



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

November 22, 2017

Mr. Stephen Posner  
Energy Facility Site Evaluation Council  
P.O. Box 43172  
Olympia, Wa98504-3172

In future correspondence please refer to:  
Project Tracking Code: 2017-05-03441  
Property: Columbia Solar Project-Tuusso

**Re: Archaeology and Historic Resources-Review Comments, Permits from DAHP Required**

Dear Mr. Posner:

Thank you for contacting the Washington State Department of Archaeology and Historic Preservation (DAHP). The above referenced project has been reviewed on behalf of the State Historic Preservation Officer (SHPO). We have the following review comments and requirements:

**2017-05-03441 TUUSSO Urtica Solar Project**

- A permit from DAHP is required 45KT4019 for formal archaeological testing and boundary determination. The DAHP permit requires the services of a professional archaeologist and takes 60 days to issue after DAHP has received a sufficient permit application.
- 45KT4020 was identified as an isolated artifact without sufficient survey methodology to identify it as an isolate rather the part of a larger site. Additional archaeological work is required.
- The inventory forms for URT-17-01, URT-17-02 and URT-1703 do not contain enough information for DAHP to make a determination of eligibility. In general we have determined such resources eligible as contributing elements of part of a larger system. However in this case, the consultant has not provided information regarding which system(s) these features are associated with nor a justifiable built date. Please note that just because a feature is common that does not detract or negate its eligibility for listing in the National Register of Historic Places (NRHP). ). In most cases you have to think of these elements as contributing to a larger piece (i.e. district).

**2017-05-03440 TUUSSO Typha Solar Project**

- 45KT4013-4018 were identified as an isolated artifacts without sufficient survey methodology to identify it as an isolate rather the part of a larger site. Additional archaeological work is required.
- The inventory forms for TYP-17-01 the Ellensburg Power Canal is eligible for listing in the NRHP.



- We concur that the Golf Cart Shed TYP-7-02 is not eligible for listing in the NRHP

#### **2017-05-03439 TUUSSO Penstemon Solar Project**

- 45KT4011 was identified as an isolated artifact without sufficient survey methodology to identify it as an isolate rather the part of a larger site. Additional archaeological work is required.
- A permit from DAHP is required 45KT4012 for formal archaeological testing and boundary determination. The DAHP permit requires the services of a professional archaeologist and takes 60 days to issue after DAHP has received a sufficient permit application.

#### **2017-05-03438 TUUSSO Fumaria Solar Project**

- 45KT3592, 45KT4007, 45KT4008 and 45KT4009 were identified as an isolated artifacts without sufficient survey methodology to identify it as an isolate rather the part of a larger site. Additional archaeological work is required.
- FUM-17-03 the lateral NB 7.7 inventory form does not contain enough information to make a determination of eligibility. In general we have determined such resources eligible as contributing elements of part of a larger system. However in this case the consultant has not provided information regarding which system(s) these features are associated with nor a justifiable built date. Please note that just because a feature is common that does not detract or negate its eligibility for listing in the National Register of Historic Places (NRHP). ). In most cases you have to think of these elements as contributing to a larger piece (i.e. district).
- FUM-17-02 the Crest Field Turnout inventory form does not contain enough information to make a determination of eligibility. In general we have determined such resources eligible as contributing elements of part of a larger system. However in this case the consultant has not provided information regarding which system(s) these features are associated with nor a justifiable built date. Please note that just because a feature is common that does not detract or negate its eligibility for listing in the National Register of Historic Places (NRHP). In most cases you have to think of these elements as contributing to a larger piece (i.e. district).
- FUM-17-01 presumably this resource is part of the larger Cascade Canal Co. Canal. This serves as a good example of how a section can be tied to a larger context. FUM-17-10 is determined eligible for listing in the NRHP.

#### **2017-05-03437 TUUSSO Camas Solar Project**

- 45KT4010 was identified as an isolated artifact without sufficient survey methodology to identify it as an isolate rather the part of a larger site. Additional archaeological work is required.
- CAM-17-01, the Whipple Barn is determined not eligible for listing in the NRHP because it lacks integrity.
- CAM-17-02, the Irrigation lateral inventory form does not contain enough information to make a determination of eligibility. In general we have determined such resources eligible as contributing elements of part of a larger system. However in this case the consultant has not provided information regarding which system(s) these features are associated with nor a

justifiable built date. Please note that just because a feature is common that does not detract or negate its eligibility for listing in the National Register of Historic Places (NRHP). There is reference to the canal being moved, but no documentary evidence to support this. There is also notes which say it contains several irrigation features but these are not pictured and no specific information is noted as to where or what these might be.

General Comments:

- The reference to eligibility determination for archaeological resources is not compatible with state laws for the protection of such resources. These resources are protected regardless of eligibility for local, state or national registers and permits from DAHP are required prior to disturbance. In absence of any federal nexus these eligibility references should be removed as cause confusion.

Thank you for the opportunity to review. If you have any questions, please contact me.

Sincerely,

A handwritten signature in blue ink that reads "Gretchen Kaehler". The signature is written in a cursive style and is followed by a long, horizontal, slightly wavy line.

Gretchen Kaehler  
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cc. Johnson Meninick, Cultural Resources, Yakama Nation  
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