



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

March 13, 2018

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- Revised Comments in Italics

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-Revised Comments

- 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 through additional shovel probing and no further information or permitting is required prior to disturbance. Please make sure it is recorded on an isolate form rather than a site form.*
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- *Although the revised report states that no impact from the project as currently proposed, designs often evolve during micrositing. Please provide the information requested previously (see below):*

“ 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, 45KT4014, 45KT4017 and 45KT4018 were identified as an isolated artifacts artifact through additional shovel probing and no further information or permitting is required prior to disturbance. **Please make sure they are recorded on an isolate forms rather than a site forms.***
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- *45KT4015 and 45KT4016 have been identified as small, low density lithic scatter through additional shovel probing. A permit from DAHP is required for formal archaeological testing and boundary determination for both sites.*
- 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 through additional shovel probing and no further information or permitting is required prior to disturbance.*
- 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, 45KT4008 were identified identified as an isolated through additional shovel probing and no further information or permitting is required prior to disturbance. **Please make sure they are recorded on an isolate forms rather than a site forms.***
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- *A permit from DAHP is required for 45KT4007 and 45KT4009 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.*
- *Although the revised report states that no impact from the project as currently proposed, designs often evolve during micrositing. Please provide the information requested previously (see below):*

“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 identified as an isolated through additional shovel probing and no further information or permitting is required prior to disturbance.*
- CAM-17-01, the Whipple Barn is determined not eligible for listing in the NRHP because it lacks integrity.
- *Although the revised report states that no impact from the project as currently proposed, designs often evolve during micrositing. Please provide the information requested previously (see below):*

“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.”

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 flourish line.

Gretchen Kaehler
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cc. Johnson Meninick, Cultural Resources, Yakama Nation
Jessica Lally, Archaeologist, Yakama Nation
Kate Valdez, THPO, Yakama Nation
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Aaron Naumann, Archaeologist, CCT
Mike Cannon, Archaeologist, SWCA