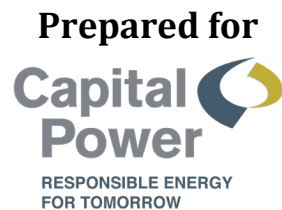


Exhibit S

Historic, Cultural, and Archaeological Resources

**Nolin Hills Wind Power Project
January 2022**



d/b/a Nolin Hills Wind, LLC

Prepared by



Tetra Tech, Inc.

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Acronyms and Abbreviations

Applicant	Nolin Hills Wind, LLC
BPA	Bonneville Power Administration
CTUIR	Confederated Tribes of the Umatilla Indian Reservation
EFSC	Energy Facility Siting Council
GLO	General Land Office
HPRC SIT	Historic Properties of Religious or Cultural Significance to Indian Tribes
HRMP	Historical Resource Mitigation Plan
MW	megawatt
NRHP	National Register of Historic Places
OAR	Oregon Administrative Rules
OCTA	Oregon-California Trails Association
ODOE	Oregon Department of Energy
ONHT	Oregon National Historic Trail
ORS	Oregon Revised Statutes
Project	Nolin Hills Wind Power Project
SHPO	State Historic Preservation Office
Tetra Tech	Tetra Tech, Inc.
TUS	Traditional Use Study
UEC	Umatilla Electric Cooperative

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1.0 Introduction

Nolin Hills Wind, LLC (the Applicant) proposes to construct the Nolin Hills Wind Power Project (Project), a wind and solar project with a nominal generating capacity of approximately 600 megawatts (MW) (preliminarily 340 MW of wind generation and 260 MW of solar generation) located in Umatilla County, Oregon. The Project comprises up to 112 wind turbine generators, depending on the final layout determined during the micrositing process. The solar array will include up to approximately 816,812 solar modules, depending on the final technology and layout selected. The Project will interconnect to the regional grid via either a transmission line leading from the northern Project substation northwest to the Umatilla Electric Cooperative (UEC) Cottonwood Substation in Hermiston, or a new 230-kilovolt transmission line to the proposed Bonneville Power Administration Stanfield Substation, north of the town of Nolin. Other Project components include electrical collection lines, substations, a battery energy storage system, site access roads, one operations and maintenance building, meteorological data collection towers, and temporary construction yards. These facilities are all described in greater detail in Exhibit B.

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

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

2.0 Analysis Area

The Analysis Area for Exhibit S includes the Area within the Site Boundary. Desktop and field studies included areas that may be directly and indirectly impacted by the Project. The direct Analysis Area includes all micrositing corridors and cultural resources survey corridors within the Project Site Boundary (as described in Exhibit B); the indirect Analysis Area includes the direct Analysis Area, as well as the area within the Site Boundary and the location of one specific historic site/built environment resource location outside the Site Boundary where the Project could have visual (indirect) impacts. The direct Analysis Area encompasses the surfaces that may be disturbed by construction and operation within the Project Site Boundary. The area is larger than the

anticipated area of direct disturbance to allow for avoidance of resources. The Analysis Area is depicted on Figure S-1.

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

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

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

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

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

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

OAR 345-022-0090

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

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

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

“Archaeological site” is defined at ORS 358.905(1)(c) as a geographic locality in Oregon, including but not limited to submerged and submersible lands and the bed of the sea within the state’s jurisdiction, that contains archaeological objects and the contextual associations of the archaeological objects with: (i) each other; or (ii) biotic or geological remains or deposits.

Examples of archaeological sites by this definition include, but are not limited to, shipwrecks, lithic quarries, house pit villages, camps, burials, lithic scatters, homesteads, and townsites.

“Archaeological objects” are defined at ORS 358.905(1)(a) as an object that: (A) is at least 75 years old; (B) is part of the physical record of an indigenous or other culture found in the state or waters of the state; and (C) is material remains of past human life or activity that are of archaeological significance including, but not limited to, monuments, symbols, tools, facilities, technological by-products, and dietary by-products. For the purposes of this analysis, isolated finds are considered archaeological objects.

3.1 Cultural Resources Inventory Methodology

The effort to complete the Applicant’s cultural resources inventory is guided by four main goals aimed at ensuring compliance with the EFSC standards. These goals include (1) identification of cultural resources within the Analysis Area (as defined in Section 2); (2) interpretation of those identified resources within a regional context; (3) evaluation of identified resources for protection under the Cultural Resources standards (OAR 345-022-0090); and (4) assessment of potential Project impacts on protected resources. In addition to tribal coordination and consultations with the Oregon-California Trails Association (OCTA), the Applicant has completed two primary studies of cultural resources within the proposed turbine area of the Analysis Area: a pedestrian cultural resources survey by Tetra Tech, Inc. (Tetra Tech) (King et al. 2020; King and Berger 2019 and 2020) and a Traditional Use Study (TUS) by the Confederated Tribes of the Umatilla Indian Reservation (CTUIR; Engum 2018). These studies have focused on all accessible portions of the direct Analysis Area. They are supplemented in this exhibit with additional records reviews to address the portions of the transmission line corridors in the Analysis Area that were inaccessible at the time of survey as well as additional subsequent work conducted in consultation with ODOE and SHPO with respect to nearby historic buildings that have views of the Project. Completion of survey of the transmission line corridor will be conducted prior to construction. A description of the discovery measures, such as surveys and inventories, that the Applicant has undertaken is described in detail in the sections below. The cultural resources survey report and the TUS are confidential documents that are exempt from public disclosure under ORS 192.501(11) and are provided separately. At the request of CTUIR, only the executive summary of the TUS is available for public review.

3.1.1 Records Review

King et al. (2020) and King and Berger (2019) include records searches that focused on the overall Project Site Boundary and a 1-mile buffer. Both searches are described below in Section 5. Data were derived from the files and databases of the State Historic Preservation Office (SHPO; e.g., Oregon Archaeological Records Remote Access and Oregon Historic Sites Database), the Oregon Historic Trails website, and historic maps and aerial photographs. Efforts focused on collecting information concerning previously recorded cultural resources within the overall Project Site Boundary, as well as previously conducted surveys within this area.

As part of research regarding some resources recorded as part of the field surveys, additional archival materials were reviewed. These materials included historic maps and aerial imagery, records available online through Ancestry.com (federal census records, Polk's local city and business directories, military records, marriage and death records, etc.), and, in some cases, historic newspaper articles available online through the University of Oregon's Historic Oregon Newspapers database.

Following SHPO's review of King et al. (2020) and King and Berger (2019), additional potential historic sites of concern outside of the direct Analysis Area were identified. These additional resources are historic buildings identified by SHPO through review of aerial photographs.

3.1.2 Field Surveys

Tetra Tech conducted a "non-collection" Phase I pedestrian survey of the direct Analysis Area totaling 15,467.5 acres (7,080 acres between July 5 and 26, 2017; 4,322 acres between May 15 and 22, 2018; 606 acres between August 7 and 8, 2018; 1,749.5 acres between July 8 and 13, 2019; 1,306 acres between May 1 and 4, 2020; and 404 acres on August 31, 2020). The surveyed area is larger than the planned areas of development due to Project design modifications that occurred after completion of the surveys. A total of 446 acres within the transmission line portions of the Analysis Area were inaccessible at the time of survey due to landowner access restrictions and another 40 acres in the UEC corridor were not surveyed due to safety concerns. A phased approach to the Project was taken. No subsurface probing of archaeological site boundaries, archaeological object localities, areas of high probability for buried archaeological resources, or areas of poor ground surface visibility was conducted. While these types of resources and areas were identified by the surveys, the Project design schedule allowed for conducting survey first and micro-siting to avoid resources. Probing of areas of high probability and/or poor ground surface visibility during survey will occur after the Project design is finalized and will be limited to those construction corridors to avoid unnecessary disturbance of other areas.

The 2017 survey area included 35.7 miles of turbine strings, 66.5 miles of other linear components (e.g., collector lines, overhead transmission line), and 2 substation locations (36-acre area total). The 2018 surveys were designed to address areas where Project components may be located that were outside of the 2017 survey area. The 2019 survey focused on accessible portions of the UEC Cottonwood transmission line route, along with newly added areas where Project components may be located. The 2020 surveys focused on the solar siting area. As a result, unsurveyed areas are

limited to the inaccessible areas of the UEC Cottonwood and Bonneville Power Administration (BPA) Stanfield transmission line routes. These areas will be surveyed prior to construction using the same methodology described here. The overall survey coverage of the analysis area for Exhibit S is depicted on Figure S-2 and further detailed in confidential Attachment S-4.

For all surveys, a 500-foot buffer on either side of the centerline of turbine strings was examined to allow for micrositing within a 1,000-foot-wide corridor. The survey corridor for the UEC Cottonwood transmission line alternative ranged between 150 to 1,200 feet wide. A 150-foot buffer was examined for all other linear components to allow for micrositing as well, within a 300-foot-wide corridor. A 250-foot-wide corridor will be examined for each potential route of the BPA Stanfield transmission line alternative outside of the turbine and solar portion of the Project Site Boundary, when this area becomes accessible and prior to construction. No buffer was examined for the substations.

The inventory was conducted in accordance with state standards for Oregon by Tetra Tech's professional archaeologists, under the supervision of a Principal Investigator who meets the Secretary of Interior Standards. In addition, tribal representatives of the CTUIR accompanied the field crews during all of the 2017, 2019, and 2020 pedestrian surveys and for one day during the May 2018 survey.

Crews walked and observed the ground, spread out in line at 20-meter intervals (i.e., transects), working under the guidance of the Field Director and a Crew Chief. Ground surface visibility varied between poor (less than 30 percent) and excellent (greater than 75 percent) throughout the Analysis Area. Although an effort was made to survey through agricultural fields after they had been plowed, the harvest schedule for some of the fields did not allow for this. Weather conditions during surveys were warm to very warm and dry. Spatial control was maintained through the use of 1:24,000 scale maps and Global Positioning System units with sub-meter accuracy. The Field Director completed daily field notes, documenting beginning and ending survey locations, crew members, environmental conditions, findings, and any issues concerning landowners and health and safety. No part of the turbine survey area was inaccessible. As stated above, survey of inaccessible and unsurveyed portions of the alternative transmission line corridors will occur prior to construction.

3.1.3 Native American Coordination

The Applicant consulted with the Oregon State Legislative Commission on Indian Services by letter on June 12, 2017. Ms. Karen Quigley responded via e-mail on June 12, 2017, identifying the following Native American tribes with interest in the Project area:

- CTUIR;
- Confederated Tribes of the Warm Springs Reservation;
- Nez Perce Tribe (Idaho); and
- Confederated Tribes and Bands of the Yakama Nation (Washington).

The Applicant contacted these tribes by letter on June 19, 2017. CTUIR has taken an active role in the Project, providing site visits for interested parties, preparing a project-specific TUS, and participating in the cultural resources pedestrian surveys. A meeting between the Applicant and CTUIR staff (natural and cultural resources) was held at CTUIR offices on June 13, 2017 to introduce the Project and coordinate development of the TUS. Coordination calls and in-person meetings with the CTUIR have continued throughout the planning phases of the Project. Other tribes have not expressed interest in the Project.

Documentation of the Applicant's tribal coordination is included in Attachment S-1.

3.1.4 Traditional Use Study

The Applicant funded a TUS for the Project, completed by the CTUIR, that led to the identification of Historic Properties of Religious or Cultural Significance to Indian Tribes (HPRCSITs) and other traditional resources within and surrounding the Project Site Boundary. The TUS provides important context and informs the Applicant in identifying and protecting cultural resources pursuant to Council Standards. The TUS focused on the turbine portion of the Project Site Boundary. As part of the TUS, the Cultural Resources Protection Program of the CTUIR conducted site visits to the Project Site Boundary with tribal elders. Oral histories regarding traditional use in and adjacent to the area were collected. Focus was placed on traditional and sacred areas traveled to by the elders' families and for what purposes; identification of First Foods; information on the natural and cultural resources of the areas; and historic use of the Project Site Boundary. Prior to beginning the fieldwork with CTUIR staff and elders, previously gathered oral histories on file at CTUIR were reviewed.

3.2 Cultural Resources Inventory Results

The following sections describe results of the records reviews, the cultural resources pedestrian surveys conducted within the Analysis Area, and the TUS conducted by the CTUIR in the turbine area. The cultural resources pedestrian surveys of the direct Analysis Area are included as confidential Attachment S-2. The executive summary of the TUS is in confidential Attachment S-3.

3.2.1 Records Review

The databases reviewed as part of the records search revealed that the Project Site Boundary and Analysis Area had been partially surveyed for cultural resources prior to the field surveys conducted for the Project. Table S-1 summarizes the previous survey coverage of the Project Site Boundary. This includes one survey conducted by Tetra Tech for a separate project, but this area of that project has not yet been reported to the SHPO. All portions of the Nolin Hills micrositeing corridor that were previously surveyed were surveyed for Nolin Hills and are included in the reports provided as Attachment S-2.

Table S-1. Previously Conducted Surveys within the Project Site Boundary

SHPO Report #	Agency Report #	Author	Year	Report Title
353	NADB 1293986	David V. Ellis (Archaeological Consultant)	(no date)	<i>Assessment of Impact on Cultural Resources of the Proposed Umatilla River 216 Project</i>
653	NADB 1294323	Julia A. Follansbee and Ellen B. Mays (Consultants)	1979	<i>A Preliminary Cultural Resource Overview for the Brownlee-Slatt and Buckley-Malin Corridors, Bonneville Power Administration</i>
1344	NADB 1295026	Richard D. Daugherty (Washington State University)	1960	<i>An Archaeological Survey of Pacific Gas Transmission Company's Alberta to California Pipeline System; Idaho, Oregon, Washington</i>
1345	NADB 1295027	John D. Combes	1961	<i>An Archaeological Survey of Pacific Gas Transmission Company's Alberta to California Pipeline System: MP 108.0 to MP 722.0 Phase II</i>
6496	NADB 1296295	R. M. Pettigrew (Oregon State Museum of Anthropology)	1985	<i>Letter Report: On the Archaeological Survey of the Proposed Old Oregon Trail Highway - Walker Road / I-82 Intersection Project, McNary Highway, Umatilla County, Oregon</i>
9272	CX8000-3- 0032	James H. Cleland, Michael S. Kelly, Clyde M. Woods, and J. Christina Smith (WIRTH Environmental Services)	1987	<i>An Archaeological Overview and Management Plan for the Umatilla Depot Activity, Umatilla, Oregon</i>
11705	N/A	John D. Combes	1961	<i>An Archaeological Survey of Pacific Gas Transmission Company's Alberta to California Pipeline System: MP108 To MP 722 Phase II</i>
11706	N/A	Richard D. Daugherty (Washington State University)	1961	<i>An Archaeological Survey Of Pacific Gas Transmission Company's Alberta To California Pipeline System: Mp108 To Mp 722</i>
14629	N/A	Barry A. Price (INFOTEC Research, Inc.)	1992	<i>PGT-PG&E Pipeline Expansion Project, Archaeological Survey of Gregory and Cook Warehouse Sites W-2, W-3 and W-4</i>
14775	N/A	Albert C. Oetting (Historical Research Associates, Inc.)	1992	<i>Cultural Resources Survey of Facilities for the Hermiston Generating Project (US Generating Company), Umatilla County, Oregon</i>
14776	Historical Research Associates Report #156	Albert C. Oetting (Historical Research Associates, Inc.)	1993	<i>Cultural Resources Survey of Facilities for the Hermiston Power Project, Umatilla County, Oregon</i>
15359	N/A	Gail C. Celmer (Seattle District Corps of Engineers)	1996	<i>Archaeological Reconnaissance Survey Chemical Stockpile Disposal Program Umatilla Army Depot Activity</i>

SHPO Report #	Agency Report #	Author	Year	Report Title
17888	N/A	Manfred Jaehnig (Confederated Tribes of the Umatilla Indian Reservation)	1997	<i>A Cultural Resource Inventory of the Proposed Co-Generation Facility Near Hermiston, Umatilla County, Oregon</i>
22161	AMEC project 8-915-16485-0	Lara C. Rooke (AMEC Earth & Environmental, Inc.)	2008	<i>Archaeological Survey for the Echo Wind Farm Hermiston, Oregon</i>
26075	N/A	Sarah L. Jenkins, Elizabeth O'Brien, and Terry L. Ozbun	2013	<i>Cultural Resource Survey for the Proposed Perennial Wind Chaser Station, Umatilla County, Oregon</i>
29355	OR-2017-008	Melissa Teoh (BPA Contract Archaeologist)	2017	<i>Cultural Resources Survey for FY17 - 2018 Construction Pasco District Wood Pole Replacement Project in Union, Morrow, Umatilla County, Oregon</i>
29588	N/A	John W. Jones (Native-X, Inc.)	2018	<i>Preliminary Letter Report for the Trident Project Archaeological Monitoring Near Hermiston, Oregon</i>
29885	A&H Services Short Report 1021	Unavailable	2018	<i>A Cultural Resources Survey of Bonneville Power Administration's Tri-Cities District FY09 Wood Pole Replacement Project, Benton, Franklin, and Walla Walla Counties, Washington, Umatilla County, Oregon</i>
N/A	N/A	Stephen Anderson, Erin King, and Jenna Farrell (Tetra Tech, Inc.)	TBD	<i>Boardman to Hemingway Transmission Line Project, 100% Cultural Resources Survey Report, Morrow, Umatilla, Union, Baker, and Malheur Counties, Oregon, and Owyhee County, Idaho (Working Title)</i>

Four previously recorded cultural resources were identified by the records review as within the Project Site Boundary, two of which are within the Analysis Area. Three of these, B2H-EE-19, B2H-SA-18, and 3B2H-CH-ISO-02, were recorded by Tetra Tech for a separate project but are not yet submitted to the SHPO. In addition to the previously recorded cultural resources, the records review identified that both transmission line alternatives cross the route of the Oregon National Historic Trail (ONHT). These resources are listed in Table S-2 and illustrated in confidential Attachment S-4.

Review of U.S. General Land Office (GLO) plats for Umatilla County indicates that historic roads and trails were common within the Project Site Boundary and surrounding areas during the late nineteenth and early twentieth centuries. Two wagon roads are depicted on the 1860 GLO plats of the southern and western portions of the Project Site Boundary around the turbines. Both pass through multiple segments of the Analysis Area. Additionally, two historic trails are depicted on the 1860 plat in the northwest corner of the Project Site Boundary around the turbines (both indicated as "Indian Trail" on the map). Combined with the historic wagon roads, they suggest a minimal to moderate level of early historic activity in the turbine area. As noted above, the Oregon Trail also passed through the Project Site Boundary, extending from the northern bank of the Umatilla River through the transmission line alternatives.

Table S-2. Previously Recorded or Noted Cultural Resources within Project Site Boundary

Trinomial or Other ID	Description	Resource Category	NRHP-Eligibility	Analysis Area
Nolin Bridge	Historic Bridge	Historic Site	Eligible	Outside Analysis Area
B2H-EE-19	Historic Refuse Scatter	Archaeological Site	Unevaluated	UEC Cottonwood Transmission Line
B2H-SA-18	Historic Stone Claim or Survey Marker	Archaeological Site	Unevaluated	Outside Analysis Area
3B2H-CH-ISO-02	Pre-Contact Biface	Archaeological Isolated Find	Unevaluated	Turbines
Oregon National Historic Trail	NHT-designated route of the historic Oregon Trail.	Archaeological Site	Listed	UEC Cottonwood Transmission Line; BPA Stanfield Transmission Line

As noted above in Section 3.1.1, SHPO identified to Tetra Tech and the Applicant additional historic buildings (unrecorded historic sites) outside of the micro-siting corridors that warranted consideration for indirect visual impacts. These include the Town of Nolin, Barn & Shed (T2N/R30E), and Residence & Barn (T2N/R29E).

3.2.2 Field Surveys

As described above in Section 3.1.2, the majority of the Analysis Area has been surveyed for cultural resources (Figure S-2). At this time, pedestrian field survey of unsurveyed portions of the Analysis Area along the transmission line alternative routes is planned to occur prior to construction. Those areas have not been surveyed due to access limitations and safety concerns. Once survey is completed in those areas, a supplemental report will be prepared to document survey findings.

Within the surveyed Analysis Area, a total of 43 sites (42 archaeological sites, 1 historic site) and 20 isolated finds have been identified. No evidence of the ONHT was identified within the survey corridor where the UEC Cottonwood transmission line alternative crosses the trail route. (Survey access was restricted where the ONHT crosses the BPA Stanfield transmission line alternative.) The previously recorded site (B2H-EE-19) and isolated find (3B2H-CH-ISO-02) in the Analysis Area were also not re-identified during surveys. Of the resources recorded by Project surveys, 38 archaeological sites and 17 archaeological objects have been reviewed and determined by SHPO to be unevaluated for listing on the NRHP. However, NRHP-eligibility recommendations for these resources have been revised in response to SHPO’s comments on the draft of King et al. (2020). SHPO’s eligibility determinations of these resources may change as a result of their review of the revised version of King et al. (2020) included in confidential Attachment S-2. Therefore, the NRHP-eligibility recommendations made in King et al. (2020), King and Berger (2019), and King and Berger (2020) are used to determine applicable EFSC siting standards and evaluate potential project impacts. The one historic site (Pendleton Ranch Sheep Camp), four of the archaeological sites (NH-BB-01, NH-BB-02, NH-BB-03, and NH-BB-04), and three of the archaeological objects (NH-BB-ISO-01, NHS-BB-ISO-01, and NHS-BB-ISO-02) are yet to be reviewed by SHPO for NRHP-eligibility.

Cairns and various types of rock alignments (pre-contact and undetermined) dominate the inventory. While some of the cairns have been attributed to Native Americans, it is thought that the undetermined cairns may be related to historic Basque sheep herders. (CTUIR's TUS for the Project has noted that Basque cairns were commonly elaborations of existing Native American cairns.) The pre-contact era resources reflect the Native American use of the Project Site Boundary, which appears primarily related to hunting and possibly sacred uses. This is supported by the findings of the TUS. The historic period resources reflect the agricultural and ranching history of the area, as well early transportation networks.

Shovel probing has been recommended for areas of poor ground surface visibility and high probability for buried archaeological resources (King et al. 2020). Although some parts of the survey area had fair to excellent ground surface visibility (over 30 percent), such as along maintained roads and recently plowed agricultural fields, other parts had poor ground surface visibility (less than 30 percent) due to dense vegetation and crops. Other poor ground surface visibility areas were within unharvested agricultural fields. The Analysis Area also crosses areas with high rates of soils deposition, such as canyon bottoms, which may include buried archaeological sites. Shovel probing of areas of poor ground surface visibility and areas of high probability for buried resources is proposed to occur following final design, but prior to construction, to avoid unnecessary disturbance in the event that certain Project components are moved within the micro-siting corridor during the final design process.

3.2.3 Traditional Use Study

The CTUIR has completed a TUS of the Project Site Boundary around the turbines and surrounding vicinity (Engum 2018). The study included a field visit with elders in early November 2017, oral history interviews, and ethnographic research. Several significant sites were identified during the study, some of which were also identified by the pedestrian survey described above. Resources of concern as identified by the TUS include rock cairns, mud springs, a network of trails and travel corridors, and First Foods procurement areas. Informants also described the turbine area as possibly containing unmarked burials. Additionally, the Project is in close proximity to five place names, including Pišxuwiyípa (the native name for Nolin), the Umatilla River, Butter Creek, and the Sand Hollow Battlefield. The battlefield is identified as a HPRCSIT. As such, the Project and surrounding area are considered by the CTUIR to be a significant cultural landscape. The Project Site Boundary around the turbines is described as “a location where people traveled to for part of their subsistence, cultural endurance, and spiritual renewal” (Engum 2018).

3.3 Cultural Resources Subject to EFSC Standards

The following sections discuss those resources that are subject to the siting standards outlined at the beginning of this section: historic properties, archaeological sites on private or state lands, and archaeological objects (i.e., isolated finds) on private lands. (The entirety of the Analysis Area is on private lands; therefore, Standard C regarding public lands is not applicable.) Table S-3 lists the cultural resources identified by the field surveys as occurring within the Analysis Area. The table

also demonstrates the extent of direct avoidance of identified resources by the Project. It should be noted that the SHPO determinations of NRHP eligibility listed in Table S-3 are based on a draft version of King et al. (2020). That report has been revised in response to comments from SHPO, including revised NRHP-eligibility recommendations. SHPO's eligibility determinations may change as a result of further review of the revised report. Therefore, the revised NRHP eligibility recommendations from King et al. (2020) are relied upon in the analyses below.

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Table S-3. Cultural Resources Identified in the Analysis Area

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
Archaeological Sites									
Oregon NHT	N/A	Historic	Trail	Listed	Listed	0	0	No trail ruts identified by surveys at NHT crossing points in UEC route. Survey not yet conducted at BPA route crossing. Any ruts identified in BPA route, once surveyed, will be spanned to avoid impacts.	a) Historic Property; b) Archaeological site on private land.
TBD	NH-BB-01	Historic	Survey Marker	Not Eligible	TBD	186	57	Avoided. No further management.	b) Archaeological site on private land.
TBD	NH-BB-02	Historic	Refuse Scatter	Not Eligible	TBD	753	229	Avoided. No further management.	b) Archaeological site on private land.
TBD	NH-BB-03	Historic	Structural Remains	Unevaluated	TBD	187	57	Avoided. Flag and monitor significant resources within 200 feet (61 meters) of disturbance.	a) Potential Historic Property; b) Archaeological site on private land.
TBD	NH-BB-04	Historic	Road	Not Eligible	TBD	480	146	Avoided. No further management.	b) Archaeological site on private land.
35UM 00536	NH-DM-01	Pre-Contact	Lithic Scatter	Unevaluated	Unevaluated	168	51	Avoided; Flag and monitor significant resources within 200 feet (61 meters) of disturbance. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00537	NH-DM-04	Pre-Contact	Lithic Scatter	Unevaluated	Unevaluated	3,235	986	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00538	NH-DM-05	Historic	Road	Not Eligible	Unevaluated	0	0	Impact not significant. No further management.	b) Archaeological site on private land.
35UM 00539	NH-DM-06	Historic	Structure/Foundation	Unevaluated	Unevaluated	395	120	Avoided. No further management.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00540	NH-DM-10	Undetermined	Cairn(s)	Unevaluated	Unevaluated	1,900	579	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
35UM 00541	NH-DM-12	Undetermined	Cairn(s)	Unevaluated	Unevaluated	798	243	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00542	NH-DM-13	Undetermined	Cairn(s)	Unevaluated	Unevaluated	565	172	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00543	NH-DM-14	Undetermined	Rock Alignment(s)	Unevaluated	Unevaluated	168	51	Avoided; Flag and monitor significant resources within 200 feet (61 meters) of disturbance. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00544	NH-DM-15	Undetermined	Rock Alignment(s)	Unevaluated	Unevaluated	635	194	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00545	NH-DM-16	Historic	Utility Line	Not Eligible	Unevaluated	854	260	Avoided. No further management.	b) Archaeological site on private land.
35UM 00546	NH-DM-17	Historic	Agriculture	Not Eligible	Unevaluated	866	264	Avoided. No further management.	b) Archaeological site on private land.
35UM 00547	NH-DM-18	Undetermined	Cairn(s)	Unevaluated	Unevaluated	1,379	420	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00548	NH-DM-19	Pre-Contact	Lithic Scatter	Unevaluated	Unevaluated	1,303	397	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00549	NH-DM-20	Pre-Contact	Lithic Scatter	Unevaluated	Unevaluated	430	131	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00550	NH-DM-21	Undetermined	Rock Alignment(s)	Unevaluated	Unevaluated	176	54	Avoided. Flag and monitor significant resources within 200 feet (61 meters) of disturbance. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00551	NH-MC-02	Pre-Contact	Rock Pile	Unevaluated	Unevaluated	3,582	1,092	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
35UM 00552	NH-MC-03	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	354	108	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00553	NH-MC-04	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	279	85	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00554	NH-MC-05	Historic	Rock Pile	Not Eligible	Unevaluated	205	62	Avoided. No further management.	b) Archaeological site on private land.
35UM 00555	NH-MC-06	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	324	99	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00556	NH-MC-08	Undetermined	Cairn(s)	Unevaluated	Unevaluated	299	91	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00557	NH-MC-09	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	567	173	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00558	NH-MC-10	Historic	Road	Not Eligible	Unevaluated	571	174	Avoided. No further management.	b) Archaeological site on private land.
35UM 00559	NH-MC-11	Pre-Contact/	Cairn(s)	Unevaluated	Unevaluated	1,966	599	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00560	NH-MC-12	Pre-Contact	Cairn(s) & Rock Alignment	Unevaluated	Unevaluated	50	15	Northern/Eastern BPA Stanfield Transmission Line route, if selected, will span 50-meter buffered area around site. No ground disturbance within the area will be allowed. Flag and monitor significant resources within 200 feet (61 meters) of disturbance. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00561	NH-MC-14	Pre-Contact	Hunting Blind(s)	Unevaluated	Unevaluated	462	141	Avoided. Native American consultation on-going to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
35UM 00562	NH-MC-16	Undetermined	Rock Pile	Unevaluated	Unevaluated	1,074	328	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00563	NH-MC-20	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	732	223	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00564	NH-MC-21	Pre-Contact	Cairn(s), Hunting Blind, Rock Concentration	Unevaluated	Unevaluated	1,651	503	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00565	NH-MC-22	Undetermined	Rock Pile	Unevaluated	Unevaluated	3,706	1,130	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00566	NH-MC-26	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	1,012	308	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00567	NH-MC-27	Pre-Contact/Undetermined	Cairn(s)	Unevaluated	Unevaluated	1,144	349	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00568	NH-MC-28	Undetermined	Cairn(s) & Rock Alignment	Unevaluated	Unevaluated	917	279	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00569	NH2-DM-02	Pre-Contact	Cairn(s)	Unevaluated	Unevaluated	403	123	Avoided. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00570	NH2-DM-04	Historic	Road	Not Eligible	Unevaluated	0	0	Impact not significant. No further management.	b) Archaeological site on private land.
35UM 00571	NH2-MC-01	Undetermined	Cairn(s)	Unevaluated	Unevaluated	143	43	Avoided; Flag and monitor significant resources within 200 feet (61 meters) of disturbance. Native American consultation ongoing to assess potential auditory and visual impacts.	a) Potential Historic Property; b) Archaeological site on private land.
35UM 00572	NH3-DM-01	Historic	Road	Not Eligible	Unevaluated	2,011	613	Avoided. No further management.	b) Archaeological site on private land.

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
35UM 00573	NH3-DM-02	Historic	Road	Not Eligible	Unevaluated	2,131	650	Avoided. No further management.	b) Archaeological site on private land.
Historic Sites/Historic Built Environment									
Pendleton Ranches Sheep Camp/Bunk House	NH-DM-02	Historic	Bunkhouse	Potentially Eligible	TBD	281	86	Direct impacts avoided. Visual impacts would affect setting. Implement Historical Resource Mitigation Plan (HRMP).	a) Potential Historic Property
Town of Nolin	N/A	Historic	Sheep Ranch Headquarters	Potentially Eligible	TBD	2,300	701	Direct and visual impacts avoided. No further management.	a) Potential Historic Property
Barn & Shed (T2N/ R30E)	N/A	Historic	Large barn, smaller shed, foundation of a residence	Potentially Eligible	TBD	800	244	Direct impacts avoided. Visual impacts would affect setting. Implement HRMP.	a) Potential Historic Property
Residence & Barn (T2N/R29E)	N/A	Historic	Residence, Barn, Windmill	Potentially Eligible	TBD	1,200	366	Direct impacts avoided. Visual impacts would affect setting. Implement HRMP.	a) Potential Historic Property
Isolated Finds/Archaeological Objects³									
N/A	NH-BB-ISO-01	Historic	Refuse	Not Eligible	TBD	96	29	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NH-DM-ISO-01	Pre-Contact	Debitage	Not Eligible	Unevaluated	298	91	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-DM-ISO-02	Historic	Refuse	Not Eligible	Unevaluated	383	117	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-DM-ISO-03	Pre-Contact	Groundstone	Not Eligible	Unevaluated	62	19	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NH-DM-ISO-04	Historic	Refuse	Not Eligible	Unevaluated	39	12	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NH-DM-ISO-05	Historic	Agriculture	Not Eligible	Unevaluated	1,198	365	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-DM-ISO-06	Historic	Refuse	Not Eligible	Unevaluated	935	285	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-DM-ISO-07	Pre-Contact	Debitage	Not Eligible	Unevaluated	3,253	992	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-DM-ISO-08	Pre-Contact	Debitage	Not Eligible	Unevaluated	516	157	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-01	Historic	Refuse	Not Eligible	Unevaluated	579	176	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-02	Pre-Contact	Core	Not Eligible	Unevaluated	78	24	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NH-MC-ISO-03	Pre-Contact	Debitage	Not Eligible	Unevaluated	162	49	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.

Trinomial	Temporary ID	Pre-Contact/ Historic	General Resource Description	NRHP Recommendation	SHPO NRHP Determination ¹	Nearest Distance to Temporary Disturbance ²		Project Effect	Applicable EFSC Siting Standard
						Feet	Meters		
N/A	NH-MC-ISO-04	Pre-Contact	Debitage	Not Eligible	Unevaluated	96	29	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NH-MC-ISO-05	Historic	Refuse	Not Eligible	Unevaluated	4,939	1,505	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-06	Historic	Refuse	Not Eligible	Unevaluated	2,219	677	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-07	Historic	Refuse	Not Eligible	Unevaluated	481	147	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-08	Pre-Contact	Core	Not Eligible	Unevaluated	1,240	378	Avoided. No further management.	b) Archaeological object on private land.
N/A	NH-MC-ISO-09	Pre-Contact	Debitage	Not Eligible	Unevaluated	1,091	332	Avoided. No further management.	b) Archaeological object on private land.
N/A	NHS-BB_ISO-01	Historic	Refuse	Not Eligible	TBD	9	3	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.
N/A	NHS-BB_ISO-02	Historic	Refuse	Not Eligible	TBD	0	0	Development within 50 meters (164 feet). Shovel probing needed to confirm isolated nature.	b) Archaeological object on private land.

1. SHPO determinations are based on a draft version of King et al. (2020). Determinations may change as a result of further review of the revised report and NRHP eligibility recommendations included in confidential Attachment S-2. NH-BB-01, NH-BB-02, NH-BB-03, NH-BB-04, NH-BB-ISO-01, NHS-BB-ISO-01, and NHS-BB-ISO-02 are yet to be reviewed by SHPO for NRHP-eligibility. Pendleton Ranch Sheep Camp/Bunk House, Town of Nolin, Property at T2N/R30E, and Property at T2N/R29E are assumed by SHPO to be NRHP-eligible.

2. Distances are rounded to the nearest whole foot or meter.

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

The identification efforts described above have identified one historic property listed on the NRHP: the Oregon Trail/ONHT. Another 31 archaeological sites are unevaluated for NRHP eligibility and treated as potentially eligible for listing on the NRHP for the purposes of this analysis. Four historic sites are also assumed to be NRHP-eligible.

Table S-4 lists the known historic and cultural resources listed, or that are likely eligible for listing, on the NRHP within the Analysis Area. (Additional details of these resources can be obtained in Table S-3 above or in Attachments S-2 and S-6.) Locations of these resources are illustrated in confidential Attachment S-4. Additional historic properties or potential historic properties may exist in unsurveyed portions of the Analysis Area, in areas of high probability for buried archaeological resources, or in areas where poor ground surface visibility was experienced during survey.

Table S-4. Historic and Cultural Resources Listed, or Likely Eligible for Listing, on the NRHP within the Analysis Area

Resource	Resource Type
NRHP-Listed Resources	
Oregon NHT	Archaeological Site
Unevaluated/Likely NRHP-Eligible Resources	
NH-BB-03	Archaeological Site
35UM 00536	Archaeological Site
35UM 00537	Archaeological Site
35UM 00539	Archaeological Site
35UM 00540	Archaeological Site
35UM 00541	Archaeological Site
35UM 00542	Archaeological Site
35UM 00543	Archaeological Site
35UM 00544	Archaeological Site
35UM 00547	Archaeological Site
35UM 00548	Archaeological Site
35UM 00549	Archaeological Site
35UM 00550	Archaeological Site
35UM 00551	Archaeological Site
35UM 00552	Archaeological Site
35UM 00553	Archaeological Site
35UM 00555	Archaeological Site
35UM 00556	Archaeological Site

Resource	Resource Type
35UM 00557	Archaeological Site
35UM 00559	Archaeological Site
35UM 00560	Archaeological Site
35UM 00561	Archaeological Site
35UM 00562	Archaeological Site
35UM 00563	Archaeological Site
35UM 00564	Archaeological Site
35UM 00565	Archaeological Site
35UM 00566	Archaeological Site
35UM 00567	Archaeological Site
35UM 00568	Archaeological Site
35UM 00569	Archaeological Site
35UM 00571	Archaeological Site
Pendleton Ranches Sheep Camp/Bunk House	Historic Site/Historic Built Environment
Town of Nolin	Historic Site/Historic Built Environment
Property at T2N/R30E	Historic Site/Historic Built Environment
Property at T2N/R29E	Historic Site/Historic Built Environment

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

The efforts described above have identified 43 archaeological sites and 20 archaeological objects on private lands.

Table S-5 lists the known archaeological sites on private lands within the Analysis Area. (Additional details of these resources can be obtained in Table S-3 above or in Attachment S-2.) Locations of these resources are illustrated in confidential Attachment S-4. Additional archaeological sites or objects may exist in unsurveyed portions of the Analysis Area, in areas of high probability for buried archaeological resources, or in areas where poor ground surface visibility was experienced during survey.

Table S-5. Archaeological Sites and Objects on Private Lands within the Analysis Area

Resource	NRHP Recommendation
Archaeological Sites	
Oregon NHT	Listed
NH-BB-01	Not Eligible
NH-BB-02	Not Eligible
NH-BB-03	Unevaluated
NH-BB-04	Not Eligible
35UM 00536	Unevaluated
35UM 00537	Unevaluated
35UM 00538	Not Eligible
35UM 00539	Unevaluated
35UM 00540	Unevaluated
35UM 00541	Unevaluated
35UM 00542	Unevaluated
35UM 00543	Unevaluated
35UM 00544	Unevaluated
35UM 00545	Not Eligible
35UM 00546	Not Eligible
35UM 00547	Unevaluated
35UM 00548	Unevaluated
35UM 00549	Unevaluated
35UM 00550	Unevaluated
35UM 00551	Unevaluated
35UM 00552	Unevaluated
35UM 00553	Unevaluated
35UM 00554	Not Eligible
35UM 00555	Unevaluated
35UM 00556	Unevaluated
35UM 00557	Unevaluated

Resource	NRHP Recommendation
35UM 00558	Not Eligible
35UM 00559	Unevaluated
35UM 00560	Unevaluated
35UM 00561	Unevaluated
35UM 00562	Unevaluated
35UM 00563	Unevaluated
35UM 00564	Unevaluated
35UM 00565	Unevaluated
35UM 00566	Unevaluated
35UM 00567	Unevaluated
35UM 00568	Unevaluated
35UM 00569	Unevaluated
35UM 00570	Not Eligible
35UM 00571	Unevaluated
35UM 00572	Not Eligible
35UM 00573	Not Eligible
Isolated Finds/Archaeological Objects	
NH-BB-ISO-01	Not Eligible
NH-DM-ISO-01	Not Eligible
NH-DM-ISO-02	Not Eligible
NH-DM-ISO-03	Not Eligible
NH-DM-ISO-04	Not Eligible
NH-DM-ISO-05	Not Eligible
NH-DM-ISO-06	Not Eligible
NH-DM-ISO-07	Not Eligible
NH-DM-ISO-08	Not Eligible
NH-MC-ISO-01	Not Eligible
NH-MC-ISO-02	Not Eligible

Resource	NRHP Recommendation
NH-MC-ISO-03	Not Eligible
NH-MC-ISO-04	Not Eligible
NH-MC-ISO-05	Not Eligible
NH-MC-ISO-06	Not Eligible
NH-MC-ISO-07	Not Eligible

Resource	NRHP Recommendation
NH-MC-ISO-08	Not Eligible
NH-MC-ISO-09	Not Eligible
NHS-BB-ISO-01	Not Eligible
NHS-BB-ISO-02	Not Eligible

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

There are no public lands within the Analysis Area.

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

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

- (i) A description of any discovery measures, such as surveys, inventories, and limited subsurface testing work, recommended by the SHPO or the National Park Service of the U.S. Department of Interior for the purpose of locating, identifying and assessing the significance of resources listed in paragraphs (A), (B) and (C);*
- (ii) The results of the discovery measures described in subparagraph (i), together with an explanation by the applicant of any variations from the survey, inventory, or testing recommended;*
- (iii) A list of measures to prevent destruction of the resources identified during surveys, inventories and subsurface testing referred to in subparagraph (i) or discovered during construction;*

The Project, taking into account mitigation, has been designed to avoid significant impacts on historic, cultural, and archaeological resources identified within the Analysis Area. The majority of known resources have been avoided through Project design (see Table S-3). Avoidance has been achieved either through spanning overhead lines over the resource or through moving Project components. Avoidance of these resources will be ensured through monitoring during construction

(see Sections 4.1 and 5). Despite this effort, some impacts may occur as a result of the Project. All impacts will be mitigated to less than significant. Attachment S-6, Draft Historical Resource Mitigation Plan (HRMP), identifies proposed mitigation measures for visual impacts to historic sites that may be eligible for NRHP listing and will have a view of the Project.

All identified resources meeting siting standard A (NRHP-listed or likely eligible for listing on the NRHP) are avoided by a minimum of 50 meters (164 feet; see Table S-3 above) with three exceptions: the ONHT and two archaeological sites (35UM 00560 and 35UM 00571). Additionally, three potentially NRHP-eligible historic sites may be visually impacted: Pendleton Ranches Sheep Camp/Bunk House, the property at T2N/R29E (barn, residence, and associated structures), and the property at T2N/R30E (barn, shed, and associated structures).

- The ONHT crosses the potential UEC Cottonwood and BPA Stanfield transmission line routes. Only the UEC Cottonwood route crossing was accessible during surveys conducted for the Project, and no trail ruts were identified in the corridor. The conditions of the trail in the BPA transmission line corridor are unknown at this time. Survey of the BPA Stanfield transmission line corridor is anticipated to be completed in spring 2020. The Applicant will design the selected transmission line route to avoid direct impacts to any identified trail ruts as well as the National Park Service–designated ONHT route. Further, the Applicant is currently consulting with OCTA regarding impacts to the trail and are developing an agreement on how to mitigate potential impacts of the Project. This additional work will occur on a continuing basis. Any impacts on the ONHT and associated archaeological sites are anticipated to be mitigated to less than significant.
- The disturbance footprint associated with the northern/eastern BPA Stanfield transmission line route is within 50 meters (164 feet) of pre-contact site 35UM 00560. If this route is selected, a 50-meter-buffer around the site will be avoided. The line will span the buffer and no ground disturbance will be allowed to occur within the buffer. The site will be monitored during construction to ensure significant impacts are avoided. The site will also be specifically addressed through consultations with the CTUIR.
- The disturbance footprint associated with the internal transmission line route is within 50 meters (164 feet) of pre-contact site 35UM 00571. A 50-meter-buffer around the site will be avoided. The line will span the buffer and no ground disturbance will be allowed to occur within the buffer. The site will be monitored during construction to ensure significant impacts are avoided. The site will also be specifically addressed through consultations with the CTUIR.
- Construction of the Project would result in up to 9 turbines being visible from the potentially NRHP-eligible Pendleton Ranches Sheep Camp/Bunk House; up to 21 turbines being visible from the potentially NRHP-eligible Property at T2N/R29E; and up to 34 turbines being visible from the potentially NRHP-eligible Property at T2N/R30E. For each historic property, assuming the setting is a historic character–defining feature, the construction of turbines would result in a significant impact. In order to achieve the full

projected wind energy generating capacity, no turbine locations can be changed to avoid these effects. As a result, a significant impact on these potential historic properties is unavoidable. The Draft HRMP in Attachment S-6 outlines three intensive level surveys that the Applicant would complete prior to construction. The surveys would comply with SHPO's *Guidelines for Historic Resources Surveys in Oregon* (OPRD 2011). The HRMP has been drafted in consultation with SHPO and ODOE. Through implementation of this plan, the potential visual impacts of the Project to the Pendleton Ranches Sheep Camp/Bunk House, the Property at T2N/R29E, and the Property at T2N/R30E historic properties would be reduced to less than significant.

In addition, most identified resources meeting siting standard B (archaeological sites and objects on private land) are avoided by a minimum of 50 meters (164 feet; see Table S-3 above), with the following exceptions: the ONHT, four archaeological sites (35UM 00538, 35UM 00560, 35UM 00570, and 35UM 00571), and eight isolated finds/archaeological objects (NH-BB-ISO-01, NH-DM-ISO-03, NH-DM-ISO-04, NH-MC-ISO-02, NH-MC-ISO-03, NH-MC-ISO-04, NHS-BB-ISO-01, and NHS-BB-ISO-02).

- As noted above, the ONHT crosses the potential UEC Cottonwood and BPA Stanfield transmission line routes. No ruts were observed by the pedestrian survey where the UEC Cottonwood route crosses the ONHT. The BPA Stanfield route crossing of the ONHT has not yet been surveyed due to access restrictions but is planned to be surveyed prior to construction. Under either alternative, the selected transmission line will span the ONHT and associated archaeological sites to avoid any direct impacts to it. Additionally, the Applicant is currently consulting with OCTA to address potential impacts on the trail.
- The disturbance area of Turbine 66 is intersected by 35UM 00538, a historic road recommended as not eligible for listing on the NRHP. A new access road and the disturbance area of Turbine 36 is intersected by 35UM 00570, another historic road segment that has been recommended as not eligible for listing on the NRHP. Any impacts to both sites are considered not significant given their NRHP eligibility recommendations. The recording and research of these resources, as documented in King et al. (2020) in confidential Attachment S-2, have mitigated any potential significant impact that would occur.
- As noted above, the disturbance area of the potential northern/eastern BPA Stanfield transmission line route is within 50 meters (164 feet) of 35UM 00560, a pre-contact cairn(s) and rock alignment, and the internal transmission line route is within 50 meters (164 feet) of NH2-MC-02. The final design of these routes will avoid temporary disturbance within 50 meters (164 feet) of each site. The sites will also be monitored during construction. If temporary disturbance within the 50-meter buffers cannot be avoided in final design, the Applicant will enter into further consultations with SHPO and CTUIR to determine appropriate mitigations to reduce the significance of impacts on the sites.

- NH-BB-ISO-01, NH-DM-ISO-03, NH-DM-ISO-04, NH-MC-ISO-02, NH-MC-ISO-03, NH-MC-ISO-04, NHS-BB-ISO-01, and NHS-BB-ISO-02 are less than 50 meters (164 feet) from the disturbance area. These isolated finds/archaeological objects have been recommended as not eligible for listing on the NRHP. As such, any impact on them is not considered significant because the resources themselves do not give significant contributions to local, state, or national history. The recording and research of these resources, as documented in King et al. (2020) in confidential Attachment S-2, have mitigated any potential significant impact that would occur. However, each of these archaeological objects will be shovel probed prior to construction to confirm the resources are isolated finds and not representative of archaeological sites. Additional mitigation, if necessary, will be identified following these efforts to reduce any identified significant impacts to less than significant. Mitigation will be determined in consultation with SHPO and CTUIR, but may include re-design (within the analysis area) to avoid or reduce data recovery efforts.

A total of 29 archaeological sites and 3 historic properties within the Analysis Area may be indirectly impacted through visual or auditory impacts. Table S-6 lists the 29 archaeological sites, all of which have been identified as HPRCSITs by CTUIR. The 3 historic properties are the Pendleton Ranches Sheep Camp/Bunk House, the Property at T2N/R29E, and the Property at T2N/R30E. All are subject to EFSC Standard A (cultural resources potentially eligible for listing on the NRHP); the archaeological sites are also subject to EFSC Standard B (archaeological site on private land). These resources are of concern to the CTUIR as HPRCSITs. Combined with other traditional resource concerns identified in their TUS (Engum 2018), the CTUIR has concluded that the proposed Project could potentially have an adverse effect on the identified HPRCSITs (sites in Table S-6 and other confidential resources). The Applicant has reached a confidential agreement with the CTUIR regarding Project effects and how to minimize or mitigate potentially significant impacts. Impacts are being mitigated through these consultations between the Applicant and CTUIR outside of the EFSC process and coordination between the two parties will continue throughout the planning and construction of the Project. Any necessary additional work identified through these consultations will occur prior to construction.

Table S-6. HPRCSITs Identified by CTUIR

<ul style="list-style-type: none"> • 35UM 00536 • 35UM 00537 • 35UM 00540 • 35UM 00541 • 35UM 00542 • 35UM 00543 • 35UM 00544 • 35UM 00547 • 35UM 00548 • 35UM 00549 	<ul style="list-style-type: none"> • 35UM 00550 • 35UM 00551 • 35UM 00552 • 35UM 00553 • 35UM 00555 • 35UM 00556 • 35UM 00557 • 35UM 00559 • 35UM 00560 • 35UM 00561 	<ul style="list-style-type: none"> • 35UM 00562 • 35UM 00563 • 35UM 00564 • 35UM 00565 • 35UM 00566 • 35UM 00567 • 35UM 00568 • 35UM 00569 • 35UM 00571
--	--	--

An existing road is less than 164 feet (50 meters) from NH2-DM-02, an NRHP-unevaluated pre-contact cairn site subject to EFSC standards A and B. Use of this road is not currently planned; however, if the road is determined to be necessary in the final design of the Project, any road expansion, if needed, will be on the side away from the resource, thus avoiding significant impacts on the site. The site would also be flagged and monitored during construction, if the road is incorporated into the final design.

In addition to the above resource-specific management recommendations, SHPO guidelines (SHPO 2013) require subsurface probing of poor ground surface visibility and areas of high probability for buried archaeological sites. Such areas within the Analysis Area are depicted in confidential Attachment S-4. Most of the areas of poor ground surface visibility are along the tops of ridgelines away from freshwater sources and on slopes. While stacked rock features, such as those that dominated the surveys in the Analysis Area, are typically found on ridgelines, this site type remains readily identifiable despite poor ground surface visibility. Ridgeline tops and slopes also experience higher rates of erosion and lower rates of soils deposition. As such, the likelihood of identifying additional archaeological sites, on the surface or subsurface, is considered low to moderate in those areas. An exception is made in areas where site distribution patterns suggest a higher likelihood for archaeological sites. General recommendations for subsurface probing in the Analysis Area are summarized in Table S-7 below (in Section 4.1). Shovel probing of high probability or poor ground surface visibility areas will be limited to the final siting corridor selected for the Project. These efforts and any resulting recommended mitigation measures will occur following issuance of the Site Certificate, but prior to construction.

As noted above, there are portions of the direct Analysis Area that have not been surveyed for cultural resources. These unsurveyed areas may include additional cultural resources not noted above, which may be subject to the EFSC standards. The buffered survey corridors that form the Analysis Area allow for the Project to be designed to avoid direct impacts to identified cultural resources. Impacts to any resources identified by future surveys in unsurveyed areas and subject to the EFSC standards that cannot be avoided by the Project will be mitigated to less than significant. This may include data recovery and/or consultations with CTUIR, SHPO, and/or OCTA, as appropriate. This additional work is anticipated to occur prior to construction, once access has been achieved. Any indirect impacts are anticipated to be mitigated to less than significant.

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

As noted above, the Project has been designed to avoid significant impacts to cultural resources where feasible. Several measures to prevent the destruction of historic, cultural, and archaeological resources have been identified by the Applicant. These are outlined below in Table S-7 and are described in confidential Attachments S-5 and S-7 and non-confidential Attachment S-6.

Table S-7. Cultural Resources Management Recommendations

Recommendation	Description
Complete Pedestrian Survey Coverage	Following receipt of the Site Certificate, once access to inaccessible and unsurveyed areas has been achieved, and prior to construction, the remainder of the Analysis Area that has not been surveyed for cultural resources for the Project will be surveyed. Methodologies employed will be the same as documented in confidential Attachment S-2 and/or consistent with current SHPO guidelines for archaeological surveys. Results of the survey, including mitigation measures necessary to avoid significant impacts, will be documented in a supplemental survey report and submitted to ODOE, SHPO, and CTUIR for review and comment.
Shovel Probing Plan	For the isolated finds (IFs) within 50 meters (164 feet) of a disturbance area in the final design, as well as the high probability and poor ground surface visibility areas within the final disturbance areas, a shovel probing plan has been drafted (confidential Attachment S-7). The plan provides methodology for shovel probing, however shovel probe design (i.e., specific shovel probe locations) will not be determined until the Project’s design nears finalization. Probing will occur following issuance of a site certificate by EFSC, but prior to construction. Results of probing will be documented in a supplemental survey report and include any further management recommendations. The plan and report will be submitted to ODOE, SHPO, and interested tribes for review and comment. Results will also be amended into the Construction Monitoring Plan, as appropriate.
Avoidance of Significant and Potentially Significant Resources in Final Design	Disturbance areas in the final design will avoid resources that have been recommended as NRHP-eligible or are unevaluated for NRHP eligibility by a minimum of 50 meters (164 feet). Avoidance includes spanning such resources or directionally drilling beneath a resource. If avoidance is infeasible, the Applicant will enter consultations with SHPO and interested tribes to determine appropriate mitigation for significant impacts. An exception to this measure is NRHP-eligible or unevaluated resources, such as NH2-DM-02, that are within 50 meters (164 feet) of existing roads to be used in the final Project design. In these instances, no disturbances shall occur between the existing roads and the resource; any necessary disturbance will be limited to the side of the road opposite the significant resource.
Implement Construction Monitoring and Inadvertent Discovery Plan	A plan outlining requirements for monitoring during construction and procedures for inadvertent discoveries during construction is being drafted in consultation with the CTUIR (Attachment S-5). The plan will include minimum avoidance buffers/markers around cultural resources, construction monitoring requirements, and procedures to follow in the event of a discovery of an archaeological resource during construction. It will be updated as necessary following completion of the above indirect impact assessment and shovel probing. Results of monitoring and any efforts conducted as a result of the inadvertent discovery protocols shall be documented in a Monitoring Report.

Recommendation	Description
Continued Coordination with Native Americans	For the Native American-related resources that may be indirectly impacted by visual and/or auditory effects of the Project, the Applicant should continue consultations with the CTUIR to assess any indirect Project impacts. The Applicant should continue their coordination and open communications with the CTUIR and other interested tribes throughout the Project to avoid impacting cultural resources, including HPRCSITs. Tribal consultation will occur outside of the EFSC process.
Finalize and Implement Historical Resource Mitigation Plan	For the three identified potentially NRHP-eligible historic properties that would have visual impacts from construction of the Project (Pendleton Ranches Sheep Camp/Bunk House, the Property at T2N/R29E, and the Property at T2N/R30E), implement an intensive level survey as outlined in Attachment S-6.

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

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

As stated above, a monitoring and inadvertent discovery plan for the Project is being drafted in consultation with the CTUIR. A working draft of the plan is provided as confidential Attachment S-5 to this exhibit.

6.0 Conclusion

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

7.0 References

Engum, Jennifer Karson. 2018. *Traditional Use Study for the Proposed Nolin Hills Wind Project, Umatilla County, Oregon*. Confederated Tribes of the Umatilla Indian Reservation, Department of Natural Resources, Cultural Resources Protection Program, Pendleton, Oregon. Submitted to Tetra Tech, Inc., Portland, Oregon. Contract No. 1140031.

King, Erin, Douglas Mitchell, Tia Cody, and Julia Mates. 2020. *Cultural Resources Pedestrian Survey Report, Nolin Hills Wind Power Project, Umatilla County, Oregon*. Tetra Tech, Inc., Portland,

Oregon. Submitted to Nolin Hills Wind, LLC. SHPO Case No. 17-1679. Tetra Tech Project #194-6029.

King, Erin, and Brady Berger. 2019. *Cultural Resources Pedestrian Survey Report Addendum 1, Nolin Hills Wind Power Project, Umatilla County, Oregon*. (Draft) Tetra Tech, Inc., Portland, Oregon. Submitted to Nolin Hills Wind, LLC. SHPO Case No. 17-1679. Tetra Tech Project #194-6029.

King, Erin, and Brady Berger. 2020. *Cultural Resources Pedestrian Survey Report, Addendum 2, Nolin Hills Wind Power Project, Umatilla County, Oregon*. (Draft.) Tetra Tech, Inc., Portland, Oregon. Submitted to Nolin Hills Wind, LLC. SHPO Case No. 17-1679. Tetra Tech Project #194-6029. September.

OPRD (Oregon Parks and Recreation Department). 2011. *Guidelines for Historic Resources Surveys in Oregon*. State Historic Preservation Office. Available online at:
https://www.oregon.gov/oprd/OH/Documents/guidelines_for_historic_resource_surveys.pdf

SHPO (Oregon State Historic Preservation Office). 2013. *Guidelines for Conducting Field Archaeology in Oregon*. Oregon State Historic Preservation Office, Salem, Oregon. November 2013, minor revision January 2016.







Figures

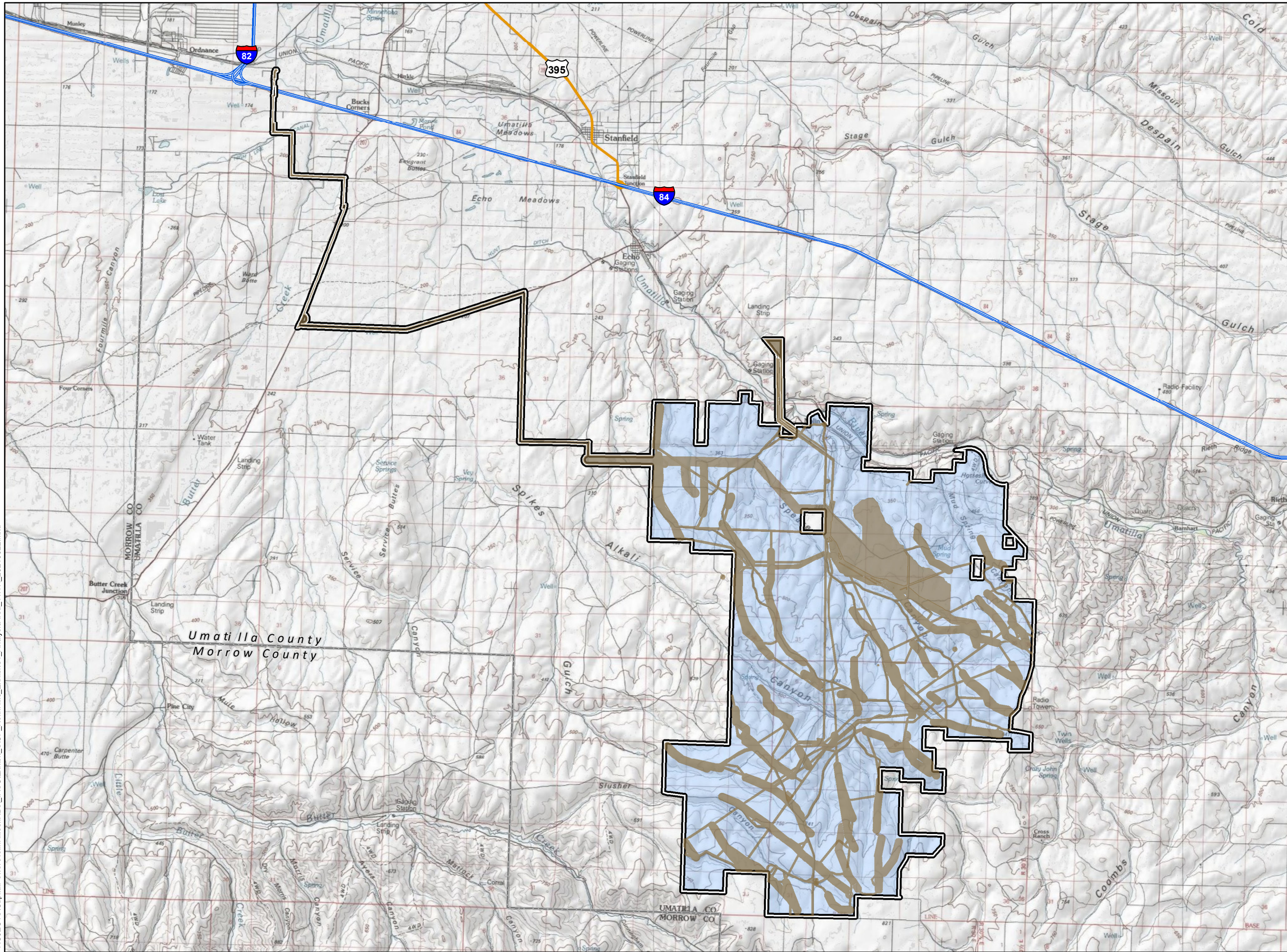
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Nolin Hills Wind Power Project

Figure S-1
Project Boundary and Analysis Area

UMATILLA COUNTY, OREGON

-  Proposed Site Boundary
-  Direct Analysis Area
-  Indirect Analysis Area
-  Interstate Highway
-  Secondary Highway
-  County Boundary

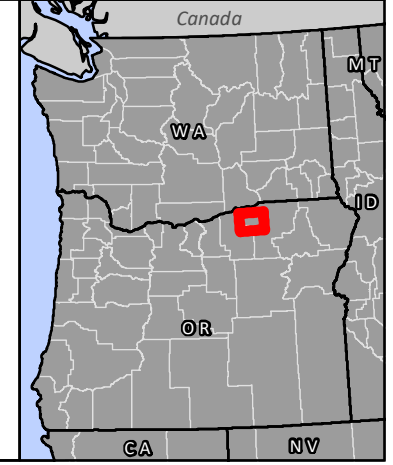


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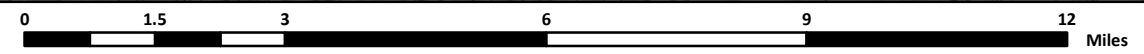
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Capital Power-Project Infrastructure;
USDA-Aerial Imagery; ESR-Roads;
Enterprise-State, County boundaries

Reference Map



1:140,000 WGS 1984 UTM Zone 11N










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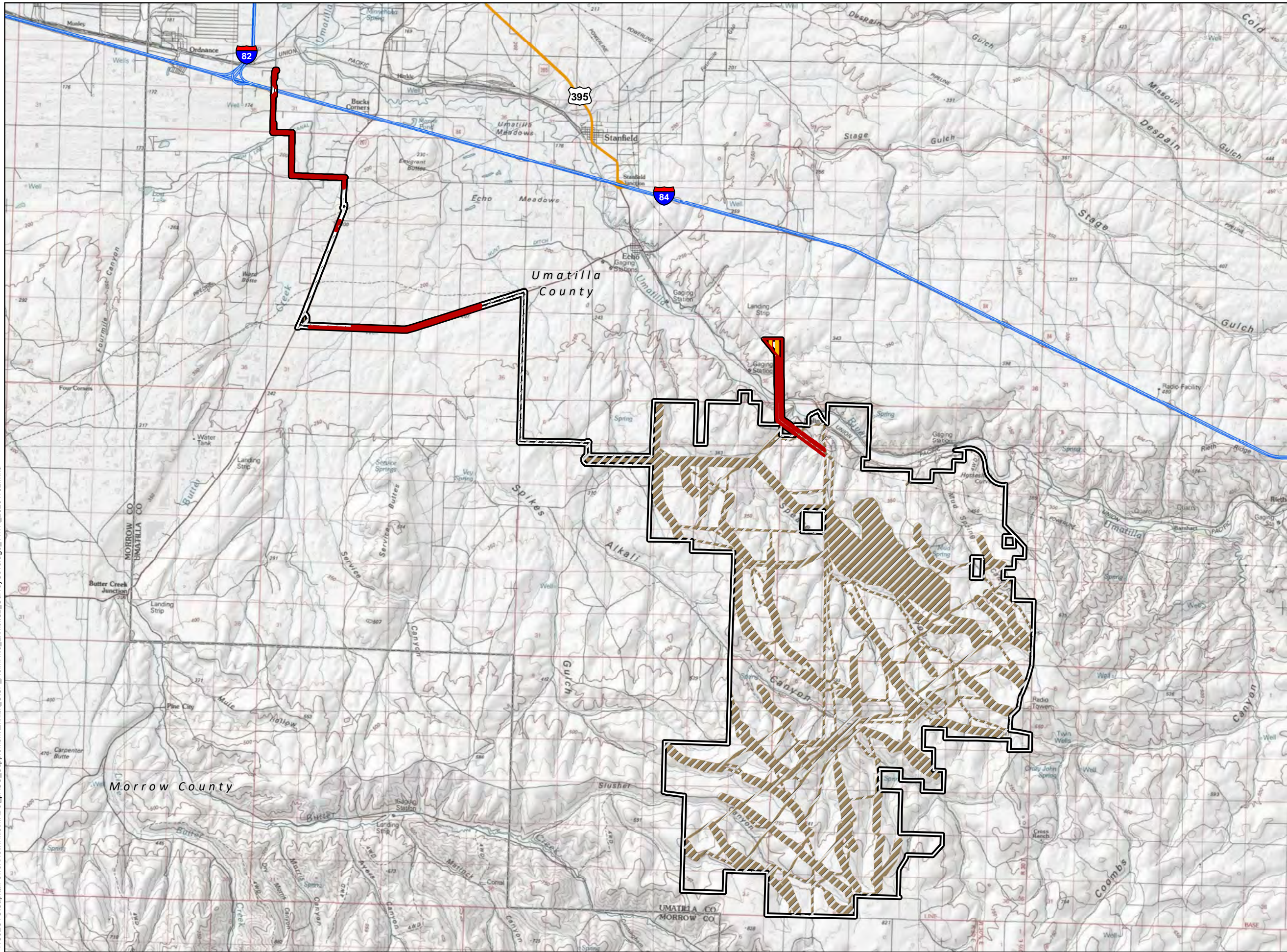
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Nolin Hills Wind Power Project

Figure S-2
Survey Coverage of Project Site
Boundary and Analysis Area

UMATILLA COUNTY, OREGON

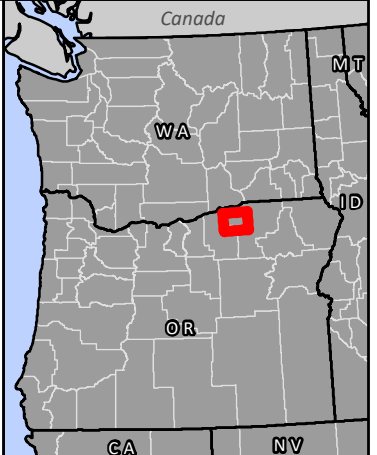
-  Proposed Site Boundary
-  Area Surveyed
-  Not Surveyed
-  Analysis Area
-  Interstate Highway
-  Secondary Highway
-  County Boundary



Data Sources

Capital Power-Project Infrastructure;
USDA-Aerial Imagery; ESRI-Roads;
Enterprise-State, County boundaries

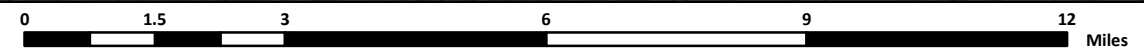
Reference Map



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1:140,000 WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

Attachment S-1. Tribal Coordination

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Date	Tribe/Agency	Comment
6/12/2017	Oregon Legislative Commission on Indian Services	E-mail/Letter inquiry request for tribal contacts with an interest in the Project area.
6/12/2017	Oregon Legislative Commission on Indian Services	E-mail with list of tribes with interest in the Project area.
6/13/2017	CTUIR/Applicant	Meeting between CTUIR and Applicant to introduce Project and discuss CTUIR concerns.
6/19/2017	Confederated Tribes of the Warm Springs Reservation; Nez Perce Tribe; Confederated Tribes and Bands of the Yakama Nation	Inquiry letters sent by Applicant to tribes with Project information, records search results, and invitation for formal and informal comment on Project.
7/5/2017-7/26/2017	CTUIR	CTUIR monitors participated in pedestrian survey with Tetra Tech.
10/5/2017	ODOE	E-mail to Nez Perce tribe requesting comments on Notice of Intent.
10/6/2017	Nez Perce Tribe	E-mail to EFSC ODOE deferring comment to CTUIR.
5/15/2018	CTUIR	CTUIR monitor participated in pedestrian survey with Tetra Tech.
5/16/2018	CTUIR/Applicant	Meeting between CTUIR and Applicant to provide update on Project and schedule, EFSC process, First Foods/Ethnobotany study, and the TUS results and potential mitigation measures.
1/16/2019	CTUIR/Applicant	Draft original survey report for wind turbine area e-mailed to CTUIR by Applicant.
3/25/2019	Applicant	E-mail to CTUIR with details of potential transmission line routes for application.
4/30/2019	CTUIR/Applicant	Meeting between CTUIR and Applicant to provide update on Project and schedule, review of environmental surveys conducted to date, visual effects, introduce transmission line components of the Project, avoidance of stacked rock features by the Project, NRHP eligibility of the stacked rock features, developing a working draft monitoring and inadvertent discovery plan, and results of the First Foods/Ethnobotany study.
7/8/2019-7/13/2019	CTUIR	CTUIR monitor participated in pedestrian survey with Tetra Tech.
7/10/2019	CTUIR/Tetra Tech	Comments on draft original survey report for wind turbine area e-mailed to Tetra Tech from CTUIR.
8/22/2019	CTUIR/Applicant	First draft of monitoring and inadvertent discovery plan e-mailed to CTUIR from Applicant. A near distance analysis for resources and turbines is also included.
10/29/2019	CTUIR/Applicant	Meeting between CTUIR and Applicant to provide update on Project and schedule, EFSC process, pedestrian survey results, and discuss identified resources of tribal concern and the monitoring and inadvertent discovery plan.
2/3/2020	CTUIR/Applicant	Final survey report, draft addendum survey report, draft monitoring plan/IDP, and nearest distance table provided to CTUIR via e-mail.
4/14/2020	CTUIR/Applicant	Meeting between CTUIR and Applicant to introduce solar portion of project, future First Foods surveys by CTUIR, CTUIR's review of Exhibit S of pASC, and mitigation measures to address CTUIR concerns and impacts on cultural resources.
5/1/2020-5/4/2020	CTUIR	CTUIR monitors participated in pedestrian survey with Tetra Tech.
8/31/2020	CTUIR	CTUIR monitors participated in pedestrian survey with Tetra Tech.

**Attachment S-2. Cultural Resources
Survey Reports
(CONFIDENTIAL)**

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Provided under Confidential Cover Pursuant to ORS 192.501(13)

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Attachment S-3. CTUIR Traditional Use Study Executive Summary

(CONFIDENTIAL)

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**Attachment S-4. Cultural Resource
Locations within the Project Site
Boundary and Analysis Area
(CONFIDENTIAL)**

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Provided under Confidential Cover Pursuant to ORS 192.501(13)

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**Attachment S-5. Working Draft
Monitoring and Inadvertent Discovery
Plan
(CONFIDENTIAL)**

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Provided under Confidential Cover Pursuant to ORS 192.501(13)

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Attachment S-6. Draft Historical Resource Mitigation Plan

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Nolin Hills Wind Power Project

Draft Historical Resource Mitigation Plan



d/b/a Nolin Hills Wind, LLC

Prepared by:



Tetra Tech, Inc.

December 2021

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1.0 Introduction

This draft Historical Resource Mitigation Plan describes approaches to mitigating the presumed significant adverse impact to three properties (Figure 1): 1) Pendleton Ranches Sheep Camp/Bunk House in the vicinity of County Road 1363, at latitude 45.527364 and longitude -119.099135; 2) buildings and structures at Township (T) 2N/ Range (R) 29E, NE 1/4 NE 1/4 Section 26; and 3) buildings and structures (including the stone foundation) at T2N/R30E, NW 1/4 SW 1/4 Section 35, resulting from construction and operation of the Nolin Hills Wind Power Project (Project). A full analysis of eligibility of these sites for eligibility for inclusion on the National Register of Historic Places (NRHP) has not been completed but the available information suggests they are likely to be determined eligible and that construction of the Project will have an adverse impact on them.

2.0 Regulatory Context for Mitigation

Pursuant to Oregon Administrative Rule (OAR) 345-022-0090 and State Historic Preservation Office (SHPO) guidance, Nolin Hills Wind, LLC (the Applicant) conducted a historic and cultural resources inventory within the Project's micrositing corridor and at specific locations as directed by SHPO. The Pendleton Ranches Sheep Camp and abandoned barn are located within this analysis area and research determined they are likely to be eligible for listing on the NRHP. The Applicant then identified potential impacts to the resource under OAR 345-021-0010(1)(s)(D) and provides this mitigation plan to prevent destruction of the resource in accordance with OAR 345-021-0010(1)(s)(D)(iii).

3.0 Description of the Aboveground Historic Property

This section provides a description of the identified properties, the determination of probable eligibility for inclusion in the NRHP, ownership associated with the properties, and the setting within the vicinity of the properties.

3.1 Property Descriptions

3.1.1 Pendleton Ranches Sheep Camp/Bunk House

The Pendleton Ranches Sheep Camp structures consist of a historic sheep ranching camp associated with Pendleton Ranches, Inc., including two standing buildings. The site is located at the head of Slusher Canyon. One standing building consists of a largely intact single-story, side gabled six-room bunkhouse that rests on concrete piers (Photograph 1). Some of the siding is deteriorating and in places it has fallen from the walls. The roof is covered in wood shingles in a plain pattern; many of the shingles are missing, leaving the roof rafters exposed.

The second standing structure consists of a single-story, one-room, front-gabled concrete and wooden subterranean cistern. The subterranean portion of the structure is constructed of form-and-poured conglomerate concrete, and the aboveground portion of the structure consists of the wooden low-pitched roof (Photograph 2).

The structures are located on private land owned by the Cunningham Sheep Ranch and accessible only by private two-track farm road.



Photograph 1. Pendleton Ranches Sheep Camp/Bunk House, View Northeast, 7/7/17



Photograph 2. Pendleton Ranches Sheep Camp Cistern, View Northeast, 7/7/17

3.1.2 Property at T2N/R30E, Barn, Foundation, and Associated Structures

Limited information is available on the structures at T2N/R30E, NW 1/4 SW 1/4 Section 35, and a full evaluation has not been conducted. Based on recent photographic evidence provided by the landowner (Photograph 3), the structures appear to include an unused and dilapidated wooden barn, a smaller storage shed, and a stone foundation that included steps down into a basement with no remaining aboveground features. The structures are located on private property owned by the Cunningham Sheep Ranch, 0.5 mile from the nearest proposed wind turbine location.



Photograph 3. T2N/R30E, NW 1/4 SW 1/4 Sect 35, View Northeast, 5/17/21

3.1.3 Property at T2N/R29E, Residence, Barn, and Windmill

Limited information is available on the structures at T2N/R29E, NE 1/4 NE 1/4 Section 26, and a full evaluation has not been conducted. Based on recent photographic evidence (Photograph 4), the structures appear to include a residence, barn, and one windmill. The structures are located on private property owned by the Cunningham Sheep Ranch, 0.4 mile from the nearest proposed wind turbine location.



Photograph 4. T2N/R29E, NE 1/4 NE 1/4 Sect 26, View South, 5/17/21

3.2 Determination of Eligibility and Preliminary Communication with Oregon State Historic Preservation Office

A full determination of eligibility has not been completed for any of these structures at this time. However, available historic information suggests they may be eligible for NRHP listing, and the Applicant concurs with a decision to treat them as if they are eligible with the aspect integrity of setting as a character-defining feature.

3.3 History

This section provides a history of the Pendleton Ranches Sheep Camp and Bunkhouse property. Research regarding the specific history of the other two properties has not yet been conducted as they are located outside of the site boundary on property not under lease for the Project. Additional background research on these properties will be conducted as part of the future mitigation effort.

The Pendleton Ranch bunkhouse and cistern were used as a bunkhouse for agricultural field crews in the 1950s and 1960s, in conjunction with operations of Pendleton Ranches, Inc., located just south of the main ranch in Nolin. Fencing and corrals are still present nearby, outside of the site, although the fencing has been replaced and the bunkhouse, no longer in use, is deteriorating. The home ranch, Cunningham Sheep Ranch, established in Nolin in the 1880s, is approximately 11 miles

north of the sheep camp. While no land modifications are indicated for this area on the 1861 General Land Office (GLO) plat maps, a building is indicated at the sheep camp's vicinity on the 1908 U.S. Geological Survey Umatilla 1:125,000 quadrangle. A 1952 aerial photograph shows a large barn on the land, closer to County Road 1363, which is no longer present, as well as fencing and corrals. The house and cistern are not visible in the photograph. However, a 1965 aerial photograph shows the house and cistern as well as the large barn, indicating the house and cistern were built or moved to the area from another location between 1952 and 1963.

The 1914 Standard Atlas of Umatilla County shows the site and surrounding section as owned by William M. Slusher. Slusher, a Joint Representative from Morrow and Umatilla counties in the 1907 legislature who was indicted for land fraud in 1908 (*Morning Oregonian* 1908), was also active in the State Woolgrowers' Association (*Oregon Daily Journal* 1907). By 1932, the land on which this sheep camp is located was owned by Pendleton Ranches, Inc., as indicated by the Umatilla County Metsker map for the site location. Pendleton Ranches, Inc. continues to own the land today.

Research revealed that several other family-owned sheep ranches dating from the late nineteenth and early twentieth centuries are in operation or are listed on the NRHP in east Oregon. However, despite the rich history of sheep ranching in Umatilla County, the results of a search in the Oregon Historic Sites Database resulted in no NRHP-eligible or -listed sheep ranches recorded in Umatilla County. This may be due to the fact that there have not been sheep ranches evaluated for listing on the NRHP in Umatilla County. (Outside of Umatilla County there are sheep ranches such as the Cant Ranch and Roba Ranch that are listed on the NRHP.) The City of Echo includes the Cunningham Sheep Company in Nolin in its Cultural Resources Inventory of 2002, along with other early farms (City of Echo 2015).

Based on information provided by the landowner, while the Pendleton/Cunningham enterprise did raise sheep, most of the sheep ranching occurred near Pilot Rock; the area where the abandoned house and cistern are located was mostly agricultural fields, as of the 1950s. This does not rule out the possibility that the land surrounding the house and cistern could have been used for sheep ranching in the 1920s, 1930s, or 1940s, nor does it negate the possibility that the house was used for shelter tending to sheep elsewhere on the Cunningham/Pendleton Ranch land and then moved.

Based on the known and potential history of these structures, they are being treated as eligible for listing in the NRHP for their association with the agricultural history of the area.

3.4 Setting

The three properties are all in isolated areas of private property that is not accessible to the public. The setting consists of rolling hills and identified features are located in draws at lower elevation, surrounded by hills. The Pendleton Sheep Ranch Camp/Bunk House is located approximately 0.25 mile from the nearest proposed wind turbine, with all or portions of up to 30 turbines potentially visible from this location. The unidentified structures are approximately 0.4 mile from the nearest proposed wind turbine, with portions of blade tips from 9 turbines visible, while an additional 5 turbines would have portions or all of the blades, hub, and tower visible. At T2N/R30E, blade tips from up to 34 turbines may be visible from the barn or associated structures; in addition, 12

turbines would have hub or lower (tower) portions visible. At T2N/R29E, blade tips of up to 5 turbines would be visible, while up to 21 turbine towers (hub height or lower) would be visible from the residence, barn, or windmill structures. Table 1 also depicts this information.

Table 1. Wind Turbines Visible from Historic Property Sites Near Project

Resource	Number of Turbines Visible (Blades or Portions of Blades only)	Number of Turbines Visible (Towers and Blades) (Hub Height: 266 feet)
T2N/R30E, Barn and Associated structures	34 turbines visible (blades only)	12 turbine towers visible (hub height or lower)
T2N/R29E, Residence, barn, and windmill	5 turbines visible (blades only)	21 turbine towers visible (hub height or lower)
Pendleton Ranches Sheep Camp/Bunk House	9 turbines visible (blades only)	5 turbine towers visible (hub height or lower)

4.0 Description of the Impacts Addressed by the Plan

Although none of the three properties are accessible to the public, their setting would contribute to presumed eligibility for listing on the NRHP and the presence of wind turbines in the vicinity of these three properties would adversely impact their setting.

Because no feasible turbine realignment exists that avoids these impacts, the Applicant will implement the mitigation action provided in Section 5.

5.0 Mitigation Measure

5.1 Intensive Level Surveys

The Applicant will conduct three Intensive Level Surveys, using the *Guidelines for Historic Resources Surveys in Oregon* (the Guidelines; OPRD 2011) for each of the properties: Pendleton Ranches Sheep Camp/Bunk House; the property at T2N/R30E, barn, foundation, and associated structures; and the property at T2N/R29E, residence, barn, and windmill.

During teleconference communications with Jason Allen (Oregon SHPO), Kathleen Sloan (Oregon Department of Energy [ODOE]), and the Applicant’s consultant (Tetra Tech, Inc.), in November 2021, the specific aspects of the Guidelines applicable to this Project were discussed and specified. The scope of work for each property is the result of those discussions and detailed below, and the Oregon SHPO’s communication regarding the Project heavily influenced this scope. The work shall be conducted by an historian/architectural historian who meets the Secretary of the Interior’s Professional Qualification Standards. No formal NRHP evaluation will be completed for any of the properties.

Using the Guidelines, the following tasks will be done for each of the three properties:

- *Research* – Prior to conducting the fieldwork, an architectural historian will review the Oregon Historic Sites Database and other online, local, and academic repositories to obtain background information about agricultural structures. Ownership information and history of properties will be conducted to the greatest extent feasible, given there is little information readily available. In addition to the review of historical literature, maps, and photos, this research will include communicating with the Umatilla County Historical Society Museum staff to determine if the Society has information about these topics.
- *Fieldwork*—A field investigation will be conducted and consist of:
 - Take photographs of the buildings and structures at the three properties, including photographs of the setting prior to construction of the Project. Overview photographs of the exteriors (and interiors, where accessible) and showing the associated buildings as they relate to the setting and in every direction, prior to construction of wind turbines.
 - Prepare measured drawings (to scale) except at properties the Oregon SHPO deems unnecessary (see specific property list below) and prepare site sketch maps with orientation of buildings and structures, prior to construction of wind turbines.
 - Provide detailed physical descriptions of the exterior and interior (where accessible) of buildings and structures.
- *Reporting*—Historians/Architectural historians will prepare three individual draft and final reports. The draft report will be reviewed by the Oregon SHPO. One (1) round of comments from the Oregon SHPO will be addressed in a final report.

Using the Guidelines, the following specific items will be included in the intensive survey report for the **Pendleton Ranches Sheep Camp/Bunk House**, a property which the Oregon SHPO staff suspects is a moveable house that is not an architectural type recorded or documented in their records:

- Prepare a thorough historic context for these types of moveable ranching properties and where they might be found or were used in Oregon. Bunk house should be considered similar to an artifact from which to glean information of these property types to use for future surveys that may include these types of buildings.

Using the Guidelines, the following specific items will be included in the intensive survey report for the **Property at T2N/R30E**, barn, foundation, and associated structure:

- Stone foundation: Emphasis will be on the physical nature of the resource, including a measured plan drawing including width of the perimeter, type of stone used, type of mortar (or dry laid technique) and how the foundation can lead to clues about the house.
- Barns on property will be documented but not to level of detail as foundation (no

measured plans required).

Using the Guidelines, the following specific items will be included in the intensive survey report for the **Property at T2N/R29E**, residence, barn, and windmill. Using the Guidelines, the following will be included in the intensive survey:

- Perimeter measurements of barn and residence only. Measured drawings are not required. Historians will look into windows of barn to determine floorplan because building is collapsing and is unsafe to enter.

6.0 Duration

Mitigation will be implemented within three (3) years from the start of construction. Prior to construction, photos of the setting of the three resources will be taken, capturing these properties within their unaltered setting (overview shots showing the in their context). Construction can then begin, as long as it does not impede further access to these properties.

7.0 Amendment of the Plan

This Historical Resource Mitigation Plan may be amended from time to time by agreement of the Applicant and the Energy Facility Siting Council (Council). SHPO will have the opportunity to review and participate in proposed amendments. Such amendments may be made without amendment of the site certificate. The Council authorizes the ODOE to agree to amendments to this plan. The Department shall notify the Council of all amendments, and the Council retains the authority to approve, reject, or modify any amendment of this plan agreed to by the Department.

8.0 References

Allen, Jason. Oregon Heritage and State Office of Historic Preservation. 2021. Personal Communication with Katie Clifford, Oregon Department of Energy. Email communication October 18, 2021.

Allen, Jason. Oregon Heritage and State Office of Historic Preservation. 2021. Personal Communication with Julia Mates, Tetra Tech, and Kathleen Sloan. Video teleconference. November 19, 2021.

City of Echo. 2015. Echo's Cultural Inventory. Electronic document, <http://www.echo-oregon.com/pub/inventory-15.pdf>, accessed October 17, 2017.

Morning Oregonian. 2008. "Eleven Accused of Land Fraud: Prominent Umatilla Men Indicted." June 9, 2008. Portland, Oregon.

OPRD (Oregon Parks and Recreation Department). 2011. *Guidelines for Historic Resources Surveys in Oregon. State Historic Preservation Office*. Available online at:

https://www.oregon.gov/oprd/OH/Documents/guidelines_for_historic_resource_surveys.pdf

Oregon Daily Journal, The. 1907. "Woolgrowers' Session Ends." 14 Nov 1907, page 6. Portland, Oregon,






Figure

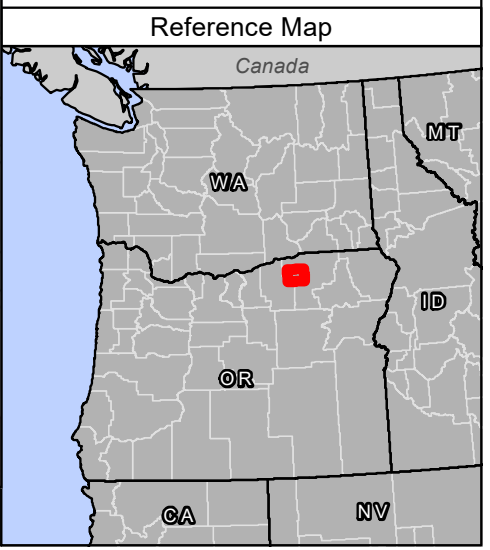
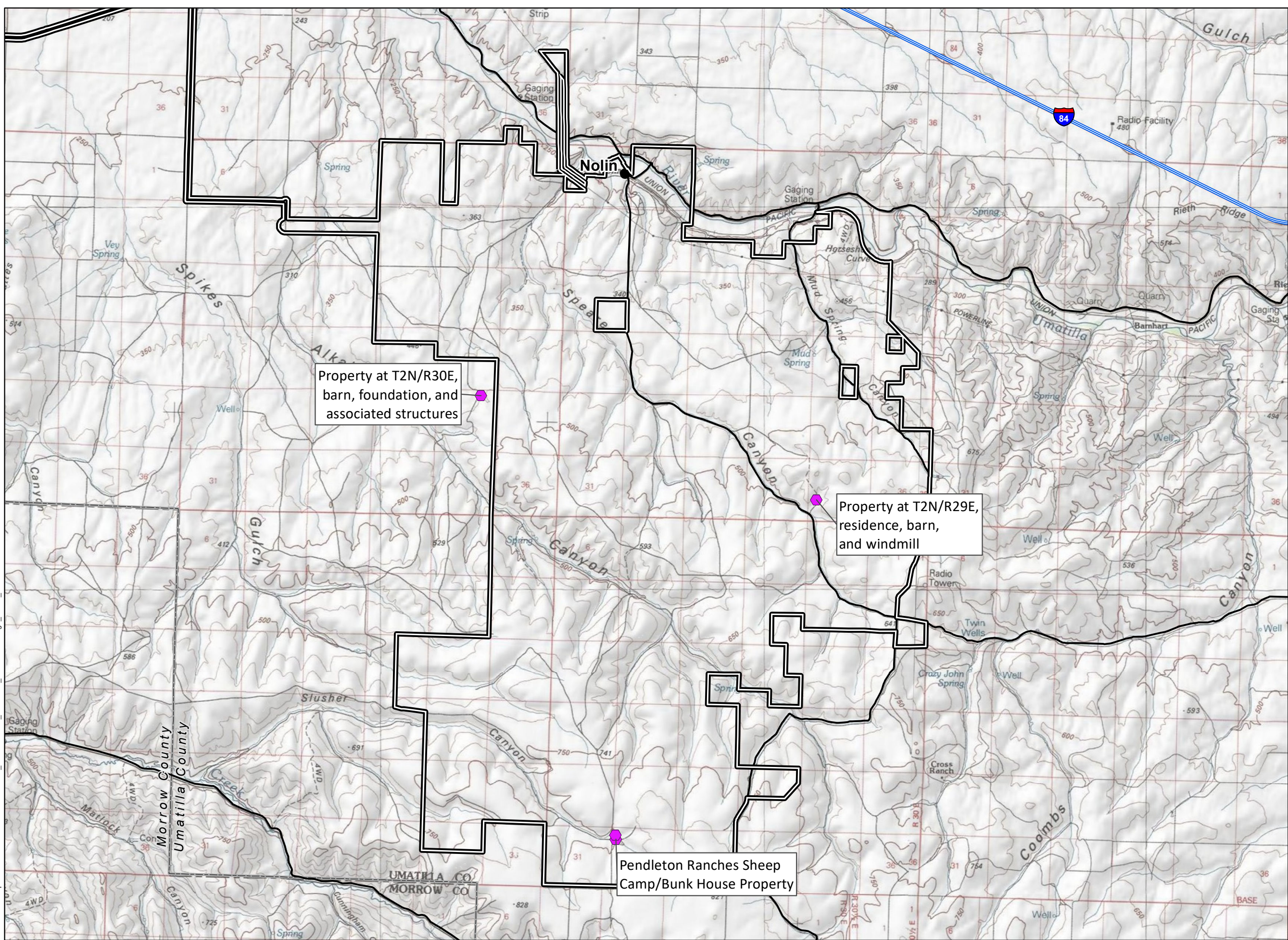
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Nolin Hills Wind Power Project

**Figure 1
Locations of Historic Buildings**

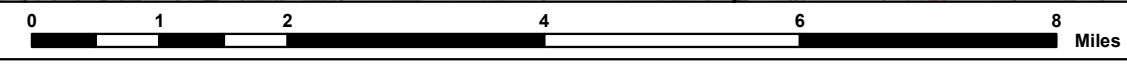
UMATILLA COUNTY, OREGON

-  Proposed Site Boundary
-  Interstate Highway
-  Secondary Road
-  City/Town
-  Historic Buildings



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1:95,000 WGS 1984 UTM Zone 11N



NOT FOR CONSTRUCTION

**Attachment S-7. Subsurface Probing Plan
(CONFIDENTIAL)**

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Provided under Confidential Cover Pursuant to ORS 192.501(13)

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