



JUANEÑO BAND OF MISSION INDIANS ACJACHEMEN NATION

Teresa M. Romero – Chairwoman
Anthony Vaughn – Vice Chair
Joseph R. Lopez – Member at Large
Ruthie Ann “Cookie” Stoffel – Member at Large

April 2, 2018

The Honorable Janis L. Sammartino
United States District Court, Southern District
Courtroom 4D, Suite 4194
221 West Broadway
San Diego, CA 92101

Re: Case No.: 3:17-cv- 02323-JLS- BGS

Dear Justice,

We the undersigned, Tribal Council of Juaneño Band of Mission Indians, Acjachemen Nation, assert the following regarding Southern California Edison’s claim that Public Watchdogs lacks Article III standing because it cannot demonstrate “hypothetical and conjectural harm.”

We, the Acjachemen, are the indigenous first peoples of Orange County, Northern San Diego County and Southern Los Angeles County. We have lived here for over 10,000 years. The San Onofre Nuclear Generating Station is located on our Traditional Cultural Property (TCP) and sacred burial grounds. As members and supporters of Public Watchdogs, we are included in Public Watchdogs’ representation in this Case No.: 3:17-cv- 02323-JLS- BGS.

Our tribe has been, is being, and will be harmed by Southern California Edison’s past disruptive construction activities, current unsafe engineering projects, and questionable future decommissioning at San Onofre.


Prior to Public Watchdogs’ November 2017 filing, we learned that a contracted Southern California Edison archaeologist covertly, therefore mostly likely illegally, removed the remains of our unearthed Ancestors, in violation of Federal and State law.

Our Ancestors' remains, extracted and stolen from their sacred burial grounds, were sent back to our Tribe per the post-mortem directions of the said archaeologist. These harmful and incredibly disrespectful actions were neither "hypothetical" or "conjectural."

It is our belief that Southern California Edison will, throughout the course of its planned 20-year decommissioning process, continue to desecrate our Traditional Cultural Property.

We therefore urge the Court to reject Southern California Edison's motion to dismiss Public Watchdog as a plaintiff.

Respectfully,



Teresa M. Romero, Chairwoman



Anthony Vaughn, Vice Chairman



Joseph R. Lopez, Member at Large



Ruthie A. (Cookie) Stoffel, Member at Large