



**SALINAN TRIBE**  
of Monterey and San Luis Obispo Counties

October 25, 2023

NOAA/National Oceanic and Atmospheric Administration  
U. S. Department of Commerce  
1401 Constitution Avenue NW, Room 5128  
Washington, DC 20230

Paul Michel, Regional Policy Coordinator  
99 Pacific Street, Suite 100F  
Monterey, CA 93940

RE: NOAA-NOS-2021-0080: Chumash Heritage National Marine Sanctuary.  
Public comments Proposed Rule, Draft Environmental Impact Statement, and Draft Management Plan.  
Submitted Electronically via Federal e-Rulemaking Portal at <https://www.regulations.gov>.

Dear Mr. Michel:

Thank you for the opportunity to comment on the proposed Chumash Heritage National Marine Sanctuary.

Since the inception of the proposed Chumash Marine Sanctuary along the coast of California, the Salinan Tribe of Monterey and San Luis Obispo Counties (Salinan Tribe) has voiced our consistent and unwavering concerns to all governmental agencies and organizations involved in this process.

At the core of these concerns is the actual naming of the sanctuary as the Chumash Heritage National Marine Sanctuary and the location of the proposed boundaries.

At this point, the proposed name is not only historically inaccurate, but it also continues to perpetuate the false narrative that the central coast of California from the Channel Islands to the Monterey County border is the home to only one homogenized culture, the Chumash culture. Educated historians and NOAA's own research show that this is not the case. California indigenous cultures throughout history have been a blend of overlapping languages and cultures. As for Salinan culture, our culture is widely regarded as well traversed all throughout San Luis Obispo County and coastline. As partial evidence we see the following:

- As reported in the 1812 Spanish Interrogatories for the San Luis Obispo Mission, we see that there were fifteen different types of languages spoken representing the many surrounding villages in the region. <sup>1</sup>

*"3. Of languages spoken at this Mission there are fifteen different kinds according to the region in which the villages are located where the converts originated; for every village possesses a distinct idiom."*

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<sup>1</sup> Engelhardt OFM, Zaphyrin. "Mission San Luis Obispo in the Valley of the Bears" Copyright 1933 by Zephyrin Engelhardt, OFM and Copyright 1963 by Franciscan Fathers of California. Spanish to English translation of the original 1812 Spanish Interrogatories as required by the Spanish government for all the California Spanish Missions. Chapter 5, page 46, response 3.

- As reported by linguist and ethnologist John P. Harrington in his research of Salinan language (Migueleño and Antoniano) and culture in San Luis Obispo County in 1912: <sup>2</sup>

*“Migueleño was spoken as far south as Arroyo Grande and as far north as San Capójo (15 or 20 miles n. of Piedra Blanca on the coast). Lesa’mò is what the Migueleño called El Morro Rock”* <sup>3</sup> ¶ *“The Migueleño went in Salinas Valley as far as and including Soledad Mission.”* <sup>4</sup> ¶ *“They talked still another language at Carmel Mission. Migeleño (sic) extended east as far as Carrizo and La Panza. About same as county line.”* <sup>5</sup>

- Today, the Bureau of Land Management, under the U. S. Department of the Interior and based on their own extensive research, also recognizes the indigenous historical landscape of the Carrizo Plain National Monument located in the southern part of San Luis Obispo County by including both Salinan and Chumash cultures on the Carrizo Native American Advisory Committee formed to preserve the nationally recognized Painted Rock.

The preceding represents just a brief glimpse of the well documented historical presence of the Salinan culture throughout all of San Luis Obispo County and far beyond. <sup>6</sup>

This is why we have consistently felt that a more appropriate name would be something that actually represents the historical accuracy of the known cultures represented in this proposed sanctuary. For example:

- Pacific Coast Tribal Heritage National Marine Sanctuary
- Chumash/Salinan Heritage National Marine Sanctuary
- Indigenous Peoples Heritage National Marine Sanctuary
- Central Coast Indigenous Heritage National Marine Sanctuary

As a reminder, since the beginning of this process, we have voiced our concerns over the naming to the proper governmental agencies. In response, we were routinely told that the name of the sanctuary had not been finalized and to not worry about this aspect, as the name on all the documents was nothing more than a placeholder until the government could bring everyone together to reasonably work this out.

But now we see that this was never the case.

Historically accurate and heartfelt proposals such as those listed above, based on sound reasoning and historical accuracy, were never taken seriously. These ideas have been pushed aside by the groups that had the ability to make a difference. Simply put, there has never been any intention to have an honest discussion about the name of this sanctuary.

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<sup>2</sup> Harrington, John P. “John P. Harrington Papers 1907-1959. Microfilm 2, Reel 84. “Salinan,” “Early Migueleño Field Notes,” “Migueleño Slipfile,” “Antoniano and Migueleño Field Notes,” “Antoniano and Migueleño Vocabulary”. National Anthropological Archives, Smithsonian Institution.

<sup>3</sup> *ibid*, pdf page 14, slipfile page 11.

<sup>4</sup> *ibid*, pdf page 16, slipfile page 14.

<sup>5</sup> *ibid*, pdf page 16, slipfile page 15.

<sup>6</sup> We are very aware that other groups have attempted to create artificial cultural boundaries based on well-known geographic locations such as Morro Rock, Diablo Canyon, Point Conception, etc. The research that we have done has been incredibly extensive on this issue. We have routinely asked these other groups to provide historical evidence for their arguments of a cultural boundary and, to this day, we have yet to be provided any level of evidence to support their positions. The concept of surveying and boundary lines for territorial rights in the United States did not actually begin until the European Explorations into North America in the 1700’s and was not a part of California land rights until California became a state in 1850. We find it historically dishonest that other groups, along with the U. S. Government, would continue down this path of attempting to divide the indigenous cultures with territorial lines.

Ironically, strong evidence for supporting an inclusive name for the sanctuary can be found by simply reading both the Draft Environmental Impact Statement (DEIS) and Draft Management Plan (DMP) recently released by NOAA in August of 2023. In these documents we clearly see the following quotes readily recognizing the cultural significance of both the Chumash and Salinan cultures involved with this proposed marine sanctuary. To wit:

*“The proposed national marine sanctuary’s coastal boundary spans portions of the historical areas of multiple Chumash and Salinan peoples and specific locations important to multiple tribes and tribal groups.”*<sup>7</sup>

*“Moreover, there is a need to recognize and promote Indigenous cultural heritage of this area, including the bands of Salinan people and the Chumash people, one of the few ocean-going bands among the First Peoples of the Pacific Coast.”*<sup>8</sup>

*“For Chumash and Salinan people, there is a deep history of connection with sections of the study area’s coast and the adjacent marine waters.”*<sup>9</sup>

*“As described above, the coastal area in the study area has been occupied for centuries by Indigenous people. The area embodies a special sense of place with sacred meaning and significant values for the Chumash, Salinan, and other Indigenous people that still reside in the region today (NOAA, 2020).”*<sup>10</sup>

*“As part of its Indigenous Cultural Heritage Action Plan, NOAA would celebrate and protect the unique Indigenous cultural heritage and resources connected to the sanctuary through meaningful collaboration and partnership with Chumash and Salinan communities.”*<sup>11</sup>

*“The Native Americans who live in this coastal area today, the Chumash and Salinan, can trace generations of family lineages in this region, that, when coupled with other historical accounts and archaeological data, show this coast and ocean area have supported their people, cultures, and heritage for thousands of years.”*<sup>12</sup>

*“ONMS [Office of National Marine Sanctuaries] discussions with many tribes and Indigenous communities revealed an understanding that the proposed sanctuary’s coastal boundary spans portions of the historical areas of multiple Salinan and Chumash peoples, and specific locations important to several tribes and tribal groups (e.g., Point Conception).”*<sup>13</sup>

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<sup>7</sup> Office of National Marine Sanctuaries: National Oceanic and Atmospheric Administration. “Proposed Chumash Heritage National Marine Sanctuary, Draft Environmental Impact Statement”. <https://sanctuaries.noaa.gov/chumash-heritage>. August 2023. Page V.

<sup>8</sup> *ibid*, page IX.

<sup>9</sup> *ibid*, page 132.

<sup>10</sup> *ibid*, page 138.

<sup>11</sup> *ibid*, page 146.

<sup>12</sup> *ibid*, page 301.

<sup>13</sup> Office of National Marine Sanctuaries: National Oceanic and Atmospheric Administration. “Proposed Chumash Heritage National Marine Sanctuary, Draft Management Plan”. <https://sanctuaries.noaa.gov>. August 2023. Page 11.

*“For past, present, and future Chumash and Salinan people, the coast and waters within the sanctuary are of deep cultural significance.”*<sup>14</sup>

NOAA’s own words in the preceding passages make a clear case for supporting an inclusive name for this sanctuary.

But as we also see in the DEIS, there is a quote that reveals the systemic inequities that has permeated this process from the very beginning, and why there has never been any intention of properly recognizing Salinan culture.

*“1. NOAA could designate the sanctuary with a name of geographic or other significance that does not favor either tribal name. This option could eliminate naming conflicts with Salinan tribes, but for Chumash tribes it could also eliminate name recognition benefits.”*<sup>15</sup>

As we see, when NOAA references the Chumash culture and the proposed sanctuary name, it is all about their “*recognition benefits*” and yet NOAA shows no concern over these same “*recognition benefits*” for the Salinan culture. We question how a government agency can act in such an overtly inequitable manner against the Salinan culture without being held responsible for these types of comments and actions.

But as we are sadly reminded, this gradual genocide of indigenous cultures, that began with the Spanish Mission Era along the coast of California in 1769, later pursued by the Mexican government with the theft of lands with their Mexican land grant policies from 1822 until 1850 and continuing after 1850 with California state and federal policies that both forced cultural genocide and funded the outright murder of the indigenous natives, continues today.

Every generation claims they will right the wrongs of the past. Yet every generation for the last 250 years has blindly repeated the sins of the past when it comes to native indigenous cultures.

At this point, the Salinan culture has been given a variance of two basic alternatives to choose from.

- The first would be to keep the original proposed boundaries up to the Monterey Bay National Marine Sanctuary in order to properly protect the central coast marine and indigenous cultures. But in order for this to happen, the Salinan culture will not be equally recognized in the actual naming of the sanctuary, thereby perpetuating a false narrative for generations to come that the Chumash culture is the only indigenous culture along the central coast of California.
- The second would be to leave a gap between the southern border of the existing Monterey Bay National Marine Sanctuary to a new northern border of the proposed sanctuary that will be moved to the south. The proposal to remove the section of the national marine sanctuary further south of Morro Bay makes it clear that the federal government will protect our cultural region only if we abandon the recognition of the Salinan culture. This is unacceptable.

There are numerous examples throughout American history in which the federal government has required indigenous groups to abandon their culture as a trade to survive, and this proposal is no different. Under this proposal, the gap that will be left over will be nothing more than a perpetual symbol that the Salinan culture is not worthy of equal environmental protection nor equal cultural recognition.

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<sup>14</sup> *ibid*, page 15.

<sup>15</sup> Office of National Marine Sanctuaries: National Oceanic and Atmospheric Administration. “Proposed Chumash Heritage National Marine Sanctuary, Draft Environmental Impact Statement”. <https://sanctuaries.noaa.gov/chumash-heritage>. August 2023. Page 54

Simply put, the Salinan culture deserves an equal seat at the table with equal respect, equal recognition, and equal dignity. Anything less will not be acceptable to us as it will continue the narrative of systemic inequities that have permeated Spanish, Mexican, and American policy for over 250 years. Because of this, we stand firm that we will not support either of the above two alternatives or variances of.

This is why we continue to support an inclusive national marine sanctuary that includes a name that represents all indigenous cultures in the study area and simultaneously keeps the boundaries up to the Monterey Bay Marine Sanctuary throughout the northern part of San Luis Obispo County. This simple proposal does more than rightfully preserve historical accuracy and cultural dignity. It will also ensure the much needed protections of not only marine life, but of the indigenous cultures and traditions that are so important to everyone along the central coast.

From the onset of this proposed sanctuary, our solution has always been one that represents historical accuracy, equality, and respect for everyone. And for this simple request, we have been marginalized, ridiculed, and routinely pushed aside.

Our issue has never been with the Chumash culture and those who carry its legacy. The Chumash culture is a vibrant story that needs to be preserved. To those who are truly descended from this culture, we support you. We are simply asking for the same respect in return.

For these reasons, the Salinan Tribe of San Luis Obispo and Monterey Counties will not support this marine sanctuary proposal until such time that both the name of the sanctuary is inclusionary representing historical accuracy, and that the boundaries equally protect all the lands up to the southern border of the Monterey Bay National Marine Sanctuary.

We stand resolved on our position.

Respectfully submitted,

The Salinan Tribe of Monterey and San Luis Obispo Counties

cc: The Honorable U. S. Congressman Salud Carbajal  
California's 24<sup>th</sup> Congressional District  
2331 Rayburn House Office Building  
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The Honorable U. S. Senator Laphonza Butler  
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Washington, DC 20510

The Honorable U. S. Congressman Jimmy Panetta  
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The Honorable U. S. Senator Alex Padilla  
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