

DeweyBurdPubEm Resource

From: Yilma, Haimanot
Sent: Friday, March 15, 2013 5:29 PM
To: 'Paige.Olson@state.sd.us' (Paige.Olson@state.sd.us)
Cc: 'Withrow, Randy' (rwithrow@louisberger.com); Jamerson, Kellee
Subject: Requirements of a specific methodology for a TCP survey

Paige,

After multiple failed attempts to reach an agreement on a Statement of Work for a field survey, on Feb 8, 2013, the NRC staff sent out an invitation to all consulting tribes announcing the open field survey approach for the Dewey Burdock project. This open field survey approach is intended to provide consulting tribes with a first-hand opportunity to identify properties of religious and cultural significance to them since the Staff have heard tribes say archeologists are not qualified to perform this task. In response to objections raised by tribes regarding previous proposals recommending partial survey of the license boundary and differences of opinion regarding survey methods (e.g., intervals for pedestrian survey), the survey invitation specifically offered tribes access to the entire license area and purposefully avoided imposing any other methodological requirements on tribal participants. In responses to this letter, the Staff received a comment that the open field survey approach to identify sites of religious and cultural significance (TCP) to the tribes does not include specific methodology and thus is not appropriate and that the SHPO will not accept it. The Staff is aware of specific NPS's guidelines as well as South Dakota guidelines set forth for performing archeological surveys and associated reporting but we are not aware of any methodological guidelines for conducting tribal surveys. Since we have heard from the tribes that TCP surveys are not comparable to archeological surveys, are you aware of any methodological guidelines or requirements for a TCP survey and associated reporting criteria that we need to consider for this upcoming field survey?

Thank you for your help in this matter.

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