



Confederated Tribes and Bands of the Yakama Nation
Established by the Treaty of June 9, 1855

Post Office Box 151
Toppenish Washington 98948

Ami Hafkemeyer
Director of Siting and Compliance
Energy Facility Site Evaluation Council
POX 43172 Olympia, Washington 98504-3172

March 5, 2024

RE: Carriger Solar Project Archaeological Survey Report; 2022-04-02736
January 2024 Draft

Dear Ms. Hafkemeyer,

The Yakama Nation Cultural Resources Program (Yakama Nation CRP) has reviewed the recent re-draft of the Carriger Solar Project Archaeological survey report dated January 2024. This proposed solar facility is located within Yakama Nation Ceded Lands, the legal rights to which were established by the Treaty of 1855 (12 stat. 951). The Treaty set forth that the Yakama Nation shall retain rights to resources upon these lands and, therefore, it is with the assistance of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

We appreciate the responses to our prior comments. We ask the author to check for consistency throughout the document regarding the eligibility and status of site 45KL2603. Several sections are contradictory regarding the recommendations for this site:

- This site is noted in Table 6.1 as unevaluated but not protected under state law. This should be revised to reflect that the site is protected.
- Page 1 notes that "none of the sites were recommended eligible....no further work is necessary;
- Section 7.0 indicates the site is potentially eligible;
- Section 7.3.9.1 notes that the site is not eligible under multiple Criteria but unevaluated under Criterion D. We recommend that this be revised to reflect that the site is potentially eligible under Criterion D;
- Section 7.3.9.2 refers to the site as unevaluated but recommends it be treated as eligible; This is technically accurate but might be more clear if it was noted as potentially eligible and protected under state law pending further evaluation.
- Section 8 states that the site is both eligible and unevaluated.

In response, please contact Yakama Nation CRP Archaeologist Jessica Lally (x4766; jessica_lally@yakama.com).

Sincerely,

Casey Barney
Yakama Nation Cultural Resources Program Manager
509-865-5121 x4738

RECEIVED

APR 02 2024

ENERGY FACILITY SITE
EVALUATION COUNCIL

CC: David Witt, Department of Archaeology and Historic Preservation