



Table Bluff Reservation Wiyot Tribe

Cultural Department

July 25, 2005

Scott C. Flanders, Director
Environmental and Performance Assessment Directorate
Division of Waste Management and Environmental Protection
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Request for information regarding Cultural Resources in the vicinity of the proposed Humboldt Bay Independent Spent Fuel Storage installation

He'ba'lo (Greetings) Mr. Flanders:

Hú (thank you) for sending the above referenced project to the Wiyot Tribe for review. After reading your letter and researching our records the Wiyot Tribe has the following comments:

1. The letter and information attached to it were not very descriptive about the project that the Pacific Gas and Electric Company (PG&E) is proposing. Therefore, we are requesting more information about the Independent Spent Fuel Storage Installation (ISFSI) on the proposed project site. This information should include a detailed description of the project such as: the facilities to be built, the depth of any foundations/footings and trenches for utilities or pipelines, the height of the facilities to be built and/or description of their footprint, and the safeguards that will be used to protect the surrounding environment and neighbors of the facility.
2. We would like a copy of a USGS 7.5 Quad map with the location of the project, its boundaries, and the area for potential effect marked clearly.
3. Wigi (Humboldt Bay), in its entirety, has very strong cultural and historical significance to the Wiyot Tribe and its people. Any impact to the sensitive ecosystem of Wigi could cause adverse affects for the subsistence, ceremonial, and cultural uses by the Wiyot people. Appropriate mitigation should be discussed with the Tribe in order to protect the integrity of Wigi for current and future generations.
4. We recommend that a Cultural and Historical Survey be done for this project before any construction activities begin. **Please note that this includes any boring or trench excavation tests.*

5. Any excavation of dirt, including boring or trench excavations, should be overseen by a cultural monitor. This applies to the installation of foundations, driven piles, drainage and flood protection measures, the installation of the storm water treatment units, grading, trenching for foundations and utilities, as well as the construction of the building. Basically, if dirt will be moved/removed, a cultural monitor needs to be at the project site watching the activity. The use of cultural monitors will ensure that the location of valuable cultural resources will be protected if found.
6. We recommend the use of a local Cultural Resources Management Consultant. Working with local Consultants will help to ensure that a complete and accurate Cultural and Historical Survey is done for this project.
7. We recommend that a Pre-Excavation Agreement be authored and signed by PG&E and the Wiyot Tribe in order to protect and appropriately treat any inadvertent discoveries of cultural resources during the implementation of the project.

If you should have any questions or concerns regarding my comments, please feel free to contact me at (707) 733-5055 or via e-mail at cultural@wiyot.us.

Hú for your time and attention to our comments. We look forward to hearing from you soon.

Čawókš,



Marnie Atkins

Tribal Historic Preservation Officer/Cultural Director