

STRATEGICALLY SHAPING

Environmental and Cultural Resource Compliance, Supporting Tribal Engagement



Preserving, protecting, and understanding the past for more inclusive and informed environmental decision-making



Federal activities and policies can affect resources and values that are important to American Indian tribes. These include impacts on important natural and cultural resources as well as impacts on tribal access to and use of those resources. For decades, Pacific Northwest National Laboratory (PNNL) has supported federal agencies with tribal consultation and federal and state cultural resource compliance efforts.

Several federal regulations, such as the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) Section 106, require federal agencies to take into account the effects of their activities on significant cultural resources and consult with American Indian tribes. These requirements mandate that federal agencies undertake government-to-government consultation with federally recognized American Indian tribes and make good faith efforts to conduct early and continuous consultation. PNNL has experience employing best practices for tribal consultation and cultural resource compliance activities, providing opportunities for collaborative analysis, identification of unique alternatives, and ensuring tribal perspectives are incorporated into a federal agency's decision-making process.

Capabilities

PNNL's interdisciplinary team includes experts in anthropology, archaeology and geoarchaeology, cultural resources management, environmental policy, and tribal relations.

- Conduct NHPA Section 106 cultural resource assessments and consultation support.
- Support cultural resource analysis conducted as part of the NEPA process.
- Identify tribes that may have historic and cultural ties to project areas.
- Conduct precontact and historic archaeological resource research and field investigations.
- Conduct archaeological resource inventories and site excavation (testing and data recovery).
- Identify and document traditional cultural places.
- Conduct oral history and ethnographic interviews.
- Develop precontact, ethnographic, and historic context statements.
- Conduct National Register of Historic Places evaluations.
- Conduct remote sensing and geophysical investigation.
- Offer expertise in GIS mapping and spatial analysis.
- Develop archaeological predictive models.
- Conduct alternatives analysis and trade-off assessments.
- Conduct Archeological Resources Protection Act-compliant damage assessments.
- Develop Native American Graves Protection and Repatriation Act plan(s) of action.
- Develop inadvertent and unanticipated discovery plans.
- Develop NHPA Section 106 agreement documents, historic property treatment, and cultural resource management plans.
- Coordinate and facilitate events and associated outreach, including development of community engagement plans, interested party and tribal engagement meetings, and workshops.
- Conduct interviews to elicit community and stakeholder input and values.
- Enhance environmental justice (EJ) analysis through tribal engagement.



**Early and effective
engagement to meet
complex cultural
resources requirements**



Efficient Solutions, Proven and Diverse Expertise

PNNL's tribal engagement and cultural resource management experts use proven multidisciplinary methods and diverse experience to deliver effective and meaningful environmental solutions to complex federal projects.

Lead NHPA Section 106 Cultural Resource Assessment

PNNL has completed thousands of NHPA Section 106 cultural resource assessments for multiple federal sponsors across the United States. PNNL has a team of experts with diverse experience that includes archaeologists that meet the Secretary of Interior's professional qualification standards, anthropologists, and tribal engagement experts with experience in all aspects of NEPA and NHPA. These experts have extensive experience working with numerous state and tribal historic preservation offices, tribes, and other consulting parties.

Coordinate EJ, NEPA, and NHPA Section 106 Process Reviews

PNNL plays a significant role supporting federal agencies that coordinate and/or use the NEPA process to comply with NHPA Section 106. Coordination of these two regulatory processes provide opportunities for efficient reviews and enhanced NEPA analysis. For example, methods used to consult with American Indian tribes for the purposes of NHPA Section 106 reviews can result in early identification of resource impacts and issues of concern, such as EJ impacts, that may not have been captured in a stand-alone NEPA assessment.

Facilitate Tribal Identification and Engagement

PNNL staff have established longstanding, trusting relationships with tribes, and have expertise engaging with tribes in a culturally sensitive manner. PNNL experience includes supporting federal agencies with tribal consultation and facilitating technical working groups and workshops with tribes. PNNL staff also have expertise in identifying tribes that may have historic and cultural connections to areas where projects may be located. PNNL also works with tribes to conduct oral history and ethnographic interviews and to identify and document traditional cultural places and other ethnographic resources.

Inform Environmental Assessments

PNNL has provided ongoing support for state and federal agencies during complex and high-profile decision-making processes. As part of PNNL's comprehensive, in-house environmental assessment team, PNNL works collaboratively with sponsors and stakeholders throughout the decision-making process using tools and techniques that analyze the trade-offs between benefits and costs, public risks, and stakeholder values. PNNL developed the Framework for the Assessment of Complex Environmental Tradeoffs—a unique, tailored method for assessing complex environmental trade-offs—to support the evaluation of competing environmental, social, and economic issues.

Clients

U.S. Department of Energy (DOE)

U.S. Nuclear Regulatory Commission (NRC)

Bonneville Power Administration

U.S. Department of Defense | State/Local Agencies



Key Projects

- **Enhancing NEPA and EJ Analysis and Cultural Resource Assessment through Tribal Engagement.** PNNL has been instrumental in assisting NRC in adapting its tribal consultation program to enhance its NEPA analysis. These efforts have resulted in innovative mitigated solutions that address tribal concerns about impacts on multiple resource areas, including cultural and ecological resources, human health, and EJ disparities.
- **Providing Comprehensive Cultural Resource Programs, Supporting Compliance Requirements.** For 23 years, PNNL managed and operated the Hanford Cultural Resources Laboratory for DOE's Hanford Site. PNNL developed a comprehensive cultural resources program to support all of DOE's cultural resources compliance requirements. This included supporting DOE's tribal consultation program and developing an oral history program and an archaeological site condition monitoring program.
- **Developing a Human Health Risk Assessment Specific to American Indian Tribes.** As part of Hanford Site cleanup efforts, PNNL developed a novel approach to assessing human health risk to American Indian tribes. This assessment analyzes subsistence resources and develops tribal-specific exposure pathways.
- **Identifying Tribal Impacts Associated with Power Plant Expansion.** PNNL supported the NRC's tribal consultation activities undertaken with a Virginia tribe to address concerns about potential impacts from a proposed power plant expansion on traditional cultural resources important to the tribe. Tribal values were incorporated into the NEPA analysis as a result of the thorough tribal engagement process.
- **Preparing Cultural Resource Summaries Prior to Spent Nuclear Fuel Removal.** PNNL leads a multi-laboratory team that conducts site infrastructure evaluations for removing spent nuclear fuel from nuclear power plant sites for DOE's Office of Nuclear Energy, Office of Integrated Waste Management. These evaluations include preparing cultural resource summaries for nuclear power plant sites and provide an opportunity to (1) incorporate tribal, state, and federal agency partners' perspectives regarding the transport of spent nuclear fuel from the site, (2) observe transportation infrastructure at and near the sites, (3) verify data and take detailed photos/videos, and (3) exchange information with nuclear power plant site managers
- **Supporting Federal Cultural Resource Programs.** Currently, PNNL supports the DOE Pacific Northwest Site Office's cultural resource program and NEPA's compliance program. This includes oversight of and compliance related to research, operations, and facility construction where activities have the potential to affect cultural resources.

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