

## DOCKETED

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## **Gabrielino Tongva Tribal Comments on FSA**

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The following comments are respectfully submitted regarding the Alamos Energy Center.

After careful review of the Cultural Resource Section (4.3-1 through 4.3-206) and Cultural Resources Appendix Figure 1, I am in agreement with CEC Staff conclusions regarding the adoption and implementation of Conditions of Certification CUL-1 through CUL-8 "would ensure that the applicant would be able to respond quickly and effectively in the event that archaeological resources are found buried beneath the project site during construction-related ground disturbance".

Let me reiterate my concerns that I expressed in June 2014 to CEC staff during tribal consultation regarding this project. At that meeting I believe I emphasized the the importance of adequate archaeological monitoring and Native American monitoring during ground disturbing construction activities.

I base my concerns and my words on nearly 25 years experience involving Native American monitoring and archaeological fieldwork. The importance of cultural resource protection to the Gabrielino Tongva Nation is a sacred duty. Any attempt to minimize the archaeological/Native American monitoring elements related to this project must be considered as an attempt to minimize the very existence of the Gabrielino Tongva people.

The project area is well within the Traditional Cultural Property and Tribal Territory of the Gabrielino Tongva Nation. We have direct cultural affinity to any prehistoric archaeological items or cultural deposits within the project area. The project applicant retained the services of a CRM firm to state that "the possibility of encountering significant buried cultural resources is considered low". And further state, "no impacts on cultural resources are expected". While these two statements may be based on archival research, cultural resource investigative reports, contacts with interested agencies and a field survey, it is a conclusion on the part of that CRM firm that I find very questionable and I must disagree.

I consider any cultural item or prehistoric archaeological find to be significant to the Gabrielino Tongva Nation. Every cultural item is SACRED TO US. The use of language that attempts to minimize the probability and importance of cultural material that may be encountered within the project area appears to merely be an attempt to minimize the need to provide adequate archaeological and Native American monitoring during construction activities within the project area. Similar to the concept of providing minimal WEAP training to construction personnel in order to identify archaeological/cultural items and assess the importance of those items in lieu of having professionally trained archaeologists and Native American monitors on site during construction activity. Both concepts I find to be offensive and irresponsible. Any CRM firm that promotes this type of conceptual cost saving should be questioned on professional integrity.

In closing, the Gabrioleino Tongva Nation will anticipate continued participation in the Application For Certification for the Alamos Energy Center process.

Sincerely,

Sam Dunlap  
Cultural Resource Director

Gabrielino Tongva Nation  
(909) 262-9351 cell  
samdunlap@earthlink.net