

Exhibit S

Historic, Cultural, and Archaeological Resources

**Carty Generating Station
October 2026**

Prepared for



Portland General Electric Company

Prepared by



TETRA TECH

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Attachment S-1. Cultural Resources Survey Report, Carty Generating Station. Morrow County,
Oregon **(Confidential – provided under separate cover)**

Acronyms and Abbreviations

AC	alternating current
AINW	Archeological Investigations Northwest Inc.
ASC	Application for Site Certificate
BCP	Boardman Coal Plant
BESS	battery energy storage system
Certificate Holder / PGE	Portland General Electric Company
CGS / Facility	Carty Generating Station
Council	Oregon Energy Facility Siting Council
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
CTWSRO	Confederated Tribes of the Warm Springs Reservation of Oregon
HPRCSIT	Historic Property of Religious or Cultural Significance to Indian Tribes
LCIS	Legislative Commission on Indian Services
MW	megawatt
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
OARRA	Oregon Archaeological Records Remote Access
ODOE	Oregon Department of Energy
ORS	Oregon Revised Statutes
RFA	Request for Amendment
SHPO	Oregon State Historic Preservation Office
WillametteCRA	Willamette Cultural Resources Associates Ltd.

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1.0 Introduction

The Portland General Electric Company (PGE or Certificate Holder) is submitting a Request for Amendment (RFA) 4 to the Site Certificate for the Carty Generating Station (CGS or Facility). The Facility is located approximately 13 miles southwest of Boardman, in Morrow County, Oregon. As currently approved, the Facility is capable of generating up to 450 megawatts (MW) from the natural gas-fueled combined-cycle unit (Unit 1).

In RFA 4, the Certificate Holder is proposing photovoltaic solar energy generation with approximately 200 MW alternating current (AC) of nominal and average generating capacity and battery energy storage system (BESS) with the capability of storing up to 200 MW AC. The overall CGS additions proposed with RFA 4 (including the BESS) are referred to throughout this request as the Carty Solar Farm with proposed RFA 4 changes. The solar generation is proposed in two separate solar areas referred to as the Northern Solar Area, located north of the Carty Reservoir, and the Southern Solar Area, located south of the reservoir [see Figure 2 in RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station)].

The Oregon Energy Facility Siting Council (Council) previously found the Certificate Holder has demonstrated an ability to construct, operate, and retire the Facility in compliance with Council standards and conditions of the Site Certificate. Exhibit S provides the information required by Oregon Administrative Rules (OAR) 345-021-0010(1)(s) in support of RFA 4. Exhibit S provides an analysis of potential significant adverse impacts of the Facility to historic, cultural, and archaeological resources. Analysis in this exhibit incorporates and/or relies on reference information, analysis, and findings found in the Application for Site Certificate (ASC), previous RFAs, and Oregon Department of Energy (ODOE) Final Orders to demonstrate that the Carty Generating Station (Facility), as modified by RFA 4, continues to comply with applicable Site Certificate Conditions and the approval standards in OAR 345-022-0090, providing evidence to support findings by the Council as required by OAR 345-022-0090. Specifically, OAR 345-022-0090 states that:

345-022-0090 Historic, Cultural and Archaeological Resources

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

(a) Historic, cultural, or archaeological resources that have been listed on, or would likely be listed on the National Register of Historic Places;

(b) For a facility on private land, archaeological objects, as defined in ORS 358.905(1)(a), or archaeological sites, as defined in ORS 358.905(1)(c); and

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

(2) The Council may issue a site certificate for a facility that would produce power from wind, solar or geothermal energy without making the findings described in section (1). However, the Council may apply the requirements of section (1) to impose conditions on a site certificate issued for such a facility.

(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.

2.0 Information About Historic, Cultural, and Archaeological Resources – OAR 345-021-0010(1)(s)

OAR 345-021-0010(1)(s) Information about historic, cultural and archaeological resources. Information concerning the location of archaeological sites or objects may be exempt from public disclosure under ORS 192.345(11). The applicant must submit such information separately, clearly marked as “confidential,” and shall request that the Department and the Council keep the information confidential to the extent permitted by law. The applicant must include information in Exhibit S or in confidential submissions providing evidence to support a finding by the Council as required by OAR 345-022-0090, including:

Pursuant to OAR 345-021-0010(1)(s), this exhibit provides information about historic, cultural, and archaeological surveys conducted for the Carty Solar Farm with proposed RFA 4 changes and general findings of those surveys. More detailed information is provided in the 2023 Cultural Resources Survey Report, Carty Generating Station (Attachment S-1). In addition, the historic, cultural, and archaeological information provided comes from the Archaeological Inventory for the PGE Carty Expansion Project (WillametteCRA 2016), previously provided as part of RFA 1.

The cultural resources survey reports are confidential documents, which are exempt from public disclosure under Oregon Revised Statutes (ORS) 192.345(11); Attachment S-1 is provided to ODOE under separate cover. The Certificate Holder has provided a copy of the confidential 2023 cultural resources survey report to the Oregon State Historic Preservation Office (SHPO) and area Tribes identified by the Legislative Commission on Indian Services (LCIS) as the Confederated Tribes of the Umatilla Indian Reservation (CTUIR) and the Confederated Tribes of the Warm Springs Reservation of Oregon (CTWSRO). The 2016 report has been reviewed by SHPO and is available to the Tribes on SHPO’s Oregon Archaeological Records Remote Access (OARRA) database.

3.0 Analysis Area

Pursuant to OAR 345-021-0010(1)(s)(A) and (B), the analysis area for historic, cultural, and archaeological resources in support of RFA 4 consists of both direct and indirect analysis areas.

Direct Analysis Area

The direct analysis area is composed of approximately 1,061 acres within the Amended Site Boundary. The Amended Site Boundary is defined in detail in Section 4.1.1.2 of RFA 4's Division 27 document (Request for Amendment 4 for the Carty Generating Station). The direct analysis area is referred to in this exhibit as the Cultural Resources Study Area (see Figure S-1). The Cultural Resources Study Area is where the Certificate Holder is proposing permanent and temporary disturbance for RFA 4.¹ All permanent and temporary disturbance associated with RFA 4 are proposed within the Cultural Resources Study Area; however, not all of the study area will be disturbed. For example, Figure S-1 shows that the study area includes portions of the northern shoreline along Carty Reservoir; however, the actual disturbance associated with RFA 4 will be setback from the northern shoreline (see Figure 2 in RFA 4's Division 27 document [Request for Amendment 4 for the Carty Generating Station]). Figure S-1 also shows that separate surveys in 2016 by Willamette Cultural Resources Associates (WillametteCRA 2016) and by Tetra Tech in 2023 (Attachment S-1) were conducted to investigate cultural and historic resources within the Cultural Resources Study Area/direct analysis area.

Indirect Analysis Area

A records review (i.e., literature and SHPO database reviews) was conducted prior to both the 2016 (WillametteCRA 2016) and 2023 cultural resources surveys (Attachment S-1) to identify previously recorded built environment and Historic Properties of Religious and Cultural Significance to Indian Tribes (HPRCSITs). Prior to the 2023 survey, a records review was conducted within and extending out to 1-mile (i.e., 1-mile buffer)—and a further expansion south beyond this 1-mile buffer—from the Cultural Resources Study Area. Figure S-1 shows the 1-mile records review boundary as the 2023 Records Review Area. This boundary forms the indirect analysis area.

Historic Built Environment

In support of RFA 3, the Certificate Holder conducted a desktop review of aerial photographs and assessors' records to identify historic built environment resources within the RFA 3 site boundary and within one mile of the RFA 3 site boundary. The boundary studied within this records review (1-mile buffer from the RFA 3 site boundary) is shown on Figure S-1 and encompasses all areas within 1 mile of the Amended Site Boundary. This boundary is referred to on Figure S-1 as the Analysis Area for 2022 Review for Historic Resources of the Built Environment. No historic buildings are documented within the 1-mile buffer.

¹ The Cultural Resources Study Area used for Exhibit S is not exactly the same as the study area boundary used to direct biological surveys for Exhibits J, P, and Q. The study area for cultural resources was defined significantly later than the boundary for biological studies. Thus, the site layout and associated disturbances had been refined and were subtly different when the Cultural Resources Study Area was defined. However, the differences are minor and both the cultural and biological study areas encompass all permanent and temporary disturbance associated with RFA 4.

4.0 Historic and Cultural Resources within the Analysis Area

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

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

Pursuant to OAR 345-022-0090(1)(b) this exhibit also addresses potential impacts to archaeological objects and sites. Archaeological objects and sites are defined in Oregon Revised Statutes (ORS) 358.905(1) as follows:

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

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

OAR 345-021-0010(1)(s)(A) Historic and cultural resources within the analysis area that have been listed, or would likely be eligible for listing, on the National Register of Historic Places.

No historic or cultural resources were identified within the direct analysis area. Thus, no historic or cultural resources within the direct analysis area have been listed, or would likely be eligible for listing, on the NRHP.

One HPRCSIT (Šišúpa) within the indirect analysis area has been listed, or would likely be eligible for listing, on the NRHP. Four precontact archaeological sites in the indirect analysis area (35MW15, 35MW16, 35MW17, 35MW18) are currently listed as “Unevaluated/Important” in the SHPO database.

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

OAR 345-021-0010(1)(s)(B) For private lands, archaeological objects, as defined in ORS 358.905(1)(a), and archaeological sites, as defined in ORS 358.905(1)(c), within the analysis area.

Background research identified no previously recorded archaeological sites on private lands within the direct analysis area. The 2023 Cultural Resources Survey Report (Attachment S-1) identified no new archaeological sites on private lands within the direct analysis area.

One HPRCSIT (Šišúpa), five precontact archaeological sites (35MW15, 35MW16, 35MW17, 35MW18, 35MW19), and two archaeological isolates occur on private lands within the indirect analysis area. Precontact site 35MW19 was determined not eligible in 2016 (Bajdek and Ozbun 2016).

No new archaeological sites were identified during the 2023 survey.

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

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

The direct and indirect analysis areas are located entirely on private property. No archaeological or historic resources were identified on public lands.

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

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

5.1 Methods – OAR 345-021-0010(1)(s)(D)(i)

(i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the State Historic Preservation Officer or the National Park Service of the U.S. Department of Interior for the purpose of locating,

identifying and assessing the significance of resources listed in paragraphs (A), (B) and (C);

A cultural resources survey was completed by Tetra Tech in 2023 for previously unsurveyed areas within the direct analysis area (see Attachment S-1). The 2016 survey conducted by WillametteCRA also covered areas within the direct analysis area. The cultural resources surveys included desktop studies and field studies described separately below. These surveys meet the requirements of Site Certificate Condition 11.3 in the Third Amended Site Certificate, which requires that field investigation be conducted in all areas to be disturbed during construction that lie outside the previously surveyed areas (Council 2022).

5.1.1 Desktop Study

Tetra Tech reviewed the Oregon SHPO's Online Archaeological Records Remote Access and Historic Sites databases to identify previously conducted surveys and recorded cultural resources within the analysis area. Additionally, historic aerial photographs and maps of the analysis area were reviewed to inform the surveys. Efforts focused on collecting information regarding previously recorded cultural resources, areas where potential unrecorded resources may exist, and potential locations of unrecorded historic sites within the analysis area. This research provided a summary of the type and frequency of cultural resources that may be encountered during the course of the subsequent survey.

The most recent records review by Tetra Tech was completed on September 16, 2023. The results indicate that 18 previous cultural resource studies have been performed within the analysis area. Five of the previous cultural resource studies have been performed within the direct analysis area (Table S-1). One was carried out prior to construction of Carty Reservoir, two were related to the PGE Cascade Crossing transmission line project, one was carried out for the PGE Carty Lateral gas pipeline, and one was carried out for RFA 1 for expansion of the CGS.

One place name was identified in the vicinity of the Facility and is recorded as an HPRCSIT by the CTUIR. Šišúpa means "rotten odor place" in reference to a spring (Hunn et al. 2015) that was likely odiferous due to high alkalinity. Šišúpa was used as a "stop over" between the Columbia River and Ione, Oregon (Hunn 2015). According to the OARRA database, the HPRCSIT has been determined to be NRHP-eligible and occurs approximately 0.25 miles outside the Amended Site Boundary but within the indirect analysis area.

Table S-1. Previous Surveys Completed within the Direct Analysis Area

SHPO Report #	Authors	Year	Title
106	David L. Cole	1977	Archaeological research in the Carty and Pebble Springs Reservoir Areas in the Columbia Plateau of Oregon
26783	Michael S. Kelly et al.	2013	Archaeological Survey for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, and Wasco Counties, Oregon
26786	Donald Shannon et al.	2011	Ethnographic Report for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, Wasco, Clackamas, and Marion Counties, Oregon
27594	Brennan P. Bajdek, Terry L. Ozbun	2015	Cultural Resource Survey for the Proposed Carty Lateral Project, Morrow County, Oregon. Addendum Eight Hydrostatic Test Fill Pipeline and Water Withdrawal Temporary Extra Work Area
28567	Paul S. Solimano, Breanne Taylor	2016	Archaeological Inventory for the PGE Carty Expansion Project, Morrow County, Oregon

No cultural resources have been previously identified in the direct analysis area.

On February 1, 2022, a letter documenting a desktop review of the RFA 3 site boundary and 1-mile buffer was submitted to SHPO (SHPO Case NO. 10-0046). In support of RFA 3, the Certificate Holder conducted a desktop review of aerial photographs and assessors' records to identify historic built environment resources within the RFA 3 site boundary and within one mile of the RFA 3 site boundary. The letter documents that there are no historic buildings within the 1-mile buffer. While the letter had indicated that the BCP facility was present in the area, it was ineligible for listing on the NRHP. This letter is included as Appendix A to the 2023 Cultural Resources Survey Report (Attachment S-1).

On August 21, 2023, the Certificate Holder consulted with LCIS, requesting assistance in identifying appropriate tribes to consult with regarding Tribal historic, and cultural resources in the vicinity of the Facility. LCIS identified CTUIR and CTWSRO. On August 24, 2023, the Certificate Holder sent outreach letters via email to representatives of CTUIR and CTWSRO. These letters introduced proposed changes to the Facility through RFA 4 and requested input regarding the potential impacts of the amended Facility on resources of concern to the tribes.

On October 6, 2023, the Certificate Holder followed up to notify the CTUIR and CTWSRO of plans for a cultural resources survey. On October 6, 2023, CTUIR responded, indicating the Facility is within the areas of concern for the Tribe and included previous comments to ODOE regarding RFA 2²: Comments specific to cultural resources centered on previous archaeological surveys and oral histories highlighting the importance of past use of the CGS area by the CTUIR, and the CTUIR recommended that ground disturbance occurring under RFA 2 be monitored for archaeological resources.

² Final Order on Request for Amendment 2 to the Site Certificate for the Carty Generating Station, pp. 63-64 (November 2020).

Demolition of the BCP was completed at the end of 2023. Therefore, historic built environment resources will not be impacted by the changes proposed with RFA 4 and no further analysis of built environment resources is provided in this exhibit.

Follow-up conversations with CTUIR are ongoing. At the time of this exhibit, no written response from the CTWSRO had been received to the initial letter or subsequent emails; however verbal communication indicated they would defer to CTUIR. ODOE sent an email to the CTUIR on October 20, 2026, and had a phone conversation with CTUIR on October 22. The Certificate Holder will continue to work with CTUIR regarding the HPRCSIT and proposes the following condition be added to the Site Certificate:

11.7. Prior to starting construction of the Carty Solar Farm with RFA 4 changes, in consultation with CTUIR, determine impact and, if necessary, mitigation regarding the Historic Property of Religious or Cultural Significance to Indian Tribes (HPRCSIT) located in the indirect analysis area.

5.1.2 Field Surveys

Tetra Tech conducted a “non-collection” cultural resources survey of the entire direct analysis area between October 11 and 13, 2023 (Attachment S-1).

The survey of the direct analysis area consisted of a pedestrian survey that included both intensive survey and reconnaissance survey. Areas covered by intensive survey included personnel walking transects spaced no more than 20 meters apart. Portions of the direct analysis area characterized by substantial disturbance and ongoing demolition of the BCP comprising approximately 188.5 acres of the direct analysis were surveyed at a reconnaissance level that included observations and photographs.

Due the acceptable ground visibility encountered during the survey and level of disturbance, no subsurface shovel probes were excavated in the direct analysis area.

5.2 Survey and Inventory Results– OAR 345-021-0010(1)(s)(D)(ii)

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

As a result of the records review and cultural resource fieldwork, no cultural resources were identified within the direct analysis area during the 2023 survey (Attachment S-1). Likewise, WillametteCRA did not identify any cultural resources in the portions of the 2016 survey that overlap with the direct analysis area.

Construction of the Carty Solar Farm with proposed RFA 4 changes will proceed within the current direct analysis area within the framework of PGE’s Inadvertent Discovery Procedure included as Appendix D to the 2023 Cultural Resources Survey Report (Attachment S-1). Should the design plans change or the Amended Carty Solar Farm expand into any new areas, additional

archaeological surveys may be necessary to determine whether archaeological resources are present.

The Certificate Holder understands that the HPRCSIT extends into the indirect analysis area and is a significant resource to the CTUIR. The Certificate Holder will establish dialogue with the CTUIR about these resources prior to starting construction.

5.3 Measures Designed to Prevent the Destruction of Historic, Cultural, and Archaeological Resources – OAR 345-021-0010(1)(s)(D)(iii)

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

Construction of the Carty Solar Farm with proposed RFA 4 changes will proceed within the framework of PGE's Inadvertent Discovery Procedure in the event that archaeological resources or human remains are discovered (Appendix D of Attachment S-1).

The Certificate Holder can comply with the existing Site Certificate conditions (11.2 through 11.5) in the Third Amended Site Certificate regarding measures for Protection of Historic, Cultural, and Archaeological Resources (Council 2022). Specifically, the Certificate Holder will ensure that a qualified archaeologist, as defined in OAR 736-051-0070, develops a training program for cultural resources (Site Certificate Condition 11.4). The training program will instruct construction personnel in the identification of cultural materials and avoidance of accidental damage to identified resource sites. Records of such training shall be maintained at the administration/control building and made available upon request. In addition, the Certificate Holder will ensure construction personnel cease all ground-disturbing activities in the immediate area if any archaeological or cultural resources are found during construction until a qualified archeologist can evaluate the significance of the find (Site Certificate Condition 11.5). The Certificate Holder will notify ODOE and SHPO of the find. If SHPO determines that the resource is significant, the Certificate Holder will make recommendations to the Council for mitigation, including avoidance, field documentation and data recovery, in consultation with ODOE, SHPO, and interested tribes. The Certificate Holder shall not restart work in the affected area until the Certificate Holder has demonstrated to the ODOE and the SHPO that it has complied with archaeological resource protection regulations.

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

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

Intensive-level surveys have not indicated the presence of cultural material or features in the direct analysis area. For this reason, no formal monitoring is planned at this time. However, the Certificate

Holder understands that there will remain a possibility of subsurface deposits, and PGE's Inadvertent Discovery Procedure will be adhered to during the course of this project. Additionally, PGE staff working on this Facility have had intensive cultural resources awareness training and will be equipped to contact a professional archaeologist should evidence for cultural material emerge. However, if the Tribe would like to have a Tribal monitor on site during specific ground disturbing activities, PGE could certainly coordinate that.

The Certificate Holder can comply with the existing Site Certificate Condition 11.6 in the Third Amended Site Certificate regarding monitoring for Protection of Historic, Cultural, and Archaeological Resources (Council 2022).

7.0 Conclusion

The conclusion derived from the cultural and archaeological surveys is that construction, operation, and retirement of the Carty Solar Farm with proposed RFA 4 changes is not likely to result in significant adverse impacts to historic, cultural, or archaeological resources that have been listed on, or would likely be listed on, the NRHP.

8.0 References

- Bajdek, Brennan P., and Terry L. Ozburn. 2016. Archaeological Evaluation of Site 35MW19 for Portland General Electric, Morrow County, Oregon. Archaeological Investigations Northwest, Inc. Report No. 3622. Submitted to Portland General Electric, Oregon.
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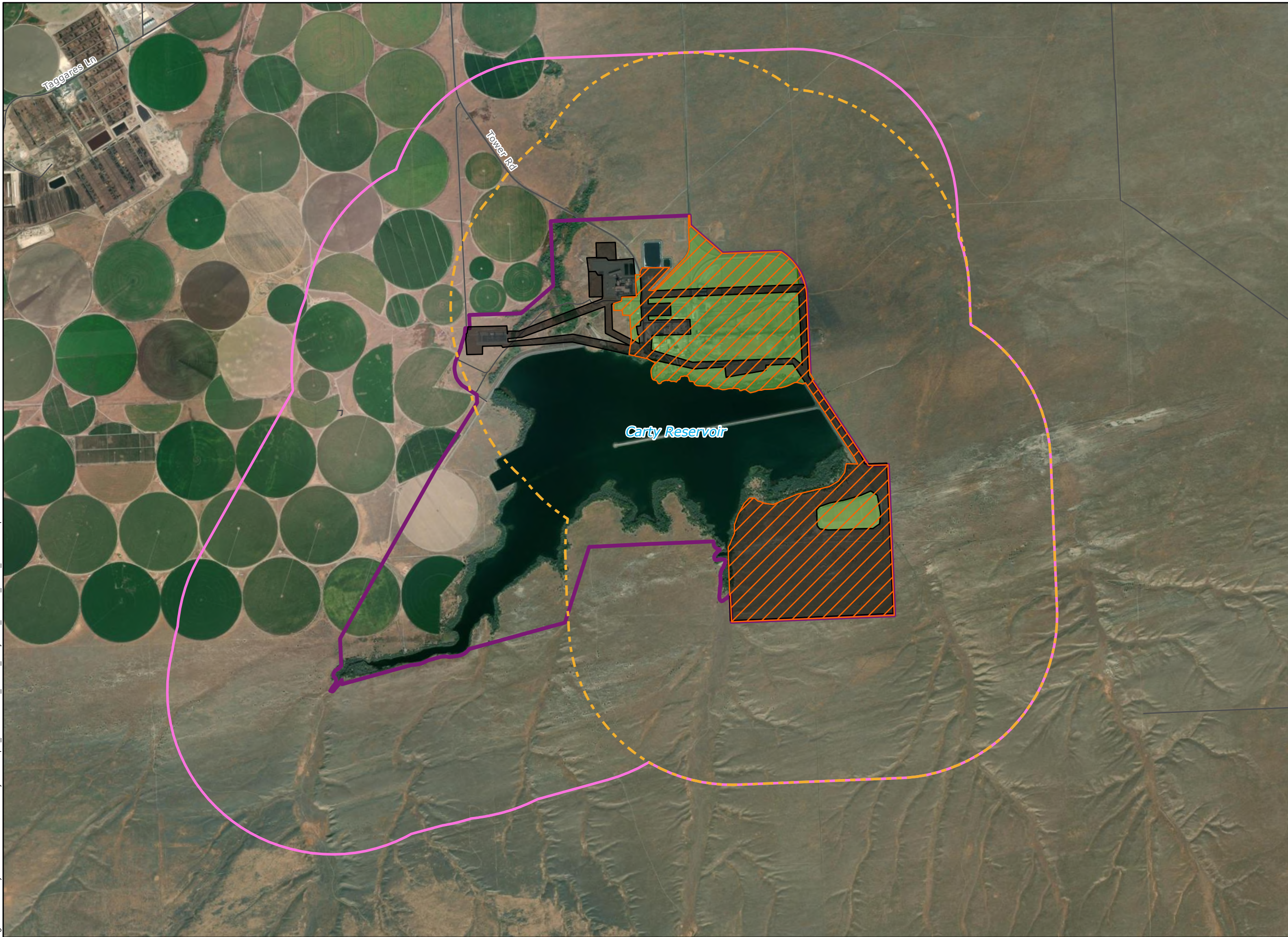
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- Shannon, D., D. Ellis, S. McDaniel, M. Stegner, R. Bevill, S. Butler, M. S. Kelly, and E. Nilsson. 2011. Ethnographic Report for Portland General Electric's Cascade Crossing Transmission Project, Morrow, Gilliam, Sherman, Wasco, Clackamas, and Marion Counties, Oregon. Submitted to Portland General Electric, Portland, Oregon. Oregon State Historic Preservation Office Case No. 26786.
- WillametteCRA (Willamette Cultural Resources Associates Ltd.). 2016. Archaeological Inventory for the PGE Carty Expansion Project, Morrow County, Oregon. P. S. Solimano and B. Taylor. Submitted to Portland General Electric, Portland, Oregon. Portland, Oregon. Oregon State Historic Preservation Office Case No. 28567.

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Figures

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**Carty
Generating Station
Request for
Amendment 4**

**Figure S-1
Analysis Areas**

MORROW COUNTY, OR

-  Amended Site Boundary
-  Cultural Resources Study Area (Direct Analysis Area)
-  2023 Archaeological Survey Area
-  2016 Archaeological Survey Area
-  2023 Records Review Area (Indirect Analysis Area)
-  Analysis Area for 2022 Review for Historic Resources of the Built Environment
-  Local Roads



Reference Map



1:36,000

WGS 1984 UTM Zone 11N



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**Attachment S-1: Cultural Resources
Survey Report, Carty Generating Station.
Morrow County, Oregon**
(Confidential and provided under separate cover)

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