



January 17, 2020

Terry Ozbun
Senior Archaeologist
Archaeological Investigations Northwest, Inc.
3510 NE 122nd Avenue
Portland, OR 97230

In future correspondence please refer to:
Project Tracking Code: 2019-05-03916
Property: Cle Elum Westside Solar Project
Re: Cle Elum Westside Solar Project

Dear Terry Ozbun:

Thank you for your thoughtful reply to our comments on your survey report for the Cle Elum Westside Solar project. After reading your letter, we have a number of remaining concerns:

- The assertion that you used “probabilistic approach to shovel testing” and modeling is unsupported. You present no statistics or models in your letter or report to demonstrate that your very limited probing provides an adequate subsurface sample to find buried archaeological materials across the project area. Furthermore, DAHP does not consider shovel testing methodology based on surface visibility alone to be adequate.
- You describe the soil conditions in your letter, which is helpful; however, this line of reasoning should be persuasively presented in the report to justify a lack of shovel tests across the majority of the project area.
- DAHP finds the comparison to other surveys unpersuasive. You state in your letter that historically, “no subsurface exploration was done for the majority of the surveys,” and that the limited subsurface exploration in the area consisted of “5 augers and 13 tests units” over 20 years. Archaeological understandings and practices have developed over time, and the record is replete with reports that would not pass review today. A history of insufficient sampling and/or reporting is not a justification for continuing the practice.

In sum, DAHP stands by its previous comment that the number of shovel tests excavated for this project (n = 8) was inadequate based on the contents of the survey report and your reply letter. Our recommendations are as follows:

1. Revise the survey report in order to address the concerns presented above

OR

2. Return to the proposed project area and carry out additional shovel testing in order to more fully support your conclusions



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. Should additional information become available, our assessment may be revised.

Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Sydney Hanson". The signature is written in a cursive style with a long horizontal line extending to the right.

Sydney Hanson
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