



POWER ENGINEERS, INC.
3 CENTERPOINTE DRIVE
SUITE 500
LAKE OSWEGO, OR 97035 USA

PHONE 503-892-6700
FAX 503-892-6799

Subject: November 2024 Addition of Route D to the Umatilla-Morrow County Connect Project, Umatilla and Morrow Counties, Oregon

In November of 2024, Umatilla Electric Cooperative (UEC) added a fourth alternative route, Route D, to the Umatilla-Morrow County Connect Project (Project). The most current design now includes four route alternatives, Routes A through D, located in Morrow and Umatilla Counties between the cities of Boardman and Hermiston (see Project Region Map, page 2).

The location of Route D was included in the larger cultural resource desktop review conducted in August 2022. The alignment of Route D was not defined at the time the cultural resource surveys and the visual assessment were performed in the eastern portions of the Project area in 2024. The addition of Route D does not affect the previous archaeological findings and recommendations. Shovel testing will occur at each proposed structure location on the remaining private property portions of the Project area prior to construction once landowner easements are obtained.

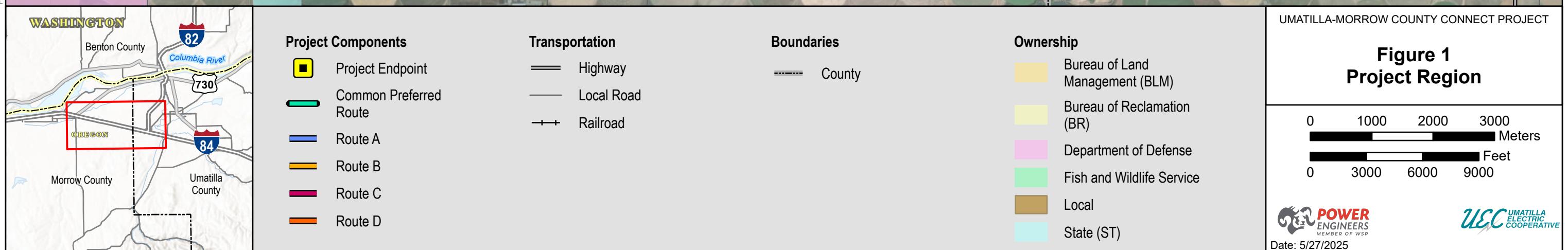
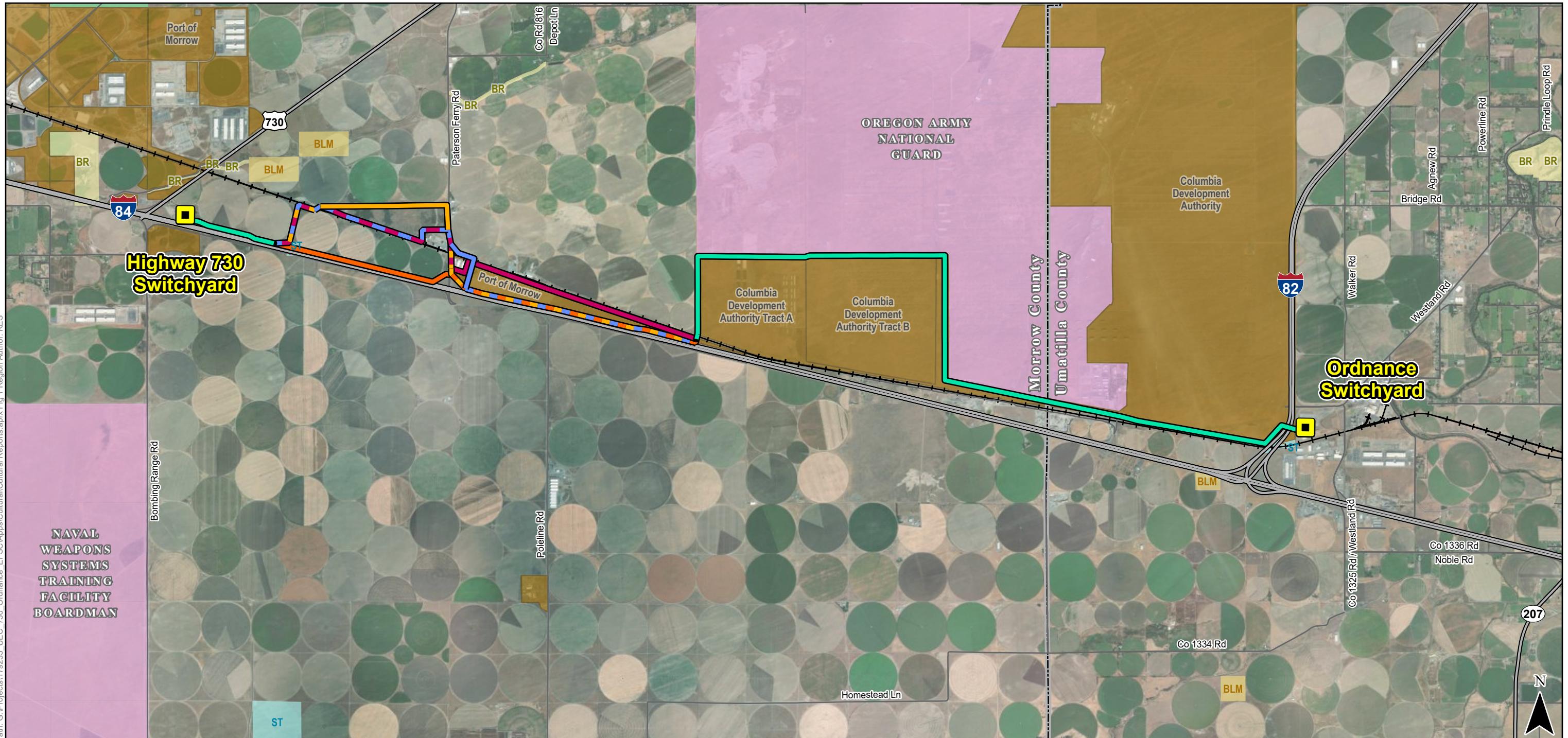


Exhibit S

Historic, Cultural, and Archaeological Resources

Umatilla-Morrow County Connect Project



**750 West Elm Avenue
PO Box 1148
Hermiston, OR 97838**

Cole Bode,
Vice President of Engineering
541-567-6414
UMCCproject@umatillaelectric.com

Application for Site Certificate

May 2025

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ATTACHMENTS

ATTACHMENT S-1 CULTURAL RESOURCES CLASS I DESKTOP REVIEW
(CONFIDENTIAL)

ATTACHMENT S-2 CULTURAL RESOURCES PEDESTRIAN SURVEY REPORT
(CONFIDENTIAL)

ATTACHMENT S-3 SHOVEL PROBE ADDENDUM LETTER REPORT (CONFIDENTIAL)

ATTACHMENT S-4 PORT OF MORROW SURVEY AND TESTING REPORT
(CONFIDENTIAL)

ATTACHMENT S-5 VISUAL EFFECTS ANALYSIS REPORT (CONFIDENTIAL)

ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
CDA	Columbia Development Authority
cm	centimeter
cmbs	centimeters below ground surface
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
Hwy	Highway
HPRCSIT	Historic Properties of Religious and Cultural Significance to Indian Tribes
I-	Interstate
KOP	Key Observation Point(s)
LCIS	Oregon Legislative Commission on Indian Services
NPS	National Park Service
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rule
OMD	Oregon Military Department
ORS	Oregon Revised Statute(s)
OSP	Oregon State Police
POWER	POWER Engineers, Inc.
Project	Umatilla-Morrow County Connect Project
Project Order	Administrative Rules, and Other Requirements Applicable to the Proposed Umatilla-Morrow County Connect Project (April 2024)
SHPO	State Historic Preservation Office
STP	Shovel Test Probe
UCDHD	Umatilla Chemical Depot Historic District
UEC	Umatilla Electric Cooperative
UMCC	Umatilla-Morrow County Connect Project
UOD or Depot	Umatilla Ordnance Depot
VCR	Visual Contrast Rating
VRM	Visual Resource Management
WWII	World War II

1.0 INTRODUCTION

Exhibit S provides information regarding historic, cultural, and archaeological resources for the Umatilla-Morrow County Connect Project (Project) as required by Oregon Administrative Rule (OAR) 345-021-0010(1)(s). The Project is a nominal, double-circuit 230-kilovolt alternating current transmission line providing an interconnect from the Umatilla Electric Cooperative (UEC) Highway 730 (Hwy 730) Switchyard to the UEC Ordnance Switchyard. The most current design includes four route alternatives, Routes A through D, located in Morrow and Umatilla Counties between the cities of Boardman and Hermiston. The Project crosses private, Columbia Development Authority (CDA) (former Umatilla Ordnance Depot [UOD]), and local public lands. The cultural survey reports summarized here within each include route summaries, descriptions, and maps as the Project was understood at the time that survey was completed. Modifications to structure locations, quantities, and routes have been made as the Project has progressed through the permitting and design phases.

2.0 ANALYSIS AREA

OAR 345-021-0010(1)(s) Information about historic, cultural, and archaeological resources. Information concerning the location of archaeological sites or objects may be exempt from public disclosure under ORS 192.502(4) or ORS 192.501(11). The applicant must submit such information separately, clearly marked as "confidential," and must request that the Department and the Council keep the information confidential to the extent permitted by law. The applicant must include information in Exhibit S or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090.

Pursuant to OAR 345-021-0010(1)(s)(A) and (B), the analysis area for historic, cultural, and archaeological resources consists of a direct analysis area. The analysis area for Exhibit S is the Area within the site boundary and 1.0 mile from the site boundary (First Amended Project Order, April 2024). The Project features and site boundary are fully described in Exhibit B and Exhibit C, respectively. The location of the Project features and the site boundary is provided in Exhibit C.

3.0 HISTORIC AND CULTURAL RESOURCES WITHIN THE ANALYSIS AREA

Pursuant to OAR 345-022-0090(1)(a), this Exhibit addresses potential impacts to significant historic, cultural, and archaeological resources. Significant resources, in this context, refers to structures, objects, or sites that:

1. Are currently listed on the National Register of Historic Places (NRHP) as individual sites or contributing resources to a recognized historic district;
2. Have been deemed eligible for listing by the State Historic Preservation Office (SHPO); or
3. Would become a contributing resource to a historic district or site as a result of a proposed preservation plan.

Pursuant to OAR 345-022-0090(1)(b) this Exhibit also addresses potential impacts to archaeological objects and sites, many of which are not eligible for NRHP listing but nevertheless contribute to the cultural landscape of Oregon. Archaeological objects and sites are defined in Oregon Revised Statutes (ORS) 358.905(1) as follows:

1. Archaeological object – means an object that is at least 75 years old, part of the physical record of an Indigenous or other culture found in the state or waters of the state, and is material remains of past human life or activity that are of archaeological significance including, but not limited to, monuments, symbols, tools, facilities, technological by-products, and dietary by-products.
2. Archaeological site – a geographic locality in Oregon, including but not limited to submerged and submersible lands and the bed of the sea within the state's jurisdiction, that contains archaeological objects and the contextual association of the archaeological objects with each other or biotic or geological remains or deposits.

3.1 Historic and Cultural Resources Listed, or Likely Eligible for Listing, on the National Register of Historic Places

OAR 345-021-0010(1)(s)(A) 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 analysis area, there are two cultural resources that are eligible for listing in the NRHP. The Umatilla Cutoff Road, 35UM497, exhibits qualities and direct associations that meet criteria for the NRHP, and the site continues to retain most aspects of integrity. The Coyote Coulee is a Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSIT) traditionally used as a travel route, hunting location, and plant gathering area by the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) that is considered eligible on the national and local level. These resources will be directly avoided during construction.

3.2 Archaeological Objects and Sites on Private Lands within the Analysis Area

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.

A total of eight archaeological sites and no archaeological isolates have been identified on private lands within the direct analysis area. Four of the sites (35UM497, temp site numbers Jan-31-C and Feb-1-A, and Coyote Coulee) are recommended eligible for listing on the NRHP.

3.3 Archaeological Sites on Public Lands within the Analysis Area

OAR 345-021-0010(1)(s)(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 identified thus far on public lands within the analysis area.

4.0 SIGNIFICANT POTENTIAL IMPACTS OF CONSTRUCTION, OPERATION, AND RETIREMENT OF THE FACILITY ON HISTORIC, CULTURAL, AND ARCHAEOLOGICAL RESOURCES

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:

4.1 Methods

(i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the State Historic Preservation Officer or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying, and assessing the significance of resources listed in paragraphs OAR 345-021-0010(1)(s)(A), (B) and (C);

An initial cultural resources Class I desktop review was conducted to identify previously conducted archaeological inventories and sites recorded within 0.5-miles of the Project boundary in August 2022 (Davis 2022) (Attachment S-1). A cultural resource survey for portions of this Facility was completed by POWER Engineers, Inc. (POWER) in January and February 2024 (Mather et al. 2024a) (Attachment S-2). The cultural resource survey occurred within portions of Sections 17, 18, 20, 21, 22, 25, 26, and 27 of Township 4 North, Range 27 East, and within portions of Sections 13 and 24 of Township 4 North, Range 26 East. The survey included a file search utilizing the Oregon Archaeological Records Remote Access database and other sources. POWER subsequently undertook a shovel testing program at proposed tower locations in May 2024 within the eastern portion the Analysis area; the results are attached to the survey report in Attachment S-3. POWER also undertook a pedestrian survey and shovel testing program in November 2024 within the Port of Morrow parcel 04N26E000003417 portion of the Project, located in Sections 14, 15, 22, 23, and 24 of Township 04 North, Range 26 East; the results are attached to the survey report in Attachment S-4. A visual effects analysis was conducted for the CDA portion of the Project area in May 2024 and the report is provided in Attachment S-5.

4.1.1 Records Search

A records search was conducted at the Oregon Archaeological Records Remote Access and the Oregon Historic Sites Database prior to individual fieldwork efforts to identify previously conducted archaeological inventories and sites recorded using a buffer zone of 0.8-kilometer (0.5-mile) radius surrounding the cultural survey boundary, summarized in Table S-1 and Table S-2 and Attachment S-1.

TABLE S-1 OREGON FILE SEARCH LIST, REPORTS AND SITES WITHIN 0.5 MILE OF PROJECT

NADB REPORT NO.	REFERENCE	REPORT TITLE	LOCATION RELATIVE TO PROJECT	RESOURCES IDENTIFIED
6496	Pettigrew 1985	<i>Report on the Archaeological Survey of the Proposed Old Oregon Trail Highway-Walker Road/I-82 Intersection Project, McNary Highway, Umatilla County</i>	Portions adjacent	-
9272	Cleland et al. 1987	<i>An Archeological Overview and Management Plan for the Umatilla Depot Activity, Umatilla, Oregon</i>	Portions overlap	Old Emigrant Road
14775	Oetting 1992	<i>Cultural Resources Survey of Facilities for the Hermiston Generating Project (US Generating Company), Umatilla County, Oregon</i>	Portions adjacent	Westland B Canal
15359	Celmer 1996	<i>Archeological Reconnaissance Survey Chemical Stockpile Disposal Program Umatilla Army Depot Activity Hermiston, Oregon</i>	Portions overlap	-
15401	Boreson 1996, ed.	<i>A Cultural Resources Inventory of Excess Real Estate Parcels, Umatilla Depot Activity Morrow and Umatilla Counties, Oregon Volume I - Technical Report</i>	Portions within and adjacent	1875 Wagon Road (likely an alignment of the Umatilla Cutoff Road) -no trinomial assigned
17888	Confederated Tribes of the Umatilla Indian Reservation 1997	<i>A Cultural Resource Inventory of The Proposed Co-Generation Facility near Hermiston, Umatilla County, Oregon</i>	Portions overlap	-
19452	Edwards 2004	<i>Archaeological Survey of Bridges 16453 and 16454 (1-84 WB and EB over OR 82 EB), Umatilla County, Oregon</i>	0.5 mile south	-
19521	Endzweig 2005	<i>Exploratory Probing and Survey: Stanfield Interchange Improvements (I-84/US395); Umatilla Butte Quarry, Umatilla-Stanfield Hwy. (Hwy. #054), MP 2.70; Ordinance Gravel Pit, Old Oregon Trail Hwy. (Hwy. #006), MP 179; Umatilla County</i>	Portion 0.5 mile south	None within 0.5 mile
24393	Dickson 2011	<i>June 13 letter to SHPO regarding monitoring at OERS spill number 2011-0997 at in Hermiston, Oregon</i>	0.25 mile south	-

NADB REPORT NO.	REFERENCE	REPORT TITLE	LOCATION RELATIVE TO PROJECT	RESOURCES IDENTIFIED
26075	Jenkins et al. 2013	<i>Cultural Resource Survey for the Proposed Perennial Wind Chaser Station, Umatilla County, Oregon</i>	0.25 mile east	Westland A Canal ca. 1907 to 1914-eligible (Jenkins et al. 2013)
27314	Stegner et al. 2015	<i>Cultural Resources Inventory Report for the Umatilla Chemical Depot Proposed Biomass Plant Project, Umatilla County, Oregon</i>	Portions overlap	35UM489-Umatilla Chemical Depot Cantonment Site-not eligible (Stegner 2014)
28313	Cooper and Scott 2016	<i>Archaeological Field Investigations for BRAC Land Parcels Leaving Federal Ownership at Umatilla Chemical Depot Morrow and Umatilla Counties, Oregon</i>	Portions within and adjacent	35UM495-historic refuse scatter and rock ring-not eligible (Gerrish 2015a) 35UM496-historic refuse scatter-not eligible (Gerrish 2015b) 35UM497-historic road, 1875 General Land Office Umatilla Cutoff-eligible (Gerrish 2016a) 35UM499-1932 Metsker Map Road-not eligible (Gerrish 2016b)
29195	Dickson 2017	<i>July 13 letter to Dennis Griffin regarding monitoring of cleanup of spill OERS 2017-0423 near milepost 170 on Interstate 84 east of Boardman, Morrow County, Oregon.</i>	100 feet south	-
29588	Jones 2018	<i>Preliminary Letter Report for the Trident Project Archaeological Monitoring Near Hermiston, Oregon</i>	0.25 mile east	None within 0.5 mile
29934	Boehm et al. 2018	<i>I-84 Median Barrier Safety Improvement Project</i>	200 feet south	-
30283	McDaniel and Stegner 2019	<i>Cultural Resources Survey of OMD Military Operations in Urban Terrain (MOUT) Sites G Block, K-Block, and SW-TA-3 at Camp Umatilla Oregon Morrow County, Oregon</i>	Portions 600 feet north	-

NADB REPORT NO.	REFERENCE	REPORT TITLE	LOCATION RELATIVE TO PROJECT	RESOURCES IDENTIFIED
30284	Stegner et al. 2019	<i>Cultural Resources Survey for OMD Bivouac Operations on Camp Umatilla Oregon Morrow County, Oregon</i>	Portions adjacent	35MW318-historic structural remains, vehicle wash station-not eligible (Stegner 2018)
30467	Diederich 2019	<i>Archaeological Survey of I and J Block Fencing, G Block Military Operations Urban Terrain (MOUT) Site Maneuver Trail at Camp Umatilla Oregon</i>	Portions 0.5 mile north	-
28902 30690	Karson Engum 2016	<i>Traditional Use Study of the Umatilla Chemical Dept, Umatilla and Morrow Counties, Oregon</i>	Portions overlap	Coyote Coulee-eligible (Karson Engum 2016)
30733	Yorck et al. 2019	<i>Addendum to Archaeological Field Investigations for BRAC Land Parcels Leaving Federal Ownership at Umatilla Chemical Depot Morrow and Umatilla Counties, Oregon</i>	Portions within and adjacent	35UM495-historic refuse scatter and rock ring-not eligible (Ellsworth 2019a) 35UM497-historic road, 1875 General Land Office Umatilla Cutoff-eligible (Ellsworth 2019b) 35UM499-1932 Metsker Map Road-not eligible (Ellsworth 2019c) 35MW323-historic road segment-not eligible (Ellsworth 2019d) 35MW324- historic road segment-not eligible (Ellsworth 2019e)
30945	Diederich 2020a	<i>Archaeological Survey of Fiscal Year 2020 Vehicle Maneuver Trail at Camp Umatilla Oregon (CUO) Morrow County, Oregon</i>	Portions 300 feet east	-
31063	Diederich 2020b	<i>Archaeological Survey for Continued G Block MOUT Development at Camp Umatilla Oregon (CUO) Morrow County, Oregon</i>	Portions 100 feet north	-

NADB REPORT NO.	REFERENCE	REPORT TITLE	LOCATION RELATIVE TO PROJECT	RESOURCES IDENTIFIED
31183	Diederich 2020c	<i>Archaeological Survey for the Water Distribution Line at Camp Umatilla Oregon (CUO) Morrow Umatilla Counties, Oregon</i>	Portions adjacent	-
31191	Diederich 2020d	<i>Archaeological Survey for the South Boundary Fence, Sea Hut, and Enlisted Barracks Parking at Camp Umatilla Oregon (CUO) Morrow and Umatilla Counties, Oregon</i>	Portions overlap	-
31386	Thomas et al. 2020	<i>Cultural Resources Survey for the I-84: Cascade Locks-Pendleton & I-82 Sign Upgrades Project</i>	Portions immediately to south	None within 0.5 mile
31559	Stegner and McDaniel 2021	<i>Cultural Resources Survey Report Oregon Military Department FY2020 Priority Areas 1-12 Camp Umatilla Oregon Umatilla and Morrow Counties, Oregon</i>	Portions adjacent	35MW359-refuse scatter-not eligible (Stegner 2021a) 35MW360-refuse scatter- not eligible (Stegner 2021b)

The Oregon Archaeological Records Remote Access and Oregon Historic Sites Database file searches showed that the Project analysis area one-half mile file search zone contains 12 previously recorded cultural resources and two historic districts. Of the known sites, three sites are partially located inside the surveyed area. Table S-2 describes the locations and types of cultural resources located within 0.5 mile of the Project. No isolates have been previously recorded within the Project.

TABLE S-2 OREGON FILE SEARCH SITES WITHIN 0.5 MILES OF PROJECT

SITE NUMBER	TYPE	DESCRIPTION OR TITLE	NRHP ELIGIBILITY	DISTANCE FROM NEAREST PROJECT FACILITY	POTENTIAL FOR RESOURCE TO BE IMPACTED
35UM489	Site	Historic military site	Not eligible	Southern boundary overlaps Project; updated boundary 30 to 135 feet north of Project boundary	No
35UM495	Site	Historic refuse scatter	Not eligible	515 feet north of Project boundary	No
35UM496	Site	Historic refuse scatter	Not eligible	610 feet north of Project boundary	No

SITE NUMBER	TYPE	DESCRIPTION OR TITLE	NRHP ELIGIBILITY	DISTANCE FROM NEAREST PROJECT FACILITY	POTENTIAL FOR RESOURCE TO BE IMPACTED
35UM497	Site	Historic wagon road	Eligible	Crosses the Project at four locations	Yes
35UM499	Site	Historic 1932 Metsker Map Road	Not eligible	Located north of Project boundary	No
35MW318	Site	Historic structural remains	Not eligible	540 feet north of Project boundary	No
35MW323	Site	Historic road segment	Not eligible	1,890 feet south of Project boundary	No
35MW324	Site	Historic road segment	Not eligible	2,700 feet south of Project boundary	No
35MW360	Site	Historic refuse scatter	Not eligible	1,530 feet north of Project boundary	No
Union Pacific	Unrecorded Infrastructure	Railroad Grade ca. 1915	Eligible	100 feet to south	No
Umatilla Chemical Depot Historic District	Historic District	Historic military property	Eligible	Overlaps Project	Yes
Umatilla Ordnance Historic District	Historic District	Historic military property	Eligible	775 feet north of Project boundary	No
Coyote Coulee	Traditional Cultural Property/ HPRCSIT	Traditionally used travel route, hunting location and plant gathering area used by CTUIR	Eligible	Southern boundary overlaps Project	Yes
Westland A Canal	Built Environment	Historic canal	Eligible	Flows immediately east of Project but is currently being rerouted	No

See Acronyms and Abbreviations.

4.1.2 Pedestrian Survey

A total of 258.6 acres was surveyed for the Project in January and February 2024 where proposed transmission line work will take place, including existing, existing improved, and new access roads, and locations where anticipated facility construction will occur.

Pedestrian survey of all locations identified as potential work areas was conducted in order to inventory potentially present historic properties and collect information sufficient to make recommendations regarding their NRHP eligibility. The Applicant intends to avoid all known cultural resources, where possible. The field methodology developed for this Project is as follows:

- » All lands within the identified Project shall be inventoried via pedestrian survey at 20-meter transect intervals.
- » Any previously identified resources with components that are located within or crossing the Project area will be surveyed intensively and re-recorded onto new state of Oregon archaeological site forms.
- » If new precontact or historic-period cultural materials are found during survey, POWER will document the finds in the field with all the information needed to complete an online State of Oregon Archaeological Site Record or Isolate Record. Information will include the environmental characteristics of the area, the cultural characteristics of the artifacts, artifact quantities, site/isolate boundaries, and scaled sketch maps. The resource will be recorded up to 30 meters (100 feet) outside of the Project survey boundary. No artifacts will be collected during fieldwork survey activities.
- » Isolates will be classified as a singular artifact without features.
- » Digital photos of the Project area, site/isolate overviews, and details will be taken and recorded on a detailed photographic log. Detailed sediment descriptions will also be recorded.
- » If any human remains, burial sites, or burial related resources are encountered during the fieldwork, they will be treated with dignity and respect. Custody of any Native American human remains or cultural items subject to the Native American Graves Protection and Repatriation Act, 25 United States Code Subsections 3001-3013, removed from public lands or Indian lands shall be determined in accordance with Native American Graves Protection and Repatriation Act and its implementing regulations 43 Code of Federal Regulations 10.

4.1.3 Subsurface Shovel Probe Testing

The field investigation was designed to identify any archaeological sites or isolated artifacts that may be present within subsurface deposits at proposed Project transmission line structure locations. A single shovel test probe (STP) was excavated at each proposed pole location to identify any buried cultural materials that may be present. Standard shovel test probes consist of cylindrical pits measuring 30 centimeters in diameter that extend a minimum of 100 centimeters below the ground surface. STPs were excavated in natural stratigraphic levels, all sediments from the STPs were screened through 0.25-inch mesh, soil characteristics were recorded in detail including observed sediment colors, textures, and any cultural resources identified, and each STP was photographed. STPs were refilled with their associated spoils once recording was completed.

Shovel probe excavation on Port of Morrow lands occurred under Oregon SHPO archaeological excavation permit 4029 issued October 18, 2024, to Principal Archaeologist Camille Mather.

Engineering redesigns to the Project occurred in October 2024 to minimize impacts to agricultural operations. The design changes shifted the locations of the proposed structures relative to the May 2024 STP testing, extending the average span of 600 feet to 810 feet apart. The changes also reduced the overall Project disturbance by eliminating a total of 12 structures within the CDA properties and 21 structures over the entire distance of the Project.

4.1.4 Visual Analysis

The non-physical Area of Potential Effect has been defined as an eight-mile buffer applied to the Project centerline, satisfying the one-mile analysis buffer as defined in the Project Order. The 11 Key Observation Points (KOPs) assessed for the current study are located on the ancestral lands of the Cayuse, Umatilla, and Walla Walla along both banks of the Columbia River, along the Umatilla River, and in resource gathering areas inland above the Columbia River, as described in Table S-3 (Hunn et al. 2015: 90-93). Numerous archaeological sites fall within these larger traditional use areas, HPRCSIT, and Traditional Cultural Properties, and are not discussed individually as many are now submerged beneath the waters of Lake Umatilla and Lake Wallula, and all may be considered significant to CTUIR. Individual cultural resource sites, their proximity to the Project area, their NRHP eligibility status, and direct Project effects to those resources are discussed in the associated cultural resource survey report (Mather et al. 2024a) (Attachment S-2).

The selected 11 KOPs were added to a Geographic Information System database and run against a terrain model of the landscape surrounding the Project. This analysis, which was a modified seen/not seen analysis, indicated if the KOP locations would have an unobstructed view of the Project area from the mapped location. The terrain model does not account for vegetation or structures that may be present on the landscape, only topographic landforms such as hills or canyons.

TABLE S-3 KEY OBSERVATION POINTS AND ASSOCIATED CULTURAL RESOURCES

KOP #	KOP NAME	CO., STATE	UTMS	NAME DESCRIPTION/LOCATION
KOP 1	Ímatalam	Umatilla, OR	318044 m E/ 5087674 m N	'lots of rocks' At the confluence of the Umatilla and Columbia Rivers; important winter village at the center of an important berry-picking and root-gathering territory and a site of salmon fishing operations, and trails led from here to the mountains and upland resources.
KOP 2	Tkúpa	Irrigon, OR	306522 m E/ 5084159 N	'washed out' At tule place, encompasses Irrigon, Umatilla National Wildlife Refuge, Paterson Slough, McCormack Slough, and Old Paterson townsite; village, camp, cemetery, trail, processing locale, cache, spiritual site, legendary site with repeated occupation from precontact to current times.
KOP 3	Táwaš	Umatilla National Wildlife Refuge, OR	298263 m E/ 5085615 N	'at brains' things roasted on a stick Encompasses Big Blalock Island, Little Blalock Island, Telegraph Island, Umatilla National Wildlife Refuge, Sand Island, Coyote Island, Port of Morrow, Whitcomb Island, Glade Creek, and Patterson, Washington; village, camp, cemetery, trail, processing locale, cache, spiritual site, legendary site with repeated occupation from precontact to current times.
KOP 4	Wanálpa	Umatilla, OR	317635 m E/ 5087538 m N	'to fade away, disappear' On the Umatilla River above the mouth; fishing site for dip netting salmon and eels by Umatilla, Cayuse, and other Columbia River people.

KOP #	KOP NAME	CO., STATE	UTMS	NAME DESCRIPTION/LOCATION
KOP 5	Mísqalu	Umatilla, OR	317456 m E/ 5087461 m N	'earwax' Upstream on the Umatilla River; fishing site for dip netting and gaffing salmon and eels by Umatilla, Cayuse, and other Columbia River people.
KOP 6	Tapatúkas	Umatilla, OR	319546 m E/ 5086052 m N	'fish with a set net' Upstream from Umatilla, Oregon on the Umatilla River; fishing site for dip netting and gaffing salmon, lamprey, and trout adjacent to two other place names that were jointly used by the Umatilla, Cayuse, and Columbia River people.
KOP 7	Twahaytkqitkawaswáakul	Umatilla, OR	319546 m E/ 5086052 m N	'looks like a grapple hook on the end of a pole' Upstream from Umatilla on the Umatilla River; fishing site adjacent to two additional place named sites jointly utilized by the Umatilla, Cayuse, and Columbia River people; fishing location for salmon, trout, and lamprey caught by dip netting and by gaffing.
KOP 8	Walúumkas	Umatilla, OR	319553 m E/ 5085151 m N	Upstream from Umatilla on the Umatilla River; fishing site adjacent to two additional place named sites jointly utilized by the Umatilla, Cayuse, and Columbia River people; fishing location for salmon, trout, and lamprey caught by dip netting and by gaffing.
KOP 9	Íkulkiipa	Umatilla, OR	319806 m E/ 5083558 m N	'at the bowls' Refers to rock formations carved into the bedrock along river, now covered in floodwaters, on the Umatilla River near Three Mile Falls Dam; camp for curing fish and dip net fishing for salmon, lamprey, and trout.
KOP 10	Coyote Coulee	Hermiston, OR	310230 m E/ 5075592 m N	Coyote Coulee was traditionally used as a travel route, hunting location, and plant gathering area by the Umatilla, located within an eight-mile-long remnant geological feature created by Missoula floodwaters.
KOP 11	Umatilla Cutoff Road	Hermiston, OR	314481 m E/ 5074787 m N	Umatilla Cutoff Road first depicted on the 1875 General Land Office map and is still visible across the broader landscape; contributing element of the Oregon Trail and was a significant historic route for westward settlement.

The Project Area of Potential Effect for non-physical effects is defined as the eight-mile buffer around the proposed Project corridor. The current study does not specifically assess effects to historic properties as would be required under Section 106 of the National Historic Preservation Act. It does generally consider potential visual changes to the viewsheds of cultural resources through the assessment of visual contrast ratings. The methodology used herein is derived from Visual Resource Management (VRM) utilized by the Bureau of Land Management (BLM). VRM is defined by the BLM as the inventory and planning actions taken to identify visual values, establish objectives for managing those values, and the management actions taken to achieve the visual management objectives (BLM 1984 and 2013). Key components of the VRM methodology are distance zones and contrast analysis.

The BLM (1986a) defines three landscape subdivisions, or distance zones, for VRM purposes, including:

- 1) Foreground-middleground (up to three to five miles)

- 2) Background (areas not seen as foreground-middleground, generally five to 15 miles)
- 3) Seldom seen (areas not seen as foreground-middleground, typically greater than 15 miles)

For this Project, the following distance zones were used for the purposes of discussion:

- 1) Foreground (zero to three miles from resource considered)
- 2) Middleground (three to five miles from resource considered)
- 3) Background (five to eight miles from resource considered)

The distance zones applied herein differ from those defined by the BLM. The current study employs similar methodology and is intended to examine potential disturbances to the viewsheds of larger traditional use areas. This is accomplished through the use of a visual contrast rating (VCR) assessment as related to site integrity in aspects of feeling, setting, and association as described further below. Distance zones are important for establishing the location of KOPs and research project parameters but do not affect the results of VCRs.

The BLM (1986b) defines four degrees of contrast for assessing potential impacts to landscapes, which include:

- » **None:** The element contrast is not visible or perceived.
- » **Weak:** The element contrast can be seen but does not attract attention.
- » **Moderate:** The element contrast begins to attract attention and begins to dominate the characteristic landscape.
- » **Strong:** The element contrast demands attention, will not be overlooked, and is dominant in the landscape.

As applied to cultural resources, VCR is used to assess potential effects on historic properties' integrity of setting, feeling, and association. Visual effects on historic properties tend to alter the characteristics that qualify a property for the NRHP when these effects diminish the integrity of setting, feeling, or association of that property. Setting is the physical environment of a historic property and refers to the character of the place in which the property played an historical role. The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as topographic features, vegetation, manmade features/structures, and relationships between structures and other structures or features, or open space (National Park Service [NPS] 1997:45). Feeling is a historic property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features, that taken together, convey the property's historic character (NPS 1997:45). Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where a historic event or activity occurred and is sufficiently intact to convey that relationship. Like feeling, association requires the presence of physical features that convey the property's historic character (NPS 1997:45). Visual elements introduced into the viewshed of a historic property would not necessarily affect the integrity of association if a modern intrusion would not alter the property's link with its associated historic person or event.

When assessing potential effects on historic properties, particularly as applicable to the aspect of setting, the above levels of contrast ratings are interpreted as equivalent to the following effects to historic properties:

- » **No Contrast** – If the proposed project elements will not be seen and/or there is no contrast (as defined above) between the undertaking and the setting. The agency determination should be “No Historic Properties Affected.”
- » **Weak Contrast** – If the proposed project elements, or portions of the elements, can be seen but will not dominate the setting or attract the attention of the casual observer because the basic elements of form, line, color, and texture found in the setting are repeated in the project’s physical elements, then the proposed undertaking will result in a weak contrast rating. The agency determination should be “No Adverse Effect” if there are no additional auditory or atmospheric effects.
- » **Moderate or Strong Contrast** – If the proposed project elements tend to dominate the setting, the proposed undertaking will have a moderate or strong contrast rating. The agency determination should be “Adverse Effect.”

During fieldwork conducted for this study, observations pertaining to potential visual effects contrasts were recorded using Cultural Visual Resource Management Forms, including observations pertaining to the cultural resources associated with KOPs and potential effects on aspects of setting, feeling, and association were also completed during fieldwork. A maximum tower height of 155 feet was assumed for completion of field forms to provide a conservative estimate of potential visual disturbance to the viewsheds of cultural resources, though this is inherently subjective as it requires the analyst to envision features that are not present. Panoramic photographs were taken with a level, tripod-mounted 56-megapixel digital single lens reflex camera. Subsequent to fieldwork, the photographs were examined to confirm and/or refine field observations prior to completion of the forms and the results presented below.

4.2 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;

A majority portion of the Project was surveyed by POWER in January, February, and November 2024 (Mather et al. 2024a, 2024b). Other private property parts of the Project could not be surveyed due to a lack of entry rights.

The pedestrian survey on the former Umatilla Ordnance Depot property portion of the Project area took place on January 30 to February 1, 2024, and was conducted by archaeologists Mr. Eric Kowalski, B.A., Mr. Choya Davis, M.A., and Ms. Camille Mather M.A., RPA. Survey started at the eastern end of the Project, within the ordnance switchyard where surface visibility was excellent at over 75%. The Ordnance Switchyard area of the Project appears to have been previously utilized as a quarry or was heavily used to borrow material from between the years of 1981 to 1994, based on aerial imagery. Sediments exposed at the surface within this area are indicative of the mapped substratum within the area of very gravelly fine sand and consisted of rounded to subrounded gravels and cobbles in a sandy matrix, intermixed with imported crushed gravels, dumped back dirt piles, dead onions and livestock, abandoned cars, stockpiled

culverts, and other modern refuse. Maintenance on the Westland A Canal utilizing heavy machinery was actively occurring at the time of survey. Earthwork on the exterior west bank of the canal provided excellent surface visibility of nearly 100%. Observed surface sediments in areas where they remained consisted of brown, dark grayish brown, and dark yellowish brown (10YR 5/3, 4/2, and 4/4) sandy loam soils (Munsell 2000). No cultural materials were observed within the Ordnance Switchyard or along the western bank of the irrigation canal.

Survey continued west of Interstate (I)-82 within private and local authority properties. The landscape within this portion of the Project and westwards is relatively flat and open with dispersed sagebrush and various grasses, weeds, and other surface vegetation. Surface visibility ranges from poor to excellent (less than 10% to 75%) with some areas covered almost entirely with surface grasses and others are open areas of bare soil and/or along bladed road margins. Ubiquitous across the Project were rodent burrow back dirt piles that provided periodic glimpses of subsurface sediments and their contents in areas of otherwise poor surface visibility. Observed surface sediments consisted of brown, dark grayish brown, and dark yellowish brown (10YR 5/3, 4/2, and 4/4) sandy loam soils containing 5% to 15% rounded to subangular gravels as well as imported crushed gravels within the soil matrix along the margins of established gravel roads within the Project. Surface features, structures, and sites associated with (former) UOD construction and operations were observed across the Project and are discussed in further detail in the following subsections.

Pedestrian survey of the Port of Morrow portion of the Project was conducted by archaeologists Marsha Hanson, B.A., Wade Carter, B.A., and Ms. Mather, M.A., RPA on November 5 to 6, 2024. Pedestrian survey started at the eastern end of the Port of Morrow Project area and progressed westward. The eastern portion of the Port of Morrow property consists of unmaintained pasturelands that are covered in various grasses, numerous invasive weed species, antelope brush (*Purshia tridentata*), salsify (*Tragopogon dubius*), and bull thistle (*Cirsium vulgare*), with moderate to excellent surface visibility (50 to 75%). The central portion of the property is currently utilized as agricultural fields under irrigation pivots separated by dirt access roads; the fields were fallow at the time of survey but last grew corn. Surface visibility was excellent at 75 to 100%. The western portion of the property abuts industrial warehouses, and the area contains gravel and dirt access roads and parking areas mostly surrounding the periphery of the parcel. Also observed were a sediment borrowing area, pushed-up sediments and imported rip rap cobbles near the railroad, an onion dumping area, and a wetland surrounded in dense six-foot-tall summer cypress (*Kochia scoparia*). Surface visibility varied greatly throughout the western end of the Project area. Observed surface sediments consisted of brown fine sandy loam or imported gravel in areas of development (Mather 2024b).

In sum, three previously recorded historic sites are mapped within the Project, and five newly recorded historic resources were identified during survey, recorded as archaeological sites, and are described below.

4.2.1 Previously Recorded Sites within the Project

35UM497-Umatilla Cutoff Road

The historic Umatilla Cutoff Road first depicted on the 1875 General Land Office map is still visible across the broader landscape and crosses the current Project in five locations. The historic road averages about 18 feet wide and has deflated berms on both edges of its alignment and ruts are present in many sections (Gerrish 2016a; Ellsworth 2019b). Site

35UM497 was determined eligible for inclusion in the NRHP under Criterion A and D August 18, 2016, and November 27, 2019. It is a contributing element of the Oregon Trail and was a significant historic route for westward settlement. It is a well-preserved section of the 15.4-mile alternate cutoff route from Cottonwood Bend to Coyote/Boardman, Oregon. This portion of the historic road has been recorded on multiple historic maps and has been used up to modern times. It is a significant local and national resource that retains its integrity of location, design, setting, materials, feeling, and association (Cooper and Scott 2016:104).

Heavy equipment was driven over an area of the road segment prior to the cultural survey at the east end of the Project area, which resulted in a surface disturbance that left tread tracks and bare earth along a section of the historic road, noted at the end of January 2024. By May 2024, the winter rain and snow had tamped down the heavy equipment ruts so that they are no longer visible, and grasses have grown over the surface scars.

During the survey (Mather et al. 2024a), the five surveyed segments of site 35UM497 were found to be in the same condition as previously reported (Cooper and Scott 2016; Yorck et al. 2019). The slight disturbances noted in 2024 from heavy equipment activities near the historic road alignment do not affect the resources' eligibility under criteria A and D and site form 35UM497 has been updated with recent observations. Site 35UM497 will be flagged with a 15-meter (50-foot) buffer and avoided during the implementation of the current transmission line project.

Site 35UM497 exhibits qualities and direct associations that meet criteria for the NRHP, and the site continues to retain most aspects of integrity. Therefore, POWER recommends that the Umatilla Cutoff Road 35UM497 remain eligible for inclusion in the NRHP. The trail predates and is not associated with the Umatilla Chemical Depot Historic District (UCDHD).

35UM489-Historic Military Site

Site 35UM489, the UMCD Cantonment Site, is a diffuse scatter of military related historic archaeological features and artifacts associated with World War II (WWII) and Cold War era activities. The site was determined not eligible in 2015. The site boundary was previously determined by the fenced boundaries of the Cantonment Area and the mapped southern 335- to 475-foot margin of the site extends into the current Project (Stegner 2014; Stegner et al. 2015). Previously recorded features and artifacts within the Project boundary that were not relocated during survey consisted of a rock concentration [F12] and the remains of two concrete slab foundations [F17, 18], an empty wood ammunition box [A5] and a metal coffee can [A7]. Surface visibility was excellent at the time of survey and the sparse features and artifacts recorded within this portion of the site do not remain within the Project boundaries. Structures within the housing area at the southeast corner of the site were demolished in 1999 (Nolte et al. 2002: Appendix A, page 11-12). Based on Google Earth maps history, the site area within the Project boundary now located on Columbia Development Authority lands underwent clean-up and construction activities in 2021. The 35UM489 site form has been updated with the most recent site observations and the site boundary shifted 335 to 475 feet north. Oregon Military Department (OMD) has been made aware of the site disturbance and boundary shift. OMD acknowledged that they conducted clean-up within that area during installation of the new south boundary fence and a new water line and pump station around that time. POWER agrees that the small portion of the site observed during survey remain not eligible for NRHP listing and non-contributing to the UCDHD as no integrity remains.

Coyote Coulee

Coyote Coulee is a HPRCSIT traditionally used as a travel route, hunting location, and plant gathering area by the CTUIR that is considered eligible on the national and local level (Karson Engum 2016). The property is located within and surrounding an eight-mile-long remnant geological feature created by Missoula floodwaters. The Project overlaps Coyote Coulee in an area that has been impacted by the construction of two gravel roads, sewer utilities installations, a large chain-link fence, and several lines of railroad. No cultural materials were observed within the portion of Coyote Coulee that overlaps the Project.

A separate Visual Effects Analysis was conducted after pedestrian survey occurred to specifically assess the potential for visual adverse effects on Coyote Coulee that may arise from Project construction (Mather et al. 2024b). Contrast levels generated by the Project within the viewshed of Coyote Coulee will produce strong visual contrasts that are likely to dominate the viewshed of this resource. It is probable that views of Project elements would attract the attention of the typical viewer from the HPRCSIT and potentially begin to dominate views of the landscape to the east, west, and overhead substantially detracting from aspects of setting, feeling, and association that Coyote Coulee possesses, resulting in an adverse effect on the historic property (Mather et al. 2024b).

4.2.2 Newly Recorded Sites within the Project

The five newly recorded historic resources observed within the Project boundary during the POWER (Mather et al. 2024a) survey are all associated with WWII- and Cold War-era activities occurring within the interior boundaries of the former UOD. The former UOD property was chosen at the onset of WWII as one of the first Army ammunition supply depots and was vital to the support of armed forces and Seattle General Depot (Chance 2010:11,13). The location met several criteria, primarily because it was situated far from the coast yet was close to northwestern military posts, ports along the Columbia River, and the existing Union Pacific Railroad to facilitate the movement of shipments, and the area was sparsely populated which decreased risk in the event of an explosion (Hightower 1984:15). The former UOD, which changed names several times through its history, was important to supplying ammunitions and later chemical weapons from WWII through the Gulf War in the early 1990s until it was completely decommissioned, remaining chemical munitions were destroyed, and the facility closed in 2012 (Oregon National Guard 2018).

Jan-30-A-Airstrip

The historic mid-twentieth-century military airstrip site is an abandoned runway located in a topographically level area in the southeast corner of the original UOD. The eastern end of the paved tarmac is 65 feet west of the Project boundary. The airstrip measures 3,135 feet in length and trends east-west on a precise bearing of 81 degrees east. The airstrip is 60 feet wide. A 60 by 60-foot apron is present at the eastern end of the runway on the southern side, and a 160 by 160-foot apron is located at the center of the airstrip also on the southern side. The airstrip is serviced by two access roads extending from South Patrol Road north to the runway, and one service road connects to A-Block ammunition storage igloos located north of the airstrip.

Inventory and assessment in 2002 recorded the airstrip and a parking apron, stating they were built in 1941, and two fuel storage tanks and a loading apron were added in 1969; none were determined eligible for NRHP inclusion (Nolte et al. 2002:12, 58). The airstrip is not depicted on

the Map of Umatilla Ordnance Depot 1941, Rev. 1952 (Office of the Quartermaster General 1941) and therefore, formal construction postdates 1952. Historic aerial imagery in 1958 indicates the airstrip was, at that time, merely a cleared dirt runway that was formalized, paved, and an outbuilding was constructed at the southern-central portion of the runway sometime before 1963. No associated historic artifacts were identified during survey and the fuel tanks are gone. From 1963 through 1993, the airstrip is present on topographic maps, but is not mapped from 2011 onward, suggesting it was abandoned sometime between 1993 and 2011. The associated outbuilding on the south side of the airstrip was razed sometime between 1981 and 1994. The airstrip is still clearly visible on modern aerial images, but the tarmac surface is extremely cracked and weathered and has become overgrown with moss, grass, and brush. The United States Army Corps of Engineers (USACE; 2015:67) did not consider the two fuel tanks or loading apron during their inventory, but stated loss of integrity for the airstrip and parking apron and determined that they were non-contributing to the UCDHD.

The mid-twentieth century military airstrip is associated with UOD Cold War-era operations and the UCDHD and was important for the receiving of munitions, chemicals, and other cargo within the Depot (Criterion A). Records do not indicate that the airstrip is associated with historically significant individuals (Criterion B), nor does it display any attributes or distinct characteristics, or unique construction methods (Criterion C). The runway is not distinctive, and the physical remains of the airstrip site do not display potential to yield any additional data or information important to history (Criterion D). The airstrip retains integrity in location, but aspects of design, materials and workmanship have been compromised by the removal of associated outbuildings, the state of disrepair that the tarmac is in, and the amount of tar-patching occurring on the surface over the years. Original paint marks have also eroded away. Changes to the setting, feeling, and direct association of the runway occurred after the Depot was decommissioned and closed between the 1980s and 2012.

Site JAN-30-A is potentially eligible for NRHP inclusion due to its association with UOD Cold War-era military operations, but it was previously found to be a non-contributing resource to the UCDHD primarily due to loss of integrity that has not improved with the passage of time. Therefore, POWER agrees that the airstrip remain not eligible individually for inclusion in the NRHP or as a contributing resource to the UCDHD.

Jan-31-A-Refuse Scatter

The historic refuse scatter site is located adjacent to and north of an east-west trending segment of railroad tracks along the southern boundary of the former UOD property and measures approximately 360 feet east-west (110 meters) by 98.5 feet north-south (30 meters). An unnamed east-west trending gravel road bisects the debris scatter near the site's northern boundary, and the southern boundary of the site abuts the elevated railroad grade located east of the Classification Yard (Office of the Quartermaster General 1941). Identified cultural materials (n=310) consist of empty fuze-cans with a key provided for opening on the base used for arming incendiary chemical bombs, unlabeled key-strip opened cans that appear military-related and not for food storage, varnish and paint cans with multiple-friction lid closures, and numerous nondiagnostic metal fragments and metal straps. Only six artifacts, less than 2% of the site's total artifacts, are located within the Project boundaries: two nondiagnostic metal fragments and three straps, and one 7.5-inch tall by 6.5-inch diameter paint can with a multiple-friction closure (lid missing) are present on the north side of the unnamed gravel road. The remaining 304 identified artifacts were observed south of the unnamed road and outside the Project boundary.

The empty fuze-cans are seven inches tall by 2.75-inches in diameter and many are crushed and in an advanced state of decay. Of these canisters, 32 were identified with a maximum density of five per square meter. One canister retained a discernible label that reads (among other text) "FUZE M 1 S.Q.," "LOADED 6-53" and "REV. 3-7-52," suggesting some of the canisters date to the early 1950s. The M1 fuze was used during WWII and after for initiating an explosive or igniting train in incendiary six-pound chemical bombs. The fuze was screwed into the side of the nose of the M69 (E1), AN-M69, AN-M69A1, and M69X bombs that held either incendiary oil or napalm, or sulfur mustard or molasses residuum, a mustard stimulant (United States Navy Bomb Disposal 1945:109, 148-149; GSI North America 2018:27-28).

The observed key-strip cans measure 2.25 inches tall by 2.50 inches in diameter and feature a lid with a 0.625-inch diameter circular depression. Fifty-four of these were identified with most of them crushed and/or flattened.

Other identified cultural materials on the south side of the gravel road include a coffee can, 18 paint and varnish can lids, 100 key-strip can lids, one colorless shard of flat glass, three brown bottle glass fragments, six curved metal brackets with metal pins, 64 nondiagnostic metal straps of varying lengths, six two-inch galvanized metal squares with drilled holes, and 19 pieces of non-diagnostic scrap metal.

The refuse scatter consists of common and military related debris with diagnostic artifacts dating to the early to mid-1950s. Artifacts were observed at the ground surface or partially covered in surface sediments and the site appears to be a surface distribution. The range of artifacts represented in the assemblage suggests that the refuse scatter may have accumulated over the course of several cargo-unloading events that occurred along the railroad tracks and gravel road. It is difficult to say if or how the observed artifacts are otherwise associated due to the secondary nature of deposition at the site.

The historic debris scatter is potentially eligible for NRHP inclusion due to its broad association with UOD WWII-era and Cold War-era storage operations and the UCDHD during its time of significance (Criterion A), but it cannot be linked to particular individuals of importance (Criterion B). The site does not contain any engineered or constructed features, nor does it possess any artistic values (Criterion C). The assemblage represents utilitarian and military related debris from the early 1950s, and the M-1 fuze was a commonly used military weapon during WWII and the Cold War, and one of many known previously housed munitions at the Depot (Matt Diederich, personal communication, 2024). Other identified components are discarded mass-produced cans, canisters, and non-diagnostic scrap metals. Refuse data has been gathered and is detailed within the associated site form. The site is not likely to yield additional significant data to history or expand our knowledge of the operations, storage, or types of munitions stored at the UOD (Criterion D). The site is within a secondary deposition context and artifacts may have been further dispersed from their original distribution along the railroad tracks and gravel road over time by natural processes or with general use of the Depot. The site does not contain any constructed or engineered features and is therefore lacking elements of design and workmanship, and many of the site's materials have been crushed and/or are in a state of decay. Changes to the setting and feeling occurred after the Depot was decommissioned and closed between the 1980s and 2012, but association with the UOD and UCDHD remain.

Site JAN-31-A is potentially eligible for NRHP inclusion due to its broad association with UOD WWII and Cold War-era military operations and the UCDHD, but the site is lacking almost all aspects of integrity. Therefore, Power recommends that site JAN-31-A be determined not eligible individually for inclusion in the NRHP or as a contributing resource to the UCDHD.

Jan-31-B-Historic Concrete Foundation

The historic concrete building foundation is located between an unnamed gravel road and an east-west trending segment of railroad tracks that run along the southern boundary of the former UOD property. The foundation is approximately 20 feet south of the unnamed gravel road and 60 feet north of where the built railroad grade begins. The foundation is in ruins and measures approximately 35 feet east-west by 25 feet north-south. The foundation is made of cement and measures eight to 12 inches tall with rebar protruding from the remnants of the poured concrete foundational walls. The floors of the structure are also cemented, and six rooms in total are present. Moss has grown around the edges of the foundation, but the floors remain relatively clear. No historic artifacts were observed in the vicinity of the recorded foundation.

A post-mounted “Westinghouse Safety Switch” was present at the southwest corner of the foundation, and the structure may be related to the receiving and distribution of railcars into the UOD facility once they were diverted off the Union Pacific mainline. The structure foundation is located approximately 90 feet north of the railroad inspection pit (built 1943) and railroad scales (built 1941) buildings positioned along the tracks. The inspection pit was not inventoried by USACE and was demolished sometime between 2002 and 2015. The railroad scales building still stands and contributes to the UCDHD (USACE 2015:5). The concrete foundation is not depicted on the Map of Umatilla Ordnance Depot 1941, Rev. 1952 but is visible in the 1958 aerial imagery and therefore, construction occurred between 1952 and 1958 (Office of the Quartermaster General 1941). OMD was contacted to see if the structure was depicted on any maps in their collections, and it was not able to be further identified (Matt Diederich, personal communication, 2024). The structure was not inventoried during the two previous efforts within the UOD nor depicted on associated maps (Nolte et al. 2002; USACE 2015). Aerial imagery shows the above-foundation portion of the structure was razed by 1994.

The concrete foundation is potentially eligible for NRHP inclusion due to its association with UOD Cold War-era operations and the internal railroad system that was important for the receiving and transportation of munitions, chemicals, and other cargo within the Depot, and for association with the UCDHD during its period of significance (Criterion A). The foundation is not known to be associated with significant persons in our past (Criterion B). The foundation does not display attributes sufficient to indicate embodiment of the work of a particular master or guild, and specific artistic value is absent (Criterion C). The current survey effort gathered the remaining potential data from the foundation and the structural remains are not likely to yield additional information important to history (Criterion D). The foundation retains integrity in location, but most aspects of design and workmanship are not retained, changes to the setting and feeling occurred after the Depot was decommissioned and closed between the 1980s and 2012 and the railroad tracks were abandoned, but association with the UOD and UCDHD remain.

Site JAN-31-B is potentially eligible for NRHP inclusion under Criterion A due to its direct association with UOD Cold War-era operations and the UCDHD but the resource lacks almost all aspects of integrity due to its entire removal other than the remaining concrete foundation. Therefore, POWER recommends that the historic concrete foundation be determined not eligible individually for inclusion in the NRHP or as contributing to the UCDHD.

Jan-31-C-Historic Railroad

The railroad system located within the former UOD was constructed at the onset of WWII. A contour map of the UOD created on behalf of the installation's Construction Division (Office of the Quartermaster General 1941) and revised in 1952 clearly shows all rail lines including the switchyard and railcar storage yard (labeled Classification Yard) that cross the current Project area. The railroad system facilitated the loading and unloading of munitions, chemicals, and other cargo across the military facility. The internal railroad infrastructure, integral to the functioning of the former UOD, connected to the Union Pacific Railroad just southwest of the UOD administrative area and current Project boundary, and consisted of approximately 51 miles of railroad tracks (Chance 2010:8; Hightower 1984:15). The railroad system within UOD was not listed individually, but none of the structures or buildings inventoried within the Depot were found to be eligible (Nolte et al. 2002:6-2). Inventory later by USACE (2015:67) found the rail network to have integrity and be a contributing resource to the UCDHD.

An approximate 1.25-mile area (not cumulative track-length) of this railroad system was recorded during the POWER (Mather et al. 2024a) survey and is described east to west as it is recorded within the Project boundary. Two single-track spurs cross the Project boundary near the utility area extending northward beyond the survey boundary. The diversion from the Union Pacific railroad line entering the former UOD property is more than 100 feet outside of the Project boundary but occurred near the southwest corner of the Cantonment Area. A system of at least 17 interconnected east-to-west parallel tracks is present along the southern boundary of the former UOD that were used as a switchyard and railcar storage area. The northernmost seven lines of the railway switchyard are present within the Project boundary. The Map of the UOD labels this general switchyard and railcar storage area as "Classification Yard" (Office of the Quartermaster General 1941). Railcars and freight were distributed in this area either northward into the Depot or continued west to connect back into the Union Pacific line. Rail lines continuing into the UOD from the switchyard and the railcar storage areas coalesce into two mainlines that curve to the northwest. The two rail lines at the curve are atop elevated grades constructed via heavy equipment that extend roughly six meters (20 feet) above the current ground surface. The two mainlines coalesce north of the curves into a single railroad track. The north-south rail line recorded within the Project boundary was used to load and unload materials for ammunition storage igloos H-Block to the west and F-Block to the east. The rail line continues north out of the survey area. Concrete loading piers occur along this north-south segment. Loading Pier 16 exists 25 feet north of the Project area.

Overall, the railroad tracks are inoperable and many portions of the larger railroad system within the UOD have already been removed or destroyed by wildfire, but the built grades overall remain in good condition (Chance 2010:18). No dismantling or destruction was observed within the current survey area and the tracks are overgrown with shrubs, weeds, and grasses. Additionally, some hardware components are broken and/or missing.

The segments of recorded UOD railroad tracks are potentially eligible for NRHP inclusion due to their association with WWII-era and Cold War-era military operations and the UCDHD and were important for the receiving and transportsations of munitions, chemicals, and other cargo within the Depot (Criterion A). Construction of the railroad lines is not known to be associated with significant persons in the past (Criterion B) nor do they display characteristics of a type, period, or method of construction, embody the work of a master, or possess high artistic value (Criterion C). Much is already known regarding the history of the tracks. They are well depicted on historic maps and are standard in their construction form and materials and are not likely to yield additional information important to history (Criterion D). The railroad tracks lack some aspects of

integrity. The portion of tracks recorded maintain integrity in their construction location and overall design, but the setting has changed after the Depot was decommissioned and closed between the 1980s and 2012. The railroad lines operated for over 50 years and undoubtedly underwent unknown repairs, modifications to hardware, removal, and destruction that has compromised the integrity of original materials and workmanship, but the materials and workmanship of the built grade retain integrity. The feeling has changed or been lost since the closure of the Depot, the abandonment of the tracks, and their disconnection from the Union Pacific mainline, but their association as a contributing resource to the UCDHD remains.

Site JAN-31-C is eligible for NRHP inclusion due to its association with WWII-era and Cold War-era military operations and has been previously recorded as a contributing property to the UCDHD and maintains some aspects of integrity. A total of six transmission pole work areas for Route Alternatives A, B, and C are located within the built grades of the UOD railroad system. Therefore, POWER recommends that the Project will result in an adverse effect on the historic property if the resource cannot be avoided by Project redesign.

Feb-1-A-Ammunition Storage Igloos

The east-west row of ammunition storage igloos and Y-mounds designated J-Row of H-Block by the military are within the original UOD boundary and the UCDHD. All igloos were found to be eligible and contributing to the UCDHD (USACE 2015:12-67). A total of 10 ammunition storage igloos and eight Y-mounds were encountered within the Project boundary, which demarcates the northern edge of the overall H-Block. Map of Umatilla Ordnance Depot dated January 10, 1941, clearly shows the J-Row. From west to east the igloos are labeled H1633 to H1642 and the Y-mounds take the number of the igloo located to their west. The H-Block is approximately 4,265 feet (0.8 miles)/ 1.3 kilometer-squared in size, but only 3,674 feet (0.7 miles/1.12 kilometers) east-west by 125 feet north-south area of the northernmost edge of the H-Block falls within the current Project boundary. The southern ends of the recorded igloos and Y-mounds lie 35 feet outside of the current Project boundary and an unnamed paved road runs east-west along the northern ends of these ammunition igloos.

The UOD was dedicated on October 14, 1941, and charged with the mission of storage and processing of vehicles, storage, and issue of lend-lease, quartermaster supplies, ammunition, small arms, and components (Oregon National Guard 2018:56). The ammunition igloos were all constructed in 1941. J.A. Terteling & Sons, the primary construction company, poured 1,000 ammunition storage igloos in 119 days. Igloos were arranged in parallel rows and constructed in two standard sizes, 26.5 by 81 feet, or 26.5 by 61 feet, and were arched, steel-reinforced structures approximately 13 feet in height and covered with a layer of gravel to protect them from wind erosion (Nolte et al. 2002:2-2). The ammunition igloos recorded within the north end of H-Block measure 61 feet in length.

In 1945, the Depot constructed X-mounds and Y-mounds to accommodate the influx of ammunition at the end of WWII requiring outdoor storage prior to renovation or demolition. The 115 X-mounds included a flat, gravel-surfaced area measuring 40 by 140 feet, with or without a shelter erected over top, and were demolished by 1955 (Nolte et al. 2002:3-7). The 693 Y-mounds were laid out between the igloos and remain; they are flat, gravel-surfaced areas measuring 34 by 64 feet and surrounded by a seven-foot-high earthen barricade (Hightower 1984:20). The eight Y-mounds are recorded in between and are nearly equidistant from the igloos at 130 feet (40 meters) apart. No artifacts or other materials were observed during the survey associated with the H-Block ammunition storage igloos. The igloos were recorded as an archaeological site because they are no longer being used for their intended purpose, are no

longer being maintained or repaired, and have been left to be eroded and resorbed into the landscape.

The ammunition storage igloos and Y-mounds are eligible for NRHP inclusion due to their direct association with UOD WWII-era and Cold War-era operations, are contributing to the UCDHD, and were important for the safe staging and storage of ammunitions and other hazardous items during the period of their significance from 1941-1965 (Criterion A). The ammunition storage igloos are not associated with significant persons in the past (Criterion B) but are extremely unique in design and construction that reflects characteristics of a type, period, and method of construction specific to the storage of various munitions during WWII and after (Criterion C). The ammunition storage igloos and Y-mounds have been well-documented previously, are mapped and labeled on historic maps, and eight acres of igloos within the F-Block have been preserved within the Umatilla Ordnance Historic District located within Camp Rees to the north of the Project boundary (Oregon National Guard 2018). The northernmost row of ammunition storage igloos in H-Block are identical to many others and are not likely to yield additional information to history (Criterion D). The ammunition storage igloos and Y-mounds retain integrity in their location and design, with changes to the setting and feeling occurring after the Depot was decommissioned and closed between the 1980s and 2012. Integrity also appears to remain in materials and workmanship from the exterior, and the abandoned structures retain association with the UCDHD due to their direct connection to the storage of munitions within the former UOD.

Site FEB-1-A is eligible for inclusion in the NRHP under Criteria A and potentially C due to its direct association with WWII-era ammunition storage within the former UOD and UCDHD and for the unique construction style of the ammunition storage igloos, and the site retains most aspects of integrity. Therefore, POWER recommends that the ammunition storage igloos and Y-mounds remain eligible for inclusion in the NRHP and are contributing properties to the UCDHD. Structures and features of site FEB-1-A will be flagged with a 15-meter (50-foot) buffer and avoided during the implementation of the current Project.

4.3 Shovel Test Probe Results Summary

Subsurface testing within the UOD parcel occurred May 6 through 9, 2024, and testing across the Port of Morrow parcel occurred November 5 through 6, 2024. A total of 68 shovel test probes were excavating at the proposed power pole locations along an approximately six-mile segment of the proposed transmission line. This segment is defined by proposed transmission line routes within Columbia Development Authority lands. A total of 37 STPs were placed across the Port of Morrow Project area. Routes A and B within the Port of Morrow parcel are approximately 2.65 miles in length, and the segment of Route C measures 2.7 miles in length. Subsurface testing locations were placed within 100-foot by 100-foot disturbance areas centered on the proposed locations of powerline transmission poles. Shovel probe locations that fell within areas of a railroad grade and a quarry were not excavated due to the presence of fill or removal of upper horizon sediments.

A consistent profile was observed across the UOD that closely matches the Quincy loamy fine sand and Burbank loamy fine sand with gravelly substratum (USDA 2024). The typical observed subsurface profile consisted of an upper soil horizon to a depth of 5 to 10 centimeters (cm) of brown fine grained loamy sand with few subangular to rounded pebbles, grass rootlets, and a slightly higher percentage of organics within the soil matrix. From 10 to 50 to 80 cm below the ground surface (cmbs) a lower horizon of gray-brown fine sand with consistently increasing

subangular to rounded pebbles, gravels, and cobble inclusions towards the lower portion of the horizon was encountered, overlying an unconsolidated substratum of gray coarse-grained sands and gravels to a depth of at least 100 cmbs (Attachment S-3).

A relatively uniform subsurface profile was observed within the Port of Morrow parcel during subsurface testing that closely matched the expected Quincy loamy fine sand with slight variations in sediment textures (USDA 2024). The typical profile encountered consisted of a surface layer five to 10 centimeters thick of brown to dark brown fine grained sandy loam containing grass rootlets, duff and organics overlying a subsoil of brown, yellowish brown, to olive brown fine to medium grained sandy loam containing less than 5% rounded to subangular gravel, with gravel inclusions increasing with depth. Variations occurred within the agricultural pastures where a 40-centimeter-deep plow zone was observed that contained manure fertilizer and corn husk inclusions, and within the onion dumping area where the upper soil horizons have been bladed off and subsoils mixed with dumped materials during industrial operations (Attachment S-4).

Design changes subsequent to May 2024 shovel probe testing shifted the proposed structures from an average span of 600 feet to 810 feet apart. Shovel probe sampling results that were gathered prior to engineering redesigns were spaced evenly across the Project area, were found to be culturally sterile, and remain a valid representation of archaeological probability across the geomorphologically uniform landscape.

No historic or precontact sites, isolates or potentially historic properties were identified within any of the excavated shovel test probes, resulting in no changes to our previous pedestrian survey recommendations. Shovel probes placed across the Port of Morrow parcel were in the structure locations of the most current design.

4.4 Visual Analysis Results Summary

The Project Order requires that a one-mile buffer be used surrounding the Project Area to analyze visual effects and an eight-mile buffer was utilized for this analysis. Visual analysis fieldwork for the Project was conducted by POWER Archaeologists Camille Mather and Josh McNutt from May 7 to 9, 2024. Cultural Visual Resource Management Forms and digital photographs were completed for each KOP in relation to their associated cultural resource(s) (Mather et al. 2024b) (Attachment S-5).

Based on the results of the collective analyses, POWER finds that resources associated with five KOPs, including KOP 1 (*Ímatalam*), KOP 2 (*Tkúpa*), KOP 3 (*Táwaš*), KOP 4 (*Wanálpá*), KOP 5 (*Mísqalu*), KOP 6 (*Tapatúkas*), KOP 7 (*Twahaytkqitkawaswáakuł*), KOP 8 (*Wałúumkas*), and KOP 9 (*Kulkuliipa*) are unlikely to have their respective viewsheds impacted by the introduction of visible Project elements (i.e., transmission structures and lines). Data collected during field visits and Geographic Information System viewshed analysis results suggest that these resources will not have views of the Project.

Assessments from two KOPs, including KOP 10 (Coyote Coulee) and KOP 11 (Umatilla Cutoff Road) indicate that contrast levels generated by the Project within the viewsheds of these resources will generate strong visual contrasts that are likely to dominate their viewsheds within portions of the resources and substantially detract from aspects of setting, feeling, and association that these resources possess.

The proposed Project, with transmission tower heights ranging from 65 to 155 feet, will generate no visual contrast to nine KOP locations and have strong visual contrasts in the remaining two KOP locations. POWER recommends a finding of no historic properties affected for KOPs 1 to 9, and the Project is anticipated to have an adverse effect on KOP locations 10 and 11.

4.5 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:...

Eligible and recommended-eligible sites 35UM497 (Umatilla Cutoff Road) and Feb-1-A (ammunition storage igloos and Y-mounds) could potentially be disturbed during construction, and Project elements will have visual adverse effects to eligible Coyote Coulee and 35UM497 Umatilla Cutoff Road. The railroad system (Jan-31-C) will be altered, as designed, within six transmission pole work areas for Route Alternatives A, B, and C resulting in an adverse effect to the historic property if the resource cannot be avoided by Project redesign. Mitigation measures must be adopted to avoid these resources during construction and to mitigate adverse effects to 35UM497, Coyote Coulee, and Jan-31-C.

4.6 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;

Eligible sites 35UM497 (Umatilla Cutoff Road) and Feb-1-A (ammunition storage igloos and Y-mounds) will both be flagged and avoided during construction activities with a 15-meter (50-foot) buffer. All other adverse effects to eligible resources will require mitigation.

An inadvertent discovery plan (IDP) for cultural resources and human remains has been developed that includes provisions for work stoppage, to protect remains from public view and further disturbance, as well as instructions to all personnel to not take photos or speak to the media in regard to cultural resources. Personnel should be briefed on the plan before construction begins, and supervisors should ensure that they have updated contact information for UEC, tribes, the SHPO, the State Physical Anthropologist, the Legislative Commission on Indian Services, and the Oregon State Police.

5.0 PROPOSED MONITORING PLAN

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.

5.1 Archaeological and Human Remains Inadvertent Discovery Plan

This document outlines procedures and protocols to be followed if archaeological objects or features, or human remains are encountered during the work. All personnel will be briefed on procedures and reporting structures before the start of any work.

Umatilla-Morrow County Connect Project falls within the purview of Oregon State laws and regulations, including:

- Cultural resource laws ORS 358.905-961 and ORS 97.740-760 protect significant archaeological sites on all non-federal public (state, county, city) and private lands.

CONTENTS OF THIS DOCUMENT

- A. Procedures for Archaeological Features and Materials
- B. Procedures for Human Remains, Burials, Funerary Objects, Sacred Objects, and Objects of Cultural Patrimony
- C. Roles and Responsibilities
- D. Contact Information
- E. Confidentiality Statement
- F. Procedure Flow Chart
- G. Visual Reference Guide for Archaeology and Tribal Heritage Items

A. PROCEDURES FOR INADVERTENT DISCOVERY OF ARCHAEOLOGICAL FEATURES AND MATERIALS

(Does not include human remains, burials, funerary objects, objects of cultural patrimony, or spiritual objects.)

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

Step 1. Stop work (immediately after discovery)

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

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

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

Establish a minimum 30-meter/100-foot area of protection, or more as necessary, around the find(s). Exclude all vehicle traffic and non-essential foot traffic. Non-ground-disturbing work may

continue outside of the area of protection with caution until the situation is assessed by a qualified archaeologist.

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

Step 3. Notify (within first hour after discovery)

Notify the project manager, agency official (if applicable), and project archaeologist.

Project Manager contacted _____ (time) _____ (initials of contactor)*

Agency Official contacted _____ (time) _____ (initials of contactor)*

Project Archaeologist contacted _____ (time) _____ (initials of contactor)*

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

If the archaeologist determines the find is an archaeological feature or object, or other cultural item or feature, their guidance must be followed. SHPO, Native American Tribes, and project and agency personnel will determine in consultation how or if work may continue at the site. If the discovery is determined to not be archaeological or a cultural item, you may continue work. This determination should be confirmed in writing to the project manager and agency official.

SHPO contacted _____ (time) _____ (initials of contactor)*

Appropriate Native American Tribes _____ (time) _____ (initials of contactor)*

B. PROCEDURES FOR INADVERTENT DISCOVERY OF HUMAN REMAINS

(Includes human remains, burials, funerary objects, objects of cultural patrimony, and spiritual objects.)

It is expected that ALL potential human remains, burials, funerary objects, or objects of cultural patrimony that are identified will be reported and accounted for within three hours of discovery.

* Indicates standardized actions and minimum information that must be collected during an inadvertent discovery; a filled-in Inadvertent Discovery Plan is not required to be submitted to an agency.

It is understood that there will be a single project point of contact to coordinate with the project archaeologist, SHPO, LCIS, Oregon State Police (OSP) and appropriate Native American Tribes.

Step 1: Stop Work (immediately after discovery)

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

Step 2. Secure and Protect the Area (as soon as possible, within 10 minutes)

Secure and protect the area of inadvertent discovery with a minimum of 100-meter/300-foot buffer, or more as necessary. The location and other information about the find should be treated as confidential and shared on a need-to-know basis only. Prevent all vehicle traffic and

unauthorized foot traffic from entry. Block remains from view and protect them from damage or exposure without touching or disturbing the remains and leave them in place.

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

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

Step 3. Notify (within first hour after discovery) – See Contact List Below (Section D)

1. Project Manager _____ (time) _____ (initials)*
2. Agency Official _____ (time) _____ (initials)*
3. Oregon State Police
DO NOT CALL 911 (unless clearly modern) _____ (time) _____ (initials)*
4. State Historic Preservation Office (SHPO) _____ (time) _____ (initials)*
5. Commission on Indian Services (LCIS) _____ (time) _____ (initials)*
6. Appropriate Native American Tribes _____ (time) _____ (initials)*

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

Step 4. Follow Guidance (timeline variable, may be up to several days or more)

Even if the site is determined not to be a crime scene by the OSP, **do not move anything!** The remains will continue to be *secured in place* along with any associated funerary objects, and protected from weather, water runoff, and shielded from view. Follow all guidance provided by OSP, LCIS, SHPO, and appropriate Native American Tribes. The OSP will be responsible for contacting the county or state medical examiner's office as appropriate.

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

C. ROLES AND RESPONSIBILITIES

PERSON RESPONSIBLE	RESPONSIBILITY
Any subcontractors to UEC will...	Notify the UEC Project Manager Patrick Collins: (541) 561-5637

Patrick Collins: (541) 561-5637 will...	Notify the POWER Project Manager Derik Vowels: 503-892-6873
Derik Vowels: 503-892-6873 will...	Notify Tom Becker, Bonneville Power Administration: 503-230-4761 Notify Scott Hall, U.S. Army Corps of Engineers: 509-527-7274
Derik Vowels: 503-892-6873 will...	Notify the Archaeologist Camille Mather: 971-270-4220
Camille Mather: 971-270-4220 will...	Notify the State Agencies (OSP, LCIS, SHPO)
Camille Mather: 971-270-4220 will...	Notify the Native American Tribes identified by LCIS
Camille Mather: 971-270-4220 will...	Enforce the work stoppage and buffer

D. CONTACT INFORMATION

AGENCY	POSITION/CONTACT	CONTACT INFORMATION
Project Manager	Derik Vowels	503-892-6873
Agency Official	Tom Becker, Bonneville Power Administration Scott Hall, U.S. Army Corps of Engineers	503-230-4761 509-527-7274
Contracted Archaeologist	POWER Engineers Camille Mather	971-270-4220
Legislative Commission on Indian Services (LCIS)	Primary Contact: Dr. Elissa Bullion, State Physical Anthropologist Secondary Contact: LCIS Office	971-707-1372 503-986-1067
Oregon State Police (OSP)	Primary Contact: Sgt. Ryan Tague Secondary Contact: Dispatch, northern command ¹ Secondary Contact: Dispatch, southern command ²	541-576-4393 800-442-0776 800-442-2068
State Historic Preservation Office (SHPO)	Primary Contact: John Pouley, State Archaeologist Secondary Contact: Jamie French, Asst. State Archaeologist	503-480-9164 503-979-7580
Native American Tribes	Confederated Tribes of the Umatilla Indian Reservation Teara Farrow Ferman, Cultural Resources Program Manager	541-276-3447
	Confederated Tribes of the Warm Springs Reservation Bobby Brunoe, THPO & NAGPRA Coordinator	541-553-2026
	[Confederated Tribes and Bands of the Yakama Nation Kate Valdez, THPO	509-985-7596
	Nez Perce Tribe Nakia Williamson-Cloud, Cultural Resource Program Director	208-621-3850

¹Northern command: Benton, Clackamas, Clatsop, Columbia, Crook, Deschutes, Gilliam, Hood River, Jefferson, Klamath, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Sherman, Tillamook, Wasco, Washington, Wheeler, Yamhill

²Southern command: Baker, Coos, Curry, Douglas, Grant, Harney, Jackson, Josephine, parts of Klamath, Lake, Malheur, Morrow, Umatilla, Union, and Wallow

E. CONFIDENTIALITY

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

To protect fragile, vulnerable, or threatened sites, the National Historic Preservation Act, as amended (Section 304 [16 U.S.C. 470s-3]), and Oregon State law (ORS 192.345(11)) establishes that the location of archaeological sites, both on land and underwater, shall be confidential.

6.0 UEC PROPOSED SITE CERTIFICATE CONDITIONS

Cultural surveys will be completed on the remaining unsurveyed parcels within the proposed Project route when trespassing access and permit is obtained.

7.0 CONCLUSIONS

In accordance with the Structural Standard set forth by OAR 345-022-0020, Exhibit S includes the application information provided for in OAR 345-021-0010(1)(s). Based on the assessment of regional historic, cultural, and archaeological information contained herein, the risk of cultural resources being impacted by Project implementation is considered low. Furthermore, this Exhibit demonstrates the applicant can design, engineer, and construct the Project to avoid all known cultural resources in the analysis area.

8.0 COMPLIANCE CROSS REFERENCES

Table S-4 identifies the location within the application for site certificate of the information responsive to the application submittal requirements OAR 345-021-0010(1)(s), Table S-5 the Approval Standard at OAR 345-022-0090.

TABLE S-4 COMPLIANCE REQUIREMENTS AND RELEVANT CROSS-REFERENCES

REQUIREMENT	LOCATION
OAR 345-021-0010(1)(s)	
OAR 345-021-0010(1)(s) Information about historic, cultural and archaeological resources. 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 Exhibit S or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including:	Section 2.0
(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 and 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 paragraphs (A), (B) and (C);	Section 4.1
(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;	Section 4.2
(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; 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

TABLE S-5 APPROVAL STANDARD

REQUIREMENT	LOCATION
OAR 345-022-0090 Historic, Cultural and Archaeological Resources	
(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:	N/A
(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;	Sections 2.0 and 4.1
(b) For a facility on private land, 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;	Sections 2.0 and 4.2
(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).	Sections 2.0 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

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ATTACHMENT S-1 CULTURAL RESOURCES CLASS I DESKTOP REVIEW (CONFIDENTIAL)

Attachment S-1 contains confidential and privileged information and is being submitted under separate cover per ORS 192.345(11) and 192.355(4).

ATTACHMENT S-2 CULTURAL RESOURCES PEDESTRIAN SURVEY REPORT (CONFIDENTIAL)

Attachment S-2 contains confidential and privileged information and is being submitted under separate cover per ORS 192.345(11) and 192.355(4).

**ATTACHMENT S-3 SHOVEL PROBE ADDENDUM LETTER REPORT
(CONFIDENTIAL)**

Attachment S-3 contains confidential and privileged information and is being submitted under separate cover per ORS 192.345(11) and 192.355(4).

ATTACHMENT S-4 PORT OF MORROW SURVEY AND TESTING REPORT (CONFIDENTIAL)

Attachment S-4 contains confidential and privileged information and is being submitted under separate cover per ORS 192.345(11) and 192.355(4).

ATTACHMENT S-5 VISUAL EFFECTS ANALYSIS REPORT (CONFIDENTIAL)

Attachment S-5 contains confidential and privileged information and is being submitted under separate cover per ORS 192.345(11) and 192.355(4).

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