



Long Term Stewardship and Sacred Sites

Rose Ferri, Project Tracking & Resource Analyst Yakama Nation
Environmental Restoration/Waste Management Program
Hanford Site, Washington State

Definition of Long-Term Stewardship

Long-term stewardship refers to all activities necessary to ensure protection of human health and the environment following completion of cleanup, disposal, or stabilization at a site or a portion of a site. Long-term stewardship includes all engineered and institutional controls designed to contain or to prevent exposures to residual contamination and waste, such as surveillance activities, record-keeping activities, inspections, groundwater monitoring, ongoing pump and treat activities, cap repair, maintenance of entombed buildings or facilities, maintenance of other barriers and containment structures, access control, and posting signs.


DOE/EM-0563, *The Report to Congress: Long-Term Stewardship*

Hanford Long-Term Stewardship Program Plan (DOE/RL-2010-35)

1.3.2 Protectiveness of the Resources and the Environment

The other key objective of LTS includes the consideration of the unique biological, natural, and cultural resources on the land. These resources are managed at the Hanford Site by using Resource Management Plans and Area Management Plans as described in the DOE/EIS-0222-F, *Final Hanford Comprehensive Land-Use Plan -Environmental Impact Statement*, Chapter 6. Site resource examples include the following:

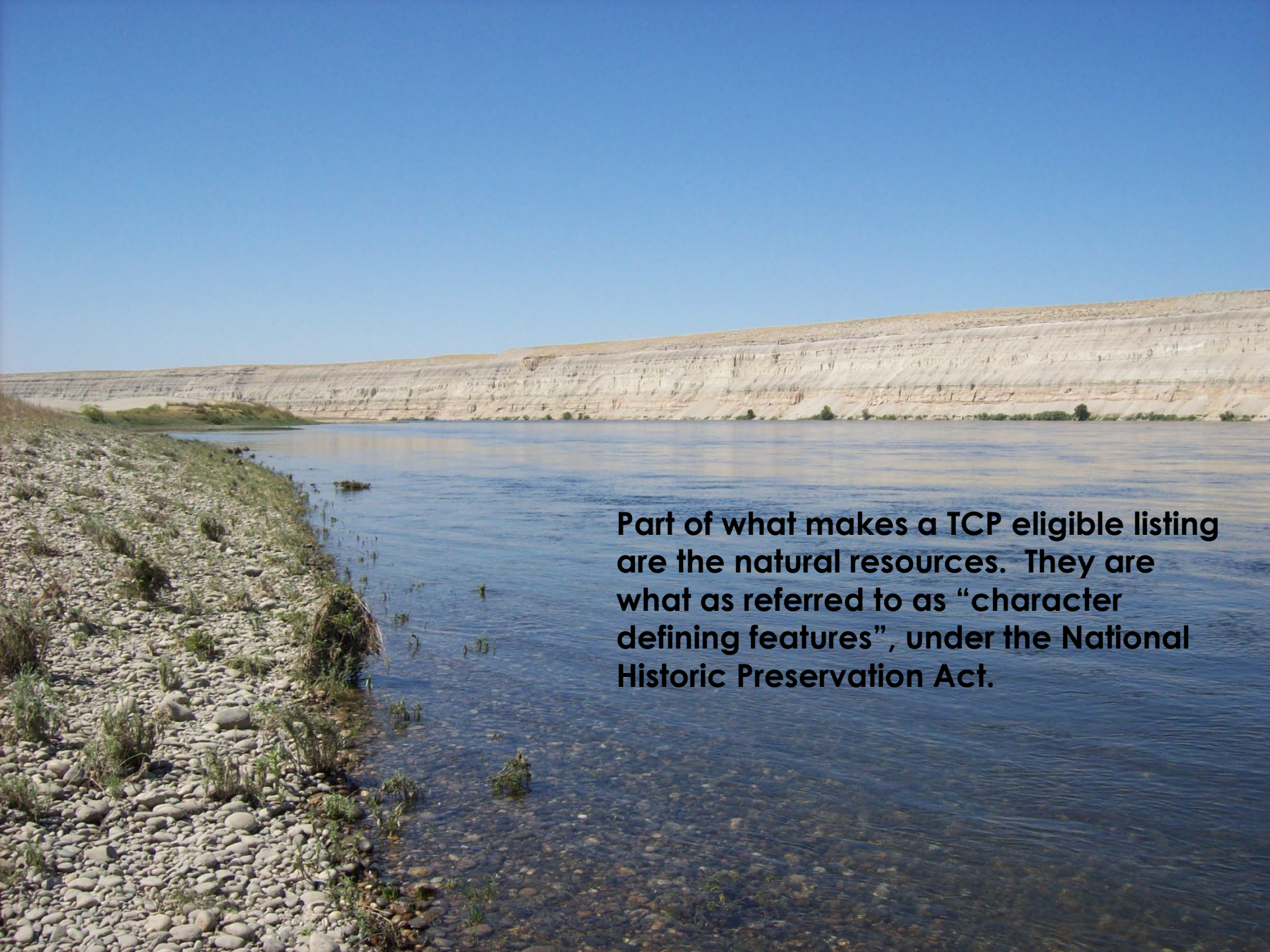
- ☐ Surface water, groundwater, land, natural gas, minerals, and other natural resources
- ☐ Fish, wildlife, and plant populations and their habitats
- ☐ Prehistoric archaeological sites
- ☐ Native American sacred and ceremonial places
- ☐ Historical resources.



Section 106 of the National Historic Preservation Act requires all federal departments and agencies to consider possible adverse effects to historic properties before funding, licensing or initiating projects that might harm such sites.



ICs/LTS can be an adverse effect if it affects any of the features that make a site eligible for listing on the National Register of Historic Places.



Part of what makes a TCP eligible listing are the natural resources. They are what as referred to as “character defining features”, under the National Historic Preservation Act.

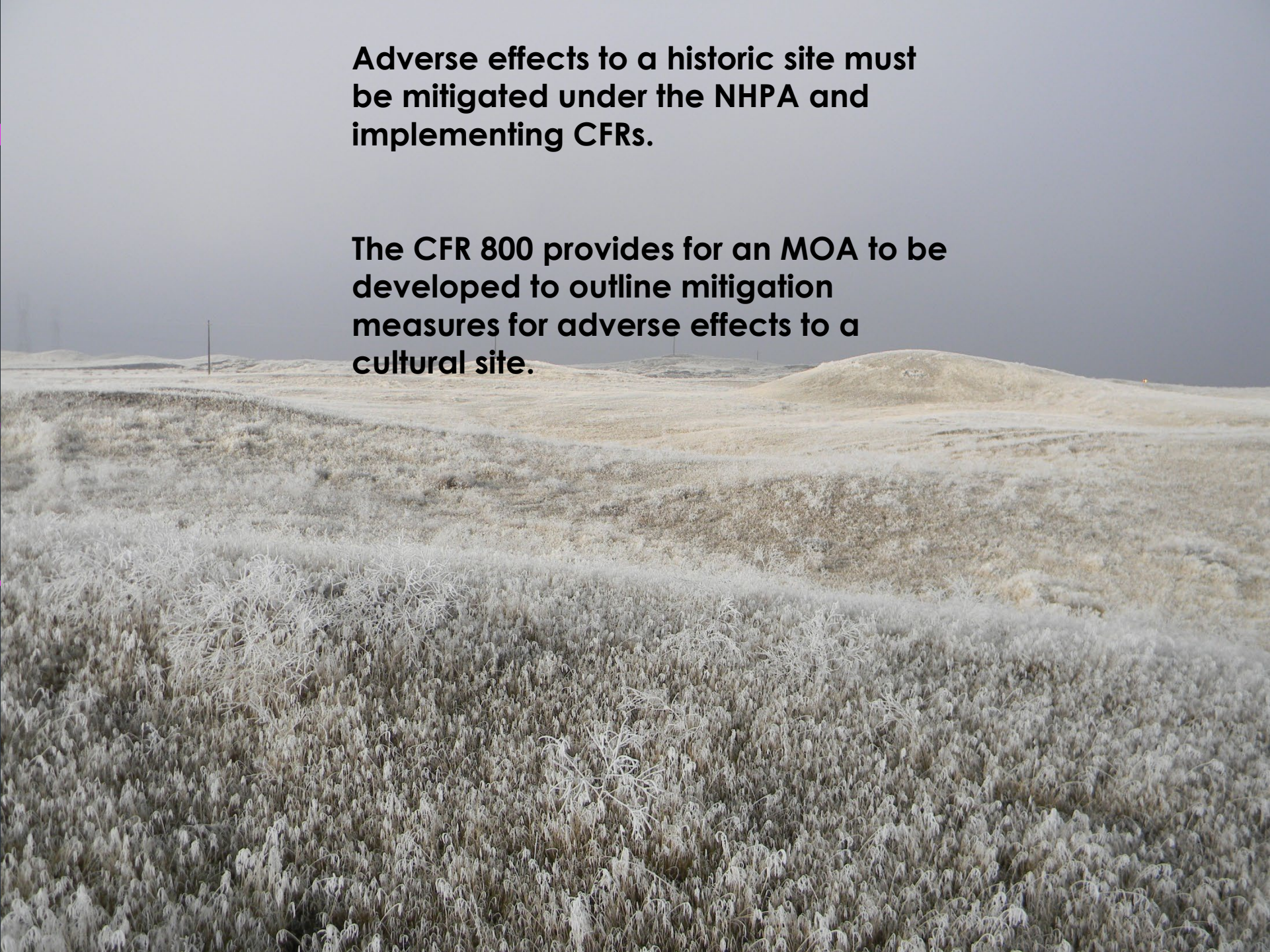
**LTS on sacred sites will mean these sites
will not be able to be used in a
Traditional manner.**

**Traditional activities include the use of
the natural resources on site.**



Adverse effects to a historic site must be mitigated under the NHPA and implementing CFRs.

The CFR 800 provides for an MOA to be developed to outline mitigation measures for adverse effects to a cultural site.





Sacred Sites

R. Martinez

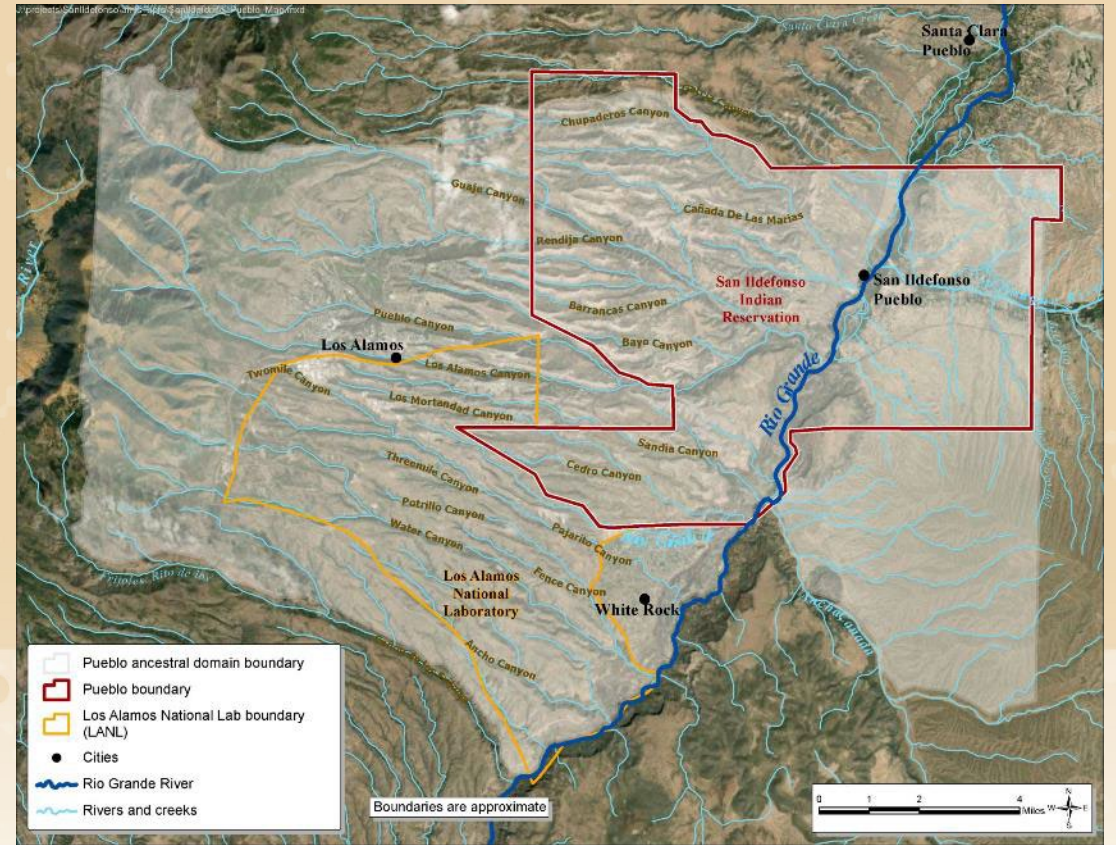
Director, Department of Environmental and Cultural Preservation

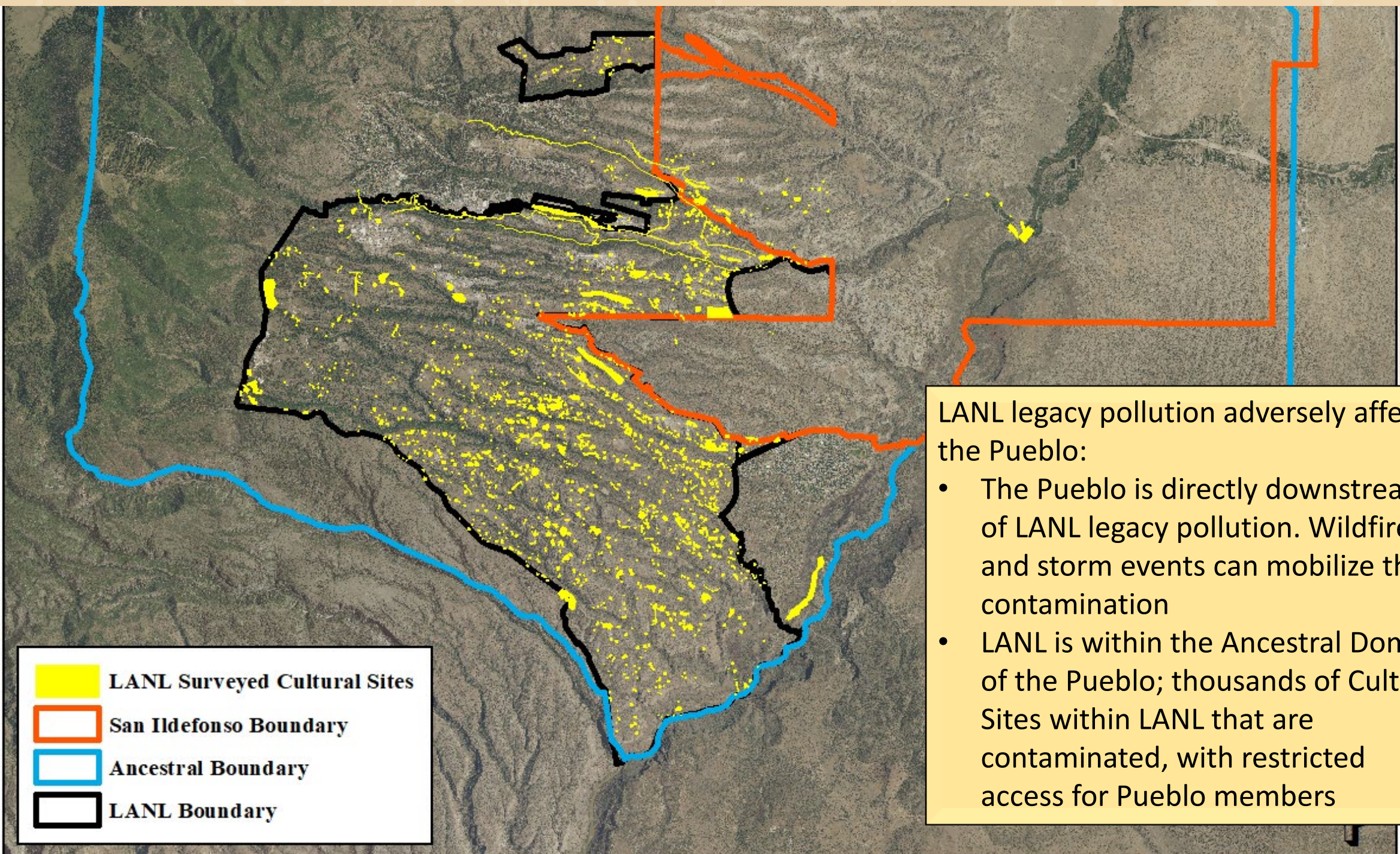
Pueblo de San Ildefonso

May 11, 2022

Po' Woh Geh Owingeh (Pueblo de San Ildefonso)

- Agricultural-based economy with a resurgence of traditional arts
 - Famous for black-on-black, high-polished pottery
- Encompasses approximately 30,000 acres within the larger Ancestral Domain of more than 60,000 acres
- Los Alamos National Laboratory is directly adjacent to the Pueblo
 - Contamination concerns





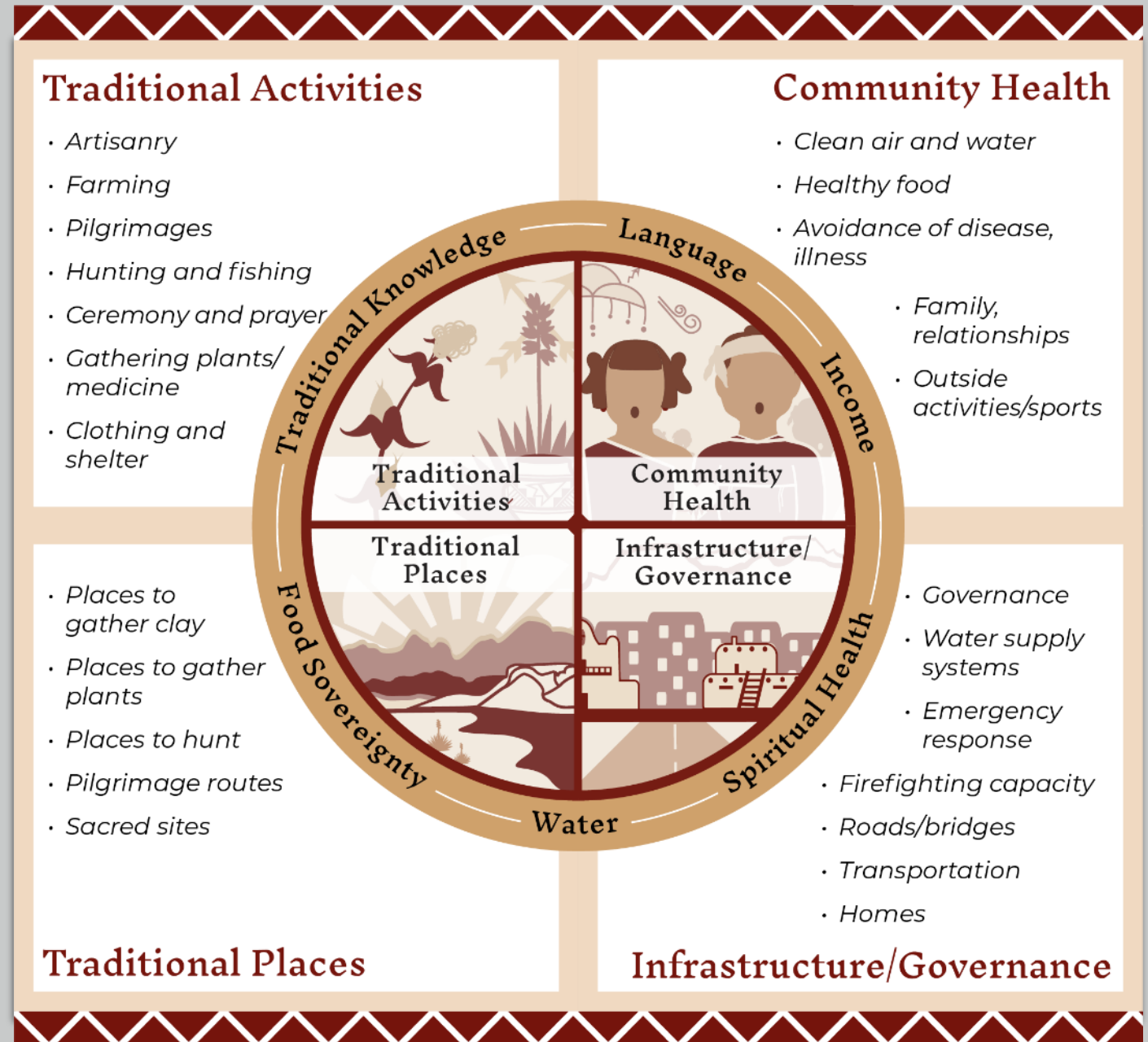
- LANL Surveyed Cultural Sites
- San Ildefonso Boundary
- Ancestral Boundary
- LANL Boundary

LANL legacy pollution adversely affects the Pueblo:

- The Pueblo is directly downstream of LANL legacy pollution. Wildfires and storm events can mobilize this contamination
- LANL is within the Ancestral Domain of the Pueblo; thousands of Cultural Sites within LANL that are contaminated, with restricted access for Pueblo members

Community Vision

- Key aspects of community life that are critical to preserve and protect
- Developing climate adaptation actions to preserve and sustain these aspects of community life for future generations



Contact

Raymond Martinez
DECP Director/Lt. Governor
Pueblo de San Ildefonso
02 Tunyo Po Santa Fe, NM 87506
rmartinez@sanipueblo.org



Sacred Sites Presentation

Larae Bill
Cultural Resource Specialist
Shoshone-Bannock Tribes



Small Modular Reactor Project (CFPP)

- 2016 DOE notified Tribes of a new project
- Originally 19 sites. Narrowed down to 4 areas on the INL
- Site visits to proposed areas chosen by the Private contractor
- CR office gave their recommendations and concerns of the 4 chosen sites.

Preferred Site

- Project proponent selects their preferred site. DOE agrees.
- Selected site not acceptable by Tribes CR
- No regard for Tribes' relation to the area
- Question. Was the Tribes' concerns regarding CR considered when determining the "Preferred Site?"



- DOE relied on a decade-old predictive model
- Tribes requested a viewshed analysis with Tribal CR full participation. This was not done.
- Good thing, this site was abandoned due to testing not being acceptable



Contact

Larae Bill
Cultural Resource Specialist
Cultural Resources/HeTO
Shoshone-Bannock Tribes
(208) 236-1081
lbill@sbtribes.com