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CHAIRMAN

Alfred Lomahquahu Jr.
VICE-CHAIRMAN

July 27, 2017

Doug Rowles
Bureau of Land Management
82 East Dogwood
Moab, Utah 84532

Re: Canyon County District March 2018 Oil and Gas Lease Sale

Dear Mr. Rowles,

This letter is in response to a Press Release dated June 29, 2017 regarding the Canyon County District March 2018 Oil and Gas Lease Sale including 45 parcels totaling 57,074 acres, DOI-BLM-UT-Y010-2017-0240-EA. 25 parcels are on the Monticello Field Office and 20 are on the Moab Field Office.

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, Moab and Monticello Field Offices' continuing solicitation of our input and your efforts to address our concerns.

As the Hopi Cultural Preservation Office has repeatedly stated previously, commingling of areas of high densities of prehistoric sites significant to the Hopi Tribe with energy development will lead to adverse effects to those prehistoric sites, and that preservation of cultural resources in areas of high site density is incompatible with energy development in the same area.

Therefore, we look forward to the BLM initiating government to government consultation on this proposal. However, we have reviewed the Public Scoping Notice and understand three parcels proposed for oil and gas leasing are in the southern end of Recapture Canyon, which contains cliff dwellings of our ancestors that the BLM says "are essential to understanding the story of the earliest inhabitants of the American Southwest." In addition, we have consulted on management conflicts in and around Recapture Canyon for many years and recommended cultural resource preservation over other conflicting uses including all terrain vehicle trails. Therefore, we hereby request that these parcels be withdrawn from this lease sale.

We also understand many of these parcels were deferred from the February 2015 oil and gas lease sale, and sufficient efforts to inventory cultural resources of the area have not yet been undertaken.

In the enclosed letter dated July 2, 2014, regarding 76 parcels are proposed for the February 2015 lease sale, we stated that we believe it is inappropriate to make determinations of effect pursuant to the National Historic Preservation Act based on no or little information, and asked what is the point of designating an Area of Critical Environmental Concern which is supposed to prioritize preservation of cultural resources if the BLM blankets it with oil and gas leases.

In the enclosed letter dated September 2, 2014, we stated that by this we mean little or no previous cultural resources survey, resulting in no sites previously identified, resulting in a determination of "No Historic Properties Affected." We also noted a Interior Department Board of Land Appeals ruling that states that BLM is under no obligation to sell every parcel that it lists in its oil and gas lease sale notices.

In the enclosed letter dated October 6, 2014, we reviewed the draft environmental assessment stated that we appreciated that the BLM acknowledges "the issuance of a lease is considered to be an irretrievable commitment of resources" and six parcels are recommended for deferral based on Native American consultation and cultural resource analysis. We stated we understood nearly 60% of the 39,000 acre Alkali Ridge Area of Critical Environmental Concern has already been leased and this Environmental Assessment proposes the leasing of another 16%.

In the enclosed letter dated December 17, 2014, we reviewed a Class I cultural resources overview supplementing the draft Environmental Assessment, DOI-BLM-UT-Y020-2014-026, for the February 2015 Oil and Gas Lease Sale. The Class I Cultural Resources Inventory which showed 20 parcels have medium to high site densities and 6 have high site densities have been withdrawn from the lease sale. We reiterated the request for deferral of the 6 additional parcels composing 6,320 acres within the 39,000 acre Alkali Ridge Area of Critical Environmental Concern and stated we do not believe the policy of "leasing first and surveying later" is in compliance with the National Historic Preservation Act.

We concur with the Advisory Council 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."

Also enclosed are our 2014 letter to the President and Utah Congressional delegation requesting the protection of Cedar Mesa, Montezuma Creek and Alkali Ridge, and our May 25, 2017 letter to Secretary Zinke supporting the addition of Alkali Ridge and Montezuma Creek to Bears Ears National Monument. Therefore, we request all the parcels in the Montezuma Creek and Alkali Ridge area be withdrawn from this lease sale.

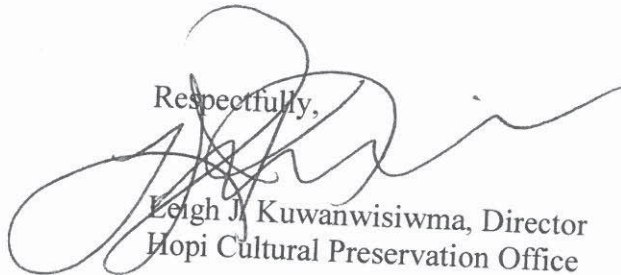
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Therefore, our initial response to the public scoping notice is to request withdrawal of the following parcels from this lease sale: 028, 029, 030, 031, 032, 033, 034, 036, 037, 038, 039, 040, 041, 042, 043, 044, 047, 048, 049, 050, 051.

And therefore, we have determined that this proposal will adversely affect cultural resources significant to the Hopi Tribe and we request continuing consultation on this proposal including be provided with copies of the Class I cultural resources survey of the area of potential effect and draft environmental assessment for review and comment. We will continue to request the withdrawal of these parcels throughout the National Environmental Policy Act and National historic Preservation Act consultations. Subsequent to review of the Class I cultural resources survey report, we may also request the withdrawal of additional parcels proposed for the March 2018 oil and gas 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

Enclosures: July 2, September 2 and October 6, 2014 letters to BLM
September 30, 2014 letter to President and Utah Congressional Delegation
May 25, 2017 letter to Secretary Zinke

xc: Josh Ewing, Friends of Cedar Mesa, 300 E. Main St., P.O. Box 338, Bluff, UT 84512
Lance Porter, Don Hoffheins, Lisa Bryant, BLM Moab Field Office
Steve Bloch, Southern Utah Wilderness Alliance
BLM State Director
Utah State Historic Preservation Office
National Trust for Historic Preservation

October 16, 2017

Gary Torres, Acting District Manager
Attention: Cameron Cox, Archaeologist
Bureau of Land Management, Canyon Country District Office
82 East Dogwood
Moab, Utah 84532

Re: Canyon County District March 2018 Oil and Gas Lease Sale

Dear Mr. Torres,

This letter is in response to your correspondence dated September 25, 2017, with an enclosed cultural resources review, regarding the Canyon County District March 2018 Oil and Gas Lease Sale now including 43 parcels totaling 40,886 acres, DOI-BLM-UT-Y010-2017-0240-EA.

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, Moab and Monticello Field Offices' continuing solicitation of our input and your efforts to address our concerns.

In the enclosed letter dated July 27, 2017, the Hopi Cultural Preservation Office responded to a BLM Press Release for this lease sale we stated we understood three parcels proposed for oil and gas leasing are in the southern end of Recapture Canyon, which contains cliff dwellings of our ancestors that the BLM says "are essential to understanding the story of the earliest inhabitants of the American Southwest."

We also stated we understood many of these parcels were deferred from the February 2015 oil and gas lease sale and enclosed our letters dated July 2, September 2, October 6 and December 17, 2014. We also enclosed are our 2014 letter to the President and Utah Congressional delegation requesting the protection of Cedar Mesa, Montezuma Creek and Alkali Ridge, and our May 25, 2017 letter to Secretary Zeinke supporting the addition of Alkali Ridge and Montezuma Creek to Bears Ears National Monument.

We requested three Recapture parcels and all the parcels in the Montezuma Creek and Alkali Ridge area be withdrawn from this lease sale, including parcels 028, 029, 030, 031, 032, 033, 034, 036, 037, 038, 039, 040, 041, 042, 043, 044, 047, 048, 049, 050, and 051. In the enclosed letter dated August 23, 2017 letter, we reiterated our request that these parcels be withdrawn from this lease sale.

We have now reviewed the enclosed literature review. We note the low site densities in the Moab parcels and the high site densities in the Monticello parcels. The sites listed are in areas that have been surveyed for cultural resources. High densities of unidentified cultural resources are also present on the Monticello parcels. The parcels we are requesting to be withdrawn from this lease sale are described in the literature review as follows:

Parcel	Acres	Surveyed	Sites Recorded	Eligible	Sites ½
028	640	115	21	13	105
029	1,663	352	59	52	105
030	2545	534	107	99	202
031	1884	404	59	47	77
032	1920	450	82	69	182
033	1080	576	33	27	173
034	1280	476	40	30	42
036	1537	235	12	4	28
037	1600	469	31	24	98
038	2305	1167	206	145	228
039	1320	393	30	26	80
040	646	336	42	36	52
041	1280	284	31	30	114
042	1093	231	26	23	43
043	1200	320	68	62	76
044	1600	351	41	35	85
047	1941	318	33	28	48
048	1280	431	25	23	45
049	640	157	15	14	42
050	965	409	24	10	25
051	1960	1081	30	24	101

In addition, Parcel 028 is 96% within the Alkali Ridge Area of Critical Environmental Concern, Parcel 029 spans Recapture Creek, Parcel 030 spans Recapture Creek and 9% is within the Alkali Ridge ACEC, Parcel 031 spans the confluence of Recapture Creek, Parcel 033 is 78% within the Alkali Ridge ACEC, Parcel 036 is 11% within the San Juan River ACEC, Parcel 037 is 13% within the Alkali Ridge ACEC, Parcel 038 is 100% within the Alkali Ridge ACEC and

less than a mile from the NHL, Parcel 039 is 100% within the Alkali Ridge ACEC, Parcel 040 is 29% within the Alkali Ridge ACEC.

Gary Torres

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As we have repeatedly stated previously, commingling of areas of high densities of prehistoric sites significant to the Hopi Tribe with energy development will lead to adverse effects to those prehistoric sites, and that preservation of cultural resources in areas of high site density is incompatible with energy development in the same area. We also reiterate that we have determined that this proposal will adversely affect cultural resources significant to the Hopi Tribe. Therefore, we reiterate our request that parcels 028, 029, 030, 031, 032, 033, 034, 036, 037, 038, 039, 040, 041, 042, 043, 044, 047, 048, 049, 050, and 051 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

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