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The following words come from the original People of this land with hope that you will be respectful of our ancestors.

My name is Sandonne Goad. I am the duly elected Tribal Council Chairwoman of the Gabrielino/Tongva Nation. My tribe is a true government with a constitution, laws, and Citizens. You can find us on the internet at www.gabrielino-tongva.com.

I am deeply concerned with the thought process of the applicant to hire a CRM that would mitigate the idea that a shard or bone fragment is insignificant. Here are a couple of examples, from other projects, of what the CRM for the applicant would find insignificant because these finds were not intact and out of archaeological and anthropological context:

1. We found bone fragments and 2mm carved shell beads with engravings on them in disturbed soils of the Arco project in 1998-2000.
2. We found intact and fragmented remains, bowls, and other tools, in areas that had been previously disturbed at the University High School Project in 2014.

There are laws in place for your protection as well as ours. The applicant trying to circumvent these laws by offering a CRM until such time as something significant is found, is a typical ploy to save money and bolster the applicant's bottomline.

Let me explain. I was an accountant for a general contractor. He told me on a couple of different occasions how he put together a bid for a project. One of the things he did was put in a ten percent or more buffer on all subcontractors, materials, labor, etc. I asked why. His comment was in case there was something come up, a change or delay, but mostly if they had underestimated or missed something it would be covered. I asked what happens when you don't go over? Do you give them a discount? He replied nope all profit and the sooner the job was done the better the bottom line. He told me everybody does it.

So, if the applicant hasn't budgeted in an archaeological group and a Native American monitor in their bid, both would eat into their profit. An employee hired as a CRM would be a significant savings.

Why their solution of a CRM is a conflict of interest.

A subcontractor is beholden to the job they subcontracted for. An employee is beholden to the company.

In the case of the applicant, the CRM they hire is beholden to them and would feel less inclined to slow or stop a job even for just five to ten minutes to remove something that would be culturally significant to the Gabrielino Tongva People. They would most likely give a blind eye to the job site or be pressured into looking the other way, because they were hired for just that reason. A CRM hired to circumvent the laws of the federal, state, and local governments, by the applicant creates the conflict of interest.

An archaeological group and a Native American monitor would be considered subcontractors, making them independent of the applicant. They would not feel any pressure to turn a blind eye for the applicant. Thus, they would rush in to remove an artifact with out stopping or possibly temporarily stopping a job site for a find. This doesnâ€™t really delay the job and gives transparency to the project.

1955

Using the excuse that the ground was disturbed in 1955, for a reason to circumvent the need for archaeological and Native American monitoring, is a travesty. There were no laws in 1955, so there was no protections from the original construction crews desecration of burials or other signs of land use by my ancestors. No one was going to stop any progress for Indians. If they did find anything, they wouldnâ€™t have reported it, because it didnâ€™t matter to them. This non reporting would make the archives flawed and the research the same.

In Conclusion

The Gabrielino/Tongva Nation is not against the progress of this project. We donâ€™t want to slow you down or stop you. We only want the opportunity to monitor and save as much of our cultural resources as possible.

Because in the end, it doesnâ€™t matter if it is a 2mm bead, a tooth, a bone shard, a tool, or a fully intact body, it is all significant to us. And no one the applicant hires should be allowed to make that decision for us, hence the reasons why the laws were put into place.

Respectfully,

Sandone Goad
Tribal Council Chairwoman
Gabrielino/Tongva Nation

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