Confederated Tribes and Bands of the Yakama Nation

Established by the Treaty of June 9, 1855

January 5, 2012

Matt McCormick
Department of Energy
Richland Operations Office
P. O. Box 550
Richland, WA 99352

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EDMC

RE: Archaeology Professional

Dear Mr. McCormick;

There has been ongoing discussion with the Department of Energy (DOE) Cultural staff and the Yakama Nation Environmental Restoration/Waste Management (YN ER/WM) Cultural staff concerning the professional level of contractor staff performing work on the Hanford Site. Terms used to describe who will be doing certain work include: professional archaeologist meeting Secretary of Interior Standards, archaeologist, cultural resource specialist, and persons holding a minimum of an undergraduate degree in anthropology, archaeology, historic archaeology, or related field.

There is some question as to the qualifications of a cultural resource specialist and what their "job duties" are within the Federal Agency/Contractor structure? Although the question has been previously asked, a definitive answer has yet to be given. In the Cultural Resource Review for project HCRC 2011-600-018 a cultural resource specialist will be used for all monitoring, but is this person qualified to do the work?

According to the 36CFR800.2(a)(1), "*...all actions taken by employees or contractors of an agency shall meet professional standards under regulations developed by the Secretary*". It does not state all work must be overseen by a professional, it states it must meet professional standards. The fieldwork cannot meet professional standards if it is not performed by a professional. YN ER/WM must insist that all field personnel meet the standards as defined by the Secretary of Interior for professional archaeology, and DOE as a Federal Agency is obligated to adhere to these standards as mandated in the 36CFR800.

A person holding an undergraduate (4 year degree) does not meet the Secretary of Interior Standards for professional archaeology, therefore is not qualified to work in the field without a professional archaeologist meeting the Secretary of Interior Standards on site with them. Likewise if a cultural resource specialist does not have professional credentials they too must have a professional on site.

Monitoring project ground disturbing activities is a critical job. The monitor is responsible for ensuring cultural resources are detected and protected. Monitoring will not meet professional standards if not performed by a professional archaeologist.

The role of undergraduate and cultural resource specialist in the field should be as support to the professional, not the replacement. Support work such as research and compiling field notes for reports is easily overseen by a professional in the office and can be completed meeting professional standards.

YN ER/WM request the roles of these employees be evaluated to ensure they are performing the work they are qualified to perform and their duties are not being extended into areas they lack the proper credentials to perform. If you have any questions please contact YN ER/WM cultural staff, Dana Miller or Rose Ferri at 509-452-2502.

Sincerely,

Russell Jim
ER/WM, Program Manager

cc:
Vera Hernandez, RHWC
Sam Jim Sr., RHWC
Philip Rigdon, YN DNR
Rob Whitlam, DAHP
Kate Valdez, YN THPO
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