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

March 21, 2011

Jill Conrad Department of Energy Richland Operations Office P. O. Box 550 Richland, WA 99352



RE: Request for Section 106 review prior to the transfer of records and artifacts from Pacific Northwest National Laboratory (PNNL) to Mission Support Alliance (MSA).

Dear Ms Conrad,

Yakama Nation Environmental Restoration/Waste Management (YN ER/WM) has concerns with regards to the transfer of cultural materials and records from PNNL to MSA. We have on more than one occasion tried to get information regarding the process, staffing, and what exactly will be moved and how. Department of Energy (DOE) to date has not provided us any information nor have they consulted with YN ER/WM on this undertaking. Due to the lack of information and consultation YN ER/WM has not been able to offer any comment as to how and to what degree this may affect these cultural resources.

This Federal Undertaking will surely have an impact on cultural resources and needs a full Section 106 review and consultation period prior to the physical transfer of artifacts and records from PNNL to MSA At present we have concerns over the process of the transfer, the handling of artifacts, records and data, storage of artifacts and data, as well as the qualifications of new personnel that will ultimately be responsible for the artifacts, records and ongoing project reviews.

Another major concern is that the artifact inventory is not up to date and according to DOE personnel, an update is not planned prior to the transfer. In other words DOE plans on transferring a collection of un-inventoried artifacts to another contractor...with no accountability from either as to what is in the collection. We were also informed parts of the artifacts collection are out on loan and it is not certain who has some of them. This is not acceptable and is certainly an adverse effect to the collection as a whole.

An April 4, 2012 transfer date does not allow for a proper Section 106 review to be completed. YN ER/WM looks forward to reviewing and commenting on the proper documentation and entering into meaningful consultation on this transfer undertaking. If you have any question please contact YN ER/WM cultural resource staff, Dana Miller, Leah Aleck or Rose Ferri at 509-452-2502.

Sincerely

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Russell Jim ERWM Project Director cc: Donald Isadore, RHWC Warren Spencer, RHWC Lavina Washines, RHWC Sam Jim Sr., RHWC

Philip Rigdon, YN DNR Andrea Spencer, YN DNR Rob Whitlam, DAHP Administrative Record