



Herman G. Honanie
CHAIRMAN

Alfred Lomahquahu Jr.
VICE-CHAIRMAN

August 29, 2016

Michelle Brown, Assistant Field Manager, Renewable Resources
Attention: David Christensen, Archaeologist
Bureau of Land Management, Vernal Field Office
170 South 500 East
Vernal, Utah 84078

Dear Ms. Brown,

This letter is in response to your correspondence dated August 16, 2016 regarding the Bureau of Land Management (BLM) Vernal Field Office November 2016 Oil and Gas Lease Sale. The Hopi Tribe claims cultural affiliation to earlier identifiable cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of our ancestral sites and we consider the prehistoric archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the BLM, Vernal Field Office's continuing solicitation of our input and your efforts to address our concerns.

As we have stated previously, the Hopi Cultural Preservation Office is interested in consulting on any proposal that has the potential to adversely affect National Register eligible prehistoric sites on the Vernal Field Office. As we have also stated previously, we believe multi-use and energy development in areas with high site densities is an adverse effect on those sites, and we believe it is inappropriate to make determinations of effect pursuant to the National Historic Preservation Act based on no or little information.

In the enclosed letter dated June 6, 2016, the Hopi Cultural Preservation Office stated we understood 76 parcels are proposed for the November lease sale and according to your correspondence, potential for locating cultural resources within the proposed lease parcels is likely and several proposed parcels are located in potentially culturally sensitive areas.

We now understand 28 parcels totaling 12,207 acres are now proposed for the November 2016 lease sale. We have reviewed the enclosed Class I overview of the areas of potential effect and understand 8.67% of the project area has been surveyed for cultural resources.

Parcel 009 near Nine Mile Canyon has 35 identified National Register eligible prehistoric sites, including 29 with rock art, with approximately 13% of the parcel surveyed for cultural resources. Parcels 009 and 010 are located entirely within the Nine Mile Canyon Area of Critical Environmental Concern and approximately 200 or more sites in Nine Mile Canyon have been identified near Parcels 009 and 010. We understand a No Surface Occupancy stipulation is proposed for these parcels but we do not concur that this will result in leasing these parcels having no adverse effects to historic properties.

Regarding Parcels 014 near Nine Mile Canyon the report states that despite the incomplete nature of the cultural resource inventories of the parcels a number of sites have been identified in and around the parcel, but then concludes that the BLM determines that a five acre parcel area could be developed within these parcels with no adverse effects to historic properties. This determination reflects a lack of identification and survey rather than a lack of sites.

Leasing of additional parcels around Nine Mile Canyon will also lead to increased and cumulative industrial traffic, noise and pollution on and around the so called Nine Mile Canyon Scenic By-way. Therefore, we request Parcels 009, 010, and 014 be withdrawn from this lease sale.

Regarding parcels with no identified cultural resources, we do not concur that no survey and no identified sites constitutes a good faith effort pursuant to the National Historic Preservation Act to determine that an undertaking will have no effect to cultural resources. We understand a No Surface Occupancy stipulation is proposed for Parcels 004 and 005 near Nine Mile Canyon but we do not concur that this will result in leasing these parcels having no adverse effects to historic properties.

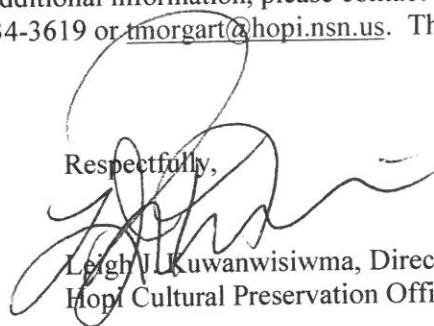
Therefore, we request Parcels 004 and 005 be withdrawn from this lease sale and we request a copy of the forthcoming cultural resources inventory report on these parcels and the previously unrecorded rock art sites in them.

Regarding Parcels 069 and 071 near Steinaker Reservoir the report states there are no identified sites in the parcels but there are 40 or more sites within one mile of their boundary. This also reflects a lack of identification and survey rather than a lack of sites. Therefore, we appreciate the No Surface Occupancy stipulations for Parcels 069 and 142, and sections of Parcels 070, 071, and 103.

In conclusion, we request Parcels 004, 005, 009, 010, and 014 be withdrawn from this lease sale.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or tmorgart@hopi.nsn.us. Thank you for your consideration.

Respectfully,



Leigh J. Kuwanwisiwma, Director
Hopi Cultural Preservation Office

xc: BLM State Director
Utah State Historic Preservation Office
Steve Bloch, SUWA