



December 11, 2017

**Mr. Leon Gaber,
Project Director,
Engage BC**

Re: Comments Regarding Cultural/Archaeological Resource Management and Consulting Practices for the Professional Reliance Review

Dear Sir,

I have participated as an archaeological consultant in the cultural resource management program for over four decades, and during that time I have witnessed a great deal of change and evolution in the CRM process. While there are numerous changes and improvements to the existing system problematics that I (and others) would like to see, some of the negative aspects and issues in the process cannot be “fixed” or modified for a number of reasons, and must remain. Nevertheless, there are some fundamental conditions and practices that I am confident can/could be improved or changed, and I briefly present and discuss them below.

(1) The existing Archaeology Branch support staff is at best a “skeleton crew”, and these few folks clearly find it difficult to adequately deal with the ever-increasing work load relating to HCA permit application reviews and permit issuance in a timely fashion. Review of final reports is heavily backlogged as well. It currently takes three to four months to get a permit issued, and this review and issuance time could be reduced to two months if there were more project officers at the Archaeology Branch. ***At the very least, their current Project Officer staff needs to be doubled in order to keep up with the present permitting demands, and keep pace with the rest of development. In my opinion, this is the greatest weakness to the consultation and management process, and it could only be remedied by instating a larger Project Officer staff at the Archaeology Branch.*** This understaffing is made worse in the summer months when many of the Project Officers choose to go on vacation and their office attendance is significantly reduced. This is the time when we typically need their services the most.

(2) Over the last few years the Archaeology Branch has experienced an unusually high turnover rate in Project Officers, with some people only lasting one or two years at the most. I see this trend as being a direct result of “burn-out” stress caused by insufficient staff having to deal with an ever-increasing workload. Constantly replacing these positions with inexperienced people requires considerable in-house training and a “learning curve” that is also detrimental to the overall efficiency of the permitting and resource management process. ***Steps should be taken to make the Project Officer positions more attractive and secure so that it will be an incentive for their employees to commit to the “long-term”.*** We need more knowledgeable and experienced Project Officers to keep pace with our expectations, and those of the public who are initiating development.

(3) There is also a conspicuous deficiency of “Archaeological Inventory Officers” at the Archaeology Branch. These people process our site inventory forms, and update the archaeological site registry. They have an enormous backlog of data going back many years that needs to be entered into the database, and they can barely keep up with current submissions, and in most cases we are waiting several months to get permanent site numbers. ***Their staff should be increased as well, with some positions being devoted exclusively to clearing up the huge backlog.***

It is critical to note that the number of full-time archaeological consultants practicing in BC is steadily rising, as are the number of developments requiring HCA permits and inspections. In contrast, the number of employees at the Archaeology Branch has remained much the same during the last two decades. Many new Archaeology Branch policies and procedures have recently been put in place to presumably help their small staff cope with the large work-load, but I fail to see any improvement in their efficiency or turn-around periods. They are clearly getting worse. ***The bottom line is that significantly more staff members are needed at the Archaeology Branch.***

There are a number of other CRM process issues related to First Nation consultation and involvement in fieldwork that I think could be improved, but most of these are beyond our control, and I doubt that they could be changed or improved.

I hope that you find my comments valuable during your assessment and review.

Regards,



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