



Historic, Cultural & Archaeological Resources Exhibit

PREPARED FOR



DATE

January 2026

REFERENCE

Oregon Energy Facility Siting Council

CONTENTS

1.	INTRODUCTION	1
2.	ANALYSIS AREA	1
3.	DESCRIPTION OF CULTURAL RESOURCE SURVEYS PERFORMED	1
3.1	METHODS	2
3.1.1	Tribal Outreach	2
3.1.2	Records Review	3
3.1.3	Field Surveys	6
3.2	SURVEY AND INVENTORY RESULTS	9
4.	HISTORIC AND CULTURAL RESOURCES WITHIN ANALYSIS AREA	21
4.1	NRHP LISTED RESOURCES AND RESOURCES LIKELY ELIGIBLE FOR LISTING	21
4.2	ARCHAEOLOGICAL OBJECTS AND SITES ON PRIVATE LANDS	21
4.3	ARCHAEOLOGICAL SITES ON PUBLIC LANDS	22
5.	MEASURES	22
5.1	SIGNIFICANT POTENTIAL IMPACTS OF THE FACILITY	22
5.1.1	Direct Impacts	22
5.1.2	Indirect Impacts	23
5.2	MEASURES DESIGNED TO PREVENT THE DESTRUCTION OF HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES	24
5.2.1	Inadvertent Discovery Plan	24
6.	PROPOSED MONITORING PLAN	24
7.	SUBMITTAL REQUIREMENTS	25
7.1	SUBMITTAL REQUIREMENTS	25
7.2	APPROVAL STANDARDS	26
8.	REFERENCES	27

ATTACHMENT 1	ANALYSIS AND SURVEY AREAS
ATTACHMENT 2	CULTURAL RESOURCE SURVEY REPORT (GEOVISIONS) – CONFIDENTIAL
ATTACHMENT 3	CULTURAL RESOURCE SURVEY REPORT (AINW) - CONFIDENTIAL
ATTACHMENT 4	HISTORIC RESOURCES REPORT (INDIRECT ANALYSIS AREA) - CONFIDENTIAL
ATTACHMENT 5	TRIBAL COMMUNICATION
ATTACHMENT 6	DRAFT INADVERTENT DISCOVERY PLAN

LIST OF TABLES

TABLE 1 ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE OF DIRECT ANALYSIS AREA	5
TABLE 2 ARCHAEOLOGICAL RESOURCES IDENTIFIED WITHIN THE ANALYSIS AREA	10
TABLE 3 SUBMITTAL REQUIREMENTS MATRIX	25
TABLE 4 APPROVAL STANDARDS	26

ACRONYMS AND ABBREVIATIONS

Acronym	Description
Applicant	DECH bn, LLC
BrightNight	BrightNight Power, LLC
CTWS	Confederated Tribes of the Warm Springs Reservation
Facility	Solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
SHPO	State Historic Preservation Office

1. INTRODUCTION

DECH bn, LLC (Applicant) plans to construct a solar photovoltaic power generation facility and related or supporting facilities in Wasco County, Oregon (Facility). The Facility will include up to 1,000 megawatts of solar capacity and a battery energy storage system with up to 4,000 megawatt hours storage capacity.

This Historic, Cultural and Archaeological Resources Exhibit provides an analysis of potential significant adverse impacts of the Facility to historic, cultural and archaeological resources and demonstrates that the Facility complies with the submittal requirements outlined in OAR 345-021-0010(1)(s) and approval standards outlined in Oregon Administrative Rules (OAR) OAR 345-022-0090. Specifically, OAR 345-022-0090(1) states that:

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

2. ANALYSIS AREA

As prescribed by the Project Order and pursuant to OAR 345-021-00010(1)(a) and (b), the analysis area consists of a direct and indirect analysis area for historic, cultural, and archaeological resources. The direct analysis area is defined as the Facility site boundary (14,418 acres). The indirect analysis area includes the Facility site boundary and a 1-mile buffer 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 micrositings corridor (12,532 acres) was utilized as the field survey extent for evaluation of direct impacts. The analysis areas are shown in Attachment 1.

The entire direct analysis area is on private land. There are some portions of the indirect analysis area that are on publicly owned land, including the Confederated Tribes of Warm Springs Reservation.

3. DESCRIPTION OF CULTURAL RESOURCE SURVEYS PERFORMED

Cultural resources surveys for the proposed Facility were completed by the Applicant's cultural resources contractors, GeoVisions and Archaeological Investigations Northwest, Inc (AINW). Field surveys were performed within the micrositings corridor (12,532 acres) to evaluate potential permit impacts within the direct analysis area as shown in Attachment and as further described in



the Background Information Exhibit. GeoVisions conducted archaeological pedestrian surveys from September 2024 through March 2025. GeoVisions report has been submitted to SHPO and is included in confidential Attachment 2). In May and June 2025, AINW conducted archaeological pedestrian surveys for the remainder of the microsite corridor. AINW's Cultural Resource Survey Report has been submitted to SHPO and is also included in confidential Attachment 3. AINW also conducted a historic resource survey of the indirect analysis area between July and October 2025. AINW's report has been submitted to SHPO and is included in confidential Attachment 4.

It should be noted that approximately 430 acres (i.e., 3 percent) of the microsite corridor has not been field surveyed for cultural resources. The Applicant acknowledges that this area is currently included in the microsite corridor, as defined in the Background Information Exhibit, however it is not proposed for Facility development. The microsite corridor is currently conservative and will continue to be reduced relative to the estimated 5,442 acres of permanent impacts associated with the Facility. Reductions in the microsite corridor will include the exclusion of this area as well as additional ongoing reductions ahead of the final ASC.

3.1 METHODS

In accordance with OAR 345-021-0010(1)(s)(D)(i), methods for cultural resources surveys are presented in confidential Attachments 2, 3 and 4. This section is summarized from these reports and includes tribal consultation, a records search, and field surveys.

3.1.1 TRIBAL OUTREACH

To inform the evaluation of potential impacts, the Applicant and Oregon Department of Energy (ODOE) consulted with Tribes that might have a potential interest in the Facility. As part of the Notice of Intent, the Applicant contacted the State Commission on Indian Services who identified the following Tribes for recommended notification about the Facility and to solicit engagement and feedback:

- Burns Paiute Tribe;
- Confederated Tribes of Grand Ronde;
- Confederated Tribes of Siletz Indians;
- Confederated Tribes of the Umatilla Indian Reservation; and,
- Confederated Tribes of Warm Springs Reservation (CTWS).

On 24 October 2024, the Applicant sent email introduction letters to the Tribes listed above. The Applicant also sent follow up emails to the Tribes on 9 May 2025. In addition to email outreach, the Applicant had a meeting with the Economic Development Director from Grande Ronde on 4 November 2024. The Applicant's cultural resources contractor, GeoVisions, a subsidiary of the CTWS, invited the Burns Paiute Tribe and the Confederated Tribes of the Umatilla Indian Reservation to participate in the field surveys; the Burns Paiute Tribe did not respond to the request to participate, and the Confederated Tribes of the Umatilla Reservation provided one person to assist with the survey.



The Applicant has had ongoing outreach with CTWS including a site walk on 7 November 2024 that CTWS attended and a meeting on 27 August 2025. The 27 August 2025 meeting was attended by the Applicant and natural resources and cultural resource management leaders from CTWS. The discussion focused on key aspects of the project and covered recreational resources, cultural and historical resources, fish and wildlife, and scenic resources. This meeting continued ongoing coordination between the Applicant and CTWS to ensure that cultural and environmental considerations are fully integrated into the Facility planning and siting. Meeting notes from the 27 August 2025 meeting are provided as Attachment 5.

3.1.2 RECORDS REVIEW

Prior to conducting fieldwork, AINW and GeoVisions completed literature searches and records reviews to identify previously recorded archaeological resources and cultural resource studies near the site boundary (direct analysis area). These reviews included an examination of records using the Oregon Archaeological Records Remote Access database administered by the SHPO to identify cultural resource studies that have been performed within 1.6 kilometers (1 mile) of the site boundary (indirect analysis area). Copies of historic documents and maps, on file at AINW, were also reviewed to determine the potential for historic-period resources being present within the analysis area. Three previous cultural resource studies overlap with the analysis area. AINW conducted a survey to document historic resources within the Indirect Analysis Area; the results of the survey are detailed below.

These cultural resource studies that overlap with the analysis area include a reconnaissance survey that was conducted for proposed access roads for the Bonneville Power Administration's Marion-Buckley 500 kV transmission line, which overlaps with the southern extent of the analysis area. No cultural resources were identified during the pedestrian survey (Davis 1980). The Cascade Crossing Transmission Project (Kelly et al. 2013; Shannon et al. 2011) included both archaeological and ethnographic studies, which overlapped with the southeastern portion of the current analysis area. No archaeological resources were documented within the current analysis area as a result of the study. A cultural resources inventory was conducted for the proposed FTV Western Build, which overlaps the northwestern portion of the analysis area. No cultural resources were documented within the current analysis area as a result of the study (Sharp et al. 1998).

Eleven cultural resource studies have been conducted within 1.6 kilometers (1 mile) of the analysis area for infrastructure development, land management planning, and energy projects (Butler et al. 2009a, 2009b; Ellis 1990; Fulton and Fulton 1999; Hylton et al. 2019; Jenkins 1990; Jenkins and Connolly 1994; Jerofke and Harvey 2005; Musser 1985; Snyder et al. 1980a, 1980b; Steggel 1979).).

3.1.2.1 ARCHAEOLOGICAL RESOURCES

One previously identified archaeological resource (Site 662EA13) has been documented in past studies and surveys within the analysis area, which is a segment of the historic-period Oak Grove-Oregon City Wagon Road, which was documented within the central portion of the analysis area. The Oak Grove-Oregon City Wagon Road provided early European American settlers of the region



a more direct route to Oregon City. The segment of the wagon road that is within the analysis area, which follows a portion of Oregon State Route 216 (OR 216), was noted as heavily impacted by modern construction and agricultural activity when it was recorded in 1985 (Musser 1985). Twenty-four previously identified archaeological resources have been found within 1.6 kilometers (1 mile) of the analysis area: Butler et al. 2009a; Connolly and Jenkins 1991; Ellis 1990; Follansbee 1979; Hylton et al. 2020; Jenkins 1990; Jenkins and Connolly 1994; Kelly et al. 2013; Musser 1985; Shannon et al. 2011; Sharp et al. 1998; Snyder et al. 1979, 1980a, 1980b as summarized in Table 1 ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE OF DIRECT ANALYSIS AREA below.



TABLE 1 ARCHAEOLOGICAL RESOURCES WITHIN 1-MILE OF DIRECT ANALYSIS AREA

Resource #	Resource Type	NRHP Eligibility	Source
Site 35WS115	Pre-contact village	Determined Eligible	Follansbee 1979
Site 35WS124	Pre-contact village	Unevaluated	Snyder 1980
Site 35WS125	Pre-contact house pit	Determined Eligible	Connolly and Jenkins 1991; Ellis 1990; Jenkins 1990; Jenkins and Connolly 1994; Snyder 1979
Site 35WS316	Pre-contact lithic scatter	Unevaluated	Butler et al. 2013
Site 35WS461	Pre-contact lithic scatter	Unevaluated	Butler et al. 2009
Site 35WS636	Historic road	Unevaluated	Kelly et al. 2013
Site 35WS637	Historic scatter	Determined Not Eligible	Kelly et al. 2013
Site 35WS638	Historic scatter	Unevaluated	Kelly et al. 2013
Site 35WS639	Historic rock feature	Recommended Not Eligible	Kelly et al. 2013
Site 35WS640	Historic pond	Recommended Not Eligible	Kelly et al. 2013
Site 35WS641	Historic scatter	Unevaluated	Kelly et al. 2013
Site 35WS642	Multi component	Unevaluated	Kelly et al. 2013
Site 35WS643	Historic road	Recommended Not Eligible	Kelly et al. 2013
Site 662EA13*	Historic road	Unevaluated	Musser 1985
Site 97FTV-ORW1	Historic scatter	Recommended Not Eligible	Sharp et al. 1998
Isolate 110-1-IF	Historic agriculture	Unevaluated	Kelly et al. 2013
Isolate 112A-2-IF	Historic object	Recommended Not Eligible	Kelly et al. 2013
Isolate 113-5-IF	Historic agriculture	Recommended Not Eligible	Kelly et al. 2013
Isolate 113-1-IF	Historic object	Recommended Not Eligible	Kelly et al. 2013
Isolate 114-1-IF	Historic object	Recommended Not Eligible	Kelly et al. 2013
Isolate WR-AA-I-6	Historic debris	Recommended Not Eligible	Hylton et al. 2020

Resource #	Resource Type	NRHP Eligibility	Source
Isolate 100919-LS3-I-2	Historic scatter	Recommended Not Eligible	Hylton et al. 2020
Isolate WBI007	Pre-contact isolate	Recommended Not Eligible	Butler et al. 2009
Isolate CMI008	Pre-contact lithic scatter	Recommended Not Eligible	Butler et al. 2009

*within direct analysis area

3.1.2.2 HISTORIC RESOURCES

No historic resources have been previously documented in the direct analysis area. There are two previously identified historic resources within the indirect analysis area (i.e., 1-mile (1.6 kilometers) from the site boundary): the Barzee Hotel (SHPO ID: 39177) and the Wapinitia School (SHPO ID: 39315). However, deed records of the area indicate that the building identified as the Wapinitia School (SHPO ID: 3915) is likely the United Brethren Church of Christ (Wasco County 1913, 1963). Both resources are noted in Oregon's SHPO database as having an Eligible/Contributing status for listing in the NRHP. The closest NRHP-listed resource is the Maupin Section Foreman's House at 601 Deschutes Access Road, approximately 8.8 miles east of the analysis area. The 1910 house was listed in the NRHP in 2005, under Criterion A for its importance in the development and operation of rail transportation in Central Oregon during the early twentieth century (Hall 2005).

3.1.3 FIELD SURVEYS

Pedestrian surveys were overseen and coordinated by Secretary of the Interior qualified and Oregon qualified archaeologists as follows:

- GeoVisions: Completed between September 2024 and March 2025 and led by Misha Miller-Sisson, MA, RPA (Principal Investigator), with field personnel consisting of Principal Investigator Misha Miller-Sisson, Field Directors Brendon Slattery BA, Alex Atkins, BA, Alex Harker, BA, and Confederated Tribe of the Warm Springs Reservation (CTWSR) tribal member Larry Squiemphen III, Crew Leader and CTWSR tribal member Chad Thurby, and Archaeological Technicians Carly Watters BA, Tristan Lewis BA, Rich Danzuka (CTWSR tribal member), Aaron Culps Jr. (CTWSR tribal member), James Wolfe III (CTWSR tribal member), Mikah Estrada (CTWSR tribal member), Sarah Clay MA, and Tristan Hardinger, BA.
- AINW: The pedestrian survey conducted by AINW were completed in May and June 2025 and were led by AINW Supervising Archaeologist Hamilton Bryant, M.A., R.P.A. AINW Project Managers and Senior Archaeologists Kelley Prince Martinez, M.S., R.P.A., and Terry Ozbun, M.A., R.P.A., managed the project and provided general oversight. Bryant, Martinez, and Ozbun meet the professional qualifications of the Secretary of the Interior's Standards and Guidelines for Archaeology.



The pedestrian surveys were conducted to identify archaeological resources visible on the ground surface by walking parallel transects spaced no more than 20 meters (66 feet) apart, as per recommendations in the Oregon Archaeology Guidelines (OR SHPO 2023: 30-31). Archaeological resources were delineated using a combination of 5-meter (16 feet) pedestrian transects and opportunistic surface inspection in areas with greater mineral soil visibility. In addition to photographing archaeological resources, representative digital photographs were taken of the analysis area, as well as significant features of the landscape. Spatial data for cultural and environmental features were collected using a handheld GPS unit capable of sub-meter precision.

As per ORS 358.905(1)(c) in conjunction with Oregon SHPO guidance, isolated finds are defined as a single artifact, archaeological sites are defined as one feature, or two or more artifacts with contextual associations. Archaeological sites and isolates were documented using photographs and site forms, which were then digitized and transcribed to the Oregon SHPO site database through Oregon Archaeological Records Remote Access portal.

When an archaeological site or object was observed it was marked with pin flags and a team of archaeologists walked (five meters or less) transects in a grid pattern radiating out from the object in the cardinal directions. This method was repeated for all artifacts observed within a single site boundary. The boundary for a single site or isolate was determined to be one meter outside the location of the artifact in the direction for which no other artifacts are observed within 30 meters. Once the boundary was determined it was recorded using a GPS for submeter accuracy, a minimum of two site overview photos from different directions with photo-scale and directional arrow was taken, as well as photographs of any site features and diagnostic artifacts. All site and isolate photographs were recorded in a photograph log and included in the digitized copy of the site form. Archaeological resource boundaries were recorded based on the distribution of surface artifacts. No subsurface testing was conducted.

Archaeological sites or objects observed on the surface were analyzed and documented in the field but not collected, in accordance with ORS 358.920(1)(a) and ORS 97.745(1). Archaeological sites or objects were identified as to type, material, function, and cultural and chronological association to the fullest extent possible. Documentation included photographs with photo scales for diagnostic artifacts. AINW's cultural resource survey report (AINW Report No. 5459) was submitted to SHPO on October 10, 2025, and to Tribes on November 7, 2025. Archaeological resource forms were submitted to SHPO on November 3, 2025. No comments have been received and the status of the resource forms is 'Submitted, Waiting for Approval.'

3.1.3.1 HISTORIC RESOURCES

AINW Architectural historians, Tara Seaver, M.S., and Charles Baer, M.S., conducted a survey for historic resources within the analysis area in July 2025. Seaver and Baer meet the professional qualifications of the Secretary of the Interior's Standards and Guidelines for Architectural History. For the purposes of this survey, historic resources are defined as buildings, sites, structures, objects, or districts that are within the analysis and were constructed at least 50 years before the survey date (i.e., constructed in or before 1975). Documentation of historic built resources within an indirect analysis area that extends 1 mile (1.6 kilometers) from the site boundary was



conducted in October 2025 by AINW Architectural Historians, Tara Seaver and Charles Baer, with field recording assistance from AINW Staff Archaeologist Anna Wilson, B.A.



3.2 SURVEY AND INVENTORY RESULTS

(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;

The results of the pedestrian surveys are documented in two separate reports (confidential Attachments 2 and 3) and a report documenting historic resources in the indirect analysis area are included in confidential Attachment 4. These reports have been submitted to SHPO for review and concurrence. No comments have been received to date.

Mineral soil visibility varied significantly across the survey area (micorsiting corridor). Although most of the survey area is classified as range land, the few agricultural fields surveyed had been plowed and planted, resulting in visibility that ranged from excellent (greater than 90 percent) in areas with minimal plant growth to poor (approximately 10 to 20 percent) in a dense wheat field. In uncultivated areas, mineral soil visibility was often highest on summits, shoulders, and slope bases. Other areas with poor surface visibility included forested floodplains and the central portions of landforms.

Archaeological resources were classified into general resource types (e.g., historic-period or pre-contact) based on field observations and prior experience working in the region. Stacked rock features that could not be confidently attributed to either historic-period or pre-contact contexts were recorded under the category 'Stacked Rock Feature' until further research can be conducted to establish a clearer cultural or temporal association.

Numerous stacked rock features were documented, most of which are interpreted as historic period rock walls, or stock fences, and were situated between basalt bluffs or outcrops on slope shoulders. These features were photographed, spatial data were collected, and representative sketch maps drawn. Stacked rock features interpreted to be pre-contact in origin were documented by recording attributes such as the presence or absence of lichen bridging, percentage of lichen coverage, orientation of the feature, and its dimensions. Lichen bridging, also known as "lichen fusion" (Jackien 2018), is defined as the growth of lichen spanning the gap between adjacent surfaces of two or more individual rocks in a feature. This data does not absolutely measure age, but lichen bridging is thought to be a proxy for long term stability. The percentage of lichen coverage was estimated, and the overall distribution was described as this may indicate a previous position or location of rocks prior to inclusion in a feature.

In total, 201 archaeological resources were identified within the survey area, summarized in Table 2 below. These resources span the pre-contact period through the mid-twentieth century and include 144 archaeological sites and 57 archaeological isolates.

Thirteen historic built-environment resources were also identified within the survey area. Each identified historic resource has been documented in the Oregon Historic Sites Database. The database entry provides a summary of each resource's physical characteristics and provides a summary of each resource's physical characteristics and provides an evaluation of its eligibility for listing in the NRHP.



TABLE 2 ARCHAEOLOGICAL RESOURCES IDENTIFIED WITHIN THE ANALYSIS AREA

Resource #	Resource Type	NRHP Eligibility	Resource Buffer
25/3647-HB-1	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-3	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-4	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-5	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-6	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-7	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-8	Historic-Period Site	Unevaluated	30 meters
25/3647-HB-9	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-12	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-13	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-15	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-16	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-17	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-18	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-20	Multicomponent Site	Unevaluated	30 meters
25/3647-HB-21	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-23	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-24	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-25	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-26	Stacked Rock Feature	Unevaluated	30 meters
25/3647-HB-27	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-28	Pre-Contact Isolate	Unevaluated	30 meters



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
25/3647-HB-30	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-31	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-32	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-33	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-34	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-35	Historic-Period Site	Unevaluated	30 meters
25/3647-HB-37	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-38	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-39	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-40	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-43	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-45	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-46	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-47	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-48	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-49	Multicomponent Site	Unevaluated	30 meters
25/3647-HB-51	Historic-Period Site	Unevaluated	30 meters
25/3647-HB-52	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-53	Stacked Rock Feature	Unevaluated	30 meters
25/3647-HB-54	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-55	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-56	Historic-Period Site	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
25/3647-HB-57	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-59	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-60	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-HB-61	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-62	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-63	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-64	Historic-Period Site	Recommended Eligible	30 meters
25/3647-HB-65	Historic-Period Site	Recommended Eligible	30 meters
25/3647-HB-66	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-67	Historic-Period Site	Unevaluated	30 meters
25/3647-HB-68	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-69	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-70	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-71	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-72	Pre-Contact Site	Unevaluated	30 meters
25/3647-HB-81	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-82	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-83	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-HB-84	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-HB-86	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-KPM-1	Historic-Period Site	Unevaluated	30 meters
25/3647-KPM-4	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-1	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-LL-2	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-3	Pre-Contact Site	Unevaluated	30 meters



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
25/3647-LL-4	Multicomponent Site	Unevaluated	30 meters
25/3647-LL-5	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-LL-6	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-LL-7	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-LL-8	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-LL-9	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-LL-10	Historic-Period Site	Unevaluated	30 meters
25/3647-LL-11	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-12	Multicomponent Site	Unevaluated	30 meters
25/3647-LL-14	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-15	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-LL-16	Historic-Period Site	Not Eligible	n/a
25/3647-LL-17	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-18	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-19	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-21	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-22	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-LL-23	Historic-Period Site	Unevaluated	30 meters
25/3647-LL-24	Historic-Period Site	Unevaluated	30 meters
25/3647-LL-26	Historic-Period Site	Recommended Not Eligible	n/a
25/3647-LL-28	Multicomponent Site	Unevaluated	30 meters
25/3647-LL-30	Historic-Period Isolate	Recommended Not Eligible	n/a
25/3647-LL-31	Pre-Contact Isolate	Unevaluated	30 meters
25/3647-LL-32	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-33	Pre-Contact Site	Recommended Eligible	30 meters
25/3647-LL-34	Pre-Contact Site	Unevaluated	30 meters
25/3647-LL-35	Pre-Contact Site	Unevaluated	30 meters



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
25/3647-LL-36	Historic-Period Site	Recommended Not Eligible	n/a
DSP-24-AA-Si-01	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-02	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-03	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-04	Historic objects: agricultural machinery parts	Recommended Not Eligible	n/a
DSP-24-AA-Si-05	Multicomponent: precontact isolate; historic debris scatter/concentration: refuse scatter	Recommended Eligible	30 meters
DSP-24-AA-Si-06	Historic objects: agricultural machinery parts	Recommended Not Eligible	n/a
DSP-24-AA-Si-07	Historic homestead; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-08	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-09	Historic structure: unknown	Recommended Not Eligible	n/a
DSP-24-AA-Si-10	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-11	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-12	Historic cairn/rock feature	Recommended Not Eligible	n/a
DSP-24-AA-Si-13	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-14	Multicomponent: precontact lithic	Recommended Eligible	30 meters



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
	material; Historic debris scatter/concentration: refuse scatter		
DSP-24-AA-Si-15	Precontact village	Recommended Eligible	30 meters
DSP-24-AA-Si-16	Multicomponent: precontact isolate; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-17	Multicomponent: precontact isolate; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AA-Si-18	Historic debris scatter/concentration: informal dump	Recommended Not Eligible	n/a
DSP-24-AA-Si-19	Multicomponent: precontact lithic material; historic debris scatter/concentration: refuse scatter	Recommended Eligible	30 meters
DSP-24-AA-Si-20	Precontact cairn: rock feature	Recommended Eligible	30 meters
DSP-24-AH-Si-01	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-AH-Si-02	Historic structure: fence base	Recommended Not Eligible	n/a
DSP-24-AH-Si-03	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-01	Multicomponent: precontact lithic material: CCS flake, basalt mano; historic debris scatter/concentration: refuse scatter	Recommended Eligible	30 meters
DSP-24-BTS-Si-02	Historic objects: agricultural machinery parts	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
DSP-24-BTS-Si-03	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-04	Historic agriculture: corral	Recommended Not Eligible	n/a
DSP-24-BTS-Si-06	Historic objects: agricultural machinery	Recommended Not Eligible	n/a
DSP-24-BTS-Si-07	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-08	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-09	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-10	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-11	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-12	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-13	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-14	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-15	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-17	Historic objects: agricultural machinery	Recommended Not Eligible	n/a
DSP-24-BTS-Si-18	Historic homestead; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-19	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
DSP-24-BTS-Si-20	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-21	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-22	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-23	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-BTS-Si-24	Historic homestead; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-CT-Si-01	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-CT-Si-02	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-CT-Si-10	Precontact house pit/depression	Recommended Eligible	30 meters
DSP-24-CT-Si-11	Multicomponent: precontact material; historic cairn/rock feature; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-CT-Si-12	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-24-CT-Si-13	Historic agriculture: well	Recommended Not Eligible	n/a
DSP-24-LS3-Si-01	Historic cairn/rock feature: rock clearance pile	Recommended Not Eligible	n/a
DSP-24-LS3-Si-02	Historic objects: agricultural equipment	Recommended Not Eligible	n/a
DSP-24-LS3-Si-03	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
DSP-24-LS3-Si-04	Historic debris scatter/concentration: refuse scatter; historic cairn/rock feature: rock clearance pile	Recommended Not Eligible	n/a
DSP-25-BTS-Si-01	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-02	Historic agriculture: irrigation, other structures; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-03	Historic objects: agricultural equipment	Recommended Not Eligible	n/a
DSP-25-BTS-Si-04	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-05	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-06	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-07	Multicomponent: precontact isolate; historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-08	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-09	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-10	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-BTS-Si-11	Historic objects: agricultural machinery	Recommended Not Eligible	n/a
DSP-25-BTS-Si-12	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
DSP-25-CT-Si-01	Precontact lithic material: lithic scatter	Recommended Eligible	30 meters
DSP-25-CT-Si-02	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-CT-Si-03	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-CT-Si-04	Historic debris scatter/concentration: refuse scatter	Recommended Not Eligible	n/a
DSP-25-CT-Si-05	Precontact lithic material: lithic scatter	Recommended Eligible	30 meters
DSP-24-AA-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-02	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-03	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-04	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-05	Historic object	Recommended Not Eligible	n/a
DSP-24-AA-Iso-06	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-07	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-08	Historic object	Recommended Not Eligible	n/a
DSP-24-AA-Iso-09	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-10	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-12	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-13	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-14	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AA-Iso-15	Precontact isolate	Recommended Not Eligible	n/a



Resource #	Resource Type	NRHP Eligibility	Resource Buffer
DSP-24-AH-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AH-Iso-02	Historic object	Recommended Not Eligible	n/a
DSP-24-AH-Iso-03	Historic isolate	Recommended Not Eligible	n/a
DSP-24-AH-Iso-04	Historic isolate	Recommended Not Eligible	n/a
DSP-24-BTS-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-24-BTS-Iso-02	Historic isolate	Recommended Not Eligible	n/a
DSP-24-BTS-Iso-03	Historic object	Recommended Not Eligible	n/a
DSP-24-BTS-Iso-04	Historic isolate	Recommended Not Eligible	n/a
DSP-24-BTS-Si-16	Historic object	Recommended Not Eligible	n/a
DSP-24-CT-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-24-CT-Iso-02	Historic isolate	Recommended Not Eligible	n/a
DSP-24-CT-Iso-03	Historic isolate	Recommended Not Eligible	n/a
DSP-24-LS3-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-24-LS3-Iso-02	Historic isolate	Recommended Not Eligible	n/a
DSP-24-LS3-Iso-03	Historic isolate	Recommended Not Eligible	n/a
DSP-25-BTS-Iso-01	Historic isolate	Recommended Not Eligible	n/a
DSP-25-BTS-Iso-02	Historic isolate	Recommended Not Eligible	n/a
DSP-25-CT-Iso-01	Historic isolate	Recommended Not Eligible	n/a



4. HISTORIC AND CULTURAL RESOURCES WITHIN ANALYSIS AREA

The subsections below, in addition to confidential Attachments 2 through 4, provide evidence to support a finding by the Council as required by OAR 345-022-0090.

4.1 NRHP LISTED AND LIKELY ELIGIBLE RESOURCES

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;

Within the direct analysis area, there are twelve cultural resources that are recommended eligible for listing on the NRHP. These include six precontact sites, two historic-period sites, and four multicomponent sites. The precontact sites consist of a potential village, a rock cairn, a house pit/depression, and three lithic scatters. The four multicomponent sites consist of precontact lithic scatters within historic period debris concentrations. The two historic period sites are historic debris refuse scatters. Additionally, 48 cultural resources were left unevaluated at the request of CTWS and are considered potentially eligible for NRHP listing. An additional 141 cultural resources are recommended to be not eligible for listing in the NRHP. The Facility has been designed to avoid all potentially eligible and unevaluated archaeological sites.

The pedestrian survey also identified 13 historic built environment resources within the direct analysis area. Six of these resources have diminished historic integrity and/or have no known historical associations of significance and are recommended to be not eligible for listing in the NRHP. Seven of the identified resources are recommended to be eligible for listing in the NRHP, primarily for associations with significant local patterns in irrigation and agricultural development of the early-to mid-twentieth century. The Facility will avoid all identified historic resources, regardless of NRHP-eligibility. Therefore, anticipated changes to historic resources eligible for listing in the NRHP will be limited to setting only. An inventory of historic resources within the indirect analysis area was completed and submitted to SHPO (see confidential Attachment 4).

4.2 ARCHAEOLOGICAL OBJECTS AND SITES ON PRIVATE LANDS

OAR 345-022-0090(4)(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.

All 201 archaeological sites or objects identified within the direct analysis area are located on private lands. These include 144 archaeological sites and 57 archaeological isolates or objects. Twelve of these sites are recommended eligible for listing on the NRHP.



4.3 ARCHAEOLOGICAL SITES ON PUBLIC LANDS

OAR 345-022-0090(4)(c) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area.

There are no archaeological sites or objects on public lands within the direct analysis area.

5. MEASURES

OAR 345-022-0090(4)(d) The significant potential impacts, if any, of the construction, operation and retirement of the proposed facility on the resources described in subsections (a), (b), and (c) and a plan for protection of those resources that includes at least the following:

5.1 SIGNIFICANT POTENTIAL IMPACTS OF THE FACILITY

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

5.1.1 DIRECT IMPACTS

Of the 201 archaeological resources identified, 141 of these resources have been recommended ineligible for NRHP listing. These eligibility recommendations are still pending SHPO's concurrence. Although OAR 345-021-0010(1)(s)(B) protects archaeological sites on private land, the impacts to the archaeological sites identified in the analysis area would not be significant. No measures are required to protect these resources. Because these resources are not eligible for listing on the NRHP and are not likely to provide significant information pertaining to national or local prehistory or history, beyond that already documented in the associated survey reports, any impact on these resources would not be significant.

In total, 50 pre-contact archaeological resources were identified during the pedestrian survey that were left unevaluated at the request of CTWS. As such, these resources are recommended potentially eligible for the NRHP, as it is not known if associated subsurface cultural material is present. In total, 10 historic period archaeological sites where a subsurface component could not be assessed are considered unevaluated or potentially eligible for listing in the NRHP. Archaeological resources that are considered unevaluated for listing in the NRHP are treated as if they are eligible for listing in the NRHP. These unevaluated cultural resources will be avoided. If the resources cannot be avoided, further work to evaluate these resources' eligibility for inclusion in the NRHP is needed.

NRHP-ineligible archaeological sites and objects are not considered significant archaeological resources as they do not meet the NRHP-eligibility criteria. Further, the sites do not meet the state's definition of a "site of archaeological significance" (ORS 358.905(1)(b)). By their nature, any meaningful information that could be gleaned from NRHP-ineligible resources (whether a site or object) would have been recorded in the associated cultural resources survey report and NRHP-



eligibility evaluation. These recordings and evaluations have concluded that the resources cannot be significantly associated with the prominent historic themes, persons, or events that have been identified for the area, nor are they representative of a unique type, period, or method of construction. They are not representative of a master, nor do they have high artistic values. They are unable to answer research questions pertinent to the region and do not offer any additional information that could inform our understanding of prehistory or history in a meaningful way. Mitigation of these NRHP-eligible resources would not provide any significant information or knowledge beyond that documented in the survey report. Based on this reasoning, impacts on NRHP-eligible archaeological sites and objects protected would not be considered significant impacts and no mitigation of these non-significant resources is proposed.

In total, 13 historic built-environment resources were recorded in the analysis area. Seven of these resources have associations of historical significance under Criteria A through D. The remaining six resources do not have associations of historical significance under Criteria A through D and/or have diminished historic integrity. All identified historic resources, regardless of NRHP-eligibility, will be physically avoided. Therefore, anticipated changes to historic resources eligible for listing in the NRHP will be limited to setting only.

5.1.2 INDIRECT IMPACTS

AINW historians documented 45 historic resources within the indirect analysis area (Baer et al. 2025). Each historic resource has been documented in the Oregon Historic Sites Database. Of the identified resources, 11 are recommended or have been previously determined to be eligible for listing in the NRHP, and 33 are recommended to be not eligible for listing in the NRHP. Additionally, one resource remains unevaluated for NRHP eligibility. All documented historic resources within the indirect analysis area will be physically avoided by the project. However, they are within the anticipated viewshed of the project, which could potentially impact their integrity of setting. Eight of the NRHP-eligible historic resources retain integrity of setting. Depending on their proximity to the project and their character-defining features, a change in setting may have potential to affect the qualities and aspects of integrity of the property that support NRHP eligibility.

Based upon preliminary review, the Facility may result in visual impacts to the 11 unevaluated historic-period rock wall sites within the direct analysis area. However, these impacts do not meet the criteria for an adverse impact. Although the setting and feeling of the sites may be diminished, the historic-period rock wall sites will maintain their ability to convey potential significance under Criterion A for their association with early regional ranching practices. The installation of fencing, solar arrays, or other infrastructure to support the Facility will be installed over 30 m (98 ft) from the sites and will not significantly impact the resources' ability to convey potential significance.

In total, 45 unevaluated archaeological resources, including pre-contact sites and isolates, multicomponent sites, and historic-period sites, may have visual impacts as a result of the Facility. While the installation of infrastructure to support the solar facility may alter aspects of setting and feeling, these impacts will not affect the information potential that makes the archaeological



resources potentially eligible for listing in the NRHP. Therefore, the characteristics that could make these archaeological resources eligible for listing in the NRHP would not be adversely impacted.

5.2 MEASURES DESIGNED TO PREVENT THE DESTRUCTION OF HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

(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;

All archaeological resources that are recommended as eligible for listing in the NRHP (including resources left unevaluated at the request of CTWS) will be avoided. For these resources, there will be no ground disturbing activities within a 30-meter (98-foot) buffer around the defined archaeological resource boundaries. If avoidance is not practicable in the final design, any significant resources (i.e. NRHP-eligible or unevaluated resources) will be mitigated to reduce impacts to a status of less than significant. The attached draft Inadvertent Discovery Plan, described in more detail below, will be implemented during construction and operations (Attachment 6).

5.2.1 INADVERTENT DISCOVERY PLAN

If previously unidentified archaeological resources are unearthed during construction or operation activities, all ground-disturbing activities will be halted in the immediate area of the find and directed away from the discovery until a qualified archeologist, as defined in OAR 736-051-0070, assesses the identity and significance of the resource (i.e., NRHP eligibility). The Applicant will also immediately notify SHPO and ODOE of the find. The archaeologist, in consultation with SHPO, ODOE, the Applicant, and any interested tribes, will determine the appropriate treatment and evaluation of the finds and, if necessary, mitigation of impacts if the finds are found to represent a resource eligible for listing in the NRHP. Facility related activities will not restart in the affected area until ODOE, in consultation with SHPO, agrees that the Applicant has demonstrated that it has complied with archeological resource protection regulations.

If human remains are inadvertently encountered during Facility activities, ODOE, SHPO, and the appropriate tribes will be contacted, as well as the Oregon State Legislative Commission on Indian Services, the Oregon State Police, and the applicable landowner. Activities will cease within 30 meters (100 feet) of the human remains until the parties involved agree upon their disposition.

6. PROPOSED MONITORING PLAN

OAR 345-022-0090(4)(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.

No NRHP-eligible or unevaluated archaeological sites are anticipated to be impacted by the Facility; therefore, monitoring conditions have not been established for the Facility. Avoidance



flagging around applicable cultural resources will be established and maintained as needed during facility construction to ensure avoidance.

All impacts to significant historic sites will be avoided through Facility design. If archaeological resources are discovered during construction, the protocols established in the Inadvertent Discovery Plan will be followed.

7. SUBMITTAL REQUIREMENTS

7.1 SUBMITTAL REQUIREMENTS

TABLE 3 SUBMITTAL REQUIREMENTS MATRIX

Requirement	Location
<i>OAR 345-021-0010(1)(s) Information concerning the location of archaeological sites or objects may be exempt from public disclosure under ORS 192.345(11). The applicant must submit such information separately, clearly marked as "confidential," and shall request that the Department and the Council keep the information confidential to the extent permitted by law. The applicant must include information in this exhibit or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including:</i>	
(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;	Section 3.1
(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;	Section 3.2
(C) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;	Section 3.3
(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:	Section 4.0, 4.3
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 subsections (a), (b), and (c);	Section 4.1
ii. The results of the discovery measures described in paragraph (A), together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended;	Section 4.2

Requirement	Location
iii. A list of measures to prevent destruction of the resources identified during surveys, inventories and subsurface testing referred to in paragraph (A) or discovered during construction; and	Section 4.4
(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.	Section 5.0

7.2 APPROVAL STANDARDS

TABLE 4 APPROVAL STANDARDS

Requirement	Location
<i>OAR 345-022-0090 Historic, Cultural and Archaeological Resources</i> <i>(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:</i>	
a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;	Sections 3 and 4.1
b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in 358.905(1)(c); and	Sections 3 and 4.2
c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).	Sections 3 and 4.3
(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A
(3) The Council may issue a site certificate for a special criteria facility under OAR 345-015-0310 without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.	N/A

8. REFERENCES

Baer, Charles, Tara Seaver, and Andrea Blaser

2025 *Cultural Resource Survey for the Deschutes Solar and Battery Energy Storage System Facility Project, Addendum 1: Historic Resources within the 1-mile Indirect Analysis Area.* Archaeological Investigations Northwest, Inc. Report No. 5540. Prepared for DECH bn, LLC, West Palm Beach, Florida.

Bryant, Hamilton, James Norton, Kelley Prince Martinez, Tara Seaver, Charles Baer, Andrea Blaser, and Terry Ozbun

2025 *Cultural Resource Survey for the Deschutes Solar and Battery Energy Storage System Facility Project.* Archaeological Investigations Northwest, Inc. Report No. 5459. Prepared for DECH bn, LLC, West Palm Beach, Florida.

Miller-Sisson, Misha, Mars Galloway, Carly Watters and Brendon Slattery

2025 *Cultural Resource Survey for the Deschutes Solar Project.* Warm Springs GeoVisions Report No. 25-06. Prepared for DECH bn, LLC, West Palm Beach, Florida

Butler, Stephanie, Amy Schlenker, Omar Ramirez, Matthew Steinkamp, Chris Monahan, Matthew Seddon, Chuck Bollong, Scott Phillips, Mini Sharma, R. Todd Baker, Celia Moret-Ferguson, Stacey De Shazo, and Kelsey Brethower

2009a *Cultural Resource Inventory for the Palomar Gas Transmission Project, Wasco, Clackamas, Marion, Yamhill, Washington, Columbia, and Clatsop Counties, Oregon.* SWCA Project Number 12521. SWCA Environmental Consultants, Portland, Oregon.

2009b *Addendum to the Cultural Resource Inventory for the Palomar Gas Transmission Project, Wasco, Clackamas, Marion, Yamhill, Washington, Columbia, and Clatsop Counties, Oregon.* SWCA Project Number 12521. SWCA Environmental Consultants, Portland, Oregon.

Connolly, Thomas, J., and Dennis L. Jenkins

1991 *Archaeological Data Recovery Plan for the Paquet Gulch Bridge Site (35WS125) Reservation Road, Wasco County.* Prepared for Oregon Department of Transportation, Salem. Oregon State Museum of Anthropology, University of Oregon, Eugene.

Ellis, David V.

1990 *Cultural Resource Survey of Proposed Realignment of Reservation Road Crossing of Paquet Gulch.* Willamette Associates Cultural Resource Specialists, Portland. On file, Oregon State Historic Preservation Office, Salem.

Follansbee, Julia A.

1979 *An Evaluation of The Abbott Site 35WS115.* Cultural Resource Management, Inc., Eugene, Oregon. On file, Oregon State Historic Preservation Office, Salem.

Fulton, Terri P., and Philip A. Fulton

1999 *Supplemental Site Investigations for the FTV Western Build, Oregon.* Northwest Archaeological Associates, Seattle, Washington. Prepared for Touch America, Inc., and David Evans & Associates, Inc., Seattle, Washington.



Hall, Michael A.

2005 National Register of Historic Places Inventory Nomination form for the Maupin Section Foreman's House. On file, Oregon State Historic Preservation Office, Salem.

Hylton, Lindon, Alex Atkins, and Lawrence Squiemphen III

2019 *Cultural Inventory of the White River Wildlife Area Cultural Resources Planning Area, Wasco County*. Warm Springs Geo Visions Report No. 19-08. Prepared for Oregon Department of Fish and Wildlife, Salem.

Jakien, Roman

2018 Rock Features of the Upper Klamath Basin: An Integrated Approach to Identification. Master's Thesis. Cultural and Environmental Resource Management, Central Washington University, Ellensburg.

Jenkins, Dennis L.

1990 *Preliminary Results of Archaeological Test Excavations at site 35WS125 within the Proposed Right-of-Way of the Reservation Road (Paquet Gulch) Bridge Project Area, Wasco County*. Oregon State Museum of Anthropology, University of Oregon, Eugene. On file, Oregon State Historic Preservation Office, Salem.

Jenkins, Dennis L., and Thomas J. Connolly

1994 *Archaeological Excavations at the Paquet Gulch Bridge Site: A Pithouse Village in the Deschutes River Basin, Southwestern Columbia Plateau, Oregon*. University of Oregon Anthropological Papers 49, Eugene.

Jerofke, Linda, and Erik Harvey

2005 *Emergency Conservation Project in Wasco County, Oregon*. Blue Mountain Consulting, La Grande, Oregon. Prepared for the Farm Services Agency, The Dalles, Oregon.

Kelly, Michael S., Elena Nilsson, Stephanie Butler, Melinda Button, and Russell Bevill

2013 *Archaeological Survey for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, and Wasco Counties, Oregon*. URS Corporation, Portland, Oregon. Prepared for Portland General Electric Company, Portland, Oregon.

Miller-Sisson, Misha

2025 *Draft Cultural Resource Survey for the Deschutes Solar Project (06.19.25), Wasco County, Oregon*. GeoVisions, Warm Springs, Oregon.

Musser, Lloyd

1985 *Cultural Resource Inventory of the Oak grove-Oregon City Wagon road*. SHPO No. 6385. National Forest Service, Bear Springs Ranger District. On file, Oregon State Historic Preservation Office, Salem.

Shannon, Donald, David Ellis, Sarah McDaniel, Michelle Stegner, Russ Bevill, Stephanie Butler, Michael S. Kelly, and Elena Nilsson

2011 *Ethnographic Report for Portland General Electric's Cascade Crossing Transmission Project Morrow, Gilliam, Sherman, Wasco, Clackamas, and Marion Counties, Oregon*. Prepared for Portland General Electric. Willamette Cultural Resource Analysts and URS Corporation, Portland Oregon.

Sharp, Nancy D., Terri P. Fulton, Philip A. Fulton, and Kenneth E. Juell



1998 *Cultural Resources Inventory of the Proposed FTV Western Build Part 1: Oregon, Volume 1.* Northwest Archaeological Associates, Inc., Seattle, Washington. Prepared for Touch America, Inc., and David Evans & Associates, Inc., Seattle, Washington.

Snyder, Sandra L., William G. Robbins, William D. Honey, and John A. Draper

1979 *Cultural Resource Survey for the Proposed Bonneville Power Administration Slatt-Marion 500 kV Transmission Line in the Region of Wasco, Marion, and Clackamas Counties, Oregon.* Oregon State Historic Preservation Office Report No. 1338. Prepared for the Bonneville Power Administration, Portland, Oregon. Oregon State University, Corvallis.

1980a *Cultural Resource Survey for the Proposed Bonneville Power Administration Slatt-Marion 500 kV Transmission Line in the Region of Wasco, Marion, and Clackamas Counties, Oregon.* Oregon State Historic Preservation Office Report No. 1536. Prepared for the Bonneville Power Administration, Portland, Oregon. Oregon State University, Corvallis.

1980b *Cultural Resource Survey for the Proposed Bonneville Power Administration Slatt-Marion 500 kV Transmission Line in the Region of Wasco, Marion, and Clackamas Counties, Oregon.* Oregon State Historic Preservation Office Report No. 1547. Prepared for the Bonneville Power Administration, Portland, Oregon. Washington Archaeological Research Center, Washington State University, Pullman.

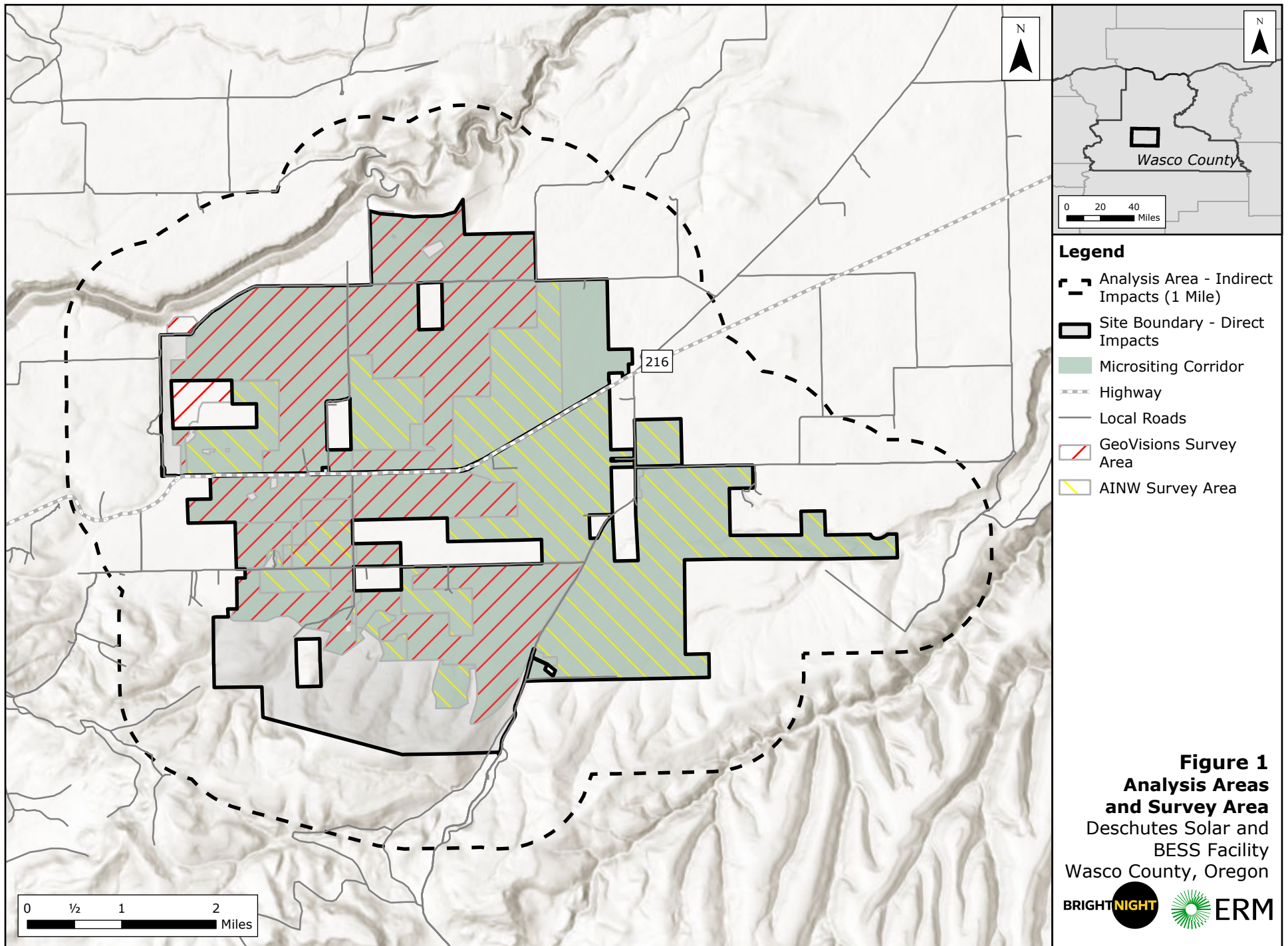
Steggel, Norm

1979 *Cultural Resources Survey of the Wasco Electric Cooperative White River Canyon Transmission Line, Oregon.* United States Department of the Interior, Bureau of Land Management, Prineville District, Oregon.



ATTACHMENT 1 ANALYSIS AND SURVEY AREAS







ATTACHMENT 2 CULTURAL RESOURCE SURVEY REPORT (GEOVISIONS) – CONFIDENTIAL



CLIENT: DECH bn, LLC

PROJECT NO: Oregon Energy Facility Siting Council

DATE: January 2026

VERSION: 02



ATTACHMENT 3 CULTURAL RESOURCE SURVEY REPORT
(AINW) - **CONFIDENTIAL**



CLIENT: DECH bn, LLC

PROJECT NO: Oregon Energy Facility Siting Council

DATE: January 2026

VERSION: 02



ATTACHMENT 4 HISTORIC RESOURCES REPORT (INDIRECT ANALYSIS AREA) - **CONFIDENTIAL**



CLIENT: DECH bn, LLC

PROJECT NO: Oregon Energy Facility Siting Council

DATE: January 2026

VERSION: 02



ATTACHMENT 5 TRIBAL COMMUNICATION



CLIENT: DECH bn, LLC

PROJECT NO: Oregon Energy Facility Siting Council

DATE: January 2026

VERSION: 02



MINUTES

LOCATION	Online
DATE	27 August 2025
GROUP/TOPIC	Coordination Meeting with BrightNight Power, LLC and the Confederated Tribes of Warm Springs

ATTENDANCE

Warm Springs Representatives:

- Austin Smith Jr. – General Manager, Branch of Natural Resources
- Myra Johnson – Chair, Cultural Heritage Committee
- Lawrence Squiemphen III – Tribal Historic Preservation Officer
- David E. Witt, PhD, RPA – Review & Compliance Specialist, Warm Springs GeoVisions
- Michael Leecy – Wildlife, Range, and Agricultural Manager
- Max Oakes – Wildlife Biologist
- Doug Manion – Fisheries Department
- Tim Outman – Natural Resource Planner and Air Quality Specialist

BrightNight:

- Bijan Damavandi
- Todd Ellwood
- Andrew Fernandez

KEY THEMES

- Strong emphasis on partnership beyond legal requirements
- Commitment to early and transparent consultation
- Importance of tribal treaty rights, cultural resources, and ecological protections

DISCUSSION HIGHLIGHTS

- Project Overview (BrightNight):
 - 14,000 acres secured; ~8,000 acres expected footprint
 - COD target: Q4 2029; preliminary permit app this quarter
 - Early community engagement (open house, fair sponsorships)

- Wildlife & Habitat:
 - Tribal concerns: elk/deer migration, eagle nesting, cultural foods
 - BrightNight: wildlife-friendly fencing, habitat corridors, setbacks from streams
- Fisheries & Water:
 - Concerns about Deschutes River tributaries, salmon/steelhead habitat
 - Questions raised on battery safety (fire/spill) — BrightNight to provide engineering memo
- Scenic Resources:
 - Tribal input: protect viewsheds, share build vs. no-build areas
 - BrightNight to provide constraints map for review
- Recreation & Treaty Rights:
 - Treaty rights for hunting, fishing, gathering remain active
 - Some landowners willing to provide tribal access (e.g., Wapanese Creek)
- Cultural Resources:
 - Geo Visions draft report complete; AINW pending
 - Warm Springs requested direct delivery of reports + shapefiles
 - Agreement on cultural monitors and botanical species list
- Local Economic Opportunities:
 - BrightNight committed to working with TERO and local enterprises for jobs and contracts

ACTION ITEMS

BrightNight to Deliver:

- Constraints map (priority vs. low-priority build areas)
- Battery storage safety overview (fire/spill/containment)
- Geo Visions report + shapefiles to Warm Springs
- Botanical species list from surveys
- Recreation access map (potential tribal access areas)

Warm Springs to Deliver:

- Review BrightNight materials and provide feedback
- Confirm points of contact for cultural resources coordination

Joint:

- Continue consultations with ODFW on wildlife/fisheries
- Integrate tribal ecological knowledge into design
- Schedule next meeting: focus on cultural resources & mitigation



ATTACHMENT 6 DRAFT INADVERTENT DISCOVERY PLAN



INADVERTENT DISCOVERY PLAN

Inadvertent Discovery Plan for the Deschutes Solar and Battery Storage System Facility Project

In the event ground-disturbing activities or other project activities related to project construction uncover protected cultural material (e.g., bones, shell, antler, horn or stone tools, glass bottles, ceramics, etc.), the following actions will be taken:

- 1) When an unanticipated discovery of protected **cultural material** (see definitions below) occurs, the contractor will completely secure the location and contact:
 - a) BrightNight, LLC (Todd Ellwood, 408-839-2402);
 - b) Archaeological Investigations Northwest, Inc. (AINW) (Kelley Prince Martinez, 971-645-6028; alternate contact: Terry Ozbun, 971-409-6944).

If AINW confirms that the discovery is archaeological:

- c) The Oregon State Historic Preservation Office (SHPO) (John Pouley, 503-480-9164, Jamie French, 503-979-7580);
 - d) And must consult with appropriate Native American Tribes for finds of Native American origin. The Legislative Commission on Indian Services (LCIS) will designate the appropriate Tribes; contact Elissa Bullion (971-707-1372).
- 2) If the discovery consists of **human remains**, the contractor will stop work within at least 30 meters (100 feet) of the human remains. Personnel should be instructed to not speak to the public or media about the discovery and the human remains will be protected from further disturbance and public viewing using methods that do not directly touch the remains. The contractor will immediately contact:
 - a) BrightNight, LLC (Todd Ellwood, 408-839-2402);
 - b) AINW (Kelley Prince Martinez, 971-645-6028; alternate contact: Terry Ozbun, 971-409-6944));
 - c) Oregon State Police (Sgt. Ryan Tague, 541-576-4393, 503-731-3030 [dispatch]);
 - d) LCIS (Elissa Bullion, 971-707-1372, Patrick Flanagan, 503-986-1067, LCIS Office, 503-986-1067);
 - e) Appropriate Native American Tribes, as designated by LCIS; and
 - f) SHPO (John Pouley, 503-480-9164, Jamie French, 503-979-7580).

NOTE: If you discover bones but are unsure if they are human, contact AINW.

- 3) Proceeding with Work
 - a) Ground-disturbing activities can proceed after the proper archaeological inspections have occurred and environmental clearances are obtained. After an inadvertent discovery, some areas may be designated as close monitoring or “no work” zones. No ground disturbing work should occur within at least 30 meters (100 feet), or more if appropriate, of a potential discovery.
 - b) Potential human remains should be protected from weather and public view using methods that do not directly touch the remains.
 - c) Personnel should be instructed not to speak to the public or media about the discovery.

Cultural material that may be protected by law could include but not be limited to:

- Buried layers of black soil with layers of shell, charcoal, or fish or mammal bones;
- Buried cobbles that may indicate a hearth feature;
- Non-natural sediment or stone deposits that may be related to activity areas of people;
- Stone, bone, shell, horn, or antler tools that may include projectile points (arrowheads), stone flakes, wood working wedges or axes, and grinding stones (Figure 1);
- Wet areas may preserve remnants of wood and other plant fibers; in these locations there may be remains including fragments of basketry, weaving, wood tools, or carved pieces;
- Concentrations of historic-period artifacts (glass, ceramic, or metal items over 50 years old) (Figure 2);
- Human remains.

Tribal Contacts:

CONFEDERATED TRIBES OF THE GRAND RONDE COMMUNITY OF OREGON	
Briece Edwards Deputy Tribal Historic Preservation Officer briece.edwards@grandronde.org thpo@grandronde.org 503-879-2084 (office)	Chris Bailey Cultural Protection Specialist chris.bailey@grandronde.org 503-879-1675
CONFEDERATED TRIBES OF THE SILETZ INDIANS	
Buddy Lane Cultural Resources Manager buddyl@ctsi.nsn.us 541-444-8230	Peter Sv-gvs (Black Bear) Hatch History & Archaeology Specialist peterh@ctsi.nsn.us; culturalresources@ctsi.nsn.us 541-444-8319 (office)
CONFEDERATED TRIBES OF THE WARM SPRINGS RESERVATION OF OREGON	
Larry Squiemphen Tribal Historic Preservation Officer Lawrence.squiemphen@ctwsbnr.org 541-553-2001 (office)	Bobby Brunoe NAGPRA Coordinator thpo@ctwsbnr.org 541-553-2026 (office)
CONFEDERATED TRIBES OF THE UMATILLA INDIAN RESERVATION	
Teara Farrow Ferman Program Manager Cultural Resources Protection Program tearafarrowferman@ctuir.org 541-429-7203	Bambi Rodriguez Assistant Program Manager Cultural Resources Protection Program bambirodriguez@ctuir.org 541-429-7203



Figure 1. Examples of stone tools, lithic debitage, and a bone awl.



Figure 2. Examples of historic-period artifacts.