



XOLON SALINAN TRIBE

"PEOPLE OF THE OAKS"

The Xolon Salinan Tribe are the People who have been referred to as the Salinan Indians from Missions San Miguel, San Antonio, and Soledad. We have always called ourselves "Xolon Indians." The Federal government called us the "Salinan's," because of the Salinas River that runs through most of our ancient territory; hence, we now call ourselves the "Xolon Salinan Tribe." Our ancient People lived (documented) along the Central Coast of California, from the northern part of San Luis Obispo – to the Big Sur area to the north – and inland to the Temblor Range.

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Office of Federal Acknowledgment
Office of the Assistant Secretary – Indian Affairs
United States Department of the Interior
Washington, DC

DOI/OS/AS-IA/OFA
Washington, DC

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Subject: Formal Comments on Petition #406 for Federal Acknowledgment of the Salinan Tribe of Monterey and San Luis Obispo Counties (STMSLO)

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To Whom It May Concern,

On behalf of the Xolon Salinan Tribe (XST), we respectfully submit formal comments regarding the petition filed by the Salinan Tribe of Monterey and San Luis Obispo Counties (STMSLO) seeking federal acknowledgment. Based on our review of the petition, we assert that it does not meet the mandatory criteria outlined in 25 CFR Part 83, particularly concerning the petitioners' status as a splinter group, lack of autonomous political influence, failure to represent the broader Salinan people, and reliance on secondary rather than primary historical evidence.

1. STMSLO is a Splinter Group

In the late 1980s, the Salinan people sought to organize under the tribal title "Salinan Nation." A Letter of Intent (LOI) was submitted in 1993 and accepted under Petitioner #139. However, during 1998-1999, internal leadership conflicts and policy changes—primarily regarding membership criteria—led to half of the Salinan Nation members to withdraw their tribal membership.

In the early 2000s, our tribal elders initiated a reorganization under the Xolon Salinan Tribe. On June 14, 2001, we submitted an LOI, which was reviewed by the Branch of Acknowledgment and Research (BAR). During this process, it was confirmed that our reorganization did not meet the definition of a "splinter group." The Xolon Salinan Tribe was granted Petitioner #242 on September 18, 2001.

STMSLO continued conducting tribal affairs under the original Salinan Nation Petition #139 for several years. It is unclear when the group changed its name to the Salinan Tribe of Monterey & San Luis Obispo Counties or whether a new LOI was submitted to reflect this change.

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The STMSLO petition itself acknowledges that its ancestors and historical communities were originally part of the same organization—Salinan Nation (Petition #139) before 2001, and the Xolon Salinan Tribe thereafter. Furthermore, the petition does not establish that STMSLO has continuously existed as a politically autonomous entity distinct from XST. Instead, it selectively highlights specific families and geographic areas while disregarding the broader historical and political structures of the Salinan people. This selective approach undermines its claim to recognition as a distinct tribe.

2. Xolon Salinan Tribe Holds Procedural Priority in the Recognition Process

The Xolon Salinan Tribe was recognized as a petitioner in 2001 under the prior regulatory framework, which required the submission of a Letter of Intent. Although the Office of Federal Acknowledgment (OFA) has since eliminated the LOI requirement, XST's earlier recognition as a petitioner establishes procedural precedence over STMSLO.

Despite sharing the same ancestral claims as XST, STMSLO did not file its petition until 2024.

3. STMSLO Lacks Political Authority Over All Salinan Peoples

To qualify for federal acknowledgment, a petitioner must demonstrate political influence and governance over its members (§ 83.11(b) and (c)). STMSLO does not exercise political authority over the entire Salinan people and fails to represent the full historical Salinan community.

There are three distinct Salinan groups that exist today, each with independent governance structures and leadership. The STMSLO petition does not establish authority over all Salinan peoples, nor does it encompass all Salinan lineages. Rather, it focuses on a limited number of families and geographic areas, failing to meet the requirement of a continuous, autonomous tribal community with broad political influence.

4. STMSLO's Petition Relies on Secondary Sources Instead of Primary Evidence

Federal acknowledgment requires substantial, direct historical documentation proving the continuous existence of a tribe as a distinct political and cultural entity. The STMSLO petition relies primarily on secondary sources, including anthropological summaries and interpretations of historical events, rather than primary documentation.

Upon review, STMSLO's supporting materials lack direct government recognition or primary records affirming its separate existence prior to this petition. The evidence presented primarily consists of:

- Anthropological studies and historical interpretations rather than official federal or state records.

- References to historical mission records that do not explicitly identify STMSLO as a distinct governing entity.
- Cultural and social interactions that fail to demonstrate actual political authority over a defined membership base.

Conversely, the Xolon Salinan Tribe has compiled historical records, documented government interactions, and primary source materials substantiating its distinct political authority and governance dating back to 1900.

5. STMSLO's Petition Ignores the Historical and Political Continuity of the Broader Salinan People

The STMSLO petition selectively emphasizes only a portion of the broader Salinan tribal community. However, federal recognition is reserved for tribes that can demonstrate historical continuity as a distinct political and cultural entity over time, rather than individual family lineages or isolated factions within a larger indigenous group.

Additionally, STMSLO's leadership structure does not reflect governance over all Salinan people, nor does it provide a history of sustained political authority distinct from XST. Its lack of centralized governance over the full Salinan community further weakens its claim to federal recognition.

Conclusion and Request

Based on these concerns, we respectfully request that the Office of Federal Acknowledgment carefully evaluate the petition of the Salinan Tribe of Monterey & San Luis Obispo Counties for the following reasons:

1. **STMSLO is a splinter group** and has not demonstrated independent political autonomy dating back to 1900, as required under § 83.4(b).
2. **Xolon Salinan Tribe holds procedural priority** in the recognition process, having been designated a petitioner in 2001, while STMSLO only recently submitted its petition in 2024.
3. **STMSLO does not represent all Salinan peoples**, focusing only on a limited number of families and geographic regions, which fails to meet the requirements for political continuity and influence under § 83.11.
4. **STMSLO lacks autonomous governance and political authority** over the broader Salinan population, making it ineligible for recognition as a distinct tribe.
5. **STMSLO's petition relies primarily on secondary sources**, lacking direct government recognition or primary historical evidence, weakening its claim under the federal acknowledgment process.

We urge the Office of Federal Acknowledgment to carefully consider these issues, as the Xolon Salinan Tribe has significant concerns regarding this petition. It is imperative that the full interpretation and truth of who we are as a "People" is properly documented, to ensure that our

historical integrity of the Salinan People is preserved and that the federal acknowledgment is granted only to the rightful representative entity.

Furthermore, due to financial and economic challenges, we continue to seek funding to advance research for our people, our ancestors, and our tribal heritage. We remain committed to completing our federal petition for submission in 2025.

We appreciate your time and consideration in reviewing our concerns. Please feel free to reach out if further clarification or additional documentation is required.

We would also like to be informed as this petition continues through the process. Below is our contact information.

Maytila' (Always Peace),

Karen R. White, Council Chair, Xolon Salinan Tribe

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