



Tolowa Dee-ni' Nation

(Formerly known as *Smith River Rancheria*)

140 Rowdy Creek Rd, Smith River, CA 95567-9525

Ph: (707) 487-9255 Fax: (707) 487-0930

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Bommelyn
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Council Secretary

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December 18, 2015

Via Electric Mail
(ceqa.guideline@resources.ca.gov)

Holly Roberson, Land Use Counsel
Governor's Office of Planning and Research
1400 Tenth Street
Sacramento, CA 95814

RE: Tribe's Comments on Proposed Changes to Appendix G and Alternatives

Dv-laa-ha~ Ms. Roberson,

On behalf of the Tolowa Dee-ni' Nation (the "Tribe"), a federally recognized tribe with ancestral lands in Southern Oregon and Northern California, the amongst the Pacific Coast, we are submitting comments regarding the formulated language of Guidelines being drafted for Appendix G (Appendix), under the California Environmental Qualities Act (CEQA), pursuant to AB52.

The Tribe understands these comments are being taken into consideration for advisory prior to being submitted to the Natural Resources Commission. It is with this understanding, we desire to have the Office of Planning and Research (OPR) understand the importance of these changes to our tribal advocacy on tribal cultural resources and the voice we want to have when working with agencies and other governments while implementing CEQA. Currently our Tribal Heritage Preservation Office (THPO) works on various project notifications and it is with these capabilities that we want to continue to improve these working relationships when moving forward in working with other governments, agencies, and developmental organizations. We want a more cohesive collaboration within our entire ancestral territory, not limiting to our tribal lands.

We would like to see under Appendix G, the separation of "tribal cultural resources" (TCR) and "paleontological resources". TCRs are not in any way similar to these other types of resources. This needs to be a distinction. We are also asking that OPR recognize in the Appendix that "tribal registers" be included in sections were "local and state registers" are recognized. As a THPO Tribe, we have an obligation to keep and maintain our own tribal register and this listing unique to the tribe. This data is confidential and thus, as part of the

*Waa-saa-ghitlh-'a~ Wee-ni Naa-ch'aa-ghitlh-ni
Our Heritage Is Why We Are Strong*

CEQA determination process this register must be used, giving the Tribe another opportunity to be part of these CEQA processes. This will allow our own data to also determine project and resources significance. The Tribe owns this data solely, thus without proper consultation this information would not be known, recognize the importance of tribal input and collaboration.

Currently the Tribe is in support, with some modifications, to the proposed language for Alternative 3.

We understand this to be an immediate deadline and have worked diligently under this quick turnaround time that we are submitting these comments today. We are asking that although we are meeting this deadline with support to Alternative 3 with modifications that we are given until after our ceremony time and the first of the year to be able to send in a more elaborate letter addressing our modifications and giving our entire Tribal Council time to meet and discuss these matters.

Should you have any questions or need more information, contact our THPO, Suntayea Steinruck at 707-487-9255 X 1180 or at sunsteinruck@tolowa.com or our Culture Director, Pyuwa Bommelyn at X 1190 or at pyuwa.bommelyn@tolowa.com.

'Alh-du',



Loren Me'-lash-ne Bommelyn
Tribal Chairman
On behalf of the Tribal Council

Cc: Suntayea Steinruck, THPO Officer