



Timothy L. Nuvangyaoma
CHAIRMAN

Clark W. Tenakhongva
VICE-CHAIRMAN

November 15, 2018

Lance Porter, District Manager
Attention: Ashley Losey, Archaeologist
Bureau of Land Management, Moab Field Office
82 East Dogwood
Moab, Utah 84532

Dear District Manager Porter,

This letter is in response to your correspondences dated September 5 and November 1, 2018, regarding cultural resources comments for the Bureau of Land Management (BLM) Canyon Country District December 2018 Oil and Gas Lease Sale.

The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the BLM Canyon County District Office's continuing solicitation of our input and your efforts to address our concerns.

In the enclosed letter dated July 23, 2018, we stated we understand the BLM proposes to offer 37 parcels totaling 53,976 acres within the Moab and Monticello Field Offices. We now understand 36 parcels are proposed for this lease sale with parcel 297 transferred to the Vernal Field Office lease sale.

We previously reviewed the Instruction Memorandum No. 2018-034 Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews, the purpose of which is to "simplify and streamline the leasing process to alleviate unnecessary impediments and burdens, to expedite the offering of lands for lease ..." We noted we have not been consulted on this Instructional Memorandum and we oppose "The BLM will not initiate any new Master Leasing Plans or complete ongoing MLPs under consideration of land use plan amendments."

In the enclosed letter dated August 16, 2018, we reviewed an interim parcel and cultural resources information including a table with information regarding known sites within a half mile of each parcel. Based on our review of the known sites in the area of potential effect and within the parcels we stated we have concerns with parcels 255 and 259 in the Moab Field Office

and parcels 301, 302, 303, 323, 324, 326, 327, 328, 329, 330, 361, 362, 363, 364, and 365 in the Monticello Field Office.

We have now reviewed the enclosed literature review. The Analysis cites “unique cultural resource density in the Monticello Field Office.” We reiterate that the co-mingling of energy development and cultural resource protection has been demonstrated to result in indirect and direct adverse effects to cultural resources. Reasonably Foreseeable Development for a given parcel as “the expected disturbance for a single pad,” between 8 and 15 acres, is a ridiculous scenario for a parcel containing a landscape composed of numerous identified and even more numerous unidentified cultural resources.

We also concur with the Advisory Council on Historic Preservation that “it is simply impossible for an agency to take into account the effects of its undertaking on historic properties if it does not even know what those historic properties are in the first place.” Therefore we do not support approving leases in areas of high identified and unidentified site densities. We also do not believe that camouflaging or painting of the more permanent structures justifies a determination of “no adverse effect” pursuant to the National Historic Preservation Act

That the Monticello Field Office is not “pristine” does not justify imposing multi-use energy first policies on the “unique cultural resource density in the Monticello Field Office.” Because the reasonably foreseeable development scenario is arbitrary and capricious, the determination of no adverse effect is equally arbitrary and capricious.

We note the Literature Review Appendix A Field Office Analysis differs widely from the enclosed Canyon County District Site Summary by Parcel with your August 1, 2018 correspondence. For example, in the Moab Field Office, Parcel 255 is listed as having 59 Total Sites in the APE and 22 Total Sites in Parcel, and Parcel 259 is listed as having 90 Total Sites in the APE and 44 Total Sites in Parcel. The Literature Review for Moab Field Office Group 3 including Parcels 255, 258. And 259 cites 18 Sites Recorded and 13 sites within ½ mile.

And therefore we now request the BLM withdraw from this lease sale the following parcels in the Monticello Field Office, including parcels that fall within the Alkali Ridge Area of Critical Environmental Concern. (The sites in parentheses are from the Site Summary by Parcel.)

Parcel	Acres	Survey %	Sites	Eligible	Sites within ½ Mile
301	357	9	19 (19)	14	67 (96)
302	320	17	3 (35)	2	13 (126)
303	2238	14	35 (33)	21	66 (97)
323	657	15	5 (18)	3	15 (48)
324	2313	9	11 (18)	6	8 (48)
326	2549	23	48 (61)	29	68 (138)

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327	2240	32	64 (67)	49	166 (244)
328	1702	22	52 (49)	45	185 (326)
329	399	95	17 (18)	14	92 (110)
330	1914	23	25 (27)	21	43 (71)
361	2518	8	37 (36)	30	44 (83)
362	2544	8	23 (24)	16	36 (59)
363	2559	22	61 (72)	59	64 (242)
364	1877	20	72 (79)	64	182 (260)
365	2240	23	27 (31)	20	101 (141)

In your effort to continue to improve the BLM's communications with tribes and pueblos, we request that the parcels we request to be withdrawn from this lease sale be withdrawn: Parcels 301, 302, 303, 323, 324, 326, 327, 328, 329, 330, 361, 362, 363, 364, and 365 in the Monticello Field Office.

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,



Stewart B. Koyiyumptewa, Program Manager
Hopi Cultural Preservation Office

Enclosures: July 23 and August 16, 2018 letters

xc: Steve Bloch, SUWA
BLM, Moab and Monticello Field Offices
Utah State Historic Preservation Office



Timothy L. Nuvangyaoma
CHAIRMAN

Clark W. Tenakhongva
VICE-CHAIRMAN

August 16, 2018

Lance Porter, District Manager
Attention: Ashley Losey, Archaeologist
Bureau of Land Management, Moab Field Office
82 East Dogwood
Moab, Utah 84532

Dear District Manager Porter,

This letter is in response to your correspondence regarding additional parcel information for the Bureau of Land Management (BLM) Canyon Country District December 2018 Oil and Gas Lease Sale. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the BLM Canyon County District Office's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office requests consultation on any proposal in Utah with the potential to adversely affect prehistoric cultural resources. In the enclosed letter dated July 23, 2018, we stated we understand the BLM proposes to offer 37 parcels totaling 53,976 acres within the Moab and Monticello Field Offices.

We reviewed the Instruction Memorandum No. 2018-034 Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews, the purpose of which is to "simplify and streamline the leasing process to alleviate unnecessary impediments and burdens, to expedite the offering of lands for lease ..." and noted we have not been consulted on this Instructional Memorandum and we oppose "The BLM will not initiate any new Master Leasing Plans or complete ongoing MLPs under consideration of land use plan amendments."

Your correspondence states "the BLM is continuing to improve its communications with tribes and pueblos..." We appreciate the enclosed interim parcel and cultural resources information including a table with information regarding known sites within a half mile of each parcel.

Lance Porter
August 16, 2018
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Based on our review of the known sites in the area of potential effect and within the parcels we have concerns with parcels 255 and 259 in the Moab Field Office and parcels 301, 302, 303, 323, 324, 326, 327, 328, 329, 330, 361, 362, 363, 364, and 365 in the Monticello Field Office.

Therefore, we look forward to receiving a copy of the literature review in late August and the draft environmental assessment for review and comment. In your effort to continue to improve its communications with tribes and pueblos, we request that the parcels we will request to be withdrawn from this lease sale be withdrawn.

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,

A handwritten signature in black ink, appearing to read "Stewart B. Koyiyumptewa", followed by a stylized flourish.

Stewart B. Koyiyumptewa, Interim Manager
Hopi Cultural Preservation Office

Enclosure: July 23, 2018 letter

xc: Steve Bloch, SUWA
BLM, Moab and Monticello Field Offices
Utah State Historic Preservation Office



Timothy L. Nuvangyaoma
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Clark W. Tenakhongva
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July 23, 2018

Lance Porter, District Manager
Attention: Ashley Losey, Archaeologist
Bureau of Land Management, Moab Field Office
82 East Dogwood
Moab, Utah 84532

Dear District Manager Porter,

This letter is in response to your correspondence regarding the Bureau of Land Management (BLM) Canyon country District December 2018 Oil and Gas Lease Sale, with an enclosed Instruction Memorandum No. 2018-034 Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews.

The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Utah. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be “footprints” and Traditional Cultural Properties. Therefore, we appreciate the BLM Canyon County District Office’s continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office requests consultation on any proposal in Utah with the potential to adversely affect prehistoric cultural resources. We understand the BLM proposes to offer 37 parcels totaling 53,976 acres within the Moab and Monticello Field Offices. We also understand a cultural resources literature review will be conducted and an environmental assessment will be developed. Therefore to enable us to determine if this proposal may affect cultural resources significant to the Hopi Tribe, please provide us with copies of the literature review and draft environment assessment for review and comment.

We have reviewed the enclosed Instruction Memorandum No. 2018-034 Updating Oil and Gas Leasing Reform – Land Use Planning and Lease Parcel Reviews, the purpose of which is to “simplify and streamline the leasing process to alleviate unnecessary impediments and burdens, to expedite the offering of lands for lease ...” We have not been consulted on this Instructional Memorandum and we oppose “The BLM will not initiate any new Master Leasing

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Plans or complete ongoing MLPs under consideration of land use plan amendments," specifically in the Vernal and Farmington Field offices.

Your correspondence states "the decision has been made to lease areas available for leasing with appropriate resource protection stipulations..." However, we are aware of a breach of confidentiality in which the BLM has released the locations of over 900 archaeological sites in Utah in its efforts to comply with the laws cited in its correspondences for the December 2018 Oil and Gas Lease Sale and the Instructional Memorandum purpose of which is to "simplify and streamline the leasing process to alleviate unnecessary impediments and burdens..."

Therefore, we have determined that the BLM has not met requirements related to the National Historic Preservation act, and has not fulfilled all tribal consultation requirements. And therefore, we hereby request the BLM cancel the December 2018 Oil and Gas Lease Sale pending consultation on mitigation of this breach of confidentiality which threatens our ancestral cultural resources the BLM is mandated to preserve and protect.

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,



Stewart B. Koyiyumptewa, Interim Manager
Hopi Cultural Preservation Office

xc: Steve Bloch, SUWA
BLM, Moab and Monticello Field Offices
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