

Exhibit S

Historic, Cultural, and Archaeological Resources

**West End Solar Project
September 2022**

**Prepared for
EE West End Solar LLC**

Prepared by



Tetra Tech, Inc.

This page intentionally left blank

Table of Contents

1.0 Introduction..... 1

2.0 Analysis Area..... 1

3.0 Cultural Resources Inventory – OAR 345-021-0010(1)(s)(A) through (C) 2

 3.1 Cultural Resources Inventory Methodology 3

 3.1.1 Records Review..... 3

 3.1.2 Field Surveys 4

 3.1.3 Native American Consultations 4

 3.2 Cultural Resources Inventory Results 4

 3.2.1 Records Review..... 5

 3.2.2 Field Surveys 7

 3.3 Cultural Resources Subject to EFSC Standards..... 8

 3.3.1 Historic and Cultural Resources Listed, or Likely Eligible for Listing, on the National Register of Historic Places (OAR 345-021-0010(1)(s)(A)) 11

 3.3.2 Archaeological Objects and Sites on Private Lands within the Analysis Area (OAR 345-021-0010(1)(s)(B)) 11

 3.3.3 Archaeological Sites on Public Lands within the Analysis Area (OAR 345-021-0010(1)(s)(C)) 12

4.0 Significant Potential Impacts of Construction and Operation, and Retirement of the Facility on Historic, Cultural, and Archaeological Resources – OAR 345-021-0010(1)(s)(D)..... 12

 4.1 Avoidance and Mitigation of Potential Impacts..... 12

 4.2 Measures Designed to Prevent the Destruction of Historic, Cultural, and Archaeological Resources..... 14

5.0 Proposed Monitoring Plan – OAR 345-021-0010(1)(s)(E)..... 14

6.0 Conclusion 14

7.0 References 14

List of Tables

Table S-1. Previously Conducted Surveys within the Project Study Area..... 5
Table S-2. Previously Recorded or Noted Cultural Resources within Study Area..... 6
Table S-3. Reviewed Historic Maps and Aerial Photographs of the Analysis Area 7
Table S-4. Cultural Resources Identified in the Analysis Area..... 9
Table S-5. Historic and Cultural Resources Likely Eligible or Listed on the NRHP within the Analysis Area 11
Table S-6. Archaeological Sites on Private Land within the Analysis Area 11
Table S-7. Cultural Resources Management Recommendations 13

List of Figures

Figure S-1. Cultural Resource Analysis and Survey Area
Figure S-2. Cultural Resource Locations within Site Boundary **(Confidential-provided under separate cover)**

List of Attachments

Attachment S-1. Cultural Resources Inventory and Evaluation Report **(Confidential-provided under separate cover)**
Attachment S-2. Historic Properties Inventory Report
Attachment S-3. Inadvertent Discovery Plan

Acronyms and Abbreviations

Applicant	EE West End Solar LLC
BPA	Bonneville Power Administration
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
EFSC	Energy Facility Siting Council
GLO	General Land Office
kV	kilovolt
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
Project	West End Solar Project
SHPO	State Historic Preservation Office
Tetra Tech	Tetra Tech, Inc.

This page intentionally left blank

1.0 Introduction

EE West End Solar LLC (Applicant), a subsidiary of Eurus Energy America Corporation, proposes to construct the West End Solar Project (Project), a solar energy generation facility and related or supporting facilities in Umatilla County, Oregon. Exhibit S was prepared to meet the submittal requirements in Oregon Administrative Rules (OAR) 345-021-0010(1)(s).

Exhibit S provides information on the historic, cultural, and archaeological resources that may potentially be impacted by the Project. The information in Exhibit S demonstrates that the Project will comply with the Oregon Energy Facility Siting Council's (EFSC) Historic, Cultural, and Archaeological Resources Standard, OAR 345-022-0090. The exhibit shows that the construction and operation of the Project, taking into account mitigation, is unlikely to result in significant adverse impacts to historic and cultural resources that are listed or eligible for listing on the National Register of Historic Places (NRHP; historic properties); archaeological objects on private lands; or archaeological sites on private or state lands.

The Project will be within the approximately 324-acre Site Boundary which is also the micrositing corridor. The solar array will be up to 16 feet tall (at full tilt) and will include up to approximately 180,000 solar modules, depending on the final technology and layout selected. Strings of solar modules will be supported by tracker systems that in turn will be supported by steel posts, typically installed 4 to 8 feet into the ground. The Project will interconnect to the regional grid via either the existing Bonneville Power Administration's (BPA) McNary to Roundup 230-kilovolt (kV) line or the PacifiCorp's Pendleton to Hermiston 69-kv line (both run southeast to northwest through the Site Boundary) or the Umatilla Electric Cooperative 115-kv line that parallels the eastern edge of the Site Boundary. Other Project components include electrical collection lines, an energy storage system, site access roads, one collection substation (with structures up to 30 feet tall), one switchyard substation, one operations and maintenance enclosure (up to 20 feet tall), temporary staging areas, and an 10-foot perimeter fence. These facilities are all described in greater detail in Exhibit B.

Information concerning the location of archaeological sites or objects is exempt from public disclosure under Oregon Revised Statute (ORS) 192.501(11). Therefore, such information, including archaeological survey reports, is provided confidentially to the Oregon Department of Energy (ODOE).

2.0 Analysis Area

The Analysis Area for Exhibit S includes all cultural resource survey corridors within the Project Site Boundary (as described in Exhibit B). The Analysis Area encompasses the surfaces that may be disturbed by construction and operation within the Project Site Boundary. The Analysis Area is depicted on Figure S-1.

3.0 Cultural Resources Inventory – OAR 345-021-0010(1)(s)(A) through (C)

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

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 NRHP;

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;

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

Subsection (1) of the Historic, Cultural, and Archaeological Resources Standard at OAR 345-022-0090(1) provides the Applicant must demonstrate that the construction and operation of the Project, taking into account mitigation, is unlikely to result in significant adverse impacts to identified resources. Note that under Section (2) of this standard, EFSC is not required to make a finding that the Project complies with OAR 345-022-0090(1). Nonetheless, the Applicant provides evidence here that the standard is met.

OAR 345-022-0090

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

- a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;*
- b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and*
- c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).*

(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.

“Archaeological site” is defined at ORS 358.905(1)(c) as a geographic locality in Oregon, including but not limited to submerged and submersible lands and the bed of the sea within the state’s jurisdiction, that contains archaeological objects and the contextual associations of the archaeological objects with: (i) each other; or (ii) biotic or geological remains or deposits. Examples of archaeological sites by this definition include, but are not limited to, shipwrecks, lithic quarries, house pit villages, camps, burials, lithic scatters, homesteads, and townsites.

“Archaeological objects” are defined at ORS 358.905(1)(a) as an object that: (A) is at least 75 years old; (B) is part of the physical record of an indigenous or other culture found in the state or waters of the state; and (C) 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. For the purposes of this analysis, isolated finds are considered archaeological objects.

3.1 Cultural Resources Inventory Methodology

The effort to complete the Applicant’s cultural resources inventory is guided by four main goals aimed at ensuring compliance with the EFSC standards. These goals include (1) identification of cultural resources within the Analysis Area (as defined in Section 2); (2) interpretation of those identified resources within a regional context; (3) evaluation of identified resources for protection under the Cultural Resources standards (OAR 345-022-0090); and (4) assessment of potential Project impacts on protected resources. In addition to tribal coordination, the Applicant has completed one primary study of cultural resources within the proposed Site Boundary (Analysis Area): a pedestrian cultural resources survey by Tetra Tech, Inc. (Tetra Tech; Attachment S-1). This study included the entirety of the Analysis Area. A description of the discovery measures, such as the survey and inventories, that the Applicant has undertaken is described in detail in the sections below. The cultural resources survey report is a confidential document that is exempt from public disclosure under ORS 192.501(11) and is provided separately as Attachment S-1.

3.1.1 Records Review

Tetra Tech conducted a records search that focused on the overall Project Analysis Area and a 1-mile buffer (Study Area; see Section 3.2.1). Data was derived from the files and databases of the State Historic Preservation Office (SHPO; e.g., Oregon Archaeological Records Remote Access and Oregon Historic Sites Database), and historic maps and aerial photographs. In addition to these sources, input from the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) was also considered. Efforts focused on collecting information concerning previously recorded cultural resources within the Study Area, as well as previously conducted surveys within this area.

To adequately evaluate potential indirect impacts to the setting (e.g. visual/audial) of historic, built environment resources from the proposed facility, Tetra Tech conducted a desktop review to identify historic buildings within the Study Area. This desktop review included review of aerial photographs, SHPO Historic Sites database, review of the Umatilla County Tax Assessor website to determine the age of buildings, and review of historic maps to identify previous and current

ownership of each parcel. These included the General Land Office cadastral maps, the 1914 Ogle map, and the 1934 Metsker map. A total of eight tax parcels were identified as containing historic buildings.

3.1.2 Field Surveys

Tetra Tech conducted a “non-collection” Phase I pedestrian survey of the Analysis Area/Site Boundary totaling 324 acres between April 6 and 10, 2020. Given the extensive prior disturbance by agricultural activities within the Analysis Area and the depositional environment of the soils present (see confidential Attachment S-1), the potential for subsurface resources within the Analysis Area is considered low. Results of prior surveys in the Study Area and the very low density of previously recorded archaeological resources in the Study Area support this (see Section 3.2.1). As such, no subsurface probing during the survey was warranted.

The inventory was conducted in accordance with state standards for Oregon by Tetra Tech’s professional archaeologists, under the supervision of a Principal Investigator who meets the Secretary of Interior Standards.

Crews walked and observed the ground, spread out in line at 20-meter intervals (i.e., transects), working under the guidance of the Field Director. Ground surface visibility varied between fair (greater than 30 percent) and excellent (greater than 75 percent) throughout the Analysis Area. Weather conditions during surveys were warm to very warm and dry. Spatial control was maintained through the use of 1:24,000 scale maps and Global Positioning System units with sub-meter accuracy. The Field Director completed daily field notes, documenting beginning and ending survey locations, environmental conditions, findings, and any issues concerning landowners and health and safety. No part of the Analysis Area was inaccessible.

Specific to the historic properties inventory survey, Tetra Tech conducted a field survey in April 2022 of the tax parcels identified in the desktop review as having historic buildings. All fieldwork was conducted from the public right-of-way. The resources were photographed and recorded on photograph logs. Documentation included photographic documentation of at least one elevation, a physical description, and a concise statement of significance relative to the building’s eligibility for listing on the NRHP (36 CFR Part 60.4).

3.1.3 Native American Consultations

A meeting between the Applicant and CTUIR staff (natural and cultural resources) occurred on October 19, 2020 to introduce the Project. The Project Site Boundary was provided to CTUIR on November 11, 2020. A draft copy of the survey report (Attachment S-1) was provided to CTUIR for review and comment on May 12, 2021. Other tribes have not expressed interest in the Project.

3.2 Cultural Resources Inventory Results

The following sections describe results of the records reviews and the cultural resources pedestrian survey conducted within the Study Area. The cultural resources pedestrian surveys of the Analysis

Area are included as confidential Attachment S-1 and the resource locations are included in confidential Figure S-2.

3.2.1 Records Review

The databases reviewed as part of the records search revealed that the entirety of the Project Analysis Area had been previously surveyed for cultural resources prior to the field surveys conducted for the Project. Additionally, a majority of the surrounding 1-mile area around the Project Site Boundary had been surveyed as well. Table S-1 summarizes the previous survey coverage of the Study Area. All portions of the Project Site Boundary that were previously surveyed were surveyed again in 2020 and are included in the report provided as confidential Attachment S-1.

Table S-1. Previously Conducted Surveys within the Project Study Area

Survey No.	Author(s) & Affiliation	Year	Report Title	Nearest Distance to Analysis Area
N/A	Unknown	Unknown (pre-2021) ¹	Unknown	Adjacent to western boundary
344	David R. Brauner, PhD (Oregon State University)	1977	Letter to SHPO re: Surface Reconnaissance for the Replacement Stanfield Sewage Treatment Plant	In (covers entirety of Analysis Area)
653	Julia A. Follansbee and Ellen B. Mays (Consultants for BPA)	1979	<i>A Preliminary Cultural Resource Overview for the Brownlee - Slatt and Buckley - Malin Corridors, Oregon</i>	In (passes northwest-southeast through Analysis Area)
3406	R. M. Pettigrew (Oregon State Museum of Anthropology, University of Oregon)	1981	Letter Report: Report on the Archaeological Survey of the Proposed Improvements of the Hermiston-Stanfield North City Limits Section, US Highway 395, Umatilla County	0.9-mile southwest of southwest corner
14776	Albert C. Oetting (Heritage Research Associates)	1993	<i>Cultural Resources Survey of Facilities for the Hermiston Power Project, Umatilla County, Oregon</i>	In (passes northwest-southeast through Analysis Area)
17251	Julie Schablitsky, Judith S. Chapman, Matt F. Goodwin, Terry L. Ozbun, and John L. Fagan (Archaeological Investigations Northwest, Inc.)	2000	<i>Cultural Resources Survey of Route Modifications and Shovel Testing of Sites for Level 3's Proposed Fiber Optic Line from Seattle to Boise: Northeast Oregon Reroutes</i>	0.9-mile southwest of southwest corner
18805	Kirsten J. Anderson (Oregon Department of Transportation)	2004	<i>Archaeology Survey Report US 395: SE 4th St (Hermiston) - I 84 Umatilla-Stanfield Highway, Umatilla County</i>	0.9-mile southwest of southwest corner

Survey No.	Author(s) & Affiliation	Year	Report Title	Nearest Distance to Analysis Area
29885	Pamela McKenney, Stephen Emerson, and Stan Gough (Archaeological and Historical Services, Eastern Washington University)	2009	<i>A Cultural Resources Survey of Bonneville Power Administration's Tri-Cities District FY09 Wood Pole Replacement Project, Benton, Franklin, and Walla Walla Counties, Washington, Umatilla County, Oregon</i>	0.2-mile northwest of northwest corner
28066	Melissa Teoh (Consultant for BPA)	2016	<i>Cultural Resources Survey for 2016 Pasco District Wood Pole Replacement Project in Umatilla County, Oregon</i>	0.9-mile northwest of northwest corner
1. Although this survey is mapped in the Oregon Archaeological Records Remote Access, the database does not provide any detailed information about it or the associated survey report.				

Two previously recorded cultural resources were identified by the records review as within the Study Area, both of which are within approximately 0.5-miles of the Analysis Area. These resources are listed in Table S-2.

Table S-2. Previously Recorded or Noted Cultural Resources within Study Area

Resource ID	Resource Description	Resource Type	NRHP-Eligibility	Nearest Distance to Analysis Area
HPP-H-2	Historic Refuse Scatter	Archaeological Site	Unevaluated	0.5-mile south of southwest corner
35UM 00399	Historic Irrigation Ditch ("Furnish Ditch")	Historic Site ¹	Unevaluated (possibly eligible under NRHP Criteria A-C)	0.5-mile northwest of the northwest corner
1. Although the historic Furnish Ditch is listed in Oregon Archaeological Records Remote Access and has been assigned a State trinomial number for an archaeological site, it is a functioning irrigation ditch. SHPO considers functioning historic irrigation ditches to be historic sites, not archaeological sites (SHPO 2016: Appendix C). As such, it is presented here as a historic site.				

Table S-3 summarizes the historic maps and aerial photographs of the Analysis Area that were reviewed. Review of U.S. General Land Office (GLO) plats for found that that the two existing transmission lines that pass through the Analysis Area, BPA's McNary to Roundup 230-kV line and PacifiCorp's Pendleton to Hermiston 69-kV line, are historic alignments. Both lines appear on the earliest reviewed historic aerial photograph (1952), but did not appear on the preceding 1908 U.S. Geological Survey Umatilla 1:125,000 quadrangle. Other than agriculture, no other activities in or near the Analysis Area were observed in the reviewed maps and photographs.

Table S-3. Reviewed Historic Maps and Aerial Photographs of the Analysis Area

Description	Year
GLO Plats	
Township 4 North/Range 29 East	1861
U.S. Geological Survey Quadrangles	
Umatilla 1:125,000	1908
Pendleton 1:250,000	1953
Stanfield 1:24,000	1962
Hermiston 1:100,000	1984
Stanfield 1:24,000	1993
Metsker Maps	
Umatilla County 1:62,500	1932 and 1934
Geo. A. Ogle & Company	
Umatilla County 1:125,000	1914
Aerial Photographs (U.S. Geological Survey Earth Explorer)	
<ul style="list-style-type: none"> • 1952 • 1958 • 1970 • 1977 	

Specific to the historic properties inventory survey, a comprehensive study of each property was completed to evaluate the significance of each building for listing on the NRHP. Archival sources such as historic maps and historic newspapers were reviewed online to develop a chain of title for the property and identify whether the properties are associated with an important individual or event in local, state, or national history. In addition, local libraries were visited. Tetra Tech also evaluated the viewshed of each property based on its distance to the project and the topography between the property and the Project. No documented properties were found to be potentially eligible for NRHP. See the attached Historic Properties Inventory Report (Attachment S-2) for a detailed evaluation of each property.

3.2.2 Field Surveys

As described above in Section 3.2.1, the entire Analysis Area has been surveyed for cultural resources (Figure S-1). Tetra Tech identified a total of three cultural resources within the Analysis Area: one archaeological site and two historic structures (transmission lines) (Attachment S-1). Of these resources, both historic structures have been reviewed and determined by Tetra Tech to be potentially eligible for or listed on the NRHP. However, NRHP-eligibility recommendations for these resources may be revised in response to SHPO’s comments on the draft of Attachment S-1. The

NRHP-eligibility recommendations made in Attachment S-1 are used to determine applicable EFSC siting standards and evaluate potential project impacts.

Both historic structures are transmission lines: the BPA McNary to Roundup 230-kv Transmission line and the Pendleton to Hermiston 69-kv Transmission Line. Both lines were included in the preliminary records search as a known historic utility corridors observed on historic cartographic references (see Section 3.2.1). No artifacts were observed to be associated with either transmission line corridor. The BPA McNary line was constructed in 1952 and the Pendleton line was constructed in 1941. Both lines are still operational and were recommended as eligible for listing in the NRHP under Criterion A for their significant association with early rural electrification in eastern Oregon. Neither line was recommended for listing in the NRHP under criteria B through D. See confidential Attachment S-1 for further details.

Archaeological site EWE-BB-01 consists of a historic refuse scatter including two abandoned vehicles and two artifact concentrations (see confidential Attachment S-1 for further detail). The vehicles are both early twentieth century disarticulated vehicles without diagnostic markings or tags. The two artifact concentrations are comprised nearly entirely of domestic and automotive cans. The site represents household and auto-related artifacts typical of debris scatters from regional farming communities discarded during the early to late twentieth century. The site was not recommended for listing in the NRHP under any criteria.

Subsurface probing was deemed unwarranted due to the extensive agricultural disturbance within the Analysis Area and the depositional environment of the soils present (see confidential Attachment S-1), and the potential for subsurface resources within the Analysis Area is considered low. Further, good ground visibility was experienced during the survey. Results of prior surveys in the Study Area and the very low density of previously recorded archaeological resources in the Study Area also support this (see Section 3.2.1).

Specific to the historic properties inventory survey, a total of eight tax parcels containing historic buildings were investigated in the field and resources were photographed and recorded on photograph logs. Each of the properties and the buildings that were visible from the public right-of-way are described in the attached Historic Properties Inventory Report (Attachment S-2).

3.3 Cultural Resources Subject to EFSC Standards

The following sections discuss those resources that are subject to the siting standards outlined at the beginning of this section: historic properties, archaeological sites on private or state lands, and archaeological objects (i.e., isolated finds) on private lands. (The entirety of the Analysis Area is on private lands; therefore, Standard C regarding public lands is not applicable.) Table S-4 lists the cultural resources identified by the field surveys as occurring within the Analysis Area. The table also demonstrates the extent of direct avoidance of identified resources by the Project.

Table S-4. Cultural Resources Identified in the Analysis Area

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	Project Effect	Applicable EFSC Siting Standard
Archaeological Sites						
TBD	EWE-BB-01	Historic	Historic Refuse Scatter	Not Eligible	Solar arrays will be placed in the site area. No significant impacts anticipated due to the NRHP ineligibility status.	b) Archaeological site on private land.
Historic Sites/Historic Built Environment						
BPA McNary to Roundup 230-kV Transmission Line	N/A	Historic	Historic Utility Line	Eligible	Direct impacts avoided if line is not selected for interconnection. If selected for interconnection, the effect is not expected to be significant as it will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. Note that development of the Project beneath the lines and around the structures would not be considered a significant impact.	a) Potential Historic Property; property likely to be listed on NRHP
Pendleton to Hermiston 69-kV Transmission Line	N/A	Historic	Historic Utility Line	Eligible	Direct impacts avoided if line is not selected for interconnection. If selected for interconnection, the effect is not expected to be significant as it will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. Note that development of the Project beneath the lines and around the structures would not be considered a significant impact.	a) Potential Historic Property; property likely to be listed on NRHP

This page intentionally left blank

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

The identification efforts described above have identified two historic sites that are recommended to be NRHP-eligible or listed. Table S-5 lists the known historic and cultural resources listed that are likely eligible for listing or listed on the NRHP within the Analysis Area (see also Table S-4 and Attachment S-1). Locations of these resources are illustrated in confidential Figure S-2 and confidential Attachment S-1. Additional historic properties or potential historic properties are not likely to occur in the Analysis Area due to the low resource density and expansive survey coverage in the records search Study Area, the extensive agricultural disturbance of the Analysis Area since at least 1952, and the soils profiles documented as within the Analysis Area. The historic properties inventory survey (see Attachment S-2) found that none of the documented historic buildings within the Analysis Area were found to be potentially eligible for NRHP. Therefore, there will be no direct or indirect impacts to historic built environment resources potentially eligible for NRHP as a result of Project construction, operation, or maintenance.

Table S-5. Historic and Cultural Resources Likely Eligible or Listed on the NRHP within the Analysis Area

Resource	Resource Type
BPA McNary to Roundup 230-kV Transmission Line	Historic Site
Pendleton to Hermiston 69-kV Transmission Line	Historic Site

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

The efforts described above have identified one archaeological site on private land. Table S-6 lists the known archaeological site on private lands within the Analysis Area. (Additional details of this resource can be obtained in Table S-4 above or in confidential Attachment S-1.) The location of this resource is illustrated in confidential Figure S-2 and confidential Attachment S-1. Additional archaeological objects or sites are not likely to occur in the Analysis Area due to the low resource density and expansive survey coverage in the records search Study Area, the extensive agricultural disturbance of the Analysis Area since at least 1952, and the soils profiles documented as within the Analysis Area.

Table S-6. Archaeological Sites on Private Land within the Analysis Area

Resource	NRHP Recommendation
EWE-BB-01	Not Eligible

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

There are no public lands within the Analysis Area.

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

4.1 Avoidance and Mitigation of Potential Impacts

ORS 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:

(i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the SHPO or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying and assessing the significance of resources listed in paragraphs (A), (B) and (C);

(ii) The results of the discovery measures described in subparagraph (i), together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended;

(iii) A list of measures to prevent destruction of the resources identified during surveys, inventories and subsurface testing referred to in subparagraph (i) or discovered during construction;

The Project, taking into account mitigation, has been designed to avoid significant impacts on historic, cultural, and archaeological resources identified within the Analysis Area. The transmission line historic sites in the Analysis Area have been avoided through Project design, wherein the associated structures of the lines have been avoided (see Tables S-4 and S-7). The one identified archaeological resource (EWE-BB-01) will not be avoided, however this impact is not considered a significant impact given the site's NRHP-ineligibility. Implementation of the Inadvertent Discovery Plan (Attachment S-3) will prevent significant impacts from occurring in the event of an unanticipated discovery of additional cultural resources during construction.

Table S-7. Cultural Resources Management Recommendations

Recommendation	Description
Avoidance of Significant and Potentially Significant Resources in Final Design	Disturbance areas in the final design will avoid resources that have been recommended as NRHP-eligible, assuming the resources are not selected for interconnection purposes (BPA McNary to Roundup 230-kv Transmission Line and the Pendleton to Hermiston 69-kv Transmission Line). Avoidance includes developing outside of the right-of-way, with the exception of access roads. If avoidance is infeasible, the Applicant will enter consultations with SHPO and the owning company (BPA and/or PacifiCorp) to determine appropriate mitigation for significant impacts.
Implement Inadvertent Discovery Plan	A plan outlining the procedures for inadvertent discoveries during construction has been drafted and is being reviewed by CTUIR as part of their review of Attachment S-1. It is included in confidential Attachment S-1 as Appendix B as well as in Attachment S-3. The plan includes minimum avoidance buffers/markers around cultural resources, construction monitoring requirements, and procedures to follow in the unlikely event of a discovery of an archaeological resource during construction. It will be updated as necessary following by CTUIR.
Continued Coordination with Native Americans	The Applicant will continue their coordination and open communications with the CTUIR and other interested tribes throughout the Project to avoid impacting cultural resources. Tribal coordination will occur outside of the EFSC process.

Based on the current Project design, the Project may interconnect to one of the two NRHP-eligible transmission line resources. Right-of-way corridor avoidance (except for access roads) is recommended if the transmission lines are not selected for interconnection. If either of the lines are selected for interconnection, the impact of the interconnection would be assessed separately and in consultation with the owning company (BPA or PacifiCorp). However, for both lines, an interconnect is not expected to result in a significant impact. An interconnection will be consistent with maintenance and upkeep that allow for the continued successful transmission of electricity, the purpose of the line. This use is expressly allowed for in BPA’s Pacific Northwest Transmission System multiple property resource (Kramer 2012). Note that development under the lines and around their associated utility pole structures will not cause significant impacts to the resources. The sites will be flagged for avoidance during construction to ensure significant impacts are avoided. These actions along with the measures listed in Table S-7 will prevent significant impacts to this resource.

The single identified resource meeting siting standard B (archaeological site on private land will not be avoided (see Table S-4). Based on the current Project design, solar arrays are planned for the area of the EWE-BB-01 resource. The resource has been recommended as not eligible for listing on the NRHP. Any impacts to the site are considered not significant given its NRHP-ineligibility recommendation. The recording and research of this resource, as documented in confidential Attachment S-1, have mitigated any potential significant impact that would occur.

4.2 Measures Designed to Prevent the Destruction of Historic, Cultural, and Archaeological Resources

As noted above, the Project has been designed to avoid significant impacts to cultural resources where feasible. Several measures to prevent the destruction of historic, cultural, and archaeological resources have been identified by the Applicant. These are outlined in Table S-7 and are described in confidential Attachment S-1.

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

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

Construction monitoring is not recommended for the proposed Project, due to the generally low potential for unidentified cultural resources in the Analysis Area. As stated above, an Inadvertent Discovery Plan for the Project is being drafted in coordination with the CTUIR (draft included in Appendix B of confidential Attachment S-1 and in Attachment S-3). Avoidance measures in combination with the Inadvertent Discovery Plan will be implemented to ensure that the potential for significant impacts on cultural resources is minimized.

6.0 Conclusion

Based on the evidence presented in this exhibit, in accordance with OAR 345-022-0090, EFSC may find that the construction, operation, and retirement of the Project, taking into account mitigation, are not likely to result in significant adverse impacts to historic, cultural, or archaeological resources that are eligible or potentially eligible for listing on the NRHP.

7.0 References

- Kramer, George. 2012. Bonneville Power Administration [BPA] Pacific Northwest Transmission System. U.S. Department of the Interior. National Parks Service. National Register of Historic Places Multiple Property Documentation Form.
- SHPO (Oregon State Historic Preservation Office). 2016. *Guidelines for Conducting Field Archaeology in Oregon*. November 2013, Minor Revision January 2016. Oregon State Historic Preservation Office, Salem, Oregon.

Figures

(Note that Figure S-2 is confidential and provided under separate cover.)

This page intentionally left blank

**Attachment S-1. Cultural Resources
Inventory and Evaluation Report**
(Confidential, provided under separate cover.)

This page intentionally left blank.

Attachment S-2. Historic Properties Inventory Report

This page intentionally left blank.

Attachment S-3. Inadvertent Discovery Plan

This page intentionally left blank.