



# **Northern Chumash Tribal Council**

*A Native American Corporation - NorthernChumash.org  
67 South Street, San Luis Obispo, CA 93401 805-801-0347*

California State Water Board  
Thomas Howard, Executive Director  
Felicia Marcus, Chair  
Francis Spivy-Weber, Vice Chair  
Tam M. Doduc  
Dorene D'Adamo  
Steven Moore  
State Water Board at PO Box 100  
Sacramento, CA 95812-0100

November 22, 2013

**Re: Northern Chumash Tribal Council Additional Comments regarding Final Technologies Assessment for Existing Once-Through Cooling System Report No. 25762-000-30R-G01G-00010, Bechtel Power Corporation. Report issued September 20, 2013.**

**Sent to Marie Huffman via email**

Dear Water Board Members,

The Northern Chumash Tribal Council (NCTC) is located in San Luis Obispo California, and was formed under the guidelines of California Senate Bill 18 April 26, 2006 as a California State Recognized Tribal Government by the California Native American Heritage Commission, organized and dedicated to preservation of the California Native American Chumash Culture, and Sacred Sites. NCTC is dedicated to meaningful consulting with Federal, State, local governments and agencies, consulting with the development community, and supporting tribal community well-being.

I and the members of the Northern Chumash Tribal Council (NCTC) have lived on this land in San Luis Obispo County for over 20,000 years continually. We have deep roots with the land, ocean and waters. NCTC is engaged with federal, state and local government concerning all land use issues in San Luis Obispo County. The Bechtel Corporation report issued September 20, 2013 for Final Technologies Assessment for existing once-through cooling systems makes the statement on page 150, second paragraph, "All cooling tower layout location foot prints avoid the Indian burial grounds." This statement is not accurate.

- We are concerned about the definition of the boundary of archaeological site CA-SLO-2, and particularly the northeastern boundary where it approaches the base of the hills. The boundary shown on the map provided in the Bechtel report is quite irregular and inconsistent with the nature of site boundaries in general. Bechtel cites no data regarding formal definition of that boundary through archaeological inventory, subsurface investigation, or other fieldwork, and to our knowledge there has been none.
- CA-SLO-61, which is located near the cliffs, and is under the proposed desalination infrastructures, is not even included in the Bechtel maps.

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- We are aware of several other known archaeological sites in the immediate vicinity of the project which merit no mention in Bechtel's report. It does not appear that they performed a records search or other background research to identify other sites in the vicinity, or analyze potential project effects on sites other than CA-SLO-2.
- Similarly, it does not appear that any archaeological field survey was performed to identify other previously unidentified sites that could be affected. To our knowledge, most of the terrain above Pecho Valley Road has not been surveyed for archaeological or historical sites, but it is likely that such sites exist in the area to be affected.
- The project area is within the *Rancho Canada de los Osos y Pecho y Islay* National Register Archaeological District, which contains more than 50 prehistoric and historic archaeological sites, some as old as 10,000 years. Effects of the proposed project on the National Register District have not been taken into consideration.
- Finally, it does not appear that there was any consultation with PG&E's in-house cultural resource specialists during the development of the project documents. The in-house staff is the most knowledgeable and most direct source of information regarding the locations of known archaeological sites, the extent of prior studies, and the requirements for effective stewardship of resources under PG&E's management. We encourage you to speak directly with PG&E Senior Cultural Resource Specialist Michael Taggart as soon as possible, Taggart, Michael [MITI@pge.com](mailto:MITI@pge.com), and before any further decisions are made or work is undertaken.

Thank you for giving us the opportunity to provide our comments.

Sincerely,

Fred Collins  
Chair  
Northern Chumash Tribal Council