



March 9, 2021

Amy I. Moon
Energy Facility Site Specialist
Energy Facility Site Evaluation Council
Utilities and Transportation Commission
PO Box 43172
Olympia, WA 98504-3172

In future correspondence please refer to:
Project Tracking Code: 2020-02-01333
Property: Benton County_Horse Heaven Wind Farm Project
Re: Report Comments

Dear Amy Moon:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. In response, we have reviewed the two cultural resources survey reports you provided for this project. Please review our comments below:

General Comments:

- DAHP agrees with the Yakama Nation that government-to-government Tribal consultation is the duty of the lead agency, not the cultural resources consultant. In this case, EFSEC and/or Benton County should have initiated this consultation. We request that EFSEC's process be revised to include this step for future projects.
- The Yakama Nation has identified multiple Traditional Cultural Properties (TCPs) within and adjacent to the project area. Consultation with the Yakama Nation and other interested Tribes should continue in order to assess impacts to these TCPs.

Archaeology Comments:

- Both reports should be revised to include DAHP report cover sheets.
- The following historic isolates are, by definition, not eligible for listing on the National Register of Historic Places. Therefore, under Washington State law, permits from the DAHP are not necessary in order to disturb them:
 - 45BN2081
 - 45BN2082
 - 45BN2083
 - 45BN2084
 - 45BN2091
- The following prehistoric isolate has not been fully evaluated for listing on the National Register of Historic Places. Per the report, this isolate will be revisited by the consultant and radial shovel probes dug around it. The DAHP will review this site form when we



receive the addendum report. Until that time, the area around the isolate may not be impacted:

- 45BN2092
- The following historic sites are unevaluated for listing on the National Register of Historic Places. If work is planned within or in close proximity to these sites, these sites will require further evaluation by an archaeologist prior to any disturbance:
 - 45BN2085
 - 45BN2086
 - 45BN2087
 - 45BN2088
 - 45BN2089
 - 45BN2090
 - 45BN2093
 - 45BN261

Built Environment Comments:

- Please revisit the evaluation of Property ID: 722995 Grain Elevator for its eligibility for listing in the National Register of Historic Places; we recommend this revised evaluation utilize the Grain Production Properties in Eastern Washington MPS that listed in the NRHP in 1988. Grain elevators have clear associations with the agricultural history of their local areas that often meets Criterion A. This grain elevator also appears to retain an excellent level of historic integrity, and therefore has potential to meet Criterion C for embodying the distinct characteristics of its type, period, and method of construction. Please note there is precedent in the State for similar historic properties to be listed in the NRHP for these reasons (for example, the Tekoa Grain Company Elevator and Flathouse).

These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law.

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me or Holly Borth (Holly.Borth@dahp.wa.gov).

Sincerely,



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