

## DOCKETED

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*Comment Received From: Freddie Rudy Romero*  
*Submitted On: 6/1/2016*  
*Docket Number: 16-IEPR-03*

**Tribal consultation**

*Additional submitted attachment is included below.*



**SANTA YNEZ BAND OF MISSION INDIANS**  
***Tribal Elders Council***

May 25, 2016

Karen Douglas, Lead Commissioner  
California Energy Commission  
1516 Ninth St.  
Sacramento, Calif.

Re: 2016 IEPR Update workshop

Commissioner Douglas,

I would like to make the following comments on behalf of the SYBCI Elders Council with regards to the 2016 IEPR Update.

1. With regard to notice of the meeting, I just received notice 3 days prior to meeting and the original notice went out on May 18, 2016. How long in the planning did was this meeting being discussed and then finalized and why were the tribes not noticed any earlier?
2. I looked at the panel in which this discussion was taking place and there was no tribal representation. Did the commission reach out to include them or is this an agency discussion only?
3. Tribes have a great deal at stake here in this matter and as was alluded to in a comment about the MLPA discussion, not everything went as well as was stated with regards to group collaboration. The tribes had to forcibly put themselves into that discussion. I feel that it is extremely important that the tribes have a major part in this discussion if these types of project are going to be proposed in our waters.
4. I was a part of a NOAA and BOEM meeting held in northern California a few years ago where discussion was held about this very issue that some pretty good results, but I was hoping that it would not end there and listening today, I am concerned that if we are not called to the table, that that might very well be the case.
5. As tribes go, we are not against such efforts that are beneficial to our environment as these, but we need to be a part of the larger picture. Tribes have the ability to offer substantial information to these efforts.
6. As was mentioned in today's discussion, we to have concerns with the lack of data on impacts to the ecosystem in our ocean, not from just placement, but long term affects.

We agree that much more data needs to be gathered and it was mentioned that some of these efforts have been in place in other countries such as Europe.

When I was first approached about a project being proposed of our coast here, I looked into those projects of the European coast and searched for data and found that there was some negative affects to sea life in and around these projects.

I believe and agree that if we are going to move forward with such projects, that we need to fill in those data gaps.

We need to look at whether or not where these projects are working if they have completed baseline studies prior to installation, as well as studies after installation, along with required monitoring at prescribed intervals.

7. We need to look at impacts from EMI that would be emitted from these transmission lines that would be laid on our ocean floor. I understand that we have lines in our ocean now, but their levels of emission are that of distribution levels, not transmission levels which would be much greater due to the amount of electrical energy transmission.

8. Tribes need to have the ability to be recognized within this conversation as experts according to their own traditional ecological knowledge and how these types of projects may affect them.

9. Tribes need to be involved in the actual studies being completed at all levels, State, Federal, and private, since these studies will need to be conducted on a permitted basis.

10. As studies are being completed and the possible placement areas for these projects are being created, we need to consider size, levels of transmittable energy, operational schedules, with regards to migrating or reproduction seasons of sea life that may be affected by these projects, and other environmental concerns.

Test areas should be established prior to full scale placement of these energy projects.

I would like to have these comments entered into record on behalf the SYBCI Elders Council.

Sincerely,

A handwritten signature in black ink that reads "Freddie B. Romero". The signature is written in a cursive, slightly slanted style.

Freddie Romero  
Cultural Resources Coordinator  
SYBCI Elders Council  
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