



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

January 25, 2023

Sonia Bumpus  
Executive Director  
EFSEC  
PO BOX 43172  
Olympia WA, 98504-3172

In future correspondence please refer to:  
Project Tracking Code: 2020-02-01333  
Property: Horse Heaven Wind Farm  
Re: Draft EIS Comments

Dear Sonia Bumpus:

Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP). We are providing our review of the Draft Environmental Impact Statement for the proposed Horse Heaven Wind Farm approximately 7 miles southwest of Richland, Benton County, Washington.

We greatly appreciate the efforts of EFSEC and your staff in developing, researching, and providing an analysis of the archaeological, historic, cultural, and tribal resources impacted by this proposed project. We believe a thorough analysis is key to understanding the profound impacts to tribal archaeological, cultural, sacred places and natural resources. Cultural resource information provides a foundation to continue consultation with the affected Tribes, EFSEC, the applicant, and other parties.

DAHP concurs that the proposed project will have significant direct and cumulative impacts on cultural resources including Traditional Cultural Properties, archaeological sites, and the larger cultural and natural landscapes that hold these significant cultural, historic, sacred, and tribal places.

As the DEIS acknowledges, important elements of the project include the location of proposed facilities that have not yet been determined, including specific alignments and infrastructure. As a result of these unknown elements, it is imperative that EFSEC continue consultation with the DAHP and affected Tribes. This will assure that all continuing design and engineering decisions are reviewed. Any additional cultural resource survey requirements, including subsurface probes to assess locations of any proposed excavations, must be professionally surveyed for cultural resources and reviewed by the consulting parties.

Since the DEIS notes that mitigation packages for cultural resources have yet to be finalized we strongly recommend that EFSEC continue government-to-government consultations with affected Tribes on these impacts and any proposed avoidance and/or mitigation efforts. We look forward to further consultation with you and the Tribes to identify project impacts to cultural resources and to identify appropriate avoidance,

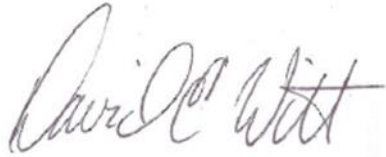


minimization, and mitigation measures. Our agency will continue to assist with these efforts and work with all parties collaboratively.

Attachment 1 contains our general and specific comments. These comments are based on the information available at the time of this review and on behalf of the Washington State Historic Preservation Officer (SHPO) in conformance Washington State law. If any federal or state capital funds are associated with this proposal, Section 106 of the National Historic Preservation Act and Governor's Executive Order 21-02 respectively apply. Should additional information become available, our assessment may be revised.

Thank you for reaching out to DAHP and providing us with an opportunity to review your Draft EIS. If you have any questions, please feel free to reach out to me.

Sincerely,



David E. Witt, Ph.D.

Tribal Liaison, Climate & Energy Projects

cc: Allyson Brooks, Director, DAHP  
Amí Hafkemeyer, Director of Siting and Compliance, EFSEC  
Jessica Lally, Yakama Nation Archaeologist  
Ashley Morton, CTUIR Archaeologist



## ATTACHMENT 1

DAHP's General Comments are as follows.

<b>General Comments</b>	
1.	Archaeological sites, and in particular indigenous archaeological sites, are the physical evidence of the use of and relationship to landscapes. These landscapes, and the constituent specific sites, are of continued importance to descendent communities and are often still visited by indigenous people for a variety of purposes. Because archaeological sites are components of cultural landscapes, all environmental impacts to archaeological sites should be considered throughout the review process, including auditory, visual, and seismic impacts. These will be highlighted throughout this letter as appropriate.
2.	The cultural resource consultant (HRA) tends to approach archaeological sites as discontinuous components, rather than components which indicate evolving interconnected relationships with specific landscapes through time. A landscape approach, which discusses the relationships between the various sites, would provide better context for understanding impacts to tribal Traditional Cultural Properties. DAHP recommends EFSEC consult with affected Tribes, DAHP, and HRA to apply a landscape approach to the cultural resource record.
3.	Both the CTUIR and Yakama Nation has have indicated that the project area overlaps and contains Traditional Cultural Properties. DAHP recommends that EFSEC consult directly with the affected Tribes to better understand potential impacts to TCPs. Specific examples are provided below; please note that the Tribes may indicate that no mitigation may be able to reduce impacts below a significant threshold.
4.	HRA recommends that there are no locations within the project lease boundary that require survey by shovel probing, "as no areas were identified that suggest a high likelihood for buried cultural deposits." Please be aware that the affected Tribes have expressed concerns regarding this statement and may indicate the need for additional testing throughout the project area.
5.	Please be aware that DAHP is considering changes to survey requirements for large projects such as Horse Heaven; future projects may require shovel probing as determined by DAHP staff in consultation with the cultural resource consultants.

Additionally, the following specific comments, arranged by EIS section, table (if applicable), and page number of the associated PDF (not the document's page number), are provided for your consideration.

Location	Table	Page	Specific Comments
4.9.1	4.9-2	293	Resource sensitivity is defined in terms of NRHP/NHPA, but EFSEC analysis is conducted under SEPA. Sensitivity of precontact sites/artifacts should be assessed in terms of SEPA. This table should be edited to comport with the text throughout section 4.9.1.
4.9.1		294	The statement that "all TCPs have a high magnitude rating" is appreciated. It is noted that the APE contains TCPs as identified by CTUIR and the Yakama Nation. These TCPs will be impacted by the proposed project; it is recommended that EFSEC consult directly with affected Tribes to further discuss avoidance and/or mitigation.



4.9.2.1		294	45BN261 has been identified as culturally sensitive by the Yakama Nation. Please consult directly with the Tribe to further discuss avoidance and/or mitigation, however, DAHP recommends an avoidance buffer of 200'/60 m from the currently modern cairn/stacked rock feature located at 46°13'37.53"N 119°29'2.06"W to account for any misidentified rock features.
4.9.2.1	4.9-3	298	Adverse environmental impacts (e.g., noise, vibration, visual) during construction to unevaluated or precontact sites will unavoidably occur. For example, the area around 45BN261 will see some of the highest visual impacts based upon the provided visual impact analyses.
4.9.2.1	4.9-3	300	Adverse environmental impacts (e.g., noise, vibration, visual) during construction to TCPs will unavoidably occur. It is recommended that EFSEC consult directly with affected Tribes to further discuss avoidance and/or mitigation.
4.9.2.1		303	DAHP acknowledges that access to TCPs may be affected during the construction stage. It is recommended that EFSEC consult directly with the affected Tribes to avoid/minimize these impacts.
4.9.2.1	4.9-4	304	Adverse environmental impacts (e.g., noise, vibration, visual) during construction to unevaluated precontact sites throughout the solar project area is probable, if not unavoidable based applicant's visual impact analysis. The table should be edited as necessary to reflect the likelihood of impact.
4.9.2.1	4.9-4	307	Adverse environmental impacts (e.g., noise, vibration, visual) during construction to TCPs will unavoidably occur. It is recommended that EFSEC consult directly with affected Tribes to further discuss avoidance and/or mitigation.
4.9.2.1		308	DAHP acknowledges that access to TCPs may be affected during the construction stage. It is recommended that EFSEC consult directly with the affected Tribes to avoid/minimize these impacts.
4.9.2.1	4.9-5	310	BESS construction may impact the environment of cultural resources, as well as the resources themselves. Potential impacts to unknown archaeological resources and architectural resources should include visual, air quality, and noise. However, due to the relatively small size of the BESS (a standard shipping container) and location (adjacent to the proposed substation), DAHP agrees that the likelihood of impact may be feasible and that the spatial extent would be local. It is recommended that viewshed modeling be conducted for the proposed BESS location (as an individual project component) to determine if there may be impacts to cultural resources.
4.9.2.1	4.9-6	314	Substation construction may impact the environment of cultural resources, as well as the resources themselves. Potential impacts to unknown archaeological resources and architectural resources should include visual, air quality, and noise. However, due to the relatively small size of the substations, DAHP agrees that the likelihood of impact may be feasible and that the spatial extent would be local. It is recommended that viewshed modeling be conducted for the proposed substation locations to determine if there may be impacts to cultural resources.
4.9.2.1	4.9-6	315	Substation construction may create an unavoidable impact to TCPs. It is recommended that viewshed modeling be conducted for the proposed substation locations to determine if there may be impacts to TCPs. Additionally, DAHP recommends that EFSEC consult directly with the affected Tribes to avoid/minimize these impacts.
4.9.2.1	4.9-7	318	It is recommended that impacts to the environment (visual, air, and noise) be considered when analyzing impacts to all cultural resources, not just architectural resources and TCPs.



4.9.2.1	4.9-7	319	Impacts to TCPs will be unavoidable. DAHP recommends that EFSEC continue consultation with the affected Tribes to discuss avoidance and/or mitigation efforts.
4.9.2.2		321	Impacts to TCPs will be unavoidable. The turbines will have an unavoidable high adverse impact to sense of place within and beyond the Lease Boundary. Fencing around project components, such as solar siting areas, may result in loss of access to TCPs unless avoided or mitigated. DAHP recommends that EFSEC continue consultation with the affected Tribes to discuss avoidance and/or mitigation efforts.
4.9.2.2	4.9-8	322	Impacts to TCPs during operation will be unavoidable. DAHP recommends that EFSEC consult with the affected Tribes to discuss avoidance and/or mitigation efforts.
4.9.2.2	4.9-8	322	Adverse environmental impacts (e.g., noise, vibration, visual) during operation to unevaluated precontact sites throughout the project area are probable, if not unavoidable based applicant's visual impact analysis. The table should be edited as necessary to reflect the likelihood of impact.
4.9.2.3	4.9-9	324	Impacts to TCPs during decommissioning will be unavoidable. DAHP recommends that EFSEC consult with the affected Tribes to discuss avoidance and/or mitigation efforts.
4.9.2.3	4.9-9	324	Adverse environmental impacts (e.g., noise, vibration, visual) during decommissioning to unevaluated precontact sites throughout the project area are probable, if not unavoidable based applicant's visual impact analysis. The table should be edited as necessary to reflect the likelihood of impact.
4.9.3		325	45BN261 has been identified as culturally sensitive by the Yakama Nation. Please consult directly with the Tribe to further discuss avoidance and/or mitigation, however, DAHP recommends an avoidance buffer of 200'/60 m from the currently modern cairn/stacked rock feature located at 46°13'37.53"N 119°29'2.06"W to account for any misidentified rock features.
4.9.3		326	DAHP recommends archaeological and/or THPO monitoring of during construction of the proposed project, in addition to contacting a qualified archaeologist in the event archaeological resources are discovered during post-construction activities.
4.9.3		327	DAHP recommends that EFSEC consult directly with the Yakama Nation to determine possible mitigation strategies, in addition to the consultation that has already occurred with the CTUIR.
4.9.3	4.9-10	329	Components of the built environment were reviewed for eligibility. DAHP finds that the following properties are not eligible for listing on the NHRP: property IDs 724940, 724941, and 724942. However, DAHP finds the following properties are eligible for listing: property IDs 724937, 724938, and 722995. Please see the attached letter dated January 25, 2023, for additional information.
4.9.3.1	4.9-11a	332	Likelihood of impact to "not eligible or unevaluated archaeological precontact period isolates or sites" is "probable" rather than "unlikely" due to visual and noise impacts during project lifetime.
4.9.3.1	4.9-11a	333	Likelihood of impact to Traditional Cultural Properties is "unavoidable" rather than "probable" due to visual and noise impacts, impacts to access during project lifetime.
4.9.3.1	4.9-11b	334	Likelihood of impact to Traditional Cultural Properties is "unavoidable" rather than "probable" due to visual and noise impacts, impacts to access during project lifetime.
4.9.3.1	4.9-11b	334	The description of impact to unknown/unidentified historic and cultural resources does not include possible impacts to site environment (air, noise, visual). These impacts should be added to the appropriate cell. Likelihood of impact is "probable," rather than "feasible."



4.9.3.1	4.9-11c	335	Likelihood of impact to Traditional Cultural Properties is "unavoidable" rather than "probable" due to visual and noise impacts, impacts to access during project lifetime.
4.9.3.1	4.9-11c	335	The description of impact to unknown/unidentified historic and cultural resources does not include possible impacts to site environment (air, noise, visual). These impacts should be added to the appropriate cell. Likelihood of impact is "probable," rather than "feasible."
5.2.1.2	5.1	9	Primary resources in common with the proposed action for all entries should include TCP resources, as all are within the viewshed of multiple Traditional Cultural Properties. All entries should be reviewed to determine if archaeological and architectural resources were impacted during construction and/or operation. DAHP suggests an additional column be added to discuss topics of Tribal concern of the various projects, so reviewers can understand how this currently proposed project may cumulatively impact Tribal concerns.
5.2.1.2	5.2	12	Tribes may have concerns regarding the cumulative impacts to water resources; vegetation; wildlife and habitat; energy and nature resources; historic and cultural resources; visual aspects, light, and glare; and noise and vibration. These impacts may implicate treaty protected rights of affected Tribal Nations. DAHP recommends that EFSEC consult directly with the affected Tribes to discuss avoidance and/or mitigation of these cumulative impacts.
5.2.2		16	DAHP recommends EFSEC consult directly with affected Tribes on individual and cumulative barriers to culturally significant animal migrations.
5.2.2		17	DAHP recommends EFSEC consult directly with affected Tribes to determine if culturally significant bird species may be affected by the proposed project.
5.2.2	5-3	21	DAHP concurs that the proposed project may or will have a significant impact on historic and cultural resources, and that this impact contributes to ongoing cumulative impacts to said resources.
5.2.2	5-3	21	DAHP concurs that the proposed project will have a significant impact on Traditional Cultural Properties, and that this impact contributes to ongoing cumulative impacts to said Properties. DAHP recommends EFSEC consult with affected Tribes on these impacts, any proposed avoidance and/or mitigation efforts, and the efficacy of said mitigation efforts.



ATTACHMENT 2





January 25, 2023

Sara Davis  
Historical Research Associates, Inc.

In future correspondence please refer to:

Project Tracking Code: 2020-02-01333

Property: Benton County\_Horse Heaven Wind Farm Project

Re: REVISED Built Environment Comments - Determination of Eligibility

Dear Sara Davis:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. 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. If any federal or state capital funds are associated with this proposal, Section 106 of the National Historic Preservation Act and Governor's Executive Order 21-02 respectively apply. Should additional information become available, our assessment may be revised.

After further review of Historic Property Inventory Forms submitted with the cultural resources survey for this project, we concur that the following properties are not eligible for listing in the National Register of Historic Places (NRHP):

- Property ID: 724940 Shop 17302 County Well Rd, Prosser, Washington, 99350
- Property ID: 724941 Machine Shed 17302 County Well Rd, Prosser, Washington, 99350
- Property ID: 724942 Grain Elevator and Grain Storage Silos 17302 County Well Rd, Prosser, Washington, 99350

However, we still do not concur with the recommendation of not eligible for the following properties:

- Property ID: 724937 Nicoson Road Farmstead Barn Storage Building Nicoson Rd, Kennewick, Washington, 99338
- Property ID: 724938 Nicoson Road Farmstead Cribbed Grain Elevator Nicoson Rd, Kennewick, Washington, 99338
- Property ID: 722995 Grain Elevator S Badger Canyon Rd, Benton City, Washington, 99320

It is our opinion that the Nicoson Road Farmstead properties (both the built environment and post contact archaeological resources) make up a potential historic district eligible for listing in the NRHP under Criteria A & C. The collection as a whole serves as an example of early 20<sup>th</sup>





century farmstead operations and broad patterns of agricultural settlement in Central Washington. Despite the loss of machinery associated with the Cribbed Grain Elevator (property ID: 724938), the property retains the majority of features that illustrate its type and period of construction, and still retains sufficient integrity of location, setting, design, materials, workmanship, association and feeling. We feel the determination of eligible is supported by the 1988 "Grain Production Properties in Eastern Washington MPD, which states that elevators predating the massive shift to bulk grain technology are significant representatives of the early signs of momentous changes to come in the industry. The Barn Storage Building (Property ID: 724937), though lacking individual distinction, does contribute to this potential historic district and helps tell the story of how the farm as a whole operated.

It is also our opinion that the community grain elevator on South Badger Canyon Road (Property ID:722995) is individually eligible under criteria A and C, as a resource that represents the broad Depression-era shift toward electrification of agricultural facilities. The silo also represents an example of its type and period of construction. Community grain silos like this are quickly disappearing from the landscape, highlighting the rarity of its type.

We look forward to further consultation with you on determination of effects to these historic properties as the project unfolds.

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.

Sincerely,



Maureen Elenga, M.A.  
Transportation Reviewer  
(360) 972-4539  
Maureen.Elenga@dahp.wa.gov

