint. Within the Solar Micrositing Area, the Certificate Holder has identified a reduced footprint where Solar Components will be concentrated (Solar Area; 1,445 acres). Solar Components will include solar arrays, inverters, battery energy storage system facilities and their subcomponents (i.e., inverters), a collector substation, approximately 600 feet of a new 230-kilovolt generation tie transmission line, 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 125 MW AC, and the infrastructure will be fenced within the Solar Micrositing Area and will cover up to 1,445 acres (Solar Area).

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

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<sup>1</sup> 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.

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 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 linear corridors within the direct analysis area. These surveys were all completed for renewables projects, including the original construction of the existing BCWF Facility.

Eleven archaeological sites and isolates are recorded within the RFA 4 Site Boundary (Table S-1). These include two multicomponent sites with historic debris and precontact lithic scatters (BSP-1-S02 and BSP-1-S12), two historic structures *in ruin* (35SH00188 and BSP-1-S10), and a historic refuse scatter (BSP-1-S03). The historic-era isolates within the RFA4 Site Boundary include two tobacco tins, a steel fastener, a glass bottle fragment, a steel fastener, a soil compactor, and a precontact obsidian biface fragment.

Four archaeological sites and one isolate have been left unevaluated for NRHP eligibility. The remaining six resources have been determined ineligible for listing on the NRHP (Kemmerlin 2025). The locations of these are depicted on confidential Figure S-2.

The alignment of the National Park Service–managed Oregon National Historic Trail also crosses the analysis area, 450 meters from the southern end of the RFA 4 Site Boundary. 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.

BGIL has conducted additional engagement following the lack of responses to PGE's 2024 outreach. BIGL consulted with Legislative Commission on Indian Services and initiated direct outreach to the identified Tribes. On September 4, 2025, BIGL emailed representatives of the Tribes. On the same day, the Confederated Tribes of the Umatilla Indian Reservation deferred to the Confederated Tribes of Warm Springs Reservation of Oregon (CTWSRO). The CTWSRO responded on September 11, 2025, expressing interest in hearing from BGIL and PGE regarding the project. BGIL followed up on September 11, 2025, to request an introductory meeting. On October 29, 2025, the CTWSRO requested a meeting, and an in-person meeting is currently being planned at Warm Springs for November 20, 2025. requested a meeting, and an in-person meeting is currently being planned at Warm Springs for November 20, 2025.

WSGV conducted a non-collection, archaeological survey of the direct analysis area between May 8 and November 3, 2024 (confidential Attachment S-1)..

**Table S-1. Cultural Resources in the RFA 4 Site Boundary**

<b>Temporary ID (Trinomial)</b>	<b>Period</b>	<b>General Resource Description</b>	<b>NRHP Recommendation</b>	<b>Applicable Siting Standard</b>	<b>Distance to Disturbance (meters)</b>	<b>Management Recommendations</b>
<b>Archaeological Sites</b>						
06/1365-D2 (35SH00188)	Historic	Homestead; 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	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
<b>Isolates</b>						
BSP-1-I02	Historic	Prince Albert tobacco tin	Not Eligible	None	50	No further management
BSP-1-I03	Historic	Liggett & Myers Tobacco Company Velvet pipe and cigarette pocket-tin	Not Eligible	None	49	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	No further management
BSP-1-I06	Historic	Aqua bottle glass fragment	Not Eligible	None	9	No further management
BSP-1-I07	Historic	Soil compactor	Not Eligible	None	142	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 four archaeological sites (35SH00188, BSP-1-S02, 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, these sites will be avoided.

Currently, disturbance is planned within 6 to 28 meters of five 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 four archaeological sites and one archaeological object (35SH00188, BSP-1-S02, BSP-1-S10, BSP-1-S12, and BSP-1-I04). All of these resources are located within the RFA 4 Site Boundary where facility elements are planned. 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 four archaeological sites and one archaeological isolate have been identified within the direct analysis area (Table S-1). These resources are unevaluated for NRHP eligibility and 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. 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-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, continuous outreach should be ongoing. 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.

Kemmerlin, Aspen. 2025. Letter to Christopher Clark, Oregon Department of Energy, July 10. Re: SHPO Case No. 25-0589 ODOE, 24-522, Biglow Solar. On file, State Historic Preservation Office, Salem, Oregon.

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

**Biglow Canyon  
Wind Farm Request  
for Amendment #4**

**Figure S-1  
Analysis Area**

**SHERMAN COUNTY, OR**

-  Solar Micrositing Area
-  Direct Analysis Area
-  Indirect Analysis Area
-  County Boundary
-  State Boundary



**Reference Map**



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1:40,000

WGS 1984 UTM Zone 10N

0 0.5 1 2 Miles

NOT FOR CONSTRUCTION


**Figure S-2. Cultural Resource Locations and Survey Area**

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

# **Attachment S-1. Cultural Resources Survey Report (Confidential)**

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

## **Attachment S-2. Inadvertent Discovery Plan**

	Portland General Electric		Procedure	
	Inadvertent Discovery Procedure (IDP)			
Document ID#: PGE-PRC-ENV-0005	Effective On: 9/11/2024	Rev. 3	Page 1 of 8	
Verify revision is current prior to use.				


## 1. Purpose

This procedure provides a protection and mitigation protocol for an inadvertent **cultural resource's** discovery, until the discovery has reached an appropriate resolution. Most inadvertently discovered **cultural resources** occur during ground-disturbing activities associated with facilities development, maintenance, or improvement.

**Cultural resources** consist of the physical remains of the activities of people in the past. This Inadvertent Discovery Procedure (IDP) should be followed should any archaeological sites, objects, or human remains are found. These are protected under Federal and State laws and their disturbance can result in criminal penalties.

### 1.1. Scope

- 1.1.1. The scope of this procedure is to minimize impacts to **cultural resources**.
- 1.1.2. This procedure is applicable to all PGE Personnel and PGE contractors.
- 1.1.3. The procedure outlines appropriate steps for PGE Personnel and Contractors when **cultural resources** are inadvertently or unanticipatedly discovered during work.
- 1.1.4. **Inadvertent discoveries** are categorized as either “definitely human remains” or “not definitely human remains” and the steps after each type of discovery are distinct.
- 1.1.5. **Cultural resources** can be found during any ground-disturbing activity. If encountered all excavation and work in the area **MUST STOP**. Archaeological objects vary and can include evidence or remnants of historic-era and precontact activities by humans. Archaeological objects can include but are not limited to:
  - A. Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads
  - B. Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles
  - C. Layers of discolored earth resulting from hearth fire
  - D. Structural remains such as foundations
  - E. Shell Middens

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F. Culturally Modified Trees

G. Human skeletal remains and/or bone fragments which may be whole or fragmented

1.1.6. If there is an **inadvertent discovery** of any **cultural resources**, follow this procedure. If in doubt, call it in.

## 1.2. Precautions

1.2.1. Determine that the area of the **inadvertent find** is safe to work in before implementing protection measures.

1.2.2. The **inadvertent find** should not be photographed, handled or removed until a professional archaeologist is contacted or on site.

1.2.3. Any communication with media should be routed through PGE's Corporate Communication department and must be avoided until adequate assessment of the discovery is made.

1.2.4. If the **inadvertent find** is clearly human, it must be treated with respect and not further disturbed.

1.2.5. PGE shall make its best efforts, in accordance with federal and state law to ensure that its personnel and contractors keep any discovery confidential. PGE will not contact the media, or any third-party member or members of the public regarding a discovery. Prior to any release of information by PGE, PGE shall concur with the responsible agencies and Tribes on the amount of information, if any, to be released to the public.

1.2.6. If applicable, review the sites HPMP (Historical Properties Management Plan) which is included in the FERC license.

1.2.7. For known environmentally sensitive areas, notify EHS prior to any ground disturbance.


## 1.3. Limitations

1.3.1. This procedure is limited to the treatment of unanticipated identification of **cultural resources** in the course of a PGE action/operation.

## 2. Responsibilities

### 2.1. PGE Personnel and Contractors

2.1.1. Stops work when an **inadvertent discovery** of a cultural resource is made.

	Portland General Electric		Procedure	
	Inadvertent Discovery Procedure (IDP)			
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2.1.2. Contacts appropriate personnel and protects the area, per the procedure.

## 2.2. PGE Security

2.2.1. Acts as point of contact for calls about **inadvertent discoveries**.

2.2.2. Notifies law enforcement when probable human remains are involved.

## 2.3. Cultural Resources Specialist

2.3.1. Conducts preliminary in-field assessment of the discovery.

2.3.2. Coordinates with PGE security as required.

2.3.3. Notifies appropriate agencies and/or appropriate Tribes within 24 hours of the discovery.

2.3.4. Provides direction and support services to affected personnel.

2.3.5. Engages an external consultant if required.

## 2.4. PGE Management

2.4.1. Ensures all site/facility Personnel have received the **cultural resources** sensitivity training.

2.4.2. Contacts PGE's Cultural Resources Specialist to discuss adequate protection for the discovery until a professional in-field assessment of the discovery is made.

2.4.3. Follows any additional management plan guidance specific to PGE project facilities.

# 3. Procedure


## 3.1. Prerequisite Actions

3.1.1. Field personnel and supervisors must complete the required Environmental Compliance Training provided by Environmental and Licensing Services that includes cultural awareness training.


## 3.2. Procedure

### 3.2.1. Initial Response

- A. If an **inadvertent discovery** of a cultural resource is made, all work within the area of discovery shall cease immediately.

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1. If the **inadvertent discovery** is believed to be human remains stop ALL work immediately and follow these steps.
    - a. Contact PGE Security and Environmental Health & Safety (EHS) immediately within two hours or as soon as reasonably practical.
    - b. Cover the remains in a manner that will avoid directly touching them and will protect them from damage, exposure, and obscure their view. Restrict access to the area and leave the cover in place until directed otherwise. Do not take photographs. Do not speak to the media.
    - c. PGE Security: Contact Oregon State Police (OSP) to determine whether the find is forensic, i.e., a recent death requiring a criminal investigation.
    - d. Contact the PGE's Cultural Resources Specialist (EHS): See the "Cultural Resources Discovery Contact List" (A01).
  2. If the discovery is not definitively human remains, PGE's personnel who uncovered the find or their supervisor will contact PGE's Cultural Resources Specialist (EHS) within two hours of discovery or as soon as practical.
    - a. PGE's Security does not need to be contacted.
  - B. PGE Personnel will flag off a buffered area about 200 feet around the discovery if possible.
    1. The area of work stoppage must be large enough to provide for the security, protection, and integrity of the discovery.
  - C. PGE Personnel must promptly protect the discovery from continued exposure to the weather and from public view.
    1. This may be accomplished using a clean tarp or other fabric.
- 3.2.2. Assessment
- A. After being contacted by PGE Security, OSP, in consultation with the State Medical Examiner and the State Physical Anthropologist, will conduct an assessment to determine if it is a crime scene.

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- B. If the site is determined not to be a crime scene by OSP, or that the find is definitely not modern, 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. PGE's Cultural Resources Specialist will conduct an on-site assessment of the **inadvertent discovery**.
1. PGE's Cultural Resources Specialist will ensure that all work has halted near the find, that the protection buffer has been created and is adequate, and that the **inadvertent discovery** continues to be treated with respect and secured from harm.
  2. If the discovery has been determined non-modern human remains by law enforcement, PGE's Cultural Resources Specialist will contact the State Historic Preservation Office (SHPO), the State Physical Anthropologist, and the Legislative Commission on Indian Services (LCIS) for further guidance as soon as possible, along with the notifying the appropriate Tribes as designated by LCIS.
  3. If the discovery is not human remains but a cultural resource, PGE's Cultural Resources Specialist will contact the State Historic Preservation Officer and appropriate Tribes as designated by LCIS within 24 hours of the discovery.
  4. PGE's Cultural Resources Specialist will inform PGE Management or Project Manager of a reasonable time frame within which construction or maintenance activity can resume at the location of discovery.
  5. PGE's Cultural Resources Specialist will inform appropriate PGE management of the **inadvertent discovery** within 24 hours of the find.
- C. Do not resume any work in the buffered area until a plan is developed and carried out between the State Police, SHPO, LCIS, and appropriate Native American Tribes and you are directed that work may proceed.

### 3.3. Acceptance Criteria

- 3.3.1. None.

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### 3.4. Post-Performance Activity

- 3.4.1. PGE's Cultural Resources Specialist will coordinate further archaeological fieldwork and reporting required to complete documentation of the **inadvertent find**.
- 3.4.2. If Tribes require repatriation of any **cultural resources**, PGE's Cultural Resources Specialist will coordinate the effort with stakeholders jointly identified by the SHPO, Tribes designated by LCIS, and PGE within a reasonable time frame.
- 3.4.3. PGE will follow appropriate laws and management procedures to assure the proper treatment and care of the discovery.
- 3.4.4. PGE's Cultural Resources Specialist will confirm with PGE Management when the area is cleared for work to resume.

## 4. References

### 4.1. Industry Standards or Codes

- 4.1.1. Code Federal Regulations (CFR): Native American Graves Protection and Repatriation Act (NAGPRA): 43 CFR 10
- 4.1.2. Oregon Revised Statute:
  - A. ORS 97.740-994 and 358.905-961: Protection under Oregon State law
  - B. ORS 146.090 & .095: Deaths requiring investigation in OR
- 4.1.3. Revised Code of Washington: RCW 68.50.645, 27.44.055, and 68.60.055: Inadvertent Discoveries in WA


### 4.2. PGE

- 4.2.1. [Cultural Resources & Inadvertent Discoveries](#) (SharePoint)

## 5. Definitions and Acronyms

### 5.1. Definitions

- 5.1.1. **Cultural Resources:** Physical evidence of past human activity (site, object, structure, natural feature or landscape) considered significant by a group of people traditionally associated with it. **Cultural resources** are defined as being fifty years or older. These resources may include artifacts (lithic or stone tools or fragments of tools, ceramic vessels, animal remains, can scatters, farm

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equipment), or features (remnants of walls, petroglyphs, cooking hearths or trash middens). **Cultural resources** may be the location of a significant event, prehistoric or historic occupation or activity, whether standing, ruined, or vanished, and possessing historical, cultural, or archaeological value.

- 5.1.2. **Inadvertent Discoveries/Finds: Cultural resources** found unexpectedly during construction or maintenance activities.

## 5.2. Acronyms

- 5.2.1. EHS: Environmental Health and Safety
- 5.2.2. HPMP: Historical Properties Management Plan
- 5.2.3. IDP: Inadvertent Discovery Procedure
- 5.2.4. LCIS: Legislative Commission on Indian Services
- 5.2.5. NAGPRA: Native American Graves Protection and Repatriation Act
- 5.2.6. SHPO: State Historic Preservation Office


## 6. Forms and Appendices

### 6.1. Forms

- 6.1.1. None.

### 6.2. Appendices


- 6.2.1. A01: IDP Contact List (see [Cultural Resources SharePoint](#) for updated contact list)

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## 7. Revision Table

Review this document no later than three (3) years of the effective date, as required by the Document Governance.

Rev. No.	Revision Date	Reason for Revision	Affected Pages
0	3/9/2016	Issued for implementation by the Generation Procedure Advisory Committee	ALL
1	2/19/2018	New template; correcting typos in A01.	A01
2	09/14/2021	Purpose statement and Scope section edited; Revised Procedure Steps and Process; Added Confidentiality statement; new template. Scope applicable to all of PGE: numbering changed.	ALL
3	08/06/2024	Minor clarifications to Procedure Section and Acronyms based on feedback from LCIS and Oregon SHPO. Updated Contact Sheet to list current staff, contact info and availability.	ALL

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Name	Affiliation	Office Phone	Mobile Phone	Email/Other	Availability
On Duty	PGE Security	503-464-8196	–		24/7
Kenny Gunn	PGE Cultural Resources Specialist (EHS)	<b>503-464-BONE (503-464-2663)</b>	503-550-5822	<a href="mailto:kenny.gunn@pgn.com">kenny.gunn@pgn.com</a>	24/7
Oregon State Police – Sgt. Ryan Tague	Oregon Law Enforcement	Dial *OSP or *677	541-576-4393 503-731-3030 (Dispatch)	<a href="mailto:ask.osp@osp.oregon.gov">ask.osp@osp.oregon.gov</a> or <a href="mailto:rtague@osp.oregon.gov">rtague@osp.oregon.gov</a>	Dispatch 24/7
Dr. Veronica Vance	Oregon State Forensic Anthropologist	503-932-8130	Same		Dispatch 24/7
John Pouley	State Archaeologist/ Oregon SHPO	503-480-9164	Same	<a href="mailto:john.pouley@oregon.gov">john.pouley@oregon.gov</a>	Mon–Fri 7:30a–3:30p
Jamie French (Secondary Contact)	Asst. State Archaeologist/Oregon SHPO	503-979-7580	Same	<a href="mailto:jamie.french@oprds.oregon.gov">jamie.french@oprds.oregon.gov</a>	Mon–Fri 7:30a–3:30p
Dr. Elissa Bullion	Oregon State Physical Anthropologist/ Commission on Indian Services	503-986-1067 (Secondary)	971-707-1372 (Primary)	<a href="mailto:Elissa.Bullion@oregonlegislature.gov">Elissa.Bullion@oregonlegislature.gov</a>	Mon-Fri 7:30a-8p Sat-Sun intermittent Dispatch 24/7
Washington State Patrol	Washington Law Enforcement (Vancouver District)	360-449-7999	–		Dispatch 24/7

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Name	Affiliation	Office Phone	Mobile Phone	Email/Other	Availability
Dr. Guy Tasa	Washington State Physical Anthropologist	360-790-1633	Same	<a href="mailto:Guy.tasa@dahp.wa.gov">Guy.tasa@dahp.wa.gov</a>	Mon–Fri 8a–4p