Request for Amendment 5 for the Biglow Canyon Wind Farm

Exhibit J. Historic, Cultural, and Archaeological Resources

Submitted to
Oregon Energy Facility Siting Council

Prepared for

Portland General Electric Company

Prepared by

October 2026

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Acronyms and Abbreviations

Acronym/Abbreviation	Definition
AC	alternating current
BCWF or Facility	Biglow Canyon Wind Farm
BESS	battery energy storage system
BIGL 2 or Project Developer	BIGL 2, LLC
Certificate Holder or PGE	Portland General Electric Company
Council or EFSC	Energy Facility Siting Council
gen-tie	generation tie
IDP	Inadvertent Discovery Procedure
kV	kilovolt
MW	megawatt
MWh	megawatt-hour
NRHP	National Register of Historic Places
O&M	operations and maintenance
OAR	Oregon Administrative Rules
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
PV	photovoltaic
RFA	Request for Amendment
SHPO	Oregon State Historic Preservation Office
Site Certificate	Site Certificate on Amendment 4
Solar Facility	solar energy generation and battery storage components
Warm Springs Tribes	Confederated Tribes of the Warm Springs Reservation of Oregon
WSGV	Warm Springs GeoVisions

1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) submits this Request for Amendment (RFA) 5 to the Site Certificate on Amendment 4, issued March 27, 2026 (Site Certificate) for the Biglow Canyon Wind Farm (BCWF or Facility) to add a second phase of solar photovoltaic (PV) energy generation and battery storage capacity to the BCWF following the solar power generation and battery storage capacity approved under RFA 4.

BCWF, owned and operated by PGE, is located within an approved site boundary comprising approximately 25,000 acres, approximately 2.5 miles northeast of the town of Wasco in Sherman County, Oregon (Background Exhibit Figure 1). The BCWF operates under the Site Certificate from the Oregon Energy Facility Siting Council (Council or EFSC) as administered by the Oregon Department of Energy (ODOE). BCWF currently consists of 217 operating wind turbines, with a maximum blade tip height of 445 feet, and a peak generating capacity of 450 megawatts (MW) (Wind Facility). RFA 4, approved March 27, 2026, added 125 MW alternating current (AC) generating capacity from PV solar arrays and 500 megawatt-hours (MWh) in battery storage capacity. The solar energy generation and battery storage components (Solar Facility) described in RFA 4 are currently under construction.

In RFA 5, PGE proposes to add up to 200 MW AC generating capacity from PV solar arrays and 1,000 MWh in battery storage capacity (RFA 5 Solar Facility) by expanding the overall BCWF site boundary by approximately 839 acres. The RFA 5 Solar Facility is located across approximately 622 acres of the existing BCWF site boundary and 839 acres of expanded site boundary, for a total of 1,461 acres (together, RFA 5 Site Boundary; see Figure 4).

The RFA 5 Site Boundary provides a conservative estimate of the maximum area needed for development and micrositing through final design and construction for the RFA 5 Solar Facility, rather than the anticipated disturbance footprint. Primary infrastructure includes solar arrays, inverters, battery energy storage system (BESS) facilities and their subcomponents (i.e., inverters), one collector substation, and medium-voltage collector lines (herein collectively referred to as "Solar Components"). Additionally, the Solar Components include operations and maintenance (O&M) structures, site access roads, internal roads, perimeter fencing, facility entry gates, and temporary laydown areas. The maximum generating capacity from the Solar Components will be 200 MW AC. Power generated from the Solar Components will be transferred to the grid via a 230-kilovolt (kV) generation tie (gen-tie) transmission line, approximately 2.7 miles long. The RFA 5 Solar Facility includes the Solar Components and the gen-tie transmission line.

PGE will own and operate the RFA 5 Solar Facility as a part of the BCWF, which, to date, has been developed by BIGL 2, LLC (BIGL 2, or Project Developer). BIGL 2, in its capacity as the Project Developer, supports PGE in this RFA 5 and may construct and temporarily operate the RFA 5 Solar Facility on behalf of PGE under a Build-Transfer Agreement.

The Certificate Holder will adhere to the current Site Certificate conditions applicable to historic, cultural, and archaeological resources, including GEN-HC-01, GEN-HC-02, and GEN-HC-03, as well as PRE-HC-01, CON-HC-01, and OPR-HC-01. These conditions require preconstruction survey and avoidance of identified resources, a 20-meter avoidance buffer for specified archaeological resources, a Archaeological Construction Monitoring Plan with qualified archaeological or Tribal monitoring during ground-disturbing activities, and implementation and periodic updating of the Inadvertent Discovery Procedure (IDP). If previously unidentified cultural resources are discovered during construction, the Certificate Holder will stop work in the immediate area and implement the approved IDP. The Certificate Holder proposes that the RFA 5 amended Site Certificate clarify that the applicable cultural-resource protection requirements, including avoidance of unevaluated archaeological resources and their 20-meter avoidance buffers, apply to the five cultural resources identified in Table J-2. These requirements include avoidance of the unevaluated archaeological resources identified in Table J-2 and their applicable 20-meter avoidance buffers, as well as applicable monitoring and inadvertent discovery measures for the remaining resources identified in Table J-2.

Exhibit J provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(s) in support of RFA 5 and describes the potential impacts of RFA 5 on historic, cultural, and archaeological resources. This analysis relies on reference information, findings, and evaluations from previous cultural resource studies and investigations within the BCWF Site Boundary, as well as new cultural resource surveys completed in 2024 to support permitting of the RFA 4 and RFA 5 Solar Facilities. The survey was completed for an earlier project layout; however, the current RFA 5 Site Boundary remains within the area surveyed, and the survey results remain applicable to the current proposal. These materials demonstrate that the Facility, as modified by RFA 5, continues to comply with applicable Site Certificate conditions and applicable laws, standards, and rules, providing evidence to support the findings required by OAR 345-022-0090. Specifically, OAR 345-022-0090 states that:

> *(1) Except for facilities described in sections (2) and (3), to issue a site certificate, the Council must find that the construction and operation of the facility, taking into account mitigation, are not likely to result in significant adverse impacts to:*
>
> > *(a) Historic, cultural, or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;*
> >
> > *(b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and*
> >
> > *(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).*

Although OAR 345-022-0090 allows the Council to issue a site certificate without making the findings described above, the Council may apply these requirements to impose conditions on the site certificate. This exhibit provides evidence that the design, construction, and operation of the proposed Solar Components will not have a significant adverse impact on historic, cultural, or archaeological resources that have been listed on, or would likely be listed on, the National Register

of Historic Places (NRHP); for a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in Oregon Revised Statutes (ORS) 358.905(1)(c); and for a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).

Pursuant to OAR 345-021-0010(1)(s), this Exhibit provides information about historic, cultural, and archaeological surveys conducted by Warm Springs GeoVisions (WSGV; WSGV 2025) on behalf of the Certificate Holder and summarizes the general findings of those surveys. The survey report is provided as confidential Attachment J-1 and is submitted to ODOE under separate cover because cultural resource survey reports are exempt from public disclosure under ORS 192.345(11).

2.0 Historic, Cultural, and Archaeological Resources Inventory – OAR 345-022-0090(4)(a)(b)(c)

OAR 345-022-0090(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;

This section provides an inventory of historic, cultural, and archaeological resources within the RFA 5 Site Boundary and the surrounding analysis area. The inventory includes information regarding historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the NRHP; archaeological objects and archaeological sites on private lands within the analysis area; and archaeological sites on public lands within the analysis area, as required by OAR 345-022-0090(4)(a) through (c). The RFA 5 Site Boundary is approximately 1,461 acres and provides a conservative estimate of the maximum area needed for development, micrositing, and temporary disturbances from the Solar Facility during construction. The analysis area is shown on Figure J-1, and the confidential cultural resources inventory and evaluation report is provided as Attachment J-1.

2.1 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 direct analysis area is defined as the area within the RFA 5 Site Boundary. The indirect analysis area includes the RFA 5 Site Boundary and a 1-mile buffer to account for auditory and visual impacts to historic sites (i.e., historic buildings, structures, or objects) and Historic Properties of Religious or Cultural Significance to Indian Tribes (Figure J-1).

2.2 Tribal Outreach

On August 9, 2024, the Certificate Holder consulted with the Oregon Legislative Commission on Indian Services, requesting assistance in identifying appropriate Tribes to conduct outreach regarding the RFA4. The Legislative Commission on Indian Services identified the Confederated Tribes of the Umatilla Indian Reservation, the Confederated Tribes of the Warm Springs Reservation of Oregon, and the Burns Paiute Tribe. On October 10, 2024, the Certificate Holder sent informal outreach letters via email to representatives of each of these Tribes. The letters described the Facility and the proposed modifications under RFA 4 and requested input regarding the potential effects on resources of concern to the Tribes No responses to the October 10, 2024, outreach letters were received from the Confederated Tribes of the Umatilla Indian Reservation or the Burns Paiute Tribe. The Certificate Holder subsequently engaged in additional coordination with the Confederated Tribes of the Warm Springs Reservation of Oregon (Warm Springs Tribe), as described below.

As part of the subsequent coordination, representatives of the Certificate Holder and Project Developer team met with representatives of the Warm Springs Tribe at the Tribe's offices to discuss the RFA 4 Solar Facility, the results of the cultural resources survey, Oregon State Historic Preservation Office (SHPO) concurrence regarding resource eligibility, proposed avoidance of National Register of Historic Places-eligible and unevaluated archaeological resources, and construction-phase cultural resource protection measures. The project team explained that the project design had been modified to avoid identified eligible and unevaluated archaeological resources by a minimum of 20 meters and that a Archaeological Construction Monitoring Plan and IDP would be implemented during construction.

The Warm Springs Tribes continued to participate in the RFA 4 review process through government-to-government consultation with the State of Oregon and submitted comments dated January 15, 2026, regarding ODOE's Proposed Order on RFA 4. Among other matters, the Warm Springs Tribes raised concerns regarding the scope of archaeological monitoring and Tribal involvement during construction and requested continued consideration of cultural resource protection measures as the project proceeded toward construction.

On February 13, 2026, the Certificate Holder and Project Developer responded to the Warm Springs Tribes' comments. The response acknowledged that the solar components approved under RFA 4 are located within the ceded lands of the Warm Springs Tribes and within an area of ongoing cultural, historical, and archaeological importance. The Certificate Holder affirmed its commitment

to cultural resource protection, including archaeological monitoring, inadvertent discovery procedures, and continued Tribal consultation, and clarified the proposed approach to archaeological resource avoidance and monitoring. The Certificate Holder also expressed support for continued consultation with the Warm Springs Tribes regarding specific or expanded areas of concern and affirmed that continued coordination with the Tribal Historic Preservation Office would remain an important component of construction planning.

Following approval of RFA 4, the Certificate Holder developed an Archaeological Construction Monitoring Plan and IDP for construction of the RFA 4 Solar Facility. These plans establish procedures for archaeological monitoring, inadvertent discoveries, cultural resource protection, Tribal coordination and participation, and associated communication protocols consistent with the requirements of the amended Site Certificate. The plans are being implemented during construction of the Solar Facility approved under RFA 4, which commenced on July 15, 2026.

Through the outreach, consultation, and coordination conducted during RFA 4 and subsequent construction planning, the Certificate Holder established an ongoing coordination framework with the Warm Springs Tribes regarding cultural resource protection and Tribal involvement. This framework, together with the Archaeological Construction Monitoring Plan and IDP developed for the RFA 4 Solar Facility, provides a foundation for continued coordination regarding RFA 5.In September 2026, the Certificate Holder sent RFA 5 outreach letters by email to representatives of the Confederated Tribes of the Warm Springs Reservation of Oregon, the Confederated Tribes of the Umatilla Indian Reservation, and the Burns Paiute Tribe. The letters described the proposed RFA 5 Solar Facility, requested information regarding potential effects on historic, cultural, archaeological, or other resources of Tribal interest, and invited the Tribes to request additional information, participate in a meeting, and/or participate in a site visit. The Certificate Holder will consider information provided by the Tribes in evaluating RFA 5 and developing measures to avoid, minimize, or mitigate potential effects on cultural resources. The Certificate Holder will continue to coordinate with ODOE, the Council, SHPO, and the Tribes, as appropriate, during review of RFA 5 and will update the applicable cultural-resource protection plans to reflect additional consultation or agreed-upon measures.

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:*

This section describes discovery measures used to locate, identify, and assess the significance of historic, cultural, and archaeological resources within the analysis area, and identifies the significant potential impacts, if any, of the proposed facility on those resources. The survey methods, records review, and field survey efforts are summarized below.

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

(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);

WSGV conducted a non-collection archaeological survey within the direct analysis area in 2024 (confidential Attachment J-1). The survey was completed to identify cultural resources within the analysis area and to evaluate those resources for NRHP eligibility, as applicable. As represented in this request, the direct analysis area includes four archaeological sites and one isolate: 35SH00173, BSP-1-S01, BSP-1-S04, BSP-1-S05, and BSP-1-I01. No built-environment features were identified within the direct analysis area. The locations of these resources are depicted on confidential Figure J-2. Additional details regarding the field survey and resource evaluations are provided in confidential Attachment J-1.

3.1.1 Methods

The cultural resource discovery measures for RFA 5 consisted of records review and non-collection archaeological survey designed to locate, identify, and assess the significance of historic, cultural, and archaeological resources within the RFA 5 Site Boundary and analysis area. These discovery measures were completed by WSGV on behalf of the Certificate Holder to identify resources that may be listed, or likely eligible for listing, on the NRHP, as well as archaeological objects and archaeological sites within the analysis area. The survey work is documented in confidential Attachment J-1.

3.1.2 Records Review

WSGV reviewed the SHPO Online Archaeological Records Remote Access and Historic Sites databases to identify previously conducted surveys and recorded cultural resources within the analysis area. Historic maps of the RFA 5 Site Boundary were also reviewed to inform the survey. The records review identified previously conducted cultural resource studies within the overall analysis area and documented previously recorded archaeological sites and isolates in the project vicinity. These records helped inform the survey approach and the evaluation of resources within the RFA 5 Site Boundary.

3.1.3 Field Surveys

WSGV conducted a non-collection archaeological survey of the direct analysis area in 2024 (confidential Attachment J-1). The survey was completed to identify cultural resources within the proposed RFA 5 Site Boundary and to evaluate those resources for NRHP eligibility, as applicable. The direct analysis area includes four archaeological sites and one isolate: 35SH00173, BSP-1-S01, BSP-1-S04, BSP-1-S05, and BSP-1-I01. The locations of these resources are depicted on confidential Figure J-2. Distances to potential impacts for the identified resources are summarized in Table J-2

(see Section 3.2) and include 0 meters for 35SH00173, BSP-1-S01, and BSP-1-I01; 20.84 meters for BSP-1-S04; and 66.29 meters for BSP-1-S05. Additional details regarding the field survey and resource evaluations are provided in confidential Attachment J-1.

Table J-1. Field Efforts Undertaken for the Project

Date	Description
May 8, 2024 – November 3, 2024	WSGV conducted a non-collection archaeological survey of the direct analysis area within the RFA 5 Site Boundary and completed field documentation of identified cultural resources.

3.2 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;

Surveys conducted to date within the direct analysis area identified five cultural resources, consisting of four archaeological sites and one isolate, as summarized in Table J-2. The locations of these resources are depicted on confidential Figure J-2. The archaeological sites consist of a historic debris scatter/concentration (35SH00173), a multicomponent site with precontact lithic material and a historic debris scatter/concentration (BSP-1-S01), a historic residential structure with an associated historic debris scatter/concentration (BSP-1-S04), and a historic debris scatter/concentration (BSP-1-S05). The isolate consists of a historic harrow (BSP-1-I01). Three archaeological sites—35SH00173, BSP-1-S01, and BSP-1-S04—are unevaluated for NRHP eligibility, while BSP-1-S05 and BSP-1-I01 are recommended not eligible for listing in the NRHP. No built-environment sites were identified within the direct or indirect analysis area.

Table J-2. Inventory Results

Resource #	Description	Landowner Status	NRHP Recommendation	Distance to Disturbance (Meters)[1]
Archaeological Sites				
BCW-4 (35SH00173)	Debris scatter/ concentration	Private Land	Unevaluated	0
BSP-1-S01	Precontact lithics; historic debris scatter/concentration	Private Land	Unevaluated	0
BSP-1-S04	Residential structure; debris scatter/ concentration	Private Land	Unevaluated	20.84
BSP-1-S05	Debris scatter/ concentration	Private Land	Not Eligible	66.29

Resource #	Description	Landowner Status	NRHP Recommendation	Distance to Disturbance (Meters)[1]
Isolated Finds				
BSP-1-I01	Harrow	Private Land	Not Eligible	0

1. Distances are measured from the mapped cultural-resource boundary to the nearest proposed RFA 5 disturbance and do not represent distances from the edge of the applicable 20-meter avoidance buffers.

3.3 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

The Certificate Holder will avoid the five cultural resources identified within the RFA 5 direct analysis area and, for the unevaluated archaeological sites identified in Table J-2, their applicable 20-meter avoidance buffers during construction of RFA 5. Although the five resources are located within the RFA 5 Site Boundary, the current RFA 5 design avoids the applicable 20-meter avoidance buffers and does not propose permanent or temporary ground-disturbing activities within those buffers. The unevaluated archaeological sites 35SH00173, BSP-1-S01, and BSP-1-S04 are protected through avoidance of their applicable 20-meter buffers under the current RFA 5 design. BSP-1-S05 and BSP-1-I01 are identified in Table J-2 as not eligible for listing in the NRHP; however, the Certificate Holder will continue to implement applicable monitoring and inadvertent discovery procedures during construction. The Certificate Holder has considered these resource locations in the current RFA 5 design and will maintain avoidance of the applicable 20-meter buffers during final design and construction planning. No disturbance within the applicable 20-meter avoidance buffers is currently proposed under RFA 5; if a future design modification would encroach into an applicable buffer, the Certificate Holder will consult with ODOE, SHPO, and the Tribes, as applicable, before proceeding. The IDP is included with the Biglow Solar Facility Archaeological Construction Monitoring Plan as Attachment J-2 and will be updated, as applicable, to incorporate the revisions being made for the RFA 4 Solar Facility and to address construction of the RFA 5 Solar Facility. If previously unidentified cultural resources are discovered during construction, the Certificate Holder will stop work in the immediate area and implement the approved IDP.

4.0 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.

The Certificate Holder will implement monitoring measures consistent with the current Site Certificate conditions applicable to historic, cultural, and archaeological resources, including GEN-

HC-01, GEN-HC-02, GEN-HC-03, PRE-HC-01, CON-HC-01, and OPR-HC-01. These conditions require preconstruction survey and avoidance of identified resources to the extent practicable, a 20-meter avoidance buffer for specified archaeological resources, a Archaeological Construction Monitoring Plan approved in consultation with SHPO, and implementation of the IDP during construction and operation, as applicable. The Archaeological Construction Monitoring Plan and IDP developed for the RFA 4 Solar Facility (Attachment J-2) will be updated, as needed, prior to construction of RFA 5 to reflect final design, Site Certificate conditions, and any additional consultation with ODOE, SHPO, and the Tribes, as applicable. Attachment J-2 will be updated before construction of the RFA 5 Solar Facility to incorporate the revised Archaeological Construction Monitoring Plan and IDP applicable to the RFA 5 design. The updated plan will provide qualified archaeological monitoring during ground-disturbing activities in the vicinity of identified cultural resources, and for Tribal Cultural Resource Monitor participation where required by consultation or site-specific resource sensitivity. The Certificate Holder's corporate IDP will also be updated prior to construction of the Solar Facility. The updated IDP will be implemented during construction and operation, as applicable, and will require immediate cessation of work in the immediate area if previously unidentified cultural resources are discovered. The updated plan will provide qualified archaeological monitoring during ground-disturbing activities in the vicinity of identified cultural resources, and for Tribal Cultural Resource Monitor participation where required by consultation or site-specific resource sensitivity. The updated plans will distinguish between the 20-meter avoidance buffers applicable to identified archaeological resources and the proposed 100-foot response area applicable to inadvertent discoveries under the IDP.

5.0 References

WSGV (Warm Springs GeoVisions). 2024. Draft Cultural Resource Survey of the Biglow Canyon Project. Prepared for BIGL bn, LLC.

6.0 Approval Standards and Submittal Requirements

Table J-3. 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:	Sections 1.0 and 6.0
(a) Historic, cultural or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;	Sections 1.0, 2.0, and 3.2; Attachment J-1
(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	Sections 1.0, 2.0, and 3.2; Attachment J-1

Requirements	Location
(c) For a facility on public land, archaeological sites, as defined in ORS 358.905(1)(c).	Sections 1.0, 2.0, and 3.2
(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.	Sections 1.0 and 6.0
(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.	Sections 1.0 and 6.0
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:	–
(a) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the National Register of Historic Places;	Sections 1.0, 2.0, and 3.2; Attachment J-1
(b) For private lands, archaeological objects, as defined in ORS 358.905(1)(a), and archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;	Sections 1.0, 2.0, and 3.2; Attachment J-1
(c) For public lands, archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area;	Section 2.0; Section 3.2
(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:	Section 3.0
(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 3.1; Attachment J-1
(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 3.2; Attachment J-1
(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	Section 3.3

Requirements	Location
(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 4.0

Figures

Biglow Canyon Wind Farm Request for Amendment #5

Figure J-1
Survey Coverage of Analysis Area

SHERMAN COUNTY, OR

Sherman County

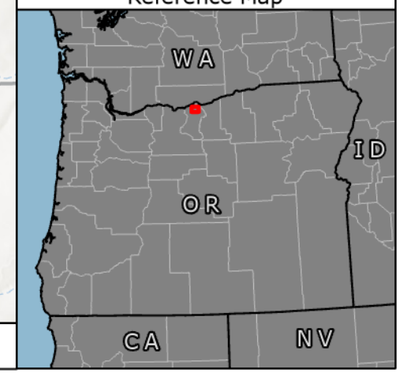
Wasco

- RFA 5 Site Boundary
- Direct Analysis Area
- Indirect Analysis Area
- County Boundary
- City/Town

TETRA TECH

PGE

Reference Map



1:40,000

WGS 1984 UTM Zone 10N

0 1 2 4 Miles

NOT FOR CONSTRUCTION

X:\BrightNight\BiglowCanyonMaps_RFA5\Exhibit_J\PGE_BiglowCanyon_RFA5_EXHIBIT_J_20260730.aprx

Figure J-2. Cultural Resource Locations

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

Attachment J-1. Cultural Resources Inventory and Evaluation Report

(Confidential)

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

Attachment J-2. Archaeological Construction Monitoring Plan for the Biglow Solar Facility Project and Inadvertent Discovery Procedure

ARCHAEOLOGICAL

CONSTRUCTION MONITORING PLAN FOR THE

BIGLOW SOLAR FACILITY PROJECT,

SHERMAN COUNTY, OREGON

SHPO Case No. 25-0589

Prepared For
Tetra Tech
Portland, Oregon

July 9, 2026
Revised September 4, 2026

REPORT NO. 5680

Archaeological Investigations Northwest, Inc.

3510 NE 122nd Ave. ● Portland, OR ● 97230 Phone 503 761-6605 ● Fax 503 761-6620

ARCHAEOLOGICAL CONSTRUCTION MONITORING PLAN FOR THE BIGLOW SOLAR FACILITY PROJECT, SHERMAN COUNTY, OREGON

PROJECT: Solar Facility Development

LOCATION: Sherman County, Oregon

Township	Range	Sections
2 North	18 East	8, 9, 17, 18, 19, 20

USGS QUADS: *Quinton, OR*, 7.5-minute, 2017

PREPARED BY: Nicholas M. Hlatky, M.A., R.P.A., and Kelley Prince Martinez, M.S., R.P.A.

INTRODUCTION

This Archaeological Construction Monitoring Plan ("Monitoring Plan") has been prepared for Tetra Tech in support of the Biglow Solar Facility Project ("Project") in Sherman County, Oregon (Figures 1 through 3). The Project is part of the larger Biglow Canyon Wind Farm ("Facility"), which consists of 217 wind turbines and related infrastructure within an approximately 25,000-acre area. The Facility is operated by Portland General Electric (PGE) and was originally constructed under an Oregon Department of Energy (ODOE) Energy Facility Siting Council (EFSC) site certificate in 2006. In 2025 PGE filed a request for a site certificate amendment to expand the Facility to include a 126 megawatt (MW) solar photovoltaic power generation facility, a 125-MW battery energy storage system (BESS), and other related infrastructure within a 1,924-acre Solar Micrositing Area ("Project Area") within the approved Facility boundary. The Project will be owned and operated by PGE with the support of BIGL bn, LLC, which is a subsidiary of BrightNight, LLC (BrightNight). EFSC issued its Final Order on the requested amendment on March 27, 2026 (EFSC 2026a), and the Site Certificate on April 1, 2026 (EFSC 2026b).

The entire Project Area was surveyed for archaeological resources in 2024 (Miller-Sisson and Galloway 2025). Seven additional archaeological surveys have also covered portions of the Project Area (CH2MHill 2005; King et al. 2020; McClintock and Sharpe 2008; Ogle and Ellis 2005, 2006; Sharma, Ellis, Ogle, and O'Brien 2006; Sharma, Ellis, Ogle, and Punke 2006). These surveys have identified 11 archaeological resources within the Project Area: 5 archaeological sites and 6 archaeological isolates. Of these 11 archaeological resources, 6 are not eligible for listing in the National Register of Historic Places (NRHP), and 5 are unevaluated for NRHP eligibility. Table 1 presents the archaeological resources within the Project Area.

The site certificate amendment issued by ODOE includes several conditions relating to cultural resources (EFSC 2026b). These conditions include ensuring the Project Area has been fully surveyed, avoiding all unevaluated archaeological resources within the Project Area with a 20-meter (m) (66-foot

[ft]) buffer, preparing an archaeological monitoring plan that includes having an Archaeological Monitor or Tribal Cultural Resource Monitor present on site during all ground-disturbing activity associated with Project construction, updating the existing Facility Inadvertent Discovery Plan (IDP), and ensuring all on-site employees adhere to the IDP during construction. Table 2 lists all site certificate conditions relating to cultural resources.

The development and implementation of this Monitoring Plan and the attached IDP assist with meeting these site certificate conditions. Currently there are no planned direct impacts to unevaluated archaeological resources or their 20 m (66 ft) buffers. The attached IDP complements the Monitoring Plan to cover the response measures in the event of an unanticipated discovery of cultural material not previously identified. The IDP is intended to be implemented by archaeological monitors, Tribal Cultural Resource Monitors, and construction crews.

TABLE 1
ARCHAEOLOGICAL RESOURCES IDENTIFIED WITHIN THE PROJECT AREA
(MILLER-SISSON AND GALLOWAY 2025)

Resource	Description	NRHP Eligibility	Report(s)
Site 35SH188	Homestead, twentieth century refuse scatter, lithic core, mussel shells	Unevaluated	Sharma, Ellis, Ogle, and Punke (2006); Miller-Sisson and Galloway (2025)
Site BSP-1-S02	Twentieth century refuse scatter, lithic flake	Unevaluated	Miller-Sisson and Galloway (2025)
Site BSP-1-S03	Twentieth century refuse scatter	Not Eligible	Miller-Sisson and Galloway (2025)
Site BSP-1-S10	Homestead and twentieth century refuse scatter	Unevaluated	Miller-Sisson and Galloway (2025)
Site BSP-1-S12	Twentieth century refuse scatter, lithic flakes	Unevaluated	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I02	Twentieth century tobacco tin	Not Eligible	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I03	Twentieth century tobacco tin	Not Eligible	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I04	Obsidian biface fragment	Unevaluated	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I05	Twentieth century steel fastener	Not Eligible	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I06	Twentieth century aqua bottle glass fragment	Not Eligible	Miller-Sisson and Galloway (2025)
Isolate BSP-1-I07	Twentieth century soil compactor	Not Eligible	Miller-Sisson and Galloway (2025)

TABLE 2

GENERAL (GEN-HC), PRE-CONSTRUCTION (PRE-HC), AND CONSTRUCTION (CON-HC) SITE CERTIFICATE CONDITIONS

Designation	Condition
GEN-HC-01	Before beginning construction of any phase of the facility, the certificate holder shall provide to the Department a map showing the final design locations of all components of that phase of the facility and areas that would be temporarily disturbed during construction and also showing the areas surveyed by CH2M Hill and Archaeological Investigations Northwest, Inc. (AINW) in preparing the Cultural Resources Surveys for Biglow Canyon Wind Farm included in the site certificate application as Attachment S-1 and in Request for Amendment #2 as Attachment 15. The certificate holder shall hire qualified personnel to conduct field investigation of all areas of permanent or temporary disturbance that CH2M Hill and AINW did not previously survey and shall provide to the Department a written report of the field investigation. If any significant historic, cultural or archaeological resources are found during the field investigation, the certificate holder shall ensure that construction and operation of the facility will have no impact on the resources. The certificate holder shall instruct all construction personnel to avoid areas where the resources were found and shall implement other appropriate measures to protect the resources. [Amendment #2]
GEN-HC-02	The certificate holder must design, construct, and operate the solar facility to avoid archaeological sites (35SH00188, BSP-1-S02BSP-1-S10, and BSP-1-S12) and archaeological isolate (BSP-1-I04) with a 20-meter avoidance buffer. [Final Order on RFA4, Historic, Cultural, and Archaeological Condition 1]
GEN-HC-03	a) Prior to construction, the certificate holder must submit to the Department for approval, in consultation with SHPO, a Cultural Resources Monitoring Plan demonstrating that an Oregon Qualified Archaeologist or Tribal Cultural Resource Monitor will be onsite during ground disturbing activities at the site. The plan may provide for exceptions to monitoring scope and frequency, subject to approval by the Department, in consultation with the Confederated Tribes of Warm Springs. b) During construction, the certificate holder shall adhere to the measures approved in the Cultural Resources Monitoring Plan. [Final Order on AMD4, Historic, Cultural, and Archaeological Condition 2]
PRE-HC-01	Prior to construction, the certificate holder shall update the contact information provided in the Final Order on ASC Attachment H, Inadvertent Discovery Plan. [Final Order on AMD4; Historic, Cultural and Archeological Condition 3]
CON-HC-01	During construction, the certificate holder shall require all onsite employees and contractors to implement and adhere to the requirements of the Inadvertent Discovery Plan, as submitted to the Department under Condition PRE-HC-01. [Final Order on AMD4; Historic, Cultural and Archeological Condition 3]

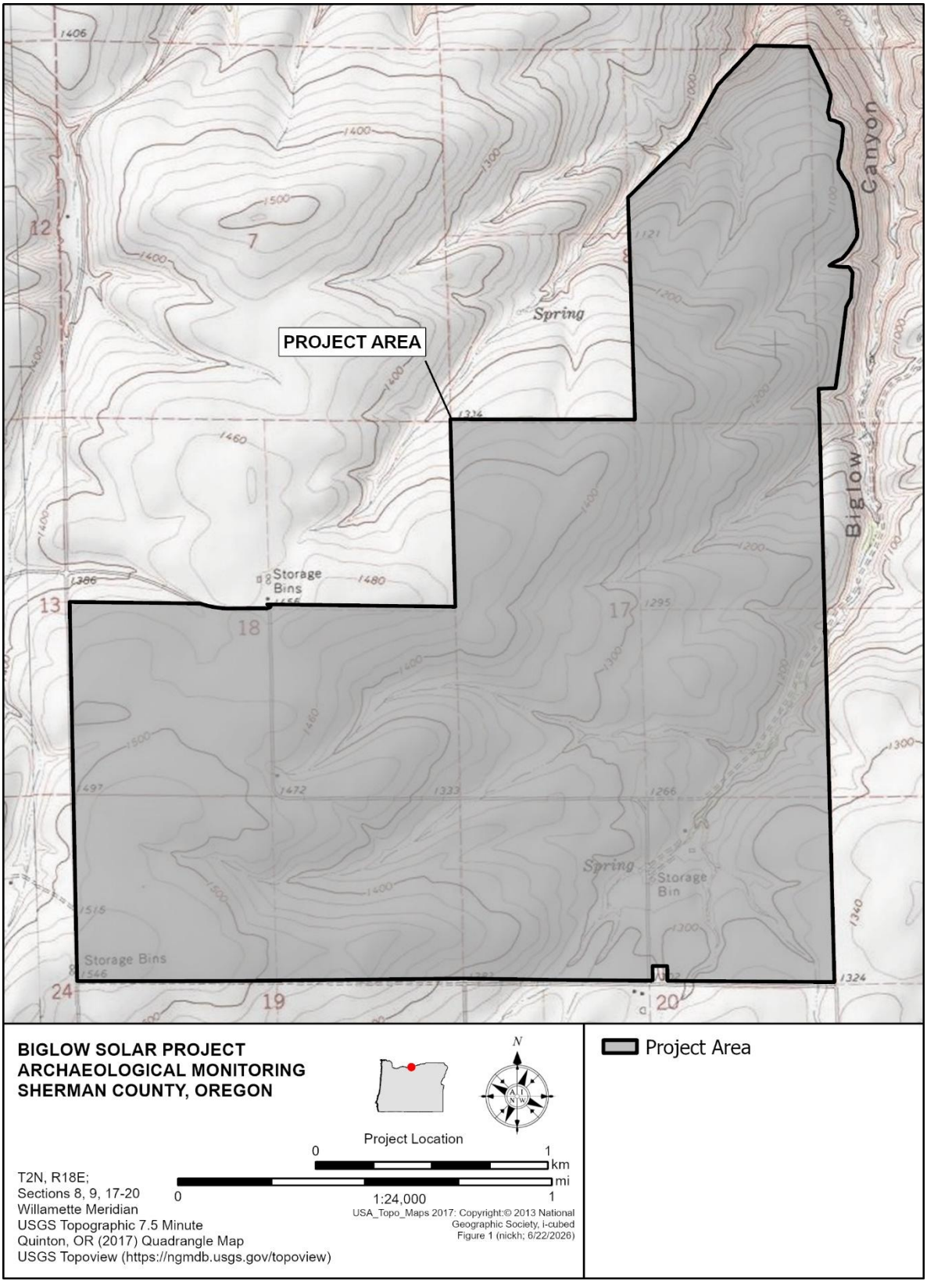


Figure 1. The Biglow Solar Facility project is in Sherman County, Oregon.

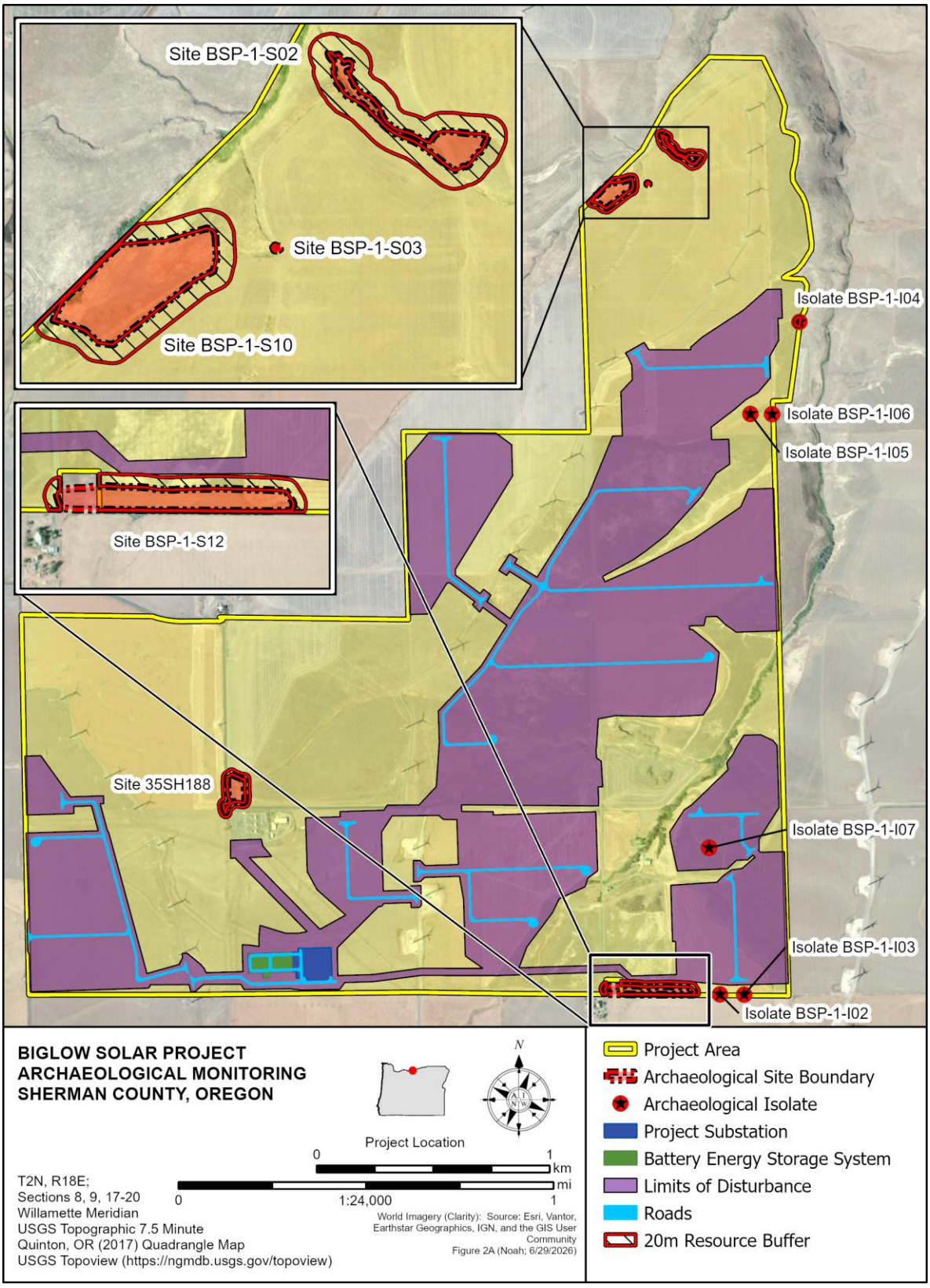


Figure 2. Aerial overview showing construction plans for the Biglow Solar Facility project.

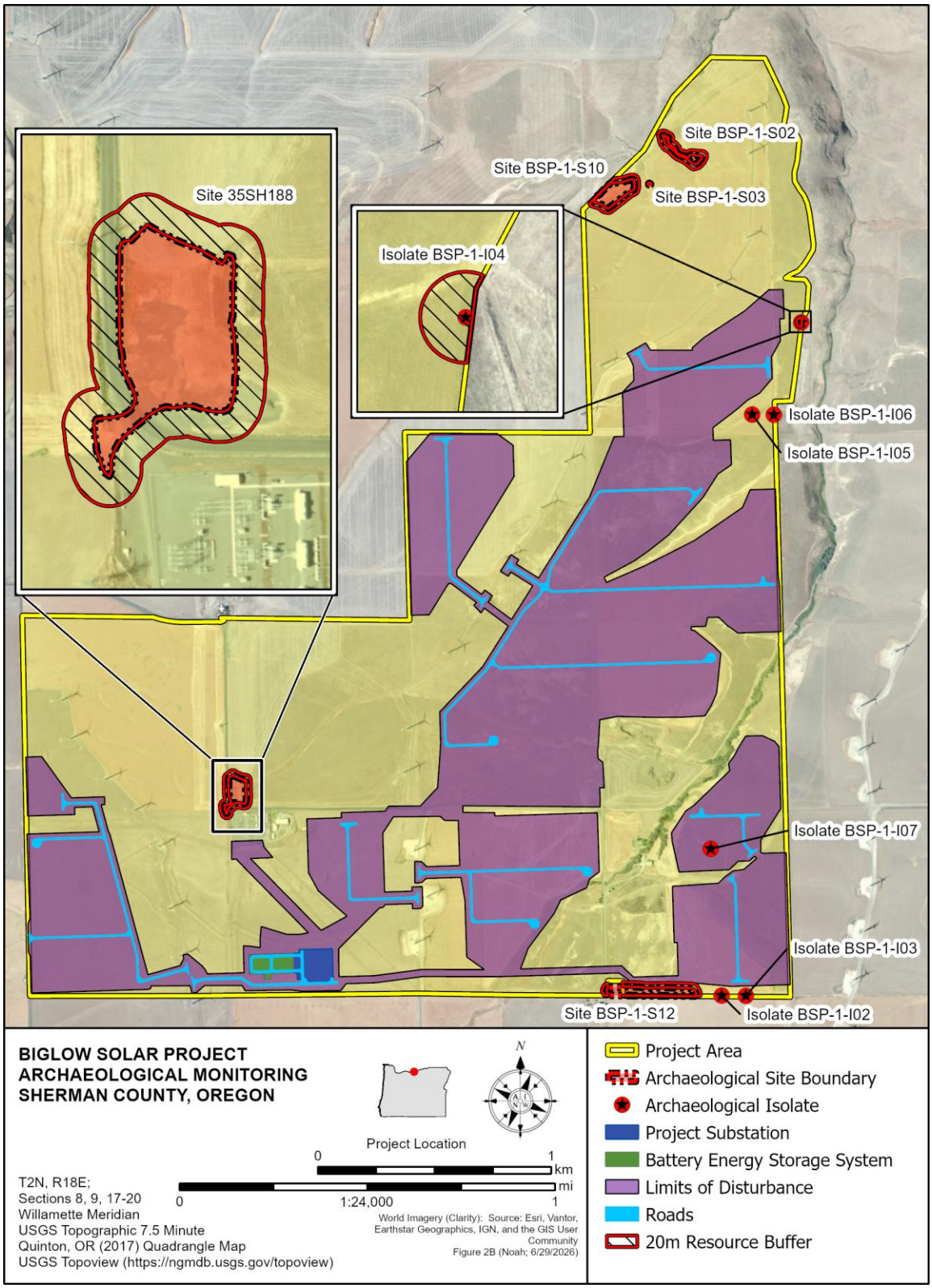


Figure 3. Aerial overview showing construction plans for the Biglow Solar Facility project.

DEFINED TERMS AND ROLES

Archaeological Monitoring: Observation by an Archaeological Monitor of initial ground-disturbing activities within the Project Area.

Archaeological Monitor: An individual that must be present during, and at the location of, ground-disturbing activities associated with the Project. The Archaeological Monitor will have the qualifications identified in the State Historic Preservation Office (SHPO) *Guidelines for Conducting Field Archaeology in Oregon* Appendix E: Archaeological Monitoring Guidelines (2016 minor revision). The SHPO monitor qualifications consist primarily of "…a minimum of 24 months of active fieldwork experience in the geographical or cultural region of the monitored action and/or laboratory processing/analysis of materials from the geographical region." The Archaeological Monitor will also be knowledgeable in recognizing "…archaeological artifacts, features, or potential cultural-bearing sediments that may be exposed…." The Archaeological Monitor will be directly supervised by the Project Archaeologist, who will be an Oregon Qualified Archaeologist.

Archaeological Feature: A discrete, non-portable, physical trace of human activity (e.g., pit, hearth, earth oven, rock pile, etc.) representing pre-contact or historic-period activity.

Archaeological Resource: An archaeological site or isolate as defined in ORS 358.905 and current SHPO guidelines. ORS 358.905 states that an archaeological site consists of "…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." SHPO has stated that their interpretation of "**archaeological objects**" means two or more artifacts.

Artifact: A discarded human made or modified object more than 75 years in age.

Ground Disturbance: Penetration of the mineral ground surface to depths of 2.5 centimeters (cm) (1 inch [in]) or more through project construction or operation activities.

Ground Disturbing Activities: Manual or mechanical excavation, trenching, grading, pile-driving, or installation of fence posts, or other actions that cause ground-disturbance. If soil conditions allow vehicle tracks or tires to sink into the ground surface creating ruts 2.5 cm (1 in) or deeper, then vehicle travel is also considered a ground-disturbing activity.

Inadvertent Discovery: The discovery of artifacts or archaeological features not previously identified within a known site, the discovery of artifacts or features outside of the boundaries of a known archaeological site or isolate, or the discovery of human remains and/or objects of cultural patrimony anywhere within the Project Boundary.

Object of Cultural Patrimony: Defined in ORS 358.905 as "…an object 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."

Project Archaeologist: A Oregon SHPO Qualified Archaeologist who provides oversight for the Monitoring under this Monitoring Plan.

Project Area: The facility boundary of the Biglow Solar Project, inclusive of all Project related ground disturbance.

ARCHAEOLOGICAL MONITORING METHODS

Coordination & Scheduling

An AINW Senior Archaeologist/Project Manager will act as the Project Archaeologist for the duration of the project. The Project Archaeologist will receive weekly updates regarding the construction schedule to determine when monitoring is required. At least three days of notice are generally required for the Project Archaeologist and Archaeological Monitor in advance of ground-disturbing activities that require Archaeological Monitoring. The Project Archaeologist will coordinate with the Archaeological Monitor throughout the week as needed and will communicate updates on the status of monitoring to Tetra Tech and BrightNight as needed. In the event of an Inadvertent Discovery, the Project Archaeologist will be responsible for all cultural resource notifications. If an Inadvertent Discovery is determined to require mitigation, the Project Archaeologist will coordinate the mitigation work. The Project Archaeologist will assist with preparation of monthly reports on monitored activities that will be submitted to ODOE.

Pre-construction Training

Prior to construction activities, AINW and/or Tetra Tech will present a training to construction staff that outlines cultural resource concerns, environmental concerns, and monitoring requirements. The training will provide guidance to construction staff on how to identify historic, cultural, and archaeological resources that may be present on site, and how to implement the IDP in the event of an Inadvertent Discovery.

Pre-construction Flagging

Prior to the beginning of construction activities, archaeological sites 35SH00188, BSP-1-S02BSP-1-S10, and BSP-1-S1, and archaeological isolate BSP-1-I04 will be flagged with a 20 m (66 ft) avoidance buffer. The flagging will be clearly visible and consist of materials easily installed and removed. When flagging the avoidance buffer, the boundaries of the archaeological resources will be confirmed using a GPS device and the flagging recorded with a GPS device. The Archaeological Monitor or Tribal Cultural Resource Monitor will periodically re-visit all flagged resources to ensure the flagging remains visible to construction crews for the duration of monitored construction.

Archaeological Monitoring

Archaeological monitoring will be conducted during all ground disturbance within the Project Area. Ground disturbance consists of manual or mechanical excavation, trenching, grading, pile-driving, or installation of fence posts, or other actions that penetrate the ground surface to depths greater than 2.5 cm (1 in). If soil conditions allow vehicle tracks or tires to sink into the ground surface creating ruts 2.5 cm (1 in) or deeper, then vehicle travel is also considered a ground-disturbing activity.

A Tribal Cultural Resource Monitor may be present during Project construction. If present, the Tribal Cultural Resource Monitor will not be under the direct supervision of the Project Archaeologist, who will be an Oregon Qualified Archaeologist. It is assumed that one Archaeological Monitor or Tribal Cultural Resource Monitor at a time will be sufficient to observe ground disturbance occurring on site. If work is planned in multiple locations not simultaneously observable by the Archaeological Monitor or Tribal Cultural Resource Monitor, additional Archaeological Monitors or Tribal Cultural Resource Monitors may be needed.

Once Project ground disturbance has been monitored in a particular location, Archaeological monitoring is no longer required for additional ground disturbance in the same location, unless the additional disturbance will extend beyond the horizontal or vertical limits of the previous disturbance. Any ground disturbance extending beyond the horizontal or vertical limits of previous disturbance will need to be monitored.

The Archaeological Monitor or Tribal Cultural Resource Monitor will document the ground disturbance that occurs during construction using a paper daily monitoring log. The daily monitoring log will include:

- Date, area of work (defined by Project features, e.g., portion of the map within the Project Area and by archaeological resource, e.g., site or isolate designation) and soils description for that day's Archaeological Monitoring Areas;
- On-site equipment and names of the construction crew leaders being monitored;
- Construction activities being monitored (e.g. grading, excavation, trenching, etc.); and
- Color digital photographs to document construction and monitoring activities, as well as soil profiles when feasible, to be submitted with a photo log as attachments to the daily log. The photo log will include time and date, direction faced, and description of the photo.

If any subsurface or previously unidentified surface artifacts or archaeological features are observed during archaeological monitoring, or if human remains and/or objects of cultural patrimony are identified anywhere within the Project Area, these will constitute an Inadvertent Discovery. If an Inadvertent Discovery is made during ground-disturbing activities, the Project Archaeologist, Archaeological Monitor and/or Tribal Cultural Resource Monitor, Tetra Tech, and BrightNight will implement the IDP.

Per the Project IDP, if an archaeological object or site is identified during Project construction, ground-disturbing activities will immediately cease within ~~60~~ 30 m (~~200~~ 100 ft) of the discovery, and the Project Archaeologist, PGE, Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO), Confederated Tribes of the Umatilla Indian Reservation (CTUIR), and SHPO will be contacted.

Per the Project IDP, if human remains or objects of cultural patrimony are identified during Project construction, ground-disturbing activities will immediately cease within ~~60~~ 30 m (~~200~~ 100 ft) of the inadvertent discovery, and the Project Archaeologist, PGE, CTWSRO, CTUIR, SHPO, Legislative Commission on Indian Services, ODOE, and state police will be contacted.

If artifacts are identified during project construction, the items will be documented and described by the archaeological monitor through notes, photographs, and GPS data collection. Artifacts will not be collected. In coordination with the Tribes, artifacts will be returned to the location of the discovery or reburied nearby if ground disturbance is continuing at the location of the discovery.

REPORTING

Within six months of the completion of the Archaeological monitoring, a report will be prepared by AINW, detailing the results of Archaeological monitoring. The report will discuss the monitoring results within the project area. If Inadvertent Discoveries are identified during Archaeological monitoring, they will be described in the report and an Oregon SHPO resource form appended to the report. If appropriate, existing archaeological site and/or isolate forms will be updated to reflect changes in boundaries and/or previously unrecorded artifact types or archaeological features that may result from Inadvertent Discoveries.

If an inadvertent discovery requires archaeological mitigation by AINW, an interim report on the results of the mitigation will be prepared by the Project Archaeologist and provided to Tribes, PGE, ODOE, and SHPO within 14 days of the completion of mitigation work. The interim report will outline the methods used to mitigate impacts to the resource, and include a count of the total number of units excavated, the number of artifacts recovered, and preliminary maps of the results. The recipients of the interim report will have 14 days to review the interim mitigation report. Review comments will be addressed by the Project Archaeologist and the interim report resubmitted to the reviewers. If there are no comments on the interim report by reviewers, then ground disturbance at the location of the mitigated discovery can proceed. The results of any archaeological mitigations will be included in the final monitoring report prepared at the conclusion of construction monitoring.

REFERENCES

CH2MHill

2005 *Cultural Resources Survey for Biglow Canyon Wind Farm Facility*. CH2MHill, Portland, Oregon. Prepared for Orion Energy, LLC, Oakland, California.

Energy Facility Siting Council (EFSC)

2026a Biglow Canyon Wind Farm - Final Order on Request for Amendment 4. March 27, 2026. https://www.oregon.gov/energy/facilities/Facilities%20library/2026-03-27-BCWAMD4-Final-Order-Signed.pdf

2026b Fourth Amended Site Certificate for the Biglow Canyon Wind Farm. April 1, 2026. https://www.oregon.gov/energy/facilities/Facilities%20library/2026-04-01-Fourth-Amended-Site-Certificate-Signed.pdf

King, Erin, Brady Berger, and Julia Mates

2020 *Cultural Resource Survey Report, Golden Hills Wind Interconnection Project, Sherman County, Oregon*. Tetra Tech, Inc., Portland, Oregon. Prepared for Bonneville Power Administration, Portland, Oregon.

McClintock, Robin and James Sharpe

2008 *Amendment III Archaeological Survey Report, Biglow Canyon Wind Farm, Sherman County, Oregon*. CH2MHill, Portland, Oregon. Prepared for Portland General Electric, Portland, Oregon.

Miller-Sisson, Misha, and Mars Galloway

2025 *Cultural Resources Survey for the Biglow Solar Project. Geovisions, Warm Springs, Oregon*. Prepared for BrightNight, LLC, West Palm Beach, Florida.

Ogle, Todd, and David Ellis

2005 *Cultural Resource Survey for the Proposed Klondike III/Biglow Canyon Wind Integration Project, Sherman County, Oregon*. Archaeological Investigations Northwest Report No. 1608. Prepared for David Evans and Associates, Inc., Portland, Oregon

2006 *Cultural Resource Survey for the Biglow Canyon Geotechnical Excavations, Sherman County, Oregon*. Archaeological Investigations Northwest Report No. 1751. Prepared for Portland General Electric, Portland, Oregon.

Sharma, Mini, David Ellis, Todd Ogle, and Michele Punke

2006 *Cultural Resource Survey for the Biglow Canyon Wind Project , Sherman County, Oregon: Supplement I*. Archaeological Investigations Northwest Report No. 1817. Prepared for Portland General Electric, Portland, Oregon.

Sharma, Mini, David Ellis, Todd Ogle, and Elizabeth J. O'Brien

2006 *Cultural Resource Survey for the Biglow Canyon Wind Project – Phase 1, Sherman County, Oregon Supplement 2*. Archaeological Investigations Northwest Report No. 1858. Prepared for Portland General Electric, Portland, Oregon.

APPENDIX

INADVERTENT DISCOVERY PLAN

1. Purpose

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

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

1.1. Scope

1.1.1. The scope of this procedure is to minimize impacts to **cultural resources**.

1.1.2. This procedure is applicable to all PGE Personnel and PGE contractors.

1.1.3. The procedure outlines appropriate steps for PGE Personnel and Contractors when **cultural resources** are inadvertently or unanticipatedly discovered during work.

1.1.4. **Inadvertent discoveries** are categorized as either "definitely human remains" or "not definitely human remains" and the steps after each type of discovery are distinct.

1.1.5. **Cultural resources** can be found during any ground-disturbing activity. If encountered all excavation and work in the area MUST STOP. Archaeological objects vary and can include evidence or remnants of historic-era and precontact activities by humans. Archaeological objects can include but are not limited to:

A. Stone flakes, arrowheads, stone tools, bone or wooden tools, baskets, beads

B. Historic building materials such as nails, glass, metal such as cans, barrel rings, farm implements, ceramics, bottles, marbles

C. Layers of discolored earth resulting from hearth fire

D. Structural remains such as foundations

E. Shell Middens

F. Culturally Modified Trees

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

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

1.2. Precautions

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

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

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

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

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

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

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

1.3. Limitations

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

2. Responsibilities

2.1. PGE Personnel and Contractors

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

2.1.2. Contacts appropriate personnel and protects the area, per the procedure.

2.2. PGE Security

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

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

2.3. Cultural Resources Specialist

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

2.3.2. Coordinates with PGE security as required.

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

2.3.4. Provides direction and support services to affected personnel.

2.3.5. Engages an external consultant if required.

2.4. PGE Management

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

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

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

3. Procedure

3.1. Prerequisite Actions

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

3.2. Procedure

3.2.1. Initial Response

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

1. If the **inadvertent discovery** is believed to be human remains stop ALL work immediately and follow these steps.

a. Contact PGE Security and Environmental Health & Safety (EHS) immediately within two hours or as soon as reasonably practical.

b. Cover the remains in a manner that will avoid directly touching them and will protect them from damage, exposure, and obscure their view. Restrict access to the area and leave the cover in place until directed otherwise. Do not take photographs. Do not speak to the media.

c. PGE Security: Contact Oregon State Police (OSP) to determine whether the find is forensic, i.e., a recent death requiring a criminal investigation.

d. Contact the PGE's Cultural Resources Specialist (EHS): See the "Cultural Resources Discovery Contact List" (A01).

2. If the discovery is not definitively human remains, PGE's personnel who uncovered the find or their supervisor will contact PGE's Cultural Resources Specialist (EHS) within two hours of discovery or as soon as practical.

a. PGE's Security does not need to be contacted.

B. PGE Personnel will flag off a buffered area about 200 feet around the discovery if possible.

1. The area of work stoppage must be large enough to provide for the security, protection, and integrity of the discovery.

C. PGE Personnel must promptly protect the discovery from continued exposure to the weather and from public view.

1. This may be accomplished using a clean tarp or other fabric.

3.2.2. Assessment

A. After being contacted by PGE Security, OSP, in consultation with the State Medical Examiner and the State Physical Anthropologist, will conduct an assessment to determine if it is a crime scene.

B. If the site is determined not to be a crime scene by OSP, or that the find is definitely not modern, do not move anything! The remains will continue to be secured in place along with any associated funerary objects, and protected from weather, water runoff, and shielded from view. PGE's

Cultural Resources Specialist will conduct an on-site assessment of the **inadvertent discovery**.

1. PGE's Cultural Resources Specialist will ensure that all work has halted near the find, that the protection buffer has been created and is adequate, and that the **inadvertent discovery** continues to be treated with respect and secured from harm.

2. If the discovery has been determined non-modern human remains by law enforcement, PGE's Cultural Resources Specialist will contact the State Historic Preservation Office (SHPO), the State Physical Anthropologist, and the Legislative Commission on Indian Services (LCIS) for further guidance as soon as possible, along with the notifying the appropriate Tribes as designated by LCIS.

3. If the discovery is not human remains but a cultural resource, PGE's Cultural Resources Specialist will contact the State Historic Preservation Officer and appropriate Tribes as designated by LCIS within 24 hours of the discovery.

4. PGE's Cultural Resources Specialist will inform PGE Management or Project Manager of a reasonable time frame within which construction or maintenance activity can resume at the location of discovery.

5. PGE's Cultural Resources Specialist will inform appropriate PGE management of the **inadvertent discovery** within 24 hours of the find.

C. Do not resume any work in the buffered area until a plan is developed and carried out between the State Police, SHPO, LCIS, and appropriate Native American Tribes and you are directed that work may proceed.

3.3. Acceptance Criteria

3.3.1. None.

3.4. Post-Performance Activity

3.4.1. PGE's Cultural Resources Specialist will coordinate further archaeological fieldwork and reporting required to complete documentation of the **inadvertent find**.

3.4.2. If Tribes require repatriation of any **cultural resources**, PGE's Cultural Resources Specialist will coordinate the effort with stakeholders jointly identified by the SHPO, Tribes designated by LCIS, and PGE within a reasonable time frame.

3.4.3. PGE will follow appropriate laws and management procedures to assure the proper treatment and care of the discovery.

3.4.4. PGE's Cultural Resources Specialist will confirm with PGE Management when the area is cleared for work to resume.

4. References

4.1. Industry Standards or Codes

4.1.1. Code Federal Regulations (CFR): Native American Graves Protection and Repatriation Act (NAGPRA): 43 CFR 10

4.1.2. Oregon Revised Statute:

A. ORS 97.740-994 and 358.905-961: Protection under Oregon State law

B. ORS 146.090 & .095: Deaths requiring investigation in OR

4.1.3. Revised Code of Washington: RCW 68.50.645, 27.44.055, and 68.60.055: Inadvertent Discoveries in WA

4.2. PGE

4.2.1. Cultural Resources & Inadvertent Discoveries (SharePoint

5. Definitions and Acronyms

5.1. Definitions

5.1.1. **Cultural Resources:** Physical evidence of past human activity (site, object, structure, natural feature or landscape) considered significant by a group of people traditionally associated with it. **Cultural resources** are defined as being fifty years or older. These resources may include artifacts (lithic or stone tools or fragments of tools, ceramic vessels, animal remains, can scatters, farm equipment), or features (remnants of walls, petroglyphs, cooking hearths or trash middens). **Cultural resources** may be the location of a significant event, prehistoric or historic occupation or activity, whether standing, ruined, or vanished, and possessing historical, cultural, or archaeological value.

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

5.2. Acronyms

5.2.1. EHS: Environmental Health and Safety

5.2.2. HPMP: Historical Properties Management Plan

5.2.3. IDP: Inadvertent Discovery Procedure

5.2.4. LCIS: Legislative Commission on Indian Services

5.2.5. NAGPRA: Native American Graves Protection and Repatriation Act

5.2.6. SHPO: State Historic Preservation Office

6. Forms and Appendices

6.1. Forms

6.1.1. None.

6.2. Appendices

6.2.1. IDP Contact List

7. Revision Table

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

Rev. No.	Revision Date	Reason for Revision	Affected Pages
0	7/9/2026	Issued for implementation for the Biglow Solar Facility construction	ALL

Name	Affiliation	Office Phone	Alt Phone	Email/Other	Availability
Kenny Gunn	PGE Cultural Resources Specialist (EHS)	503-464-BONE (503-464-2663)	503-550-5822	kenny.gunn@pgn.com	24/7
Nicholas Hlatky	Archaeological Investigations Northwest, Inc.	971-645-6124	Same	nickh@ainw.com	
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