

THE HOPI TRIBE

Hopi Cultural Preservation Office

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CHAIRMAN

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April 6, 2007

Sandra A. Meyers, Field Office Manager
Bureau of Land Management, Monticello Field Office
P.O. Box 7
Monticello, Utah 84535

Dear Ms. Meyers,

Thank you for your correspondence dated March 7, 2007, regarding the proposed programmatic Special Recreation Permit: Jeep Use in Arch Canyon and Hotel Rock. As you know from our previous consultations and our March 21st administrative meeting, the Hopi Tribe claims ancestral and cultural affiliation to prehistoric cultural groups in the Monticello Field Office area, and therefore the Hopi Cultural Preservation Office appreciates the Field Office's continuing solicitation of our input and your efforts to address our concerns.

As you also know from our previous consultations and administrative meeting, the Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties. We have reviewed the enclosed Proposed Action and Cultural Resource Impact Analysis and Mitigating Measures and Environmental Assessment UT-090-07-010, and we find them inadequate in addressing the Southern Utah Wilderness Alliance *A Petition to Preserve Arch Canyon's Natural and Cultural Heritage*, Jerry D. Spangler's *Site Condition and Vandalism Assessment of Archaeological Sites, Lower and Middle Arch Canyon, San Juan County, Utah*, and the Hopi Tribe's January 24, 2007, request for the immediate interim closure of the Arch Canyon road and the adjacent Hotel Rock trail.

Rather than doubling the permitted Special Use Permit use on these two routes, we believe the Moab Field Office should consider the National significance of identified and unidentified prehistoric cultural resources that may be adversely affected by this proposed doubling of use including the Jeep Jamboree, Cruise Moab/Rising Sun, and additional four-wheel drive tours. It appears the Moab Field Office is being driven by a timetable of accommodation allowing minimal National Environmental Policy Act evaluation, review, and comment prior to the April 21 and May 3, 2007, scheduled and advertised dates for the Jeep Jamboree and Cruise Moab tours.

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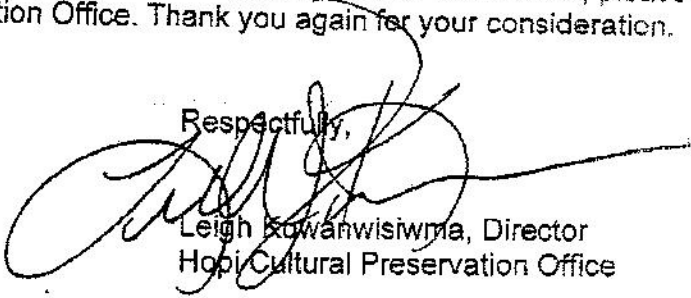
As we indicated in our administrative meeting on issues raised in the *Petition and Assessment*, we specifically support addressing the *Assessment* conclusion that "Cultural resources in Arch Canyon will continue to deteriorate without an aggressive management plan that includes public outreach, limitations on vehicular access, site stabilization and better management of pedestrian traffic on and around significant sites."

Therefore, in regard to EA UT-090-07-010, we have determined that the Proposed Action has the potential to adversely affect identified and unidentified cultural resources significant to the Hopi Tribe. And therefore, in regard to this Environmental Assessment, we support the SUWA *Petition*, the Spangler report recommendations, and our previous request for the interim closure of the Arch Canyon road, and the No Action Alternative.

Nevertheless, we hope to continue consultations on developing an aggressive management plan that includes public outreach, limitations on vehicular access, site stabilization and better management of pedestrian traffic on and around significant sites, as well as permanent protection and preservation actions for identified and unidentified prehistoric sites in Arch Canyon.

Should you have any questions or require additional information, please contact the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,



Leigh Kowanwisiwma, Director
Hopi Cultural Preservation Office

cc: Liz Thomas, Southern Utah Wilderness Alliance
Utah State Historic Preservation Office