

Wild Horse Wind PP
EIS Scoping Comment - 23

STATE OF WASHINGTON
Office of Archaeology and Historic Preservation
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April 27, 2004

Ms. Irina Makarow
EFSEC
PO Box 43172
Olympia, WA 98504-3172

In future correspondence please refer to:
Log: 012403-02-EFSEC
Re: Wild Horse Wind Power Project

Dear Ms. Makarow:

Thank you for providing a copy of the Application for Site Certification (*Application*) and the *Draft Archaeological Survey of the Wild Horse Wind Power Project Area, Kittitas County, Washington (Survey)* for the above referenced project. I have consulted with Russell Holter, a Project Compliance Reviewer in this office, and we have authored the following comments.

We generally concur with the avoidance measures proposed for the archaeological sites, although we offer some comments for your consideration.

1. The general proposal is to avoid any damage to the archaeological resources by altering the project enough to avoid contact with the archaeological sites. We concur with this plan. However, should this become impossible, and the archaeological sites cannot be avoided, testing for significance would be necessary. Test excavations would require a permit from this office per RCW 27.53.060 and requires a 30-day comment period and consultation with the affected Tribes. Pending significance findings, further mitigation may be necessary.
2. Section 3.14.4.1, pages 24-25 of the *Application* state that a 100 foot design buffer will be placed around sites recorded during the current survey and that all ground disturbing actions near known archaeological sites would be monitored by a professional archaeologist. We would like to clarify our understanding of how this process would work and offer the following language instead:

The archaeologist should flag off or otherwise delineate the archaeological sites with a 100-foot buffer. Ground disturbing actions within a specified radius of any archaeological sites, either

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recorded during the Wild Horse *Survey* or previously recorded, would be monitored by a professional archaeologist to prevent damage or destruction to both known and unanticipated archaeological resources. If any archaeological materials, including but not limited to human remains, are observed, excavation in that area would cease, and OAH, EFSEC, the affected Tribes and the applicant would be notified. If the project cannot be moved or re-routed to avoid resources, the resources would have to be tested for eligibility for listing in the National Register of Historic Places (NRHP). Any excavation or disturbance to the archaeological sites would require an excavation permit from this office per RCW 27.53.060. Any flagging or pin flags would be removed by the archaeologist at the end of the monitoring project.

3. We recommend a written monitoring plan be developed to outline monitoring methods, expectations and procedures to follow in the event of an archaeological discovery. We would appreciate the opportunity to comment on this monitoring plan.
4. A map depicting the project site layout, overlaid with a map depicting newly recorded sites, isolates, previously recorded sites, and all survey transects would be helpful. The 11x17" color Figure 1 in the first *Survey* draft is helpful, because of its size and resolution. It is difficult to read and digitize surveyed areas on our GIS layer from smaller maps. Also, we look forward to receiving a Table of Contents and List of Figures and Tables included in the final *Survey* report.
5. This office recommends that a qualified cultural resources consultant conduct a survey of the affected area to determine whether the project is sited within a historical or cultural landscape. This determination needs to be sent to the Office of Archaeology and Historic Preservation for concurrence.
6. If the project undertaking is found to be within a historic or cultural landscape, the cultural resources consultant needs to determine what the effect the undertaking will have to that landscape and address the effects in the mitigation section of the final Environmental Impact Statement. This determination should be sent to OAH for concurrence with these measures.
7. We recommend you conduct a professional survey of those properties 50-years of age or older within the Zone of Visual Dominance and as far away as 2/3rds of a mile distant from the affected area on all sides. The consultant should be looking for historic properties that may be affected by having a wind farm located within its territorial view. A Historic Property Inventory form should be filled out for each property that is potentially historic and returned to this office. A blank copy of the form can be found at our website www.oahp.wa.gov.
8. If federal permits or funds are involved in this project, Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations, 36CFR800, must be followed to determine if any of the proposed actions will have an adverse effect on historic properties, including archaeological sites. We would appreciate receiving any

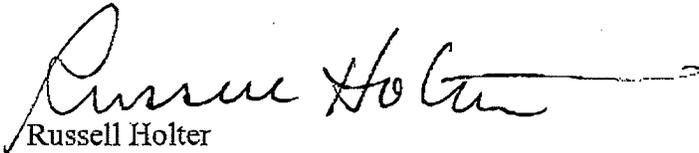
correspondence or comments from concerned tribes or other parties concerning cultural resource issues that you receive as you consult under the requirements of 36CFR800.4(a)(4).

These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,



Stephenie Kramer
Assistant State Archaeologist



Russell Holter
Project Compliance Reviewer

cc: Johnson Meninick
Camille Pleasants
Lithic Analysts