

Preliminary Application for Site Certificate for the Speedway Energy Facility

Exhibit J. Historic, Cultural, and Archaeological Resources

**Submitted to
Oregon Energy Facility Siting Council**

Prepared for



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Prepared by



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Attachment J-1. Cultural Resources Inventory and Evaluation Report (Confidential–provided under separate cover)
Attachment J-2. Cultural Resource Locations Mapset (Confidential–provided under separate cover)
Attachment J-3. Preliminary Draft Inadvertent Discovery Plan (IDP)

Acronyms and Abbreviations

Acronym/Abbreviation	Definition
Applicant	BGTF Speedway Project LLC
BPA	Bonneville Power Administration
cm	centimeters
cmbs	centimeters below the surface
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
CTWSRO	Confederated Tribes of Warm Springs Reservation of Oregon
Facility	Speedway Energy Facility
HBE	historic built environment
HPA	high probability area
HPRCSITs	Historic Properties of Religious or Cultural Significance to Indian Tribes
LCIS	Oregon Legislative Commission on Indian Services
LLC	limited liability company
m	meters
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
SHPO	State Historic Preservation Office
SP	shovel probes
VCR	Visual Contrast Rating
WCRA	Willamette Cultural Resources Associates, Ltd.

1.0 Introduction

BGTF Speedway Project LLC (Applicant) proposes construction and operation of the Speedway Energy Facility (Facility), a renewable energy facility incorporating wind, solar, and battery energy storage, located on privately owned land in unincorporated Sherman County, Oregon. The Facility's proposed point of interconnection (POI) to the regional electrical grid will be via a new Bonneville Power Administration (BPA) switchyard to be located adjacent to the existing BPA 500-kilovolt (kV) Ashe-Marion Transmission Line, which generally runs northeast/southwest through the site boundary.

Exhibit J provides an analysis of potential significant adverse impacts of the Facility to historic, cultural, and archaeological resources. The information contained herein supports demonstration of compliance with the Historic, Cultural, and Archaeological Resources approval standard for Oregon Administrative Rules (OAR) 345-022-0090. Specifically, OAR 345-022-0090(4) states that:

(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit 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 this exhibit or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including:

(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;

(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;

(c) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;

Pursuant to OAR 345-022-0090, this exhibit provides information about historic, cultural, and archaeological surveys conducted for the Analysis Area and general findings of those surveys. Surveys were conducted by Willamette Cultural Resources Associates, Ltd. (WCRA) (Boyle et al. 2026). More detailed information is provided in the survey report (Boyle et al. 2026) included in confidential Attachment J-1. Cultural resource survey reports are confidential documents that are exempt from public disclosure under Oregon Revised Statutes (ORS) 192.345(11); Attachment J-1 is provided to the Oregon Department of Energy (ODOE) under separate cover.

1.1 Analysis Area

Pursuant to OAR 345-001-0010, the Analysis Area for historic, cultural, and archaeological resources consists of both Direct and Indirect Analysis Areas. The Analysis Area is shown on Figure J-1.

The Direct Analysis Area is defined as the area within the Facility site boundary surveyed by WCRA and encompasses 22,266.2 acres. The Direct Analysis Area accounts for physical impacts to historic, cultural, and archaeological resources. The entire Direct Analysis Area is located on private land.

The Indirect Analysis Area includes the Direct Analysis Area and a variable buffer that ranges from 1 to 2.5 miles around the Direct Analysis Area. The Indirect Analysis Area accounts for auditory and visual impacts to historic built environment (HBE) resources (i.e., historic buildings and structures) and Historic Properties of Religious or Cultural Significance to Indian Tribes (HPRCSITs). HBE resources were surveyed and documented by WCRA from the public right-of-way; therefore, the closest accessible road to the buffer area determined the boundaries of the Indirect Analysis Area.

1.2 Tribal Outreach

On behalf of the Applicant, Tetra Tech consulted via email with the Oregon Legislative Commission on Indian Services (LCIS) on April 30, 2024, to request assistance in identifying appropriate Tribes to informally coordinate with regarding Tribal historic and cultural resources and other concerns in the vicinity of the Facility. LCIS responded the same day identifying the Burns Paiute Tribe, Confederated Tribes of the Umatilla Indian Reservation (CTUIR), and Confederated Tribes of Warm Springs Reservation of Oregon (CTWSRO) as recommended to contact. Based on the U.S. Department of Housing and Urban Development's Tribal Directory Assessment Tool, WCRA also recommended including the Nez Perce Tribe and Yakama Nation in coordination efforts.

On April 29, 2024, the Applicant provided to CTWSRO via email a letter of introduction for the Facility. On May 13, 2024, the Applicant provided additional letters of introduction via email to CTUIR, Burns Paiute Tribe, Nez Perce Tribe, and Yakama Nation. Follow-up letters were provided to all five Tribes on March 18, 2025, describing Facility changes since the original 2024 outreach. More details regarding Tribal outreach conducted by WCRA regarding their surveys are included in confidential Attachment J-1.

CTWSRO has been actively involved in discussions with the Applicant regarding the Facility as well as with WCRA regarding cultural resource surveys. WCRA followed up with CTWSRO staff on May 2, 2024, to discuss the Facility and planned surveys, including methodology to be employed. WCRA and the Applicant have continued to engage (together and separately) with CTWSRO on several additional occasions, including virtual meetings on January 14, 2025, and June 9, 2025, and in in-person meetings at CTWSRO offices on March 3, 2025, July 15, 2025, and April 7, 2026. At these meetings, WCRA discussed subsurface survey methodology, heard the CTWSRO's intentions for archaeological resources and general interest in the Analysis Area and surrounding landscape, and discussed the CTWSRO Tribal Historic Preservation Officer's comments on the report. The

Applicant has contracted with CTWSRO to provide additional ethnographic work, as requested by the Tribe.

CTUIR indicated that they deferred to CTWSRO regarding the Facility. Yakama Nation expressed interest in reviewing the survey report when ready. No responses were received from either the Burns Paiute Tribe or Nez Perce Tribe.

2.0 Description of Surveys – OAR 345-022-0090(4)(d)(A)

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

(A) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the State Historic Preservation Officer or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying and assessing the significance of resources listed in subsections (a), (b), and (c);

The Applicant retained WCRA to conduct a cultural resources survey for the Facility (Boyle et al. 2026; confidential Attachment J-1). Survey (pedestrian and subsurface) of the Direct Analysis Area was completed over multiple sessions between May 2024 and July 2025. To date, 19,743.9 acres of the Direct Analysis Area have been surveyed for cultural resources. Results of the survey are included in Boyle et al. (2026), which is attached here as confidential Attachment J-1. Current survey coverage of the Direct Analysis Area is depicted in Figure S-2.

The remaining 2,522.3 acres of the Direct Analysis Area were surveyed by WCRA in 2026 and will be documented in a forthcoming addendum survey report. Results of this additional fieldwork are not addressed here and will be provided under confidential cover once the addendum report is finished in 2026.

The Indirect Analysis Area has been subjected to a HBE reconnaissance survey from public rights-of-way. The HBE survey occurred in July 2024 and September 2025. Results of the survey are included in Boyle et al. (2026), which is attached here as confidential Attachment J-1. No additional HBE survey of the Indirect Analysis Area is anticipated.

2.1 Methods

WCRA initially conducted a records search via the Oregon State Historic Preservation Office (SHPO)'s Oregon Archaeological Records Remote Access and Oregon Historic Sites Database, as well as local inventories, to determine whether any cultural resources investigations have been conducted within 1 mile of the Analysis Area. Federal databases consulted included the National Archives and Records Administration's searchable National Register of Historic Places (NRHP) database and a geospatial NRHP database maintained by the National Park Service.

Historic maps (e.g., General Land Office maps, Metsker and Ogle atlas maps, and Sanborn maps) were also examined to understand the development of the Analysis Area and place it within a

historic context. WCRA also reviewed ethnographic studies to identify areas of significance to Tribes in the vicinity of the Analysis Area. This included a review of Hunn et al. (2015) and Shannon and Ellis (2013). The records search was followed by archaeological field investigations and HBE surveys.

The Applicant is conducting ethnographic studies of the Analysis Area in cooperation with the CTWSRO. These confidential studies will inform Facility development but are not included in this Application for Site Certificate.

2.1.1 Archaeological Field Investigations

The archaeological field investigations consisted of a systematic pedestrian survey of all accessible portions of the Direct Analysis Area. Certain “exclusion areas,” as well as one topographically inaccessible area in the westernmost parcel of the Facility site boundary, were not included within the pedestrian survey; these were predetermined to be areas where no ground disturbance would occur. WCRA archaeologists used an interval spacing of 20 meters (m). All previously recorded archaeological resources were resurveyed, using transect intervals of 5 to 10 m to establish surface boundaries. No artifacts were collected.

The pedestrian survey was supplemented by the excavation of shovel probes (SP), both at precontact and multicomponent resources (to delineate resource boundaries) and in high probability areas (HPAs) for further exploratory investigations. Boundary SPs were placed depending on the type of resource. For pre-contact isolates identified in thin soils, four SPs were excavated in cardinal directions, 10 m away from the isolate. In the case of precontact and multicomponent sites, SPs were placed 5 m away from the boundary of the surface finds, and approximately 20 m apart from each other. As many SPs as needed were placed to encompass each site’s suspected boundary.

Regardless of location and/or purpose of excavation (boundary delineation or HPA), all of the SPs measured approximately 40 centimeters (cm) in diameter, were excavated in 10 cm arbitrary layers until two consecutive culturally sterile layers were reached, and were excavated to a minimum of 75 cm below the surface (cmbs). Several of the SPs were extended using an auger to gain a better understanding of subsurface deposits located at greater depths. SPs were terminated if impenetrable layers were encountered (e.g., bedrock or compacted gravel). The excavated material was screened through ¼-inch mesh, and the locations of each shovel probe were mapped using Global Positioning System (GPS) units capable of submeter accuracy. No artifacts were collected.

The archaeological survey was conducted in accordance with SHPO’s *Guidelines for Conducting Field Archaeology in Oregon* (SHPO 2016). An “isolate” is defined as a single artifact and no features. Oregon SHPO policy is that isolates are usually not considered to be significant resources, with some exceptions (Boyle et al. 2026:40). Often, the documentation of the isolate in the survey report exhausts its potential for information. An “archaeological site” is defined as two or more artifacts;

the presence of one or more features in a site regardless of the number of artifacts constitutes an archaeological site.

2.1.2 Determination of High Probability Areas

WCRA used specific methods for identifying HPAs and conducting subsurface probing based on outlines by Solimano (2012), Butler et al. (2012), and Kelly et al. (2013), combined with ethnographic data and information obtained during the pedestrian survey.

During the pedestrian survey, archaeologists also identified additional HPAs. Field methods for identifying HPAs varied slightly between the northern and southern parts of the Direct Analysis Area, but in both areas, methods were based on topography, ethnographic history, and the results of the pedestrian survey. Based on discussions with CTWSRO staff, WCRA archaeologists identified HPAs in the Direct Analysis Area that held the greatest potential for archaeological resources based on precontact activity patterns. WCRA established HPAs on ridgetops and benches above major drainages based upon these considerations. In total, 29 HPAs were identified (135.25 acres) and 285 probes were placed generally at 20 m intervals.

2.1.3 HBE Investigations

HBE is defined as the network of man-made resources that serve as authentic and tangible reminders of the past. It comprises buildings, structures, sites, objects, and districts that are 50 years of age or older and not in ruin. To account for the length of Facility design and implementation, WCRA considered all resources 45 years and older to be historic age.

Historic-age resources not previously documented in the databases reviewed ahead of fieldwork were identified using tax assessor data compiled from city and county datasets and provided via email correspondence with the Sherman County Assessor. This list was supplemented by an analysis of historic images and aerial imagery to confirm construction dates and identify any additional resources not listed or mis-dated in the assessor's records. Finally, the Indirect Analysis Area was visually combed during the reconnaissance-level survey to ensure all historic-age resources, including potential districts, not identified during desktop research were accounted for.

Fieldwork was conducted according to Oregon SHPO standards and, where appropriate, guided by the National Park Service National Register Bulletin *Guidelines for Local Surveys: A Basis for Preservation Planning* (NPS 1985).

All historic-age resources were documented with high-resolution digital photographs, and notes were made on each resource's apparent age, retention of historic integrity, type, style, and character-defining features. Secondary resources on the same tax lot, such as garages and outbuildings, that are adjacent to a primary resource, such as a residence, were surveyed and recorded in association with the primary resource. Secondary resources such as barns, crop processing and storage, and sheds or cabins in the middle of fields otherwise not associated with a primary resource, were surveyed and recorded independently. All resources were documented

from the public right-of-way unless landowners gave explicit permission to document from within the parcel.

WCRA documented and evaluated all HBE resources within the Direct Analysis Area for NRHP eligibility. Although WCRA documented most of the buildings in the Indirect Analysis Area, architectural historians did not evaluate every building within the Indirect Analysis Area for individual NRHP-eligibility. With guidance from SHPO¹, WCRA identified narrow periods and themes of historic context for the local area in order to systematically categorize and evaluate resources that may be contributing to the significance of the region. WCRA found three periods or themes of history that are locally significant: Pre-Railroad Grass Valley (ca. 1860–1900), Expansion of the Wheat Industry (ca. 1920-1980), and George Helms' Concrete Masonry Unit Buildings (ca. 1951). WCRA considered other important periods in central Sherman County and Grass Valley's history, including groupings according to architectural style, recreational development (conservation, hunting, fishing, biking, and racing), and the general diminishment of the wheat industry, but concluded that there were no other significant groupings that aptly represented local history. Many of the HBE resources in the city of Grass Valley have been dramatically altered from their initial date of construction. There were several resources in the Indirect Analysis Area that did not fit within the parameters of the groupings listed above but are representative examples of architectural styles and warranted evaluation of eligibility for listing individually in the NRHP under Criterion C.

2.2 Records Review

WCRA's records search identified a total of 18 archaeological resources (13 sites and 5 isolates) within the Direct Analysis Area (Kelly et al. 2013; O'Grady and Connolly 1998). There are also 14 resources within 1 mile of the Direct Analysis Area, including seven archaeological sites and seven isolates.

Precontact resources within the Direct Analysis Area include lithic isolates and scatters. The majority of the previously recorded resources are historic-era isolates and archaeological sites that appear to be associated with agricultural practices and/or homesteading, such as rock piles assembled during field clearing, fence lines, roadbeds, refuse scatters, abandoned equipment, and/or landscape modifications like berms, dams, and ponds.

No HBE surveys or resources were identified as within the Direct Analysis Area by WCRA's review of the Oregon Historic Sites Database. Elsewhere in the Indirect Analysis Area, WCRA's review identified one HBE survey and 22 HBE resources that had been previously recorded.

WCRA's ethnographic research indicated rivers in the surrounding region, including the John Day, Deschutes, and Columbia rivers, are of significance to Tribes and that the area east of the Deschutes River (where the Analysis Area is) was utilized for seasonal collection of important cultural plants and traditional foods.

¹ The HBE survey methodology was predetermined in conversation with Robert Olguin from SHPO on July 2, 2025.

2.3 Survey Results – OAR 345-022-0090(4)(d)(B)

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

In total, 53 archaeological sites, 15 isolates, and 197 HBE resources have been identified within the Analysis Area. All of the archaeological resources and 123 of the HBE resources are within the Direct Analysis Area, while 74 are within the Indirect Analysis Area. An overview of locations of the identified cultural resources is provided in confidential Figure J-3, with more detailed mapping in confidential Attachment J-2.

The archaeological survey identified 50 newly recorded archaeological resources and 15 previously recorded archaeological resources. An additional three previously recorded resources were not re-located (78A-1-IF, ISO 2, and 90-2-IF). Of the newly recorded resources documented in the Direct Analysis Area, 6 are pre-contact isolates, 4 are pre-contact sites, 3 are multicomponent sites, 4 are historic-era isolates, and 33 are historic-era sites. Of the previously recorded resources within the Direct Analysis Area, 2 are pre-contact isolates, 2 are pre-contact sites, 3 are historic-era isolates, and 11 are historic-era sites. WCRA has recommended one archaeological site (MFG-06) as eligible for listing on the NRHP, 55 resources as not eligible, and has left 12 resources unevaluated for NRHP eligibility.

In total 375 SPs were excavated (285 in HPAs and 90 as archaeological resource delineation probes) in the Direct Analysis Area. Only one SP, a resource delineation probe at 25-18-DW-4, was positive. The remainder of the 314 SPs were negative. No additional archaeological resources were identified through the subsurface survey.

WCRA architectural historians surveyed and evaluated 123 HBE resources (37 primary resources, 86 secondary resources) in the Direct Analysis Area. An additional 198 primary HBE resources (544, including secondary resources) within the Indirect Analysis Area were also surveyed. Utilizing the thematic methodology outlined above for the HBE survey, the surveyed HBE resources were screened and reduced to those listed below in Table J-1. Several commonplace HBE resources were frequently noted in the Direct Analysis Areas, including barns, dams, windmills, and grain bins. Of the HBE resources recorded by WCRA, 41 (12 in Direct Analysis Area, 29 in the Indirect Analysis Area) have been recommended as NRHP-eligible.

Resources within the Analysis Area are summarized in Table J-1.

Table J-1. Inventory Results

Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
Archaeological Sites					
25-18-DW-01	Historic Refuse Scatter	Not Eligible	No further management required	None	142.0 ft; Solar Fence
25-18-DW-02	Historic Railroad Grade and Refuse Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	96.7 ft; Solar Fence
25-18-DW-04	Multicomponent - Pre-contact Lithic Scatter and Historic Vessel Glass	Unevaluated	Buffer (100 ft) and Avoid	a, b	148.85 ft; Solar Array
25-18-DW-08	Historic Refuse Scatter	Not Eligible	No further management required	None	226.3 ft; Solar Fence
25-18-DW-09	Historic Secondary Discard	Not Eligible	No further management required	None	372.9 ft; Solar Fence
25-18-DW-12	Historic Refuse Scatter	Not Eligible	No further management required	None	392.2 ft; Access Road
25-18-DW-13	Historic Highway Segment, Rock Piles, Culvert, and Roadside Discard	Not Eligible	No further management required	None	121.8 ft; Collection
25-18-DW-14	Multicomponent - Pre-Contact Lithic Scatter and Historic Ceramic Fragment	Unevaluated	Buffer (100 ft) and Avoid	a, b	350.6 ft; Solar Fence
25-18-DW-17	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Access Road
25-18-DW-20	Historic Refuse Scatter	Not Eligible	No further management required	None	171.6 ft; Crane Path
25-18-DW-21	Historic Refuse Scatter	Not Eligible	No further management required	None	28.6 ft; Turbine

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
25-18-DW-23	Historic Refuse Scatter	Not Eligible	No further management required	None	304.8 ft; Crane Path
25-18-DW-24	Historic Remnants of Homestead and Refuse	Not Eligible	No further management required	None	0 ft; Collection
25-18-MS-01	Historic Farm Equipment and Glass Bottle	Not Eligible	No further management required	None	0 ft; Access Road
25-18-MS-02	Historic Remnants of Homestead	Unevaluated	Buffer (100 ft) and Avoid	a, b	142.9 ft; Solar Fence
25-18-MS-03	Historic Household Refuse	Not Eligible	No further management required	None	78.4 ft; Collection
25-18-MS-04	Historic Windmill and Cistern	Not Eligible	No further management required	None	101 ft; 230-kV Collection
25-18-MS-07	Precontact Lithic Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	93.3 ft; Access Road
25-18-MS-09	Multicomponent-H Debitage and Refuse Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	2,165.8 ft; Turbine
25-18-MS-10	Precontact Debitage	Unevaluated	Buffer (100 ft) and Avoid	a, b	734.7 ft; Solar Fence
25-18-MS-11	Historic Power Pole and Refuse	Not Eligible	No further management required	None	20.6 ft; Solar Fence
25-18-MS-13	Historic Secondary Discard	Not Eligible	No further management required	None	0 ft; Solar Fence
25-18-MS-14	Historic Rock Pile and Refuse Scatter	Not Eligible	No further management required	None	366.0 ft; Solar Fence
25-18-MS-16	Historic Refuse Scatter	Not Eligible	No further management required	None	506.7 ft; Collection

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25-18-MS-17	Historic Refuse Scatter	Not Eligible	No further management required	None	474.5 ft; Access Road
25-18-MS-21	Precontact Lithic Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	80.5 ft; Collection
25-18-MS-23	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Collection
35SH308	Historic Refuse Scatter and Field-Clearing Piles	Not Eligible	No further management required	None	592.4 ft; Collection
35SH309	Historic Field-Clearing Piles	Not Eligible	No further management required	None	0 ft; Collection
35SH310	Historic Fence Line	Not Eligible	No further management required	None	172 ft; 230-kV Collection
35SH311	Historic Field-Clearing Pile	Not Eligible	No further management required	None	209.5 ft; Collection
35SH312	Historic Field-Clearing Pile	Not Eligible	No further management required	None	693.0 ft; Solar Fence
35SH320	Historic Earthen Levy	Not Eligible	No further management required	None	1,345.8 ft; Access Road
35SH321	Historic Rock Feature and Lumber	Not Eligible	No further management required	None	1,717.2 ft; Access Road
35SH322	Historic Refuse Scatter	Not Eligible	No further management required	None	2,494.6 ft; Collection
35SH323	Historic Refuse Scatter, Farm Equipment, and Rock Features	Not Eligible	No further management required	None	190.2 ft; Collection
35SH324	Historic Fence Line	Not Eligible	No further management required	None	885.4 ft; Access Road
35SH331	Precontact Lithic Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	932.8 ft; Collection
35SH397	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Collection
88-1-IF	Precontact Lithic Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	140.0 ft; Intersection Improvement
MAM-01	Historic Refuse Scatter	Not Eligible	No further management required	None	161.8 ft; Solar Fence

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MAM-02	Historic Refuse Scatter	Not Eligible	No further management required	None	86.0 ft; Solar Fence
MFG-02	Historic Homestead Remnants and Refuse Scatter	Not Eligible	No further management required	None	147 ft; 230-kV Collection
MFG-03	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Solar Fence
MFG-06	Historic Granary and Barn (also as HBE 11a and 11b)	Eligible	Buffer (100 ft) and Avoid	a, b	35.2 ft; Solar Fence
MFG-07	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Solar Fence
MFG-08	Precontact Lithic Scatter	Unevaluated	Buffer (100 ft) and Avoid	a, b	80.1 ft; Solar Fence
MRS-03	Historic Refuse Scatter	Not Eligible	No further management required	None	0 ft; Intersection Improvement
MRS-06	Historic Refuse Scatter	Not Eligible	No further management required	None	358.3 ft; Solar Fence
MRS-07	Historic Refuse Scatter	Not Eligible	No further management required	None	1,478.2 ft; Solar Fence
MRS-08	Historic Refuse Scatter	Not Eligible	No further management required	None	125 ft; 230-kV Collection
MRS-11	Historic Refuse Scatter	Not Eligible	No further management required	None	394.4 ft; Collection
MRS-12	Historic Refuse Scatter	Not Eligible	No further management required	None	32.0 ft; Solar Fence
Isolates					
25-18-DW-10	Precontact Debitage	Not Eligible	No further management required	None	19.8 ft; Solar Fence
25-18-DW-15	Precontact Debitage	Not Eligible	No further management required	None	0 ft; Access Road
25-18-DW-16	Precontact Debitage	Not Eligible	No further management required	None	0 ft; Crane Path

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
25-18-DW-22	Historic Glass Bottle	Not Eligible	No further management required	None	465.4 ft; Solar Fence
25-18-MS-18	Historic Glass Bottle	Not Eligible	No further management required	None	2,568.8 ft; Access Road
25-18-MS-19	Historic Glass Bottle	Not Eligible	No further management required	None	68.3 ft; Collection
25-18-MS-22	Historic Glass Bottle	Not Eligible	No further management required	None	320.4 ft; Collection
25-18-MS-6	Precontact Biface Tip Fragment	Not Eligible	No further management required	None	427.6 ft; Solar Fence
78A-1-IF	Precontact Debitage (Previously recorded; Not relocated by WCRA survey.)	Unevaluated	Buffer (100 ft) and Avoid	a, b	1,066.8 ft; Collection
86-3-IF	Historic Lard Pail	Not Eligible	No further management required	None	545.9 ft; Access Road
86A-1-IF	Historic Metal Can	Not Eligible	No further management required	None	338.6 ft; Collection
90-2-IF	Historic Glass Bottle (Previously recorded; Not relocated by WCRA survey.)	Not Eligible	No further management required	None	610.0 ft; Collection
ISO 2	Precontact Debitage (Previously recorded; Not relocated by WCRA survey.)	Not Eligible	No further management required	None	716.2 ft; Collection
MRS-02	Precontact Proximal Flake	Not Eligible	No further management required	None	140.9 ft; Solar Fence
MRS-05	Precontact Angular Shatter	Not Eligible	No further management required	None	245.5 ft; Collection
Historic Built Environment					
001a	63105 Lonerock Road (Residence)	Eligible	Minimize or avoid physical impact.	a	268.8 ft; Welcome and Laydown Yard

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
001b	63105 Lonerock Road (Garage)	Not eligible	No further management required	None	291.8 ft; Welcome and Laydown Yard
001c	63105 Lonerock Road (Barn)	Not eligible	No further management required	None	220.2 ft; Solar Fence
001d	63105 Lonerock Road (Barn)	Not eligible	No further management required	None	196.6 ft; Solar Fence
001e	63105 Lonerock Road (Barn)	Not eligible	No further management required	None	209.0 ft; Solar Fence
001f	63105 Lonerock Road (Barn)	Not eligible	No further management required	None	148.3 ft; Solar Fence
002	Culvert	Not eligible	No further management required	None	30.8 ft; Intersection Improvement
003	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	53.6 ft; Collection
004	Culvert	Not eligible	No further management required	None	65.7 ft; Collection
005	Barn	Eligible	Minimize or avoid physical impact.	a	10.9 ft; Collection
006a	61909 Lonerock Road (North Barn)	Not eligible	No further management required	None	2,062.5 ft; Solar Fence
006b	61909 Lonerock Road (South Barn)	Not eligible	No further management required	None	1,977.7 ft; Solar Fence
007	Barn	Not eligible	No further management required	None	587 ft; 230-kV Collection
008a	95453 Blagg Lane (Residence)	Not eligible	No further management required	None	993.0 ft; Collection
008b	95453 Blagg Lane (Garage)	Not eligible	No further management required	None	995.9 ft; Collection
008c	95453 Blagg Lane (Shed)	Not eligible	No further management required	None	840.2 ft; Collection
009a	Windmill	Eligible	Minimize or avoid physical impact.	a	531.6 ft; Solar Fence
009b	Cistern	Not eligible	No further management required	None	1,134.2 ft; Solar Fence
010	Culvert	Not eligible	No further management required	None	511.8 ft; Collection
011a	Barn (also as archaeological site MFG-06)	Eligible	Minimize or avoid physical impact.	a	434.3 ft; Solar Fence

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
011b	Outbuilding (also as archaeological site MFG-06)	Eligible	Minimize or avoid physical impact.	a	42.8 ft; Solar Fence
012	Culvert	Not eligible	No further management required	None	196 ft; 230-kV Collection
013a	93589 Rutledge Lane (Residence)	Not eligible	No further management required	None	250.4 ft; Solar Fence
013b	93589 Rutledge Lane (Garage)	Not eligible	No further management required	None	258.7 ft; Collection
013c	93589 Rutledge Lane (Barn)	Not eligible	No further management required	None	236.2 ft; Solar Fence
013d	93589 Rutledge Lane (Shed)	Not eligible	No further management required	None	207.7 ft; Solar Fence
013e	Cistern (Irrigation Facility)	Not eligible (Listed as eligible in Boyle et al. 2026, but WCRA anticipates not eligible recommendation in forthcoming addendum.)	No further management required. (Described as "Minimize or avoid physical impact" in Boyle et al. 2026, but WCRA anticipates a "no further management" recommendation in forthcoming addendum.)	None	0 ft; Solar Fence
013f	Dam	Not eligible	No further management required	None	335.1 ft; Solar Fence
014a	Rutledge Reservoir Dam	Not eligible	No further management required	None	295 ft; 230-kV Collection
014b	Dam	Not eligible	No further management required	None	341.3 ft; Solar Fence
015a	92722 Rutledge Lane (Residence)	Not eligible	No further management required	None	837.8 ft; Collection
015b	92722 Rutledge Lane (Shed)	Not eligible	No further management required	None	806 ft; 230-kV Collection
015c	92722 Rutledge Lane (Windmill)	Not eligible	No further management required	None	815.9 ft; Collection
015d	92722 Rutledge Lane (Chicken Coop)	Not eligible	No further management required	None	824.1 ft; Collection

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
015e	92722 Rutledge Lane (Shed)	Not eligible	No further management required	None	759 ft; 230-kV Collection
015f	92722 Rutledge Lane (Shed)	Not eligible	No further management required	None	697 ft; 230-kV Collection
015g	92722 Rutledge Lane (Well House)	Not eligible	No further management required	None	736 ft; 230-kV Collection
016a	Dam	Not eligible	No further management required	None	549.4 ft; Solar Fence
016b	Dam	Not eligible	No further management required	None	387.2 ft; Solar Fence
016c	Dam	Not eligible	No further management required	None	273 ft; 230-kV Collection
017a	Dam	Not eligible	No further management required	None	680.6 ft; Collection
017b	Dam	Not eligible	No further management required	None	267.3 ft; Collection
017c	Dam	Not eligible	No further management required	None	405.8 ft; Collection
018a	60906 Highway 216 (Residence)	Not eligible	No further management required	None	1,040.0 ft; Collection
018b	60906 Highway 216 (Garage)	Not eligible	No further management required	None	1,072.9 ft; Collection
018c	60906 Highway 216 (Garage)	Not eligible	No further management required	None	1,166.0 ft; Collection
018d	60906 Highway 216 (Barn)	Not eligible	No further management required	None	1,220.8 ft; Collection
018e	60906 Highway 216 (Cabin); Pre-Railroad Theme	Eligible	Minimize or avoid physical, visual, and auditory impact. Conduct viewshed analysis and VCR assessment.	a	1,278.2 ft; Solar Fence
018f	Dam	Not eligible	No further management required	None	0 ft; Solar Fence
019a	Shed	Not eligible	No further management required	None	114.3 ft; Crane Path
019b	Windmill	Not eligible	No further management required	None	339.1 ft; Crane Path

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
019c	Dam	Not eligible	No further management required	None	12.1 ft; Turbine
019d	Dam	Not eligible	No further management required	None	503.0 ft; Crane Path
019e	Dam	Not eligible	No further management required	None	413.2 ft; Collection
019f	Dam	Not eligible	No further management required	None	210.4 ft; Turbine
020a	91634 Earls Lane (Residence)	Not eligible	No further management required	None	129.8 ft; Crane Path
020b	91634 Earls Lane (Shed)	Not eligible	No further management required	None	308.1 ft; Crane Path
020c	91634 Earls Lane (Building)	Not eligible	No further management required	None	384.4 ft; Crane Path
020d	91634 Earls Lane (Building)	Not eligible	No further management required	None	370.3 ft; Crane Path
020e	91634 Earls Lane (Building)	Not eligible	No further management required	None	196.1 ft; Crane Path
021	Windmill	Not eligible	No further management required	None	0 ft; Collection
022a	Grain Bin; Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	190.6 ft; Solar Fence
022b	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	286.4 ft; Solar Fence
023a	59720 Twin Lakes Road/Justesen Ranch (Residence)	Not eligible	No further management required	None	779.9 ft; Solar Fence
023b	59720 Twin Lakes Road/Justesen Ranch (Tack Room)	Not eligible	No further management required	None	525.4 ft; Solar Fence
023c	59720 Twin Lakes Road/Justesen Ranch (Cabin)	Not eligible	No further management required	None	524.7 ft; Solar Fence
023d	Dam	Not eligible	No further management required	None	0 ft; Solar Fence
024a	Dam	Not eligible	No further management required	None	230 ft; 230-kV Collection
024b	Building	Not eligible	No further management required	None	355.6 ft; Crane Path
024c	Dam	Not eligible	No further management required	None	319.7 ft; Solar Fence

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
025a	91043 Davis Lane (Residence)	Not eligible	No further management required	None	346.7 ft; Collection
025b	91043 Davis Lane (Barn)	Not eligible	No further management required	None	316.8 ft; Collection
025c	91043 Davis Lane (Barn)	Not eligible	No further management required	None	369.0 ft; Solar Fence
025d	91043 Davis Lane (Barn)	Not eligible	No further management required	None	165.9 ft; Solar Fence
025e	91043 Davis Lane (Barn)	Eligible	Minimize or avoid physical impact.	a	258.8 ft; Solar Fence
025f	91043 Davis Lane (Shed)	Not eligible	No further management required	None	306.8 ft; Solar Fence
025g	91043 Davis Lane (Windmill)	Not eligible	No further management required	None	155.3 ft; Collection
025h	91043 Davis Lane (Building)	Not eligible	No further management required	None	156.5 ft; Collection
025i	Dam	Not eligible	No further management required	None	165.8 ft; Solar Fence
025j	Dam	Not eligible	No further management required	None	321.1 ft; Solar Fence
025k	Dam	Not eligible	No further management required	None	202.4 ft; Welcome and Laydown Yard
025l	Dam	Not eligible	No further management required	None	176.9 ft; Solar Fence
025m	Dam	Not eligible	No further management required	None	505.4 ft; Solar Fence
025n	Dam	Not eligible	No further management required	None	489.6 ft; Crane Path
026a	Justesen Grange Cabin	Not eligible	No further management required	None	360.0 ft; Bypass and Road Improvements
026b	Windmill	Not eligible	No further management required	None	292.4 ft; Bypass and Road Improvements
026c	Barn	Not eligible	No further management required	None	306.1 ft; Bypass and Road Improvements
027a	58560 Twin Lakes Road (Residence)	Not eligible/Not contributing	No further management required	None	878.4 ft; Collection

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
027b	58560 Twin Lakes Road (Shed)	Not eligible/Not contributing	No further management required	None	942.4 ft; Collection
027c	58560 Twin Lakes Road (Trailer)	Not eligible/Not contributing	No further management required	None	947.7 ft; Collection
027d	58560 Twin Lakes Road (Building)	Eligible/Contributing	Minimize or avoid physical impact.	a	783 ft; Collection
027e	58560 Twin Lakes Road (Building)	Eligible/Contributing	Minimize or avoid physical impact.	a	810 ft; Collection
027f	58560 Twin Lakes Road (Barn)	Eligible/Contributing	Minimize or avoid physical impact.	a	708 ft; Collection
027g	58560 Twin Lakes Road (Cabin); Pre-Railroad Theme	Eligible/Contributing	Minimize or avoid physical impact.	a	721 ft; Collection
027h	58560 Twin Lakes Road (Shed)	Eligible/Contributing	Minimize or avoid physical impact.	a	647 ft; Collection
027i	58560 Twin Lakes Road (Feeder Barn)	Eligible/Contributing	Minimize or avoid physical impact.	a	627 ft; Collection
027j	58560 Twin Lakes Road (Barn)	Eligible/Contributing	Minimize or avoid physical impact.	a	420 ft; Collection
027k	58560 Twin Lakes Road (Granary); Wheat Expansion Theme	Eligible/Contributing	Minimize or avoid physical impact.	a	188 ft; Collection
027l	58560 Twin Lakes Road (Grain Bins); Wheat Expansion Theme	Eligible/Contributing	Minimize or avoid physical impact.	a	411 ft; Collection
027m	58560 Twin Lakes Road (Granary); Wheat Expansion Theme	Eligible/Contributing	Minimize or avoid physical impact.	a	635 ft; Collection
027n	58560 Twin Lakes Road (Barn)	Eligible/Contributing	Minimize or avoid physical impact.	a	849 ft; Collection
027o	58560 Twin Lakes Road (Barn)	Eligible/Contributing	Minimize or avoid physical impact.	a	1,043 ft; Solar Fence
027p	58560 Twin Lakes Road (Outbuilding)	Eligible/Contributing	Minimize or avoid physical impact.	a	1,048 ft; Collection
027q	58560 Twin Lakes Road (Windmill)	Eligible/Contributing	Minimize or avoid physical impact.	a	913 ft; Solar Fence

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027r	Outhouse	Not eligible/Not contributing	No further management required	None	701.4 ft; Collection
027s	Trailer	Not eligible/Not contributing	No further management required	None	668.7 ft; Turbine
027t	Buether Dam #1 (Upper Buether Reservoir)	Eligible	Minimize or avoid physical impact.	a	1,015.1 ft; Turbine
027u	Buether Dam #2 (Lower Buether Reservoir)	Eligible	Minimize or avoid physical impact.	a	550.0 ft; Intersection Improvement
027v	Dam	Not eligible	No further management required	None	45.9 ft; Collection
028	Dam	Not eligible	No further management required	None	228.5 ft; Solar Fence
029a	Residence	Not eligible	No further management required	None	379.7 ft; Collection
029b	Livestock Barn	Not eligible	No further management required	None	256.5 ft; Solar Fence
029c	Dam	Not eligible	No further management required	None	67.7 ft; Access Road
030	Dam	Not eligible	No further management required	None	1,321.8 ft; Access Road
031a	58325 Bourbon Lane (Residence)	Not eligible	No further management required	None	551.4 ft; Solar Fence
031b	58325 Bourbon Lane (Grain Bin); Wheat Expansion Theme	Not eligible	No further management required	None	759.4 ft; Solar Fence
031c	58325 Bourbon Lane (Shed); Wheat Expansion Theme	Not eligible	No further management required	None	828.1 ft; Solar Fence
032	BPA Jones Canyon-Santiam No. 1 Transmission Line	Eligible	Minimize or avoid physical impact.	a	0 ft; Collection
033	BPA Ashe-Marion No. 2 Transmission Line	Not eligible	No further management required	None	1,317.8 ft; Collection
035d	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	17,139.3 ft; Solar Fence

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
040b	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	5,661.7 ft; Solar Fence
041e	64070 Fraser Road (Grain Storage Barn); Wheat Expansion Theme	Not eligible	No further management required	None	4,193.6 ft; Solar Fence
041f	64070 Fraser Road (Grain Apparatus); Wheat Expansion Theme	Not eligible	No further management required	None	4,370.8 ft; Solar Fence
042	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	7,537.9 ft; Solar Fence
044b	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	4,874.9 ft; Solar Fence
050e	Grain Bins; Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	4,621.1 ft; Intersection Improvement
051a	60945 Lonerock Road (Martin/Padget Ranch); Individual Buildings	Not eligible	No further management required	None	598.4 ft; Solar Fence
051h	60945 Lone Rock Road (Grain Bins); Wheat Expansion Theme	Not eligible	No further management required	None	154.9 ft; Solar Fence
055h	60335 Horseshoe Bend Road (Grain Bins); Wheat Expansion Theme	Not eligible	No further management required	None	5,497.3 ft; Access Road
059d	64397 Hwy 97 (Grain Bins); Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	15,294.2 ft; Solar Fence
061	Independent Order of Odd Fellows Cemetery; Individual Buildings	Not eligible	No further management required	None	9,766.7 ft; Solar Fence
062a	92257 Mt. Hood Lane (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	9,920.3 ft; Solar Fence
062c	92257 Mt. Hood Lane (Shed); Pre-Railroad Theme	Not eligible	No further management required	None	9,955.4 ft; Solar Fence
063	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	7,617.7 ft; Solar Fence

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
065a	63329 Hwy 97 (Rolfe House); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,812.9 ft; Solar Fence
070a	505 North Mill Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,093.1 ft; Solar Fence
074	402 N Mill Street (St. John the Baptist Catholic Church); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,180.7 ft; Solar Fence
077a	314 Northwest 2nd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,318.3 ft; Solar Fence
079	310 Northwest 2nd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,342.8 ft; Solar Fence
085a	302 Northwest 3rd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,706.1 ft; Solar Fence
088	214 Northwest North Street (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,575.0 ft; Solar Fence
089	220 Northwest 2nd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,339.6 ft; Solar Fence
090a	236 North Mill Street (OHSD #656478; Residence); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,158.2 ft; Solar Fence
091	233 North Mill Street (OHSD #656476; Memorial Pavilion); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	3,983.3 ft; Solar Fence
094a	214 Northwest 2nd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,346.5 ft; Solar Fence

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Resource #	Description	NRHP Recommendation	Management Recommendation	Applicable EFSC Siting Standard OAR 345-022-0090(4)(a) or (b)	Distance (feet) to Proposed Infrastructure
096	205 Northwest 3rd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,560.2 ft; Solar Fence
101	202 Northwest 2nd Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,385.0 ft; Solar Fence
102a	101-103 W Church St (OHSD #656473; Residence); Individual Buildings	Not eligible	No further management required	None	4,034.6 ft; Solar Fence
103a	211 Northeast Church Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	3,667.9 ft; Solar Fence
106	126 Northwest Mill Street (OHSD #656472; Old Shell/Garage); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,207.1 ft; Solar Fence
107	114 N Mill Street (OHSD #656470; Post Office); George Helms' CMU Buildings Theme	Eligible	Minimize or avoid physical impact.	a	4,193.1 ft; Solar Fence
108a	121 N North Mill Street (OHSD #656471; Country Café); George Helms' CMU Buildings Theme	Not eligible	No further management required	None	4,081.0 ft; Solar Fence
108b	111 N Mill Street (OHSD #656469; Western Art/Old Livery Stable); Pre-Railroad Theme	Not eligible	No further management required	None	4,080.2 ft; Solar Fence
112a	213 W Market Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,614.6 ft; Collection
113	102 Northwest 2nd (Odd Fellows/Rebekah Meeting Hall); Individual Buildings	Not eligible	No further management required	None	4,429.4 ft; Solar Fence

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114	104 N. Mill Street (OHSD #656468; Grass Valley County Market/W.F. Weigand & Co. Hardware and Vehicles, Bank); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,246.9 ft; Solar Fence
115a	102 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	5,161.7 ft; Collection
116	102 Railroad Street (Residence); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,898.4 ft; Collection
117	104 R Street (Residence); George Helms' CMU Buildings Theme	Not eligible	No further management required	None	4,883.9 ft; Collection
120	104 North 2nd Street (OHSD #656480; IOOF, Legion Hall/Old Baptist Academy); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,474.4 ft; Collection
121	102 South Mill Street (OHSD #656466; Antiques/Citizens Commercial); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	4,257.9 ft; Solar Fence
122b	110 S South Mill Street (OHSD #656465; Motel); George Helms' CMU Buildings Theme	Not eligible	No further management required	None	4,056.3 ft; Solar Fence
127	109 S Mill Street (OHSD #656464; Old Fire Station/City Hall); George Helms' CMU Buildings Theme	Eligible	Minimize or avoid physical impact.	a	4,295.9 ft; Solar Fence
129	109 S 2nd Street (OHSDE #38145; Methodist Church); Pre-Railroad Theme	Eligible	Minimize or avoid physical, visual, and auditory impact. Conduct viewshed analysis and VCR assessment.	a	4,609.0 ft; Collection

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131	210 South 4th Street (OHSD #656481; Grass Valley High School); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	5,150.9 ft; Collection
134a	311 Southwest Lincoln Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,978.2 ft; Collection
138a	406 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,881.5 ft; Collection
141a	410 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,794.0 ft; Collection
142	407 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,824.6 ft; Collection
143a	409 Southwest 4th Street (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,771.4 ft; Collection
145a	502 Southwest 4th Street (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,665.6 ft; Collection
146	510 Southwest 4th Street (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,497.3 ft; Collection
149a	602 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	4,351.2 ft; Collection
151a	601 S 3rd Street (OHSD #656482; Grain Elevator/Carsten von Borstel); Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	4,275.7 ft; Collection
151b	601 S. 3rd Street (Grain Elevator Office); Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	4,318.2 ft; Collection
153	610 Southwest 4th Street (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,174.1 ft; Collection

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154a	Residence; Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	4,254.8 ft; Collection
156a	305 Southwest Main Street (Residence); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	3,877.3 ft; Collection
158a	802 Southwest Sharp Street (Residence); Individual Buildings	Not eligible	No further management required	None	3,785.7 ft; Collection
161a	912 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	3,250.8 ft; Collection
162a	1006 Southwest 4th Street (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	3,047.2 ft; Collection
163a	202 S. Krusow Street (Grain Elevator); Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	2,852.6 ft; Collection
170g	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	782.6 ft; Solar Fence
171a	91938 Barnett lane (Residence); Individual Buildings	Not eligible	No further management required	None	832.9 ft; Solar Fence
172a	92340 Barnett Lane (Residence); Pre-Railroad Theme	Not eligible	No further management required	None	3,297.1 ft; Solar Fence
179b	Grain Elevator; Wheat Expansion Theme	Eligible	Minimize or avoid physical impact.	a	11,643.3 ft; Bypass and Road Improvements
181a	59126 Stark Road (Sequence Gulch Ranch); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	6,142.6 ft; Collection
181e	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	6,424.9 ft; Access Road
181m	Grain Bin; Wheat Expansion Theme	Not eligible	No further management required	None	6,236.9 ft; Access Road
184a	58266 Finnegan Road (Residence); Individual Buildings	Eligible	Minimize or avoid physical impact.	a	2,103.6 ft; Solar Fence
186f	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	196.1 ft; Solar Fence

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188	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	3,063.6 ft; Solar Fence
191a	93190 Liberty Lane (Residence); Pre-Railroad Theme	Eligible	Minimize or avoid physical impact.	a	14,782.7 ft; Access Road
193	Barlow Cutoff Trail	Not eligible	Discuss with Oregon-California Trails Association; no further work	None	0 ft; Solar Fence
194	Dalles Military Road	Not eligible	No further management required	None	430.4 ft; Access Road
195	BPA John Day-Grizzly No. 1 Transmission Line	Eligible	Minimize or avoid physical impact.	a	6,366.6 ft; Solar Fence
196	BPA John Day-Grizzly No. 2 Transmission Line	Eligible	Minimize or avoid physical impact.	a	6,366.6 ft; Solar Fence
198d	Grain Bins; Wheat Expansion Theme	Not eligible	No further management required	None	5,584 ft; Solar Fence

3.0 Potential Impacts – OAR 345-022-0090(4)(d)

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

Sixty-nine of the identified resources are protected under Siting Standards OAR 345-022-0090(4)(a), including 12 archaeological sites (1 NRHP eligible and 11 unevaluated/potentially NRHP eligible), 1 isolate (unevaluated/potentially NRHP eligible), and 56 HBE resources (all NRHP eligible or eligible/contributing).

WCRA has recommended that all 13 of the archaeological resources be avoided by a minimum of 100 feet. With the exception of five archaeological sites (MFG-06, MFG-08, 25-18-DW-02, 25-18-MS-21, and 25-18-MS-07), all are avoided by this recommended minimum distance (Table J-1). The five sites that are avoided but not by at least 100 feet include three pre-contact lithic scatters (MFG-08, 25-18-MS-07, and 25-18-MS-21), 1 historic granary and barn (MFG-06), and 1 historic railroad grade with refuse scatter (25-18-DW-02). The solar fenceline is within 35 feet of MFG-06, within 80 feet of MFG-08, and within 97 feet of 25-18-DW-02. A collection line is within 81 feet of 25-18-MS-21, and an access road is within 93 feet of 25-18-MS-07.

WCRA has recommended that physical impacts be avoided or minimized for all of the HBE resources recommended eligible, with an additional recommendation that visual and auditory impacts be minimized or avoided for those resources recommended eligible under Criterion A that retain integrity of setting. With the exception of four HBE resources (032/BPA Jones Canyon-Santiam No. 1 Transmission Line, 005/Barn, 011b/Outbuilding [same location as archaeological site MFG-06], and 013e/Cistern), all HBE resources are avoided by an acceptable distance that physical impacts would be considered unlikely. The Facility will be constructed under the BPA Jones Canyon-Santiam No. 1 Transmission Line (the transmission line will span over the Facility). No modifications to the line will be necessary and there is no further concern for the line as an HBE resource. A collection line is within 11 feet of the 005/Barn HBE resource, and the solar fenceline is within 43 feet of the 011b/Outbuilding HBE resource. These distances are considered close enough in proximity to the historic buildings that physical impacts may occur as a result of ground disturbance or installation of Facility infrastructure, which can be addressed by monitoring during construction activities. Although current designs for the Facility include physical impact to resource 013e/Cistern, the eligibility of this resource was revised in the forthcoming addendum report, due to the identification of a better example of this resource type in the Analysis Area. WCRA has also recommended that the addition of solar panels and wind turbines to the surrounding landscape may diminish the integrity of setting and feeling of two NRHP-eligible HBE resources that have thus far retained integrity of setting, but whether this constitutes a significant impact must be evaluated on a case-by-case basis, considering viewshed in relation to topography. It is for these resources (018e/Cabin and 129/Methodist Church) that WCRA has recommended that a viewshed analysis and VCR assessment be completed.

The remaining resources in Table J-1 do not meet the criteria for consideration under any of the Siting Standards under OAR 345-022-0090(4). They are recommended by WCRA as not eligible for listing on the NRHP and are thus not historic properties considered under OAR 345-022-0090(4)(a). Because remaining archaeological sites and isolates in Table J-1 have been recommended as not eligible for listing in the NRHP, they also do not meet the definition of archaeological objects or sites in ORS 358.905(1). Under ORS 358.905(1)(a), “archaeological object” means 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* [emphasis added] including, but not limited to, monuments, symbols, tools, facilities, technological by-products and dietary by-products. ORS 358.905(1)(c) defines “archaeological site” 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 each other or biotic or geological remains or deposits. The identification of an archaeological object is dependent on significance, and the identification of an archaeological site is dependent upon the inclusion of archaeological objects. It is common practice that NRHP eligibility equates to significance or a statement of significance by or to a Tribe. This is supported by ORS 358.905(1)(b) where “site of archaeological significance” is defined as an archaeological site on, or eligible for inclusion on, the NRHP as determined in writing by the SHPO or any archaeological site that has been determined significant in writing by an Indian Tribe. Without NRHP eligibility or listing or statements from Tribes indicating significance, the archaeological resources in Table J-1 that have been recommended by WCRA as not eligible for the NRHP are not considered under Siting Standards in OAR 345-022-0090(4).

There are no public lands within the Direct Analysis Area. Thus, Siting Standard OAR 345-022-0090(4)(c) is not applicable.

4.0 Measures Designed to Prevent the Destruction of Resources – OAR 345-022-0090(4)(d)(C)

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

All protected cultural resources identified by WCRA have been avoided by Facility design. At WCRA’s recommendation, where construction disturbance will occur within 328 feet of a resource protected under OAR 345-022-0090(4)(a) and/or (b), as indicated in Table J-1, a flagged 100-foot exclusionary zone will be established during construction to ensure avoidance. Ground-disturbing or potentially ground-disturbing activities will not occur within the 100-foot exclusionary zones. This includes using the areas for parking, spoil, or temporary storage of equipment. Environmental monitors will confirm flagging remains in place and accurately placed during construction. If these

conditions are not met with the specified restrictions, WCRA has recommended construction monitoring (see Section 5.0 below).

If avoidance of resources protected under OAR 345-022-0090(4)(a) or (b), as indicated in Table J-1, is not possible, any significant impacts will be mitigated to reduce impacts to a status of less than significant. Appropriate mitigation will be determined through coordination between the Applicant, ODOE, SHPO, Tribes, and, if appropriate, interested historic preservation groups.

As indicated in Section 3, the significance of visual, and/or auditory impacts to two HBE resources protected under OAR 345-022-0090(4)(a) is unclear at this time. These HBE resources include 018e and 129. To determine the significance of visual, and/or auditory impacts to each of these resources, the Applicant will complete a viewshed analysis to assess the visibility of the Facility from each protected HBE resource, taking into account topography and obstructions. The VCR system will be utilized to determine the degree of contrast, and therefore the degree of visual impact, of the Facility in the landscape, considering varied atmospheric conditions. Efforts to design Facility elements in order to avoid physical and visual impact, to lessen the contrast of the Facility in the landscape, and to reduce or manage noise impacts will incorporate specific findings of viewshed analyses or VCR forms. Results of the visual analysis will be provided to ODOE and SHPO. Mitigation for significant visual impacts on HBE resources that cannot be addressed by avoidance or Facility design will be determined in coordination with ODOE and SHPO.

Although the potential for additional archaeological resources to be discovered during construction is considered low, a preliminary Inadvertent Discovery Plan is included as Attachment J-3 and will be implemented during Facility construction.

Any Worker Environmental Awareness Program trainings during construction will include a cultural resources component that describes the purpose, procedures, and appropriate use of the IDP. If requested by interested Tribes, a cultural sensitivity training course for all construction workers in addition to or in lieu of the above may be implemented. The Tribe will provide this training.

5.0 Monitoring – OAR 345-022-0090(4)(e)

(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.

Five archaeological sites (MFG-06, MFG-08, 25-18-DW-02, 25-18-MS-21, and 25-18-MS-07) and two HBE resources (005/Barn, and 011b/Outbuilding [same location as archaeological site MFG-06]) that are protected under OAR 345-022-0090(4)(a) or (b) are avoided but not by a recommended distance of 100 feet, for archaeological resources, or a distance considered suitable to ensure avoidance of physical impacts to HBE resources. The Applicant will seek to avoid these archaeological and HBE resources by a minimum of 100 feet in final design. If avoidance of this buffer is not possible, archaeological monitoring of ground disturbance within the 100-foot avoidance buffer will be implemented during construction. Archaeological monitoring will be

conducted by an archaeologist and/or a Tribal monitor. If monitoring is determined necessary in these areas, an Archaeological Monitoring Plan will be drafted prior to construction and outline when and where archaeological monitoring is to occur, daily documentation requirements for monitoring activities, the authority of the monitor(s) to stop construction when necessary, and requirements for reporting the results of archaeological monitoring. The monitoring plan will be submitted to ODOE, SHPO, and interested Tribes for review prior to finalization.

Archaeological monitoring of construction outside the 100-foot avoidance buffers around resources protected under OAR 345-022-0090(4)(a) or (b), as indicated in Table J-1, has not been recommended because the potential for additional unidentified archaeological resources in the Facility site boundary is considered low based upon the extent of surface and subsurface survey conducted as well as the analysis of HPAs completed by WCRA. Therefore, archaeological monitoring broadly across the Facility is not anticipated. However, the Applicant will discuss with CTWSRO any requests to conduct Tribal monitoring.

6.0 References

- Boyle, Brigid, Dianna Wilson, Michael Shimel, Estelle Weiss-Tisman, Matt Goodwin, Mario Battaglia, Megan McGuinness, Madisen Campbell, and Paul Solimano. 2026. *Cultural Resources Survey for the Speedway Energy Facility, Sherman County, Oregon*. Willamette Cultural Resources Associates, Ltd., Portland, Oregon. Submitted to Tetra Tech, Portland, Oregon. WCRA Report #25-18. SHPO Case #25-1323.
- Butler, Stephanie, Sarah McDaniel, Michelle Stegner, Russ Bevill, Michael S. Kelly, and Elena Nilsson. 2012. *Cultural Resources Inventory Plan for Portland General Electric's Cascade Crossing Transmission Project*. URS Corporation, Portland, Oregon. Prepared for Portland Electric Company, Portland, Oregon.
- Hunn, Eugene S., E. Thomas Morning Owl, Phillip E. Cash Cash, and Jennifer Karson Engum. 2015. *Čáw Pawá Láakni / They Are Not Forgotten. Sahaptian Place Names Atlas of the Cayuse, Umatilla, and Walla Walla*. University of Washington Press, Seattle.
- Kelly, Michael S., Elena Nilsson, Stephanie Butler, Melinda Button, Russell Bevill. 2013. *Archaeological Survey for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, and Wasco Counties, Oregon*. Prepared for Portland General Electric Company. URS Corporation. On file, Oregon SHPO, Salem.
- NPS (National Park Service). 1985. *Guidelines for Local Surveys: A Basis for Preservation Planning*. National Register Bulletin 24. Washington D.C.
https://www.nps.gov/subjects/nationalregister/upload/NRB24-Complete_Part1t.pdf
- O'Grady, Patrick, and Thomas J. Connolly. 1998. *Archaeological Survey of the Grass Valley (MP 27.4)-Kent (MP 40.3) section, Biggs-Madras Highway (US 97), Sherman County (ODOT Key # 09652)*. Prepared for Oregon Department of Transportation, Salem. University of Oregon State Museum of Anthropology, Eugene. On file, Oregon SHPO, Salem.

SHPO (Oregon State Historic Preservation Office). 2016. *Guidelines for Conducting Field Archaeology in Oregon*. Salem, Oregon.

Shannon, Donald, and David Ellis. 2013. *Ethnographic Report for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, Wasco, Clackamas, and Marion Counties, Oregon*. Prepared for Portland General Electric Company, Portland, Oregon. WillametteCRA and URS Corporation, Portland, Oregon.

Solimano, Paul S. 2012. *Refining Field Methods for Subsurface Survey Along the Western Portion of the Cascade Crossing Project*. WillametteCRA Project No. 11-12.

7.0 Approval Standards and Submittal Requirements

Table J-2. Approval Standards and Submittal Requirements Matrix

Requirements	Location
OAR 345-022-0090 Historic, Cultural and Archaeological Resources	
Approval Standards	
(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:	Section 3
(a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;	Table J-1; Section 3
(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	Table J-1; Section 3
(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).	N/A
(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.	-
(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.	-
Submittal Requirements	
(4) To assist the Council in determining whether the standard outlined in (1) through (3) has been met, the Applicant must submit 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 this exhibit or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including:	-

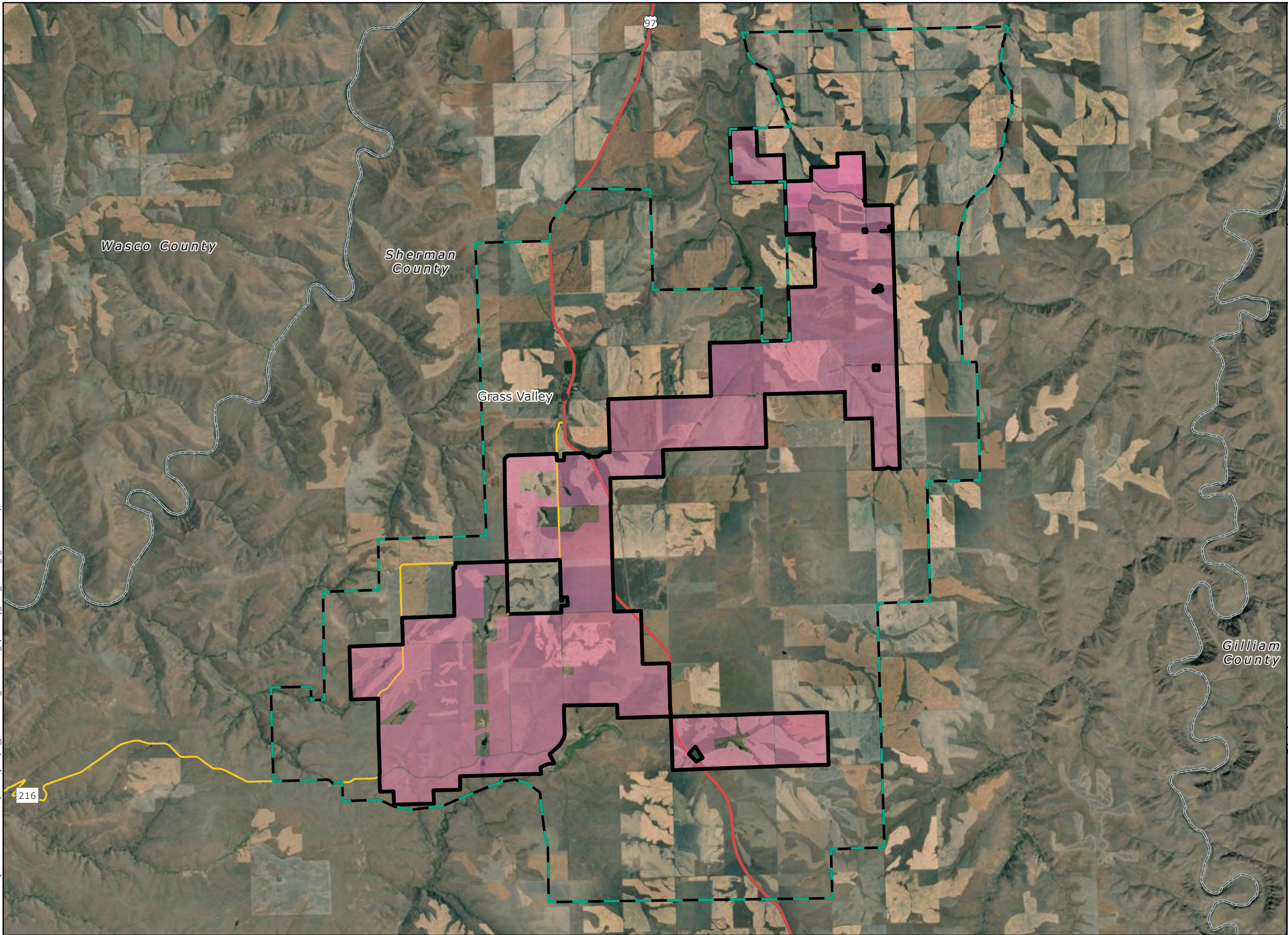
**Preliminary Application for Site Certificate
Exhibit J. Historic, Cultural, and Archaeological Resources**

Requirements	Location
(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;	Table J-1; Section 3
(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;	Table J-1; Section 3
(c) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;	N/A
(d) The significant potential impacts, if any, of the construction, operation and retirement of the proposed facility on the resources described in subsections (a), (b), and (c) and a plan for protection of those resources that includes at least the following:	-
(A) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the State Historic Preservation Officer or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying and assessing the significance of resources listed in subsections (a), (b), and (c);	Section 2
(B) The results of the discovery measures described in paragraph (A), together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended;	Section 2.3
(C) A list of measures to prevent destruction of the resources identified during surveys, inventories and subsurface testing referred to in paragraph (A) or discovered during construction; and	Sections 4 and 5
(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
EFSC 2-2025, amend filed 04/02/2025, effective 04/02/2025	

Figures

(Note: Figure J-3 is Confidential and provided under separate cover)

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Speedway Energy Facility

**Figure J-1
Cultural Resources
Analysis Area**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Indirect Analysis Area
- Direct Analysis Area
- City/Town
- County Boundary
- US Highway
- State Highway

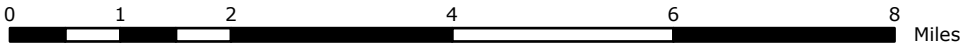


Reference Map



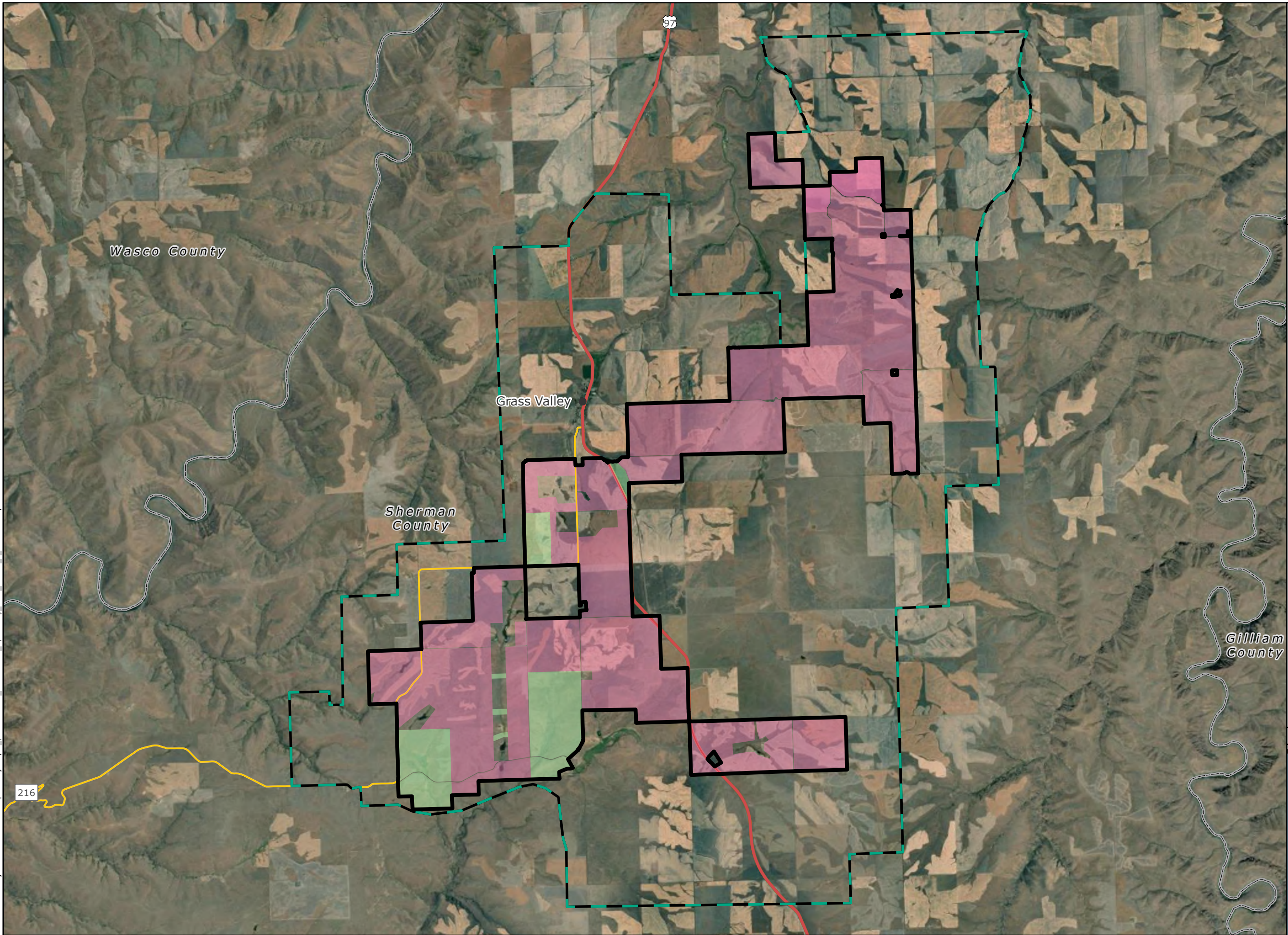
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NOT FOR CONSTRUCTION

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Speedway Energy Facility

**Figure J-2
Survey Coverage of
Analysis Area**

SHERMAN COUNTY, OR

- Facility Site Boundary
- Indirect Analysis Area
- City/Town
- County Boundary
- US Highway
- State Highway
- Survey Coverage in Direct Analysis Area
 - Surveyed
 - Not Yet Surveyed

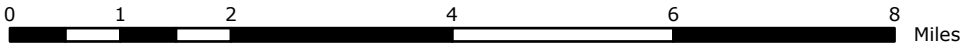


Reference Map



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WGS 1984 UTM Zone 10N



NOT FOR CONSTRUCTION

Attachment J-1. Resources Inventory and Evaluation Report

(Confidential—provided under separate cover)

Attachment J-2. Cultural Resource Locations Mapset

(Confidential—provided under separate cover)

Attachment J-3. Preliminary Draft Inadvertent Discovery Plan (IDP)

Attachment A:
Archaeological and Human Remains
Inadvertent Discovery Plan (IDP)

Project Name: **Speedway Energy Facility**

Project Proponent: **BGTF Speedway Project, LLC**

Project Manager: **[INSERT]**

SHPO Case Number: **[INSERT]**

Date: **[INSERT]**

This document outlines procedures and protocols to be followed if archaeological objects or features, or human remains are encountered in the course of work. These procedures are intended for circumstances where there is no expectation or anticipation of encountering archaeological materials or human remains. Thus, these procedures are for inadvertent discoveries of archaeological materials or human remains when an archaeological monitor is not present. **These procedures are not a replacement for due diligence, robust project design, and consultation with appropriate Native American Tribes.**¹ Prior to undertaking project work, an assessment of the likelihood for disturbance to cultural resources and tribal heritage should be completed.

All project personnel will be briefed on all procedures, responsibilities, and reporting structures before the start of any work. **At least one printed copy of this document should be kept on-site at all times and available for reference.** Various steps in this document have places for time, date and initials to ensure the steps are completed in order, and we recommend these sections are completed in pen.

Contents Of This Document

- A. Procedures for inadvertent discoveries of archaeological features and materials, without human remains, burials, funerary objects, sacred objects, and objects of cultural patrimony.
- B. Procedures for inadvertent discovery of human remains, including
 - a. Funerary objects are any objects that, as part of a death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later.
 - b. Object of cultural patrimony are objects having ongoing historical, traditional or cultural importance central to the native Indian group or culture itself, rather than property owned by an individual native Indian, and which, therefore, cannot be alienated, appropriated, or conveyed by an individual regardless of whether or not the individual is a member of the Indian tribe. The object shall have been considered inalienable by the native Indian group at the time the object was separated from such group. Procedures for inadvertent discoveries of 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

¹ Appropriate Native American Tribes will be identified by LCIS

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 the 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 (Project Manager) to coordinate with the project archaeologist, the lead federal agency (if applicable), the Oregon State Historic Preservation Office (SHPO), the Oregon Legislative Commission on Indian Services (LCIS), and appropriate Native American Tribes. This contact should be established before the start of work.

The following steps are the ultimate responsibility of the project proponent. But from a practical perspective, some steps would likely be implemented first by field personnel such as the proponent's employees, agents, contractors and subcontractors. For example, Steps 1 (stop work) and 2 (secure the area) would probably be implemented by construction personnel. Step 3 (notifications) should be directed by the project proponent, while Step 4 (following Guidance) should be overseen by the project proponent.

Step 1. Stop work (immediately after discovery)

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

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

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

Establish a **minimum** 30-meter/100-foot area of protection (i.e., buffer), 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.⁴ This also includes securing any spoils that were removed from the area of the discovery within the buffer. Spoils removed from the discovery area should not leave the project location.

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

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

³ "Archaeological site" means a geographic locality in Oregon that contains archaeological objects and the contextual associations of the archaeological objects with each other or biotic or geological remains or deposits (ORS 358.905).

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

Step 3. Notify (within first hour after discovery)

Notify the project manager, lead federal agency official (if applicable), and project archaeologist. If there is not an archaeologist on retainer for the project, the project manager will contact an Oregon Qualified Archaeologist (which includes agency and Tribal archaeologists) to assess the find.

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

Lead Federal Agency _____ (time contacted) _____ (initials of contactor)

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

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

If the archaeologist determines the find is an archaeological feature or object, or other cultural item or feature, OR if no qualified archaeologist can be contacted within the first hour of discovery, the **SHPO and appropriate Native American Tribes must be contacted**, and their guidance must be followed. The SHPO, the appropriate 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 proponent and agency official.

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

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

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

B. Procedures for Inadvertent Discovery of Human Remains

(Includes human remains, burials, funerary objects, objects of cultural patrimony, and spiritual objects. These are any object that is reasonably believed to have been placed intentionally with or near human remains or items made exclusively for burial purposes)

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

The following steps are the ultimate responsibility of the project proponent. But from a practical perspective, some steps would likely be implemented first by field personnel such as the proponent's employees, agents, contractors and subcontractors. For example, Steps 1 (stop work) and 2 (secure the area) would probably be implemented by construction personnel. Step 3 (notifications) should be directed by the project proponent, while Step 4 (following Guidance) should be overseen by the project proponent.

Step 1: Stop work (immediately after discovery)

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

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

Secure and protect the area of inadvertent discovery with a **minimum** of 100-meter/300-foot buffer, or more 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. This also includes securing any spoils that were removed from the area of the discovery within the buffer. Spoils removed from the discovery area should not leave the project location.

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

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

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

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

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

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

1. Project Manager _____ (time) _____ (initials)
2. Lead Federal Agency _____ (time) _____ (initials)
3. Oregon State Police⁹ **DO NOT CALL 911**¹⁰ _____ (time) _____ (initials)
4. State Historic Preservation Office (SHPO) _____ (time) _____ (initials)
5. Commission on Indian Services (LCIS) _____ (time) _____ (initials)
6. Appropriate Native American Tribes¹¹ _____ (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)

If the OSP determines the site IS a crime scene, follow OSP instructions.

If the OSP determines the site IS NOT a crime scene, do not move anything! Continue to secure the remains along with any associated funerary objects in place, and protected the find from weather, water runoff, and shielded from view. Follow all guidance provided by the OSP, the LCIS, the lead federal agency (if applicable), the SHPO, and the appropriate Native American Tribes. Continue the work stoppage within the buffer until a plan is developed and carried out between the OSP, the LCIS, the lead federal agency (if applicable), the SHPO, and the appropriate Native American Tribes. Work may only continue within the buffer when directed, in writing, by the lead federal agency (if applicable), the SHPO and the appropriate Native American Tribes.

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

¹⁰ **Unless remains are clearly modern.**

¹¹ ALL Tribes designated by LCIS must be notified. Contacting one or some of the Tribes does not fulfill the obligation to notify.

C. Roles and Responsibilities

This section lists the roles and responsibilities for project personnel. **This section should be completed by the project proponent when the field personnel are known.** Contact information can be found on the following page.

Person Responsible	Responsibility
On-Site Supervisor (if applicable) [Name]: [555-555-5555] will...	Notify the Project Manager
Project Manager will...	Notify the Agency Official
Project Manager will...	Notify the Contracted Archaeologist
Project Manager will...	Notify the State Agencies (OSP, LCIS, SHPO)
Project Manager will...	Notify the Native American Tribes identified by LCIS
Project Manager will...	Enforce the work stoppage and buffer

D. Contact Information¹²

Agency	Position/Contact	Contact Information
Project Manager	[Name]	[555-555-5555]
Contracted Archaeologist	[Insert]	503-281-4576
Legislative Commission on Indian Services (LCIS)	Primary Contact: Dr. Elissa Bullion, State Physical Anthropologist	971-707-1372
	Secondary Contact: LCIS Office	503-986-1067
Oregon State Police (OSP)	Primary Contact: Sgt. Ryan Tague	541-576-4393
	Secondary Contact: Dispatch, northern command ¹³	800-442-0776
	Secondary Contact: Dispatch, southern command ¹⁴	800-442-2068
State Historic Preservation Office (SHPO)	Primary Contact: John Pouley, State Archaeologist	503-480-9164
	Secondary Contact: Jamie French, Assistant State Archaeologist	503-979-7580
Native American Tribes	Briece Edwards, Confederated Tribes of Grand Ronde	503-879-2084
	Buddy Lane and Peter Sv-gvs (Black Bear) Hatch, Confederated Tribes of Siletz Indians	541-444-8230 541-444-8319
	Lawrence Squiemphen, Confederated Tribes of the Warm Springs Reservation	541-553-2001

¹² Contact information should be regularly updated for all individuals. Up to date contacts for LCIS, OSP, SHPO, and Native American Tribes can be found on the LCIS cultural resources page: [Commission on Indian Services archaeology \(oregonlegislature.gov\)](https://www.oregonlegislature.gov/archaeology)

¹³ Northern command: Benton, Clackamas, Clatsop, Columbia, Crook, Deschutes, Gilliam, Hood River, Jefferson, Klamath, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Sherman, Tillamook, Wasco, Washington, Wheeler, Yamhill

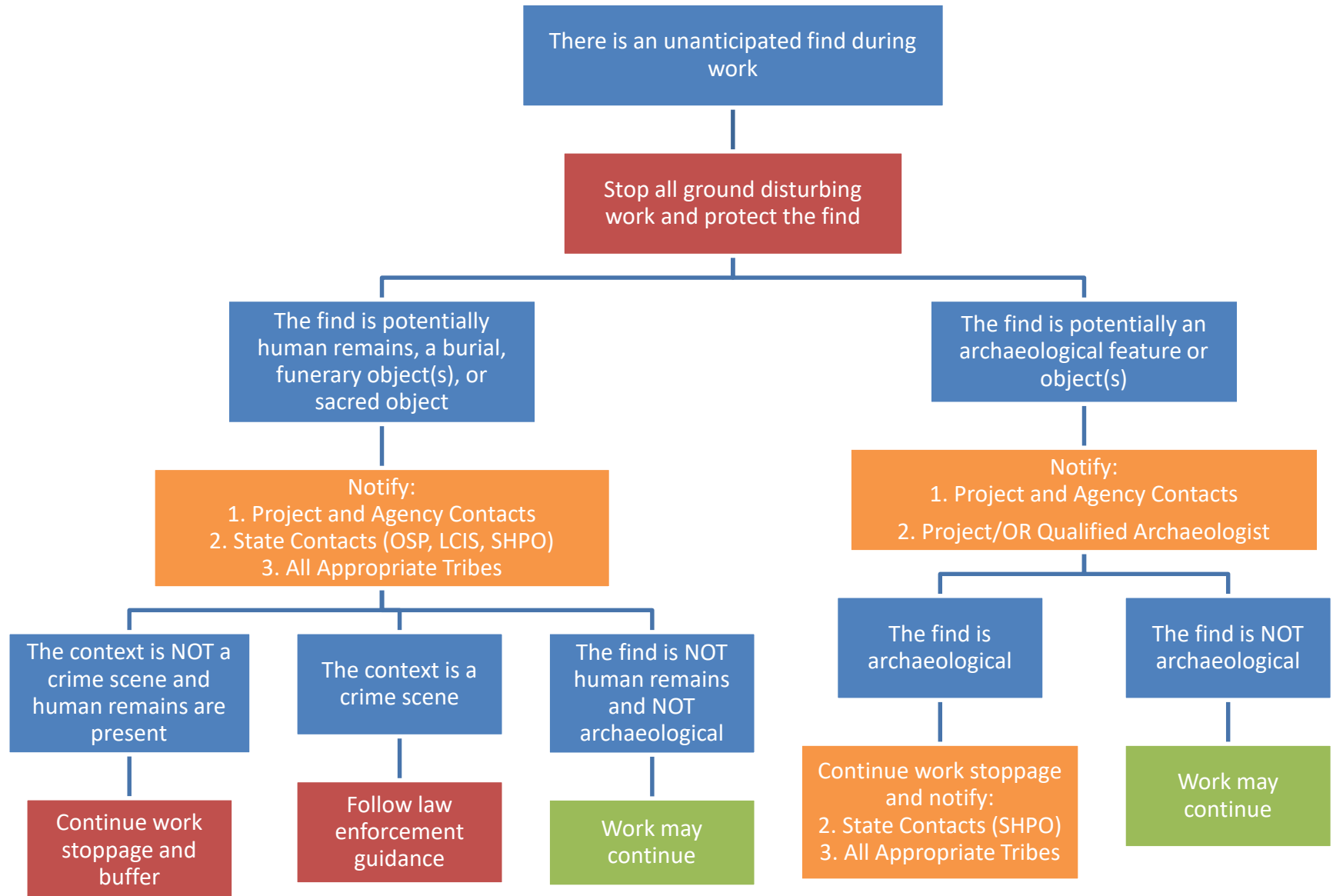
¹⁴ Southern command: Baker, Coos, Curry, Douglas, Grant, Harney, Jackson, Josephine, parts of Klamath, Lake, Malheur, Morrow, Umatilla, Union, and Wallowa

E. Confidentiality

[Proponent] 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 Oregon SHPO. Photos shall not be taken except for when authorized by the lead federal agency (if applicable), the SHPO, the LCIS, and the appropriate 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.

F. Procedure Flow Chart



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

Lithics and Stone Tools



Figure 1. Stone flakes.



Figure 2. Stone projectile points.



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

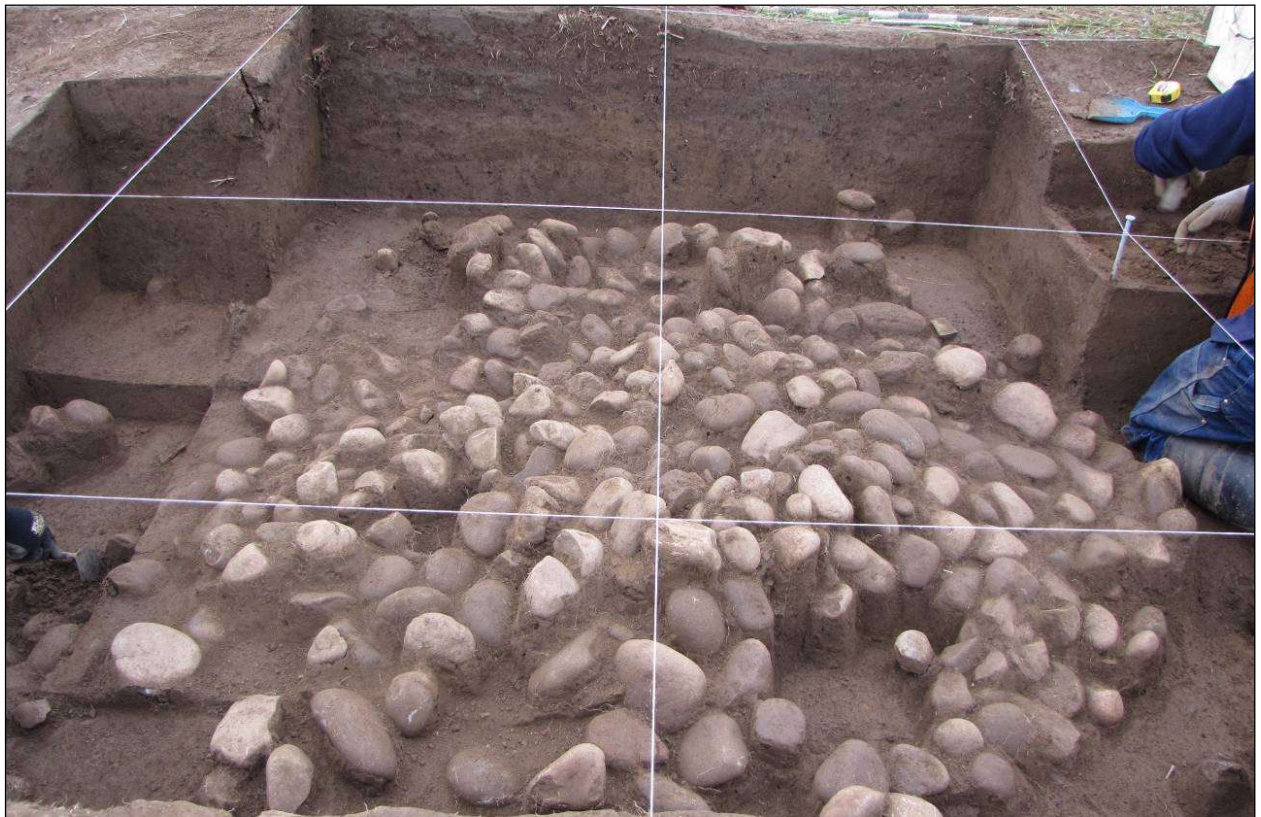


Figure 4. Camas oven, fire cracked rock feature at a precontact archaeological site (example only).

Basketry/Cordage



Figure 5. Open diagonal twine basket fragments from Fort Rock Cave (UOMNCH).



Figure 6. Three-strand braid, sagebrush bark from Paisley Caves (UOMNCH).

Shell Middens



Figure 7. Cross section of shell midden.

Beads



Figure 8. Dentalium shell beads (UOMNCH).



Figure 9. Glass trade beads, Upper Columbia River (UOMNCH).

Fish Weirs



Figure 10. Wooden fish weir.



Figure 11. Fishing weir.



Figure 12. Close up of fishing weir.

Culturally Modified Trees



Figure 13. Example of peeled pine.



Figure 14. Arborglyph on aspen tree.

Historic Artifacts



Figure 15. Historical glass.

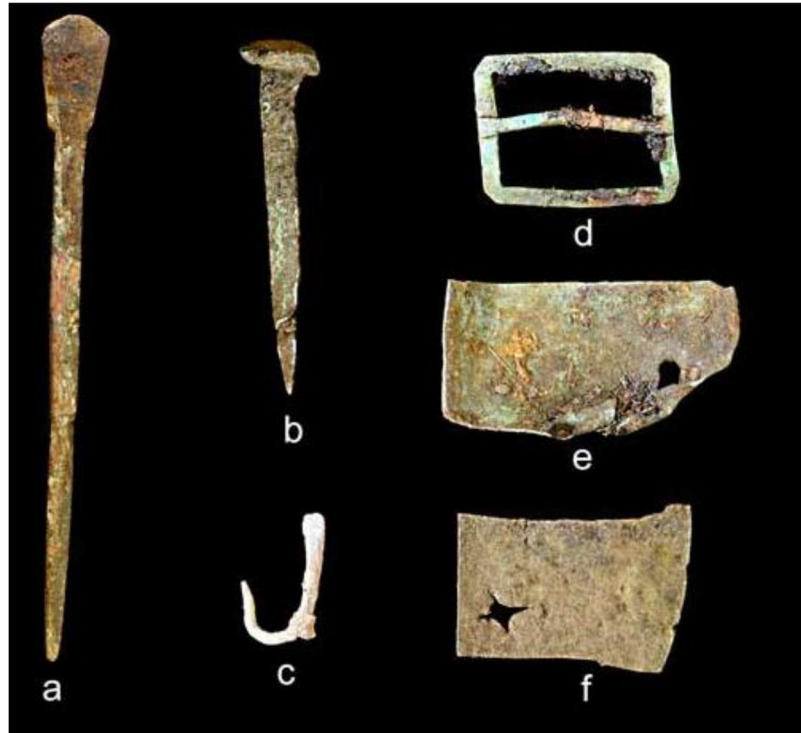


Figure 16. Historical metal artifacts.