



Timothy L. Nuvangyaoma  
CHAIRMAN

Craig Andrews  
VICE-CHAIRMAN

November 14, 2023

Tracy Stone-Manning, Director  
Bureau of Land Management  
1849 C Street NW  
Washington, DC 20240

Dear U.S. Bureau of Land Management Director Stone-Manning,

With this notice the Hopi Tribe joins the Pueblo of Zuni, the San Carlos Apache Tribe, the Tohono O'odham Nation, and Archaeology Southwest in the findings of fatal flaws in the process used by the Bureau of Land Management (BLM) to complete the National Historic Preservation Act (NHPA) Section 106 process for the proposed SunZia Undertaking. The Hopi Tribe previously responded to BLM correspondence in letters dated June 9, 2009; May 2 and December 4, 2012; July 22, 2013; April 12, 2017; and February 15, 2018. Despite our requests and suggestions, BLM proceeded to approve two final environmental impact statements and the substandard historic property treatment plans—all without effective effort to place the archaeological surveys in the broader contexts of region-scale Hopi, O'odham, Zuni, or Apache history and geography. BLM attempted without authority or success to transfer to Tribes the duty to identify historic property of religious or cultural significance. When the Hopi Tribe and other Tribes refused to do this work for BLM and the SunZia proponent for free, BLM and the proponent opted to ignore the abundant and well published evidence for the religious and cultural significance of the San Pedro Valley. These reckless and harmful actions are inconsistent with multiple policies and the BLM fiduciary responsibility.

After more than a decade of fruitless exchanges, the Hopi Tribe is pleased to find BLM attention directed toward meaningful consultation, as defined in the NHPA regulations (36 CFR 800.16(f)): "seeking, discussing, and considering the views of other participants, and, where feasible, seeking agreement with them regarding matters arising in the section 106 process." Having all but lost hope in BLM leadership and in protecting the San Pedro Valley as an integral part of the Hopi Tribe area of cultural affinity and sacred homeland, we now join the disputing parties. We must insist that BLM complete for the San Pedro Valley the identification process prescribed at 36 CFR 800.4, the assessment of adverse effects prescribed at 36 CFR 800.5, and the resolution of adverse effects prescribed at 36 CFR 800.6.

The NHPA and its implementing regulations place primary emphasis on the avoidance of adverse effects (see 36 CFR 800.1(a), 800.6(a)), and so does the Hopi Tribe. We call upon our Trustee to give special attention to the sworn statement of SunZia's project manager, Tom Wray, during the 2015 AZ Line Siting hearings to the effect that a single 500 kV SunZia line could be double-circuited with one of the several EHV lines running through Tucson area.

The Hopi Tribe is committed to the timely resolution of this dispute in solidarity with the other disputing parties and in collaboration with BLM. Please include the Hopi Tribe in all correspondence and consultations regarding this important matter.

Respectfully,



Stewart B. Koyiyumptewa  
Program Manager/THPO  
Cultural Preservation Office  
The Hopi Tribe

Cc: Timothy L. Nuvangyaoma, Chairman, the Hopi Tribe  
Dr. Carrie Joseph, Director, Department of Natural Resources