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To: Ms. Nikki Bass
Office of Federal Acknowledgment Director,
Department of the Interior
Office of the Assistant Secretary—Indian Affairs

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Washington, DC

Attention: Office of Federal Acknowledgment, United States Department of the Interior,
Mail Stop 4071 MIB, 1849 C Street, N.W., Washington, DC 20240

From: yaktit'utit'yu yaktit'hini Northern Chumash Tribe
San Luis Obispo County, CA and Region

Re: Rejection of Petition #406 Salinan Tribe of Monterey and San Luis Obispo Counties,
CA. Dated August 25, 2024

As yaktit'utit'yu yaktit'hini Northern Chumash Tribe of San Luis Obispo County, CA and Region (ytt Tribe) we are writing to state our strong objection to the Salinan Tribe of Monterey and San Luis Obispo Counties, CA (SAL) Petition #406 for Federal Acknowledgement (Petition). Our objection is based on their Petition's misrepresentation of the area they describe as their homeland. In their Petition, they have incorrectly inserted themselves into the ancestral homeland of the yak tit'yu tit'yu yak tit'hini Northern Chumash Tribe of San Luis Obispo County and Region.

For the sake of clarity and accuracy, it should be noted that anthropologists and linguists have historically referred to our people as "Obispeño Chumash", "Northern Chumash", and "S.L.O. Indians". The term "S.L.O Indians" is derived from Mission San Luis Obispo de Tolosa, located in the heart of our homeland. In the context of this document and in all public and private records, "Obispeño Chumash", "Northern Chumash", and "S.L.O Indians" are all names for what is now called yaktit'utit'yu yaktit'hini Northern Chumash Tribe of San Luis Obispo County and Region.

Since time immemorial, our people have lived in the region that is now called San Luis Obispo County. We live along the coastal estuaries, oak-studded hillsides, and tidal waters that shape our homelands. These places are not resources; they are kin. The waters, mountains, valleys, forests and skies carry the stories of our families, written into our hearts and the land through ceremony, stewardship, and collective memory.

Our governance emerges from the land itself, from the relationships that sustain us. Reciprocity and care are central to how we live, how we harvest, and how we protect.

We have always understood that balance is not maintained through domination but through mutual respect. Every act of tending—whether gathering abalone, burning to care for the oak trees, or weaving tule—is an act of sovereignty. It is our way of being in the world, one that refuses extraction and honors responsibility.

Colonial forces disrupted these relationships, displacing our people and fragmenting our lands. Disease, violence, and policies of assimilation sought to erase us, but they failed. Our languages, our stories, our practices remain, carried forward by those who refused to forget. Sovereignty is not given—it is lived and defended. It is in the songs we sing, the trails we walk, and the care we extend to our homelands and each other. Sovereignty is our right and our responsibility and we will protect it from anyone who threatens to undermine it by making false claims to our ancestral homelands.

We are not creating something new; we are reaffirming what has always been true. We honor our ancestors and act for the generations to come.

With these cultural tenets and with the love of our homeland, we have provided the following evidence and expert commentary to substantiate our heritage and refute the erroneous land claims made by SAL. Many of the same sources who are cited in the SAL Petition are actually and unequivocally clear that the land and waters now known as San Luis Obispo County are the ancestral homelands of the Northern Chumash. We appreciate your careful consideration and review of these detailed resources and rely on you to see the truth.

Difference Between Legitimate Ancestral Claims and Post-Contact Displacement

To begin, there is a critical and non-negotiable difference between legitimate ancestral claims to a given homeland and post-contact displacement as a direct result of colonization. We are aware that various Salinan families now reside in San Luis Obispo County. They were displaced by the Spanish Mission system which caused their relocation to what is now San Luis Obispo County.

We personally understand the historical trauma of colonizing governments' mistreatment of native people with families and communities displaced as a result. However, forced displacement does not afford ancestral claim to another tribe's homeland. Our homeland is defined at the time of pre-contact, before Spanish missionization re-arranged our order of life, a time that honors our governance, social structures, and traditional kinship bonds that were forged through the shared history of countless generations over thousands of years

We have read and noted that, by their own admission in the Petition, the SAL did not arrive in the Toro Creek area (located north of Morro Bay) until the mid 19th century, approximately 100 years after colonial contact. In admitting this, they thereby acknowledge that they do not have pre-colonial ancestral ties to this area.

In the following paragraphs, we will present additional supporting evidence for this statement with numerous citations, for your reference.

Salinan Admission of Pre-Contact Origins in Monterey County

In Section I: Introduction, G: Brief Statement of Claim of Federal Acknowledgement and Continuous Existence from 1900 of the SAL Petition for Federal Acknowledgement, SAL immediately concedes that “After the secularization of the California Spanish Mission in 1834” a group of Indians from Monterey County “formed an Indian settlement” outside of the San Antonio Mission (4). In doing so, they acknowledge their ancestral origins in Monterey County. They then admit that “During the later part of the 19th and into the early part of the 20th century, a portion of this documented group of Indians would eventually migrate south to an isolated area in San Luis Obispo County known as Toro Creek” (4). The SAL statement concludes by saying “By the end of the 20th century, we will see that the Toro Creek Indians would eventually form with others to create the Salinan Tribe of San Luis Obispo Counties that we see today” (4). By acknowledging their ancestral origins in Monterey County, tracing their lineage to the Toro Creek migrants, and anchoring their organization in this post-contact community, SAL unintentionally makes their own unassailable case for rejection of their Petition on the basis of false claims to the ancestral homelands of their sovereign neighbors, the Northern Chumash.

Anthropological Consensus re: Pre-Contact Northern Chumash Presence in San Luis Obispo County

Read in a vacuum, the SAL Petition erases the Northern Chumash as though they never existed. In fact, the preponderance of ethnogeographic and linguistic evidence clearly demonstrates that the Northern Chumash were well established in what is now San Luis Obispo County long before Spanish contact and remain the continuous, active, rightful, and recognized stewards of this territory.

The argument presented in the SAL Petition relies primarily on a carefully curated collection of favorable anecdotal reports in various linguistic accounts (in addition to casual references made in contemporaneous news stories). However, in scholarly publications and peer-reviewed articles, the retroactive analyses of the historical

boundaries between ancestral homelands is based upon complex linguistic frameworks which distinguish between language families and relate them to known geographic landmarks and villages. In the relevant ethnogeographic literature, the Salinan language spoken at Mission San Miguel Arcángel is generally referred to by the Spanish word “Migueleno”, while the Northern Chumash language spoken at Mission San Luis Obispo de Tolosa is referred to as “Obispeno”. The corresponding areas occupied by Migueleno and Obispeno speakers at time of contact is, therefore, the established benchmark for verifying whether or not a given organization has an abiding relationship to the land they claim and thus a legitimate case for federal acknowledgment in that region.

Turning to the anthropological scholarship on the area in question, it is abundantly clear that San Luis Obispo County was occupied by Obispeno speakers at time of contact, and, given our traditional knowledge of the place, thousands of years before that. In their 2005 report, *An Ethnogeography of Salinan and Northern Chumash Communities - 1769 to 1810*, renowned archaeologist Randall Milliken and pre-eminent anthropologist Dr. John Johnson present “...a new understanding of the Salinan and Northern Chumash communities as they might have existed at Spanish contact, between 1769 and 1810” (i). Their report is “based on a thorough review of all evidence from Mission Period documents and ethnographic information” (Johnson, 2025).

Pre-Contact Northern Chumash Presence from Santa Maria River to Ragged Point and throughout San Luis Obispo County

In this comprehensive study of both Salinan and Northern Chumash history in the region, Milliken and Johnson state that “compelling early evidence exists to show that Northern Chumash was originally spoken in the San Miguel-Santa Margarita corridor as far north as the village of Las Gallinas at San Marcos Creek, as Gibson (1983)... By the end of 1805, the villages of the Paso Robles and Santa Margarita regions were empty. Their people were at Mission San Luis Obispo... Also, Arroyo de la Cuesta included all of San Luis Obispo as speakers of Chumash languages ([1837]). We therefore infer that the inhabitants of all the Paso Robles and Santa Margarita region spoke Northern Chumash, as did the Las Gallinas people of San Marcos Creek” (136-137).

The Milliken and Johnson report confirms and aligns with our own traditional understandings of our ancestral presence in and throughout San Luis Obispo County. Through systematic and reliable linguistic analysis, Milliken and Johnson make it clear that Northern Chumash were present throughout what is now San Luis Obispo County all the way up to and including San Miguel, which sits at the far northern edge of the county line. On this basis alone, it is inappropriate for SAL to claim pre-contact ancestral ties to this region, much less to any land or waters to the south of this line.

This truth is echoed in a February 2025 letter, written by Dr. John Johnson after reviewing the SAL Petition, in which he states that “some clarification is required on certain points” and reiterates that “people speaking the Obispeño language inhabited rancherías extending from near the Santa Maria River in the south along the coast to at least as far north as Cambria. Inland, people speaking Obispeño occupied the upper Salinas River watershed from the Santa Margarita area to just north of Paso Robles. Fr. Felipe Arroyo de la Cuesta, the Franciscan missionary who documented California Indian languages in the early nineteenth century, reported that the Indians at the ranchería known as Las Gallinas in Spanish, located between Mission San Miguel and Paso Robles, was inhabited by people speaking a Northern Chumash dialect” (1).

Additionally, there is an abundance of scholarly evidence indicating the pre-contact presence of Obispeño Chumash all the way up to what is now the Monterey County line. In Cal Poly State University Professor of Anthropology Dr. Terry L. Jones’ et al. report *Toward a Prehistory of Morro Bay: Phase II Archaeological Investigations for the Morro Bay Highway 41 Widening Project, San Luis Obispo County, California* affirms that “this boundary may have extended farther north near the current Monterey County line” (Jones et al. 1994, 10).

The recognition of Chumash presence up to and including the very northern edge of San Luis Obispo County is repeated in and supported by the work of archaeologist Dr. Gary S. Breschini, past president of the Society for California Archaeology. Breschini’s 1983 report *A Cultural Resources Overview of the Coast and Coast Valley Study Areas* aligns with the work of Jones and R.O. Gibson in concluding that recent archaeological evidence and archival research of Spanish diaries and mission records suggest that the northern Obispeño Chumash territorial boundary may have extended north to San Carpoforo Creek, near Ragged Point (Breschini et al. 1983; Gibson 1983, 94; Jones et al 1994, 10). In his frequently referenced M.A. thesis *Ethnography of the Salinan People: A Systems Approach*, archaeologist R.O. Gibson also places the southern boundary of Salinan territory just north of Ragged Point (Gibson 1983, 94).

Multiple different scholars working at different times in history confirm findings which verify our deep-rooted Tribal knowledge of our homeland. Specifically, that pre-contact Northern Chumash territory extends from the Santa Maria River to Ragged Point, encompassing the entirety of what is now San Luis Obispo County.

The scholarship also verifies the authenticity of pre-contact Northern Chumash presence in Diablo Lands, located on the Pecho Coast, an area extending from Point San Luis (Avila Beach) in the south and north into Montaña de Oro State Park. In Dr.

Johnson's 2020 report, *Descendants of Native Rancherías in the Diablo Lands Vicinity: A Northern Chumash Ethnohistorical Study*, there is a significant and unambiguous acknowledgment of pre-contact Northern Chumash presence in the Diablo Lands area, Johnson writes,

"Yak Tityu Tityu Yak Tilhini has widespread support among those families who descend from rancherías that once existed in the Diablo Lands area. Leaders of this organization not only can trace their ancestry back to these original rancherías, but this group of families can demonstrate continuity and identity as a Northern Chumash community that persisted in the San Luis Obispo area from colonial times down to the present day. Clearly this tribal group is that which demonstrates the strongest case for cultural affiliation with the Diablo Lands area" (58).

Milliken and Johnson's conclusions, Jones and Breschini's explicit and extensive corroborations, as well as Johnson's recent attestations to the findings align with our tribe's long standing awareness that what is now San Luis Obispo County is and always has been the homeland of Northern Chumash people. While we recognize and lament the profoundly destructive impact of violent colonization on our neighboring nations as well as our own, we do not consent to erasure in the ongoing history of our ancestral homelands.

Clarification of Historical Confusions re: Post-Contact Presence of Salinan Speakers in San Luis Obispo County

Unfortunately, the chaos of colonization and subsequent disruption of our lifeways has many reverberations throughout time, including (but not limited to) dangerous distortions in the institutionally accepted narratives about who and where we are in the world. Specifically, the forced displacement of native people throughout the region created abiding confusion in the work of early ethnographers.

Milliken and Johnson allude to this confusion in *An Ethnogeography of Salinan and Northern Chumash Communities - 1769 to 1810* in their nuanced discussion of the Carrizo Plain region and when they state that "the inland Paso Robles, Atascadero, Santa Margarita area has also been subject to controversy" (141). They immediately address the historical inaccuracy by affirming that they "find the early evidence for Northern Chumash in those areas to be straightforward. Salinan-speaking people seem to have moved into those areas during the 1820s as Mission San Miguel took over some ranches from the much smaller Mission San Luis Obispo" (141).

While Milliken and Johnson present an unambiguous understanding of the inland areas of San Luis Obispo County as Northern Chumash homeland, the historical obscurity has been repeatedly exploited at our expense. It is, therefore, worth clarifying before moving into further discussion of specific land claims made in the SAL Petition, specifically to the Toro Creek area.

Early ethnographers to the region include Henry Henshaw, William Marvin Mason, John Peabody Harrington, and C. Hart Merriam. Milliken and Johnson acknowledge that the “Salinan consultants to Henshaw, Mason, Harrington, and Merriam were correct in asserting that the San Miguel-Santa Margarita corridor was inhabited by Salinan-speakers during the middle and late nineteenth centuries. In Chapter 2 we showed how Mission San Miguel took over Rancho Asunción in the 1820s as the population of Mission San Luis Obispo shrank to a point where it did not need that outstation. The ethnographers from the 1850s forward met Salinan descendants living and working on ranches in the Santa Margarita area and throughout San Luis Obispo County. Without doubt, however, had ethnographers visited Paso Robles, Atascadero, and Santa Margarita regions before 1800 they would have found that the local villagers were Northern Chumash-speakers” (138).

Dr. Katherine Klar of UC Berkeley provides an additional angle on this archival misconception in her May 2015 letter to the Native American Heritage Commission. Klar studied the Northern Chumash language for over 40 years and wrote her doctoral dissertation on the prehistory of the Chumashan languages. In her letter, she sheds light on errors inherent to Alfred L. Kroeber’s 1925 “Map of Native Tribes, Groups, Dialects, and Families” (4). The Kroeber Map was based on work done with Harvard anthropologist Roland B. Dixon. According to Klar, neither Kroeber nor Dixon did the ethnographic survey which would have helped them identify accurate boundaries between Salinan and Chumash peoples (4). Instead, without “any real evidence” they arbitrarily drew boundary lines which would imply Salinan presence in the northern part of what is now San Luis Obispo County (4). Unfortunately, “while linguists almost immediately began to question the Kroeber-Dixon assertions, archaeologists, ethnologists, and native people continued to rely on the Kroeber map” (4).

According to Klar’s expert account, while Kroeber and Dixon were drawing their boundaries, John P. Harrington and C. Hart Merriam were working “more (Harrington) or less (Merriam) secretly at making their own recordings of California languages, but these they did not share with Kroeber and Dixon” (5). The relevant linguistic evidence, therefore, is literally missing from this picture. Klar invokes Dr. Katherine Turner’s 1987 U.C. Berkeley doctoral dissertation *Aspects of Salinan Grammar*, an “authoritative work which has not been superseded by any other research” (2). Describing this dissertation,

Klar says “Dr. Turner collected and linguistically analyzed all known sources of information about the Salinan language, and her written conclusions therein stand as the most reliable authority we have on the issue under discussion (2). The work includes a map which argues for moving the Chumash Salinan boundary north of where Kroeber placed it (5). Klar then notes that Victor Golla, the “scholar who is currently recognized among linguists and archaeologists as the pre-eminent expert in the entire picture of the linguistic prehistory of California, found no reason, in his thorough 2011 reference work *California Indian Languages*, to differ substantially from Turner’s earlier assessment (5). The map from Katherine Turner’s *Aspects of Salinan Grammar* shows the Salinan territory significantly to the north of what is commonly taken for granted on the basis of the incomplete and inaccurate 1925 Kroeber map. Any argument which relies on the Kroeber map or presumes its boundaries to be historically accurate reference points is automatically and irreparably unreliable.

While there are ethnogeographic records of Salinan speakers in what is now San Luis Obispo County, this does not, by any means, imply that Salinan people were here for the many thousands of years which preceded contact with the Spanish colonizers, a necessary condition for any meaningful determination of ancestral claim to the land. Both Milliken and Johnson as well as Klar and, by implication, Turner provides historically accurate records and references which explain the eventual presence of Salinan people in San Luis Obispo County and eliminate any apparent need to rely on outdated accounts and their mistaken conclusions regarding the actual boundaries between our two nations.

Re: SAL’s False Claim of ytt Northern Chumash Ancestor Rosario Cooper as “Migueleño Linguistic Informant”

In addition to resolving any lingering historical confusions about the meaning of post-contact Salinan presence in San Luis Obispo County, it is of the utmost importance to acknowledge and unequivocally correct the misleading assertion in the SAL Petition that our ancestor Rosario Cooper is a “Migueleño Linguistic Informant”. Not only was she a ytt Northern Chumash woman, she was the last native speaker of the Obispeño language.

In Section IV: Seven Mandatory Criteria, Criterion 83.11(a) - Identification of Indian Entity, pg. 74 of the SAL Petition for Federal Acknowledgment, they put forth in “Evidence for Inclusion” a list of persons contacted by John Peabody Harrington, listing Rosario Cooper as a “Migueleño Linguistic Informant”. This is patently untrue. Dr. John Johnson addresses this error directly in his February 2025 letter where he writes,

“although Rosario Cooper personally was acquainted with certain individuals who spoke the Migueleño dialect of the Salinan language and spoke of them to Harrington, she herself did not speak that language. As was well documented by Harrington during his interview with Rosario Cooper, she was a native speaker of the Obispeño (Northern Chumash) language. Indeed, at the time she worked with Harrington, she was the last person living who had spoken that language from birth” (1).

Johnson then outlines the well-documented evidence of Rosario Cooper’s Northern Chumash ancestry, saying: “genealogical research that I have conducted, using baptismal, marriage, and burial registers of Mission San Luis Obispo, document Rosario Cooper’s ancestry. Her ancestors had been born in native rancherías (villages) in different parts of the territory where the Obispeño language was spoken. Her ancestors came from the rancherías of Tsquieu (tsikiw) at the mouth of Pecho Creek on the Diablo Coast; Sepjato (tsipxatu), located somewhere along the coast between Arroyo Grande and Avila Beach; Slegin (čiliqin) in the Arroyo Grande; Etsmoli (čimoli) on upper Arroyo Grande Creek, and Petpatsu (petpatsu), not precisely located, but likely somewhere not far from the mission” (1).

Without a doubt, Rosario Cooper was a Northern Chumash woman, Obispeño speaker, and child of the lands and waters now known as San Luis Obispo County. That SAL references her as a Migueleño is both alarming and deceptive given their accompanying attempts to claim Obispeño homelands.

Acknowledgement of SAL presence in Monterey County

We recognize and respect the SAL claims to areas within what is now Monterey County. However, we do not and cannot recognize or consent to SAL’s repeated attempts to claim parts of ytt Northern Chumash homelands including but not limited to the Toro Creek area, located north of Morro Bay, and lisamu’, also known as Morro Rock. In the SAL Petition for Federal Acknowledgement, the post-contact occupation of Toro Creek is the primary justification of SAL’s claim to fulfill Criterion 83.11(e) - Descent from Historical Indian Tribe.

Refutation of SAL Ancestral Claims to Toro Creek

Dr. John Johnson addresses this aspect of the SAL Petition directly in his February 2025 letter, when he says that the “Obispeño ranchería, Setjala (tsixala), was located at Cayucos not far from Toro Creek, according to evidence contained in the mission records. Sometime during the mid to late nineteenth century, certain Migueleño Salinan

families moved to Toro Creek and established a community there. The Petition for Federal Acknowledgement submitted by the Salinan Tribe of Monterey and San Luis Obispo Counties describes this community, which continued to exist up until a 1929 court decision forced them to move from their homes. The fact that the Toro Creek community was established by Salinan families from Mission San Miguel does not mean that it originally was a Salinan homeland. As mentioned above, the ethnohistoric evidence indicates that speakers of the Obispeño (Northern Chumash) language occupied that vicinity and further north when Mission San Luis Obispo was founded in 1772" (2).

Dr. Johnson's expert testimony is validated by the primary source *Papers of John Peabody Harrington* in the National Anthropological Archives of the Smithsonian Institution. Quoting from an interview with Juan Solano at "County Hospital, S.L.O" on June 6, 1912, Harrington writes, "Cayuco means turtle in S.L.O. language" and "The Rancheria at Cayuco was originally a S.L.O. rancheria." (Microfilm 2, Reel 84, pg. 0012-0014). In the context of Harrington's papers, S.L.O refers to the Obispeño (Northern Chumash) people. Harrington's well-respected records actually indicate that the longstanding existence of Northern Chumash people preceded the eventual Salinan presence at Toro Creek.

Even the claim of post-contact Salinan presence in the Toro Creek area is brought into question by discrepancies in the SAL Petition. A noteworthy example occurs in Section IV: Seven Mandatory Criteria, Criterion A. 1900-1939: Bylon/Encinales Section, Criterion 83.11(a) 1900 -1939 – Identification of Indian Entity of the SAL Petition for Federal Acknowledgement. Here, SAL quotes archaeologist Robert Gibson's analysis of the historical relevance of the Baylon Indians dating back to the early mission era at the San Miguel Mission, where he says that the Baylon family is from "*village Tojolojcm, probably located near the town of Jolon*" and cites another baptism record of "*the nephew of Thadeo who was a native of the rancheria of Cazz*" (184-185).

Assuming, with Gibson, that Tojolojcm is located near Jolon, this places the Baylon family far to the north and nowhere near Toro Creek. And, according to Gibson's 1983 Map of Salinan and Northern Chumash Territories and Rancherías, Cazz is located in the mountain ranges east of the San Miguel Mission (Milliken and Johnson, 2005, pg. 53). Neither Tojolojcm village or Cazz village is located along the Toro Creek area of the Toro Creek Indian's claim, further establishing that the Baylon family did not originate in the Toro Creek area. Nor, according to the primary sources cited by Gibson himself, restated here in the SAL Petition, were Salinan people present in Toro Creek at the time of Mission secularization. The Baylon family's post-contact presence in Cazz to the east

of San Miguel Mission may speak to their post-contact migration but this is not equivalent to pre-contact ancestral claim to the land.

Refutation of SAL ancestral claims to Lisamu' (Morro Rock)

The SAL Petition makes another significant error by equating a Memorandum of Agreement between SAL and The State of California, Department of Parks and Recreation with a legitimate and historical claim to Lisamu' (what is now known as Morro Rock) as part of their ancestral homelands. In Section IV: Seven Mandatory Criteria, A.12 and A.13, Criterion 83.11(a) 2000-Present - Identification of Indian Entity, pg. 154 of the SAL Petition for Federal Acknowledgment, they put forth in "Evidence for Inclusion" the following statement:

"Beginning in 2003 and ratified in future Memorandum of Agreements beginning in 2006, The Salinan Tribe of San Luis Obispo and Monterey Counties has been in a continuous relationship with the State of California based on our identification as an Indian entity to hold a special religious ceremony at the summit of Morro Rock, an ecological reserve that is closed to public access."

While we think this is a true statement, it fails to mention that any tribe in California is eligible to enter into an identical agreement with California State Parks. This agreement does not give SAL special status above any other California Tribe. This statement also fails to mention the fact that Lisamu' (Morro Rock) has been decided by the California Native American Heritage Commission to be in the homeland of ytt Northern Chumash.

Rather, SAL cites the section of the 2018 Memorandum of Agreement with the State of California where it says, "Whereas, the Salinan Tribe of Monterey and San Luis Obispo Counties (Salinan Tribe) are descended from the indigenous people of the contemporary DPR, San Luis Obispo Coast District" (155).

They make no mention of the March 15, 2018 letter from the Native American Heritage Commission (NAHC) to the Salinan Tribe of Monterey and San Luis Obispo Counties Re: Revised Report of Dr. Wendy Teeter Regarding Tribal Cultural Affiliation to Morro Rock in which the NAHC states that, in accordance with Dr. Teeter's report, "the preponderance of the evidence identifies Morro Rock as within the Chumash homelands" (1).

It's worth noting that while the NAHC and Dr. Wendy Teeter acknowledge the modern importance of Lisamu' to Salinan peoples, this does not imply pre-contact ancestral

claim to Lisamu'.. Rather, this aligns with earlier evidence suggesting the presence of Salinan peoples in the area surrounding Lisamu' starting in the 19th century, 100 years after colonial contact. In her May 2015 letter to the Native American Heritage Commission, Dr. Katherine Klar of UC Berkeley supports this claim first by clarifying that "the mere fact that Lisamu' is *mentioned* in Salinan primary sources (such as the Harrington notes and texts collected by Mason), and that Salinan people called Morro Rock by a similar (but not phonetically identical name) does not allow anyone to demonstrate the claim" of pre-contact relationship with Lisamu' (1). Further, "there is no doubt that Lisamu' is originally Chumashan, not Salinan" (2). Klar concludes with this definitive assertion of fact:

"I do not doubt that Lisamu' was an important and sacred site to the Salinan people, and most likely to all central coast peoples, but reliable scholarly analyses of the primary source materials regarding ancestral claims to it leave no doubt that Lisamu' was well within the traditional lands of the Northern Chumash people, and that they are the rightful protectors of the site" (7).

While the Memorandum of Agreement between SAL and The State of California, Department of Parks and Recreation grants Salinan people access to Lisamu', it is by no means proof or evidence of precontact ancestral claim to Lisamu' or the surrounding areas as suggested by its inclusion as evidence in Section IV: Seven Mandatory Criteria, A.12 and A.13, Criterion 83.11(a) 2000-Present - Identification of Indian Entity of the SAL Petition.

Unfounded Ancestral Claims Perpetuate Violent Dispossession

Any SAL claims to Toro Creek, Lisamu' and the surrounding areas on the basis of post-contact occupation ignore and erase the pre-colonial presence of Northern Chumash people. It is clear that while SAL people did indeed occupy Toro Creek beginning in the 19th century, this was long after the arrival of the Spaniards in 1769 and also after the secularization of the California mission system 1834, the first moment in history when our Northern Chumash ancestors would have had a real chance to even attempt to return to our original homelands. To allude to the temporary absence of Northern Chumash communities in areas like Toro Creek as legitimate evidence of another nation's claim to these lands is to perpetuate an ongoing cycle of violent dispossession and denial of our lived experience as Northern Chumash.

As stated earlier, the SAL concede in their Petition that their ancestors came from what is now Monterey County then down into San Luis Obispo County in the wake of

colonization and subsequent displacement. The open acknowledgement of their modern displacement to San Luis Obispo County is contrasted with the corresponding failure to mention the presence and prevalence of the Northern Chumash in and throughout San Luis Obispo County. This omission is especially troublesome given our own history of removal and displacement

Rejection of SAL Petition #406 on the Basis of Inaccurate, Outdated, and Disproven Claims to Ancestral Homelands of ytt Northern Chumash

As demonstrated by the abundant archaeological, anthropological, and linguistic evidence, San Luis Obispo County is and always has been the homeland of the Northern Chumash people, now called yaktit̓'utit̓'u yaktit̓'hini Northern Chumash Tribe San Luis Obispo County, CA and Region (ytt Tribe) .

We see this confirmed in Milliken and Johnson's definitive work *An Ethnogeography of Salinan and Northern Chumash Communities - 1769 to 1810*, which establishes a sound historical record of Northern Chumash presence in the San Miguel-Santa Margarita corridor, Paso Robles, Santa Margarita region and San Marcos Creek (136-137). Dr. Johnson substantiates and expands upon this statement of fact in his February 2025 letter, highlighting the presence of Obispeño speakers at "rancherías from the Santa Maria river in the south along the coast to at least as far north as Cambria" and "in the upper Salinas River watershed" (Johnson, 2025, 1). The formal, scholarly acknowledgement of Northern Chumash presence in the San Miguel area is especially critical given its position at the far northern edge of the San Luis Obispo County line.

The presence of Northern Chumash people all the way up to the northern boundary of what is now San Luis Obispo County is repeatedly corroborated by the work of regional subject-matter experts. The respective works of Dr. Terry L. Jones, Dr. Gary S. Breschini, and R.O. Gibson provide ample anthropological evidence of pre-contact Northern Chumash presence extending to Ragged Point, again at the northernmost boundary of San Luis Obispo County (Jones et al. 1994, 10; Breschini et al 1983; Gibson 1983, 94). The findings of these well-respected and longstanding authorities align with our own history and traditional relationships to the land and waters in and throughout the entirety of what is now San Luis Obispo County.

To support our refutation of the incorrect claims throughout the SAL Petition and to shed light on some of the arguments presented within, we provided helpful context for the history of academic research related to Salinan and Northern Chumash peoples. A working knowledge of the historical conditions is necessary for an accurate

interpretation of the academic references SAL leans on in an attempt to substantiate their unfounded land claims.

The original violence of colonization is not limited to discrete incidents in the past. Rather, it continues to echo, repeat, and perpetuate. In the case of our Northern Chumash homelands in San Luis Obispo County, some early American researchers misinterpreted incomplete information or rashly elevated their assumptions into inaccurate statements of fact, creating lasting confusion for subsequent generations. Dr. Katherine Klar clarifies for the record that the 1925 Kroeber Map which suggests the presence of Migueleño speakers in what is now San Luis Obispo county is not only outdated but also inaccurate and repeatedly refuted by the recognized specialists in California Indian Languages. In her review of Dr. Katherine Turner's 1987 U.C. Berkeley dissertation *Aspects of Salinan Grammar*, Klar establishes the actual boundary of Salinan speakers to be to the north of the Kroeber map, further disproving SAL ancestral land claims south of what is now Monterey County.

The reliable records which support our defense of our homelands are anchored in the work of our beloved ancestor, Rosario Cooper. It is disturbing that the SAL Petition erroneously labels her as a Migueleño speaker. This is an especially dubious aspect of the SAL Petition given Rosario Cooper's well-known, genealogically legitimate connection to Obispeño rancherías throughout San Luis Obispo County (Johnson, 2025, 1).

With no record of direct descendancy from the Obispeño people, the only possible basis for the mistaken SAL land claims is the 19th century presence of Salinan speakers at Toro Creek. This unilateral declaration constitutes the irreplaceable core of their case, one which is disproven by accredited experts, common sense, and their own, admission in Section I: Introduction. As Dr. Johnson puts it in his written response to the SAL Petition, "the fact that the Toro Creek community was established by Salinan families from Mission San Miguel does not mean that it originally was a Salinan homeland" (2). In fact, "the ethnohistoric evidence indicates that speakers of the Obispeño (Northern Chumash) language occupied that vicinity and further north when Mission San Luis Obispo was founded in 1772" (2).

We can apply the same logic to clarify any implied ambiguity around the inland Paso Robles, Atascadero, and Santa Margarita areas. As Milliken and Johnson state plainly in their comprehensive ethnogeography, they "find the early evidence for Northern Chumash to be straightforward" and "Salinan-speaking people seem to have moved into those areas during the 1820s" due to changes in the California Mission system (141).

This error of falsely equating post-contact occupation with legitimate ancestral claims to the land in question is seen again in the ongoing SAL attempts to identify themselves with Lisamu' (Morro Rock), a sacred landmark unequivocally established by Dr. Katherine Klar of U.C. Berkeley as "well within the traditional lands of the Northern Chumash people" (Klar, 2018, 7).

When we recognize the way that colonial violence shapeshifts and repeats itself, it is obvious that institutional validation of post-contact claims to Northern Chumash homelands by anyone other than documented Northern Chumash descendants would be an explicit authorization of the ongoing violence against us.

There is no amount of false equivocation, curation of anecdotal evidence, or denial of well-documented histories and traditions which could possibly constitute a valid ancestral claim to any place, especially not the homelands of a sovereign Tribal nation, one which is still very much alive, present and well, against all odds.

In light of the comprehensive evidence presented above, we as yaktit'utit'u yaktit'hini Northern Chumash Tribe of San Luis Obispo County - the documented descendants of this land - do respectfully and resolutely request that the Office of Federal Acknowledgement reject the August 25, 2024 Salinan Tribe of Monterey and San Luis Obispo Counties Petition for Federal Acknowledgement #406 on the basis of inaccurate, inappropriate and unsubstantiated claims to our ancestral homeland of San Luis Obispo County and Region.

Our belonging as Northern Chumash people was established many thousands of years ago. We are still here. We, the yaktit'utit'u yaktit'hini Northern Chumash Tribe of San Luis Obispo County and Region are uniquely and indisputably connected to this specific place in the world, rooted to a time immemorial. The natural world remembers us, and continues to imprint herself in our bodies. Our matrilineal society is more than just a social construct, it lives as instructions written in the code of our DNA, a story told by genetic markers passed down through an unbroken chain of mothers and daughters. Our bodies are designed to balance with this place physically, in thought and in practice. We are still stewards and always will be. Our homeland is in a set place, unmovable and defined. Though we may travel around the world, this place remains our homeland.

Thank you for your time and attention. For questions, clarification, or additional resources, you are welcome to contact ytt Northern Chumash Tribal Chairwoman Mona Olivas Tucker via email at olivas.mona@gmail.com.

Respectfully,

Mona Olivas Tucker

Mona Olivas Tucker, Chair
yaktiʔutitʔu yaktihini Northern Chumash Tribe
of San Luis Obispo County and Region

Addendum

Works Cited + Appendix

Works Cited¹

- i. Breschini, G.S., T. Haversat, and R.P. Hampson (1983). *A Cultural Resources Overview of the Coast and Coast Valley Study Areas*. Report submitted to Archaeological Consulting, Salinas. Copies available from the Northwest Information Center at Sonoma State University.
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- v. Johnson, John. (2020, September). *Descendants of Native Rancherías in the Diablo Lands Vicinity: A Northern Chumash Ethnohistorical Study*. Santa Barbara Museum of Natural History.
- vi. Johnson, John. (2025, Feb 25) "Letter to ytt Northern Chumash Tribe Chairwoman Mona Tucker re: Salinan Petition for Federal Acknowledgement".
- vii. Jones, T.L., K. Davis, G. Farris, S.D. Grantham, B. Rivers, and T. Fung (1994). *Toward a Prehistory of Morro Bay: Phase II Archaeological Investigations for the Morro Bay Highway 41 Widening Project, San Luis Obispo County, California*. Report submitted to Central Coast Information Center, University of California, Santa Barbara, California.
- viii. Klar, Katherine. (2015, May 30). *Letter to Native American Heritage Commission [Issue Brief]*. University of California, Berkeley.
- ix. Kroeber, A.L. (1925). *Handbook of the Indians of California*. Bureau of American Ethnology Bulletin 78. <https://repository.si.edu/handle/10088/15545>

¹ Dedicated letters from experts and government agencies are included in their entirety in the Appendix section of the Addendum and are also included as PDF attachments and printed copies in the respective digital and physical versions of this communication package.

- x. Milliken, Randall and Johnson, John. (2005). *An Ethnogeography of Salinan and Northern Chumash Communities - 1769 to 1810*. Far Western Anthropological Research Group, Inc. https://digitalcommons.csumb.edu/hornbeck_ind_1/4/
- xi. Teeter, Wendy. (2018, January). *Update to Original Letter Report to California Native American Heritage Commission re: Morro Rock* [Issue Brief]. Fowler Museum at UCLA.
- xii. Turner, Katherine. (1987). *Aspects of Salinan Grammar*. University of California, Berkeley. <https://escholarship.org/uc/item/8483x855>
- xiii. United States, Native American Heritage Commission (NAHC). (2018, March 15). "Letter re: Revised Report of Dr. Wendy Teeter Regarding Tribal Cultural Affiliation to Morro Rock"

Appendix

- i. Johnson, John. (2025, Feb 25) "Letter to ytt Northern Chumash Tribe Chairwoman Mona Tucker re: Salinan Petition for Federal Acknowledgement".
- ii. Klar, Katherine. (2015, May 15). *Letter to Native American Heritage Commission [Issue Brief]*. University of California, Berkeley.
- iii. Teeter, Wendy. (2018, Jan 20). *Update to Original Letter Report to California Native American Heritage Commission re: Morro Rock [Issue Brief]*. Fowler Museum at UCLA.
- iv. United States, Native American Heritage Commission (NAHC). (2018, March 15). "Letter re: Revised Report of Dr. Wendy Teeter Regarding Tribal Cultural Affiliation to Morro Rock".
- v. Johnson, John. (2020, September). *Descendants of Native Rancharías in the Diablo Lands Vicinity: A Northern Chumash Ethnohistorical Study*. Santa Barbara Museum of Natural History. *****A physical copy of this report is included in the physical communication package as a printed document.*****

Attachments omitted

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