THE HOPI TRIBE

Timothy L. Nuvangyaoma
Chairman

Craig Andrews
Vice Chairman

October 11, 2022

Mr. Ramon Williams
Federal Communications Commission (FCC)
45 L Street NE
Washington DC 20554

Re: Tilson Technology Management 100-foot monoelm telecommunications tower - ASR A1208809

Dear Mr. Williams,

The Hopi Tribe has decided to reverse its April 5, 2022, concurrence to formally oppose the proposed Tilson Technology Management 100-foot monoelm telecommunications tower ASR A1208809 in response to a notice on September 11, 2022, in the Verde Independent.

The Hopi Tribe has determined that the proposed tower would irreparably disturb critical viewshed and ancestral settlements of the Hopi Bear clan burial mounds found on either side of the proposed tower site. The proposed location is also on the Tribe's ancestral *Palatkwapi* Trail system. Hopi ancestors took these trails in their migration from Mesoamerica to our current homelands in northeast Arizona. This trail continued to be used for trading and ceremony pilgrimages until the modern development and ownership of the property prevented access into these areas. Our relationship with this area continues today.

The proposed tower site was not evident in the limited materials and descriptions forwarded to the Tribe, nor were we able to prepare our reversal and opposition statement in the last window for public comment, which closed on July 18. Combined with staffing shortages, this period coincided with one of our Tribe's most essential and busiest annual ceremonial seasons.

Title 36 CFR 800.16(d) states that the *Area of Potential Effects is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist. The area of potential effects is influenced by the scale and nature of the undertaking and may be different for different kinds of effects caused by the undertaking.*

The project includes the Cornville and Little Cornville Ruins and the Ottens and Sheeps Head mounds. These uniquely punctuate the opposing loops of Oak Creek, also in mirror fashion. These mirroring relationships are significant geographic features that translate into traditional visual relationships of ceremonial significance. The Cornville and Little Cornville mesas have cultural sites that point towards the east. This orientation to the rising sun is ceremonial. The Hopi calendar

includes the sun's path on the horizon between solstices and has guided the Hopi people's ceremonial, planting, growing, and harvesting calendar for thousands of years.

The Tilson documents in the ASR 1208809 FCC indicate the scale of the proposed tower would be equivalent to a 10-story high building in height with the crown of the antenna on par with and between the Cornville and Little Cornville ruins. The proposed 100-foot-tall undertaking would obstruct the mesas' viewshed toward the sun, an adverse effect on the visual integrity of the tribe's cultural landscape. The sugarloaf mound on the east side loop of Oak Creek is registered as Ottens Burial Mound under the Archeological Conservancy, with an undisclosed address to protect the burial site. The Ottens mound would be directly and wholly obstructed from the Cornville Ruin because of the scale of the proposed project. This visual relationship is of cultural and ceremonial interest to the Tribe, as the visual relationship from ruin to burial mound is how the modern Hopi people stayed close to the departed, not unlike family cemeteries near homes on people's private properties in American culture.

This area is also part of a larger cultural and geographic landscape of mesa top ruins, further up and down along Oak Creek and on the main Verde River that Oak Creek flows into. The Bear Clan is one of the first clans to arrive in the area. The first of many clan migrations to settle in the surrounding of the proposed site. The Cornville and Little Cornville ruins and adjacent ruins and mounds are part of the Hopi historical footprint.

Please see attached Exhibit B: Arizona SHPO Form cover form, page 94 of Tilson's Exhibit A: Response for Additional Environmental Review (2) found in the FCC ASR 1208809. Tilson's archeological consultant Tara Cubie indicates on this form a standardized choice of Area of Potential Effect (APE) of 1/2 mile. Ms. Cubie also checks the box indicating "no" cultural resources are present in this APE when their limited topographical map shows both the Cornville and Little Ruins present. According to the guidelines found in Title 36 CFR 800.16 (d), and given the features of our surrounding cultural and historical landscape detailed above, the Hopi Tribe determines that the standardized 1/2 mile APE choice is an inaccurate determination. The immediately surrounding setting of the proposed site is part of the larger geographic landscape, including the two ruins, the two mounds, and the *Palatkwapi* Trail, passing through the exact area of the proposed site. A proper archeological survey of the surrounding geographic setting should have been conducted, as required by the Title 36 CFR 800.16 (d) guideline. With the survey, the full extent of the APE would have become apparent. Therefore, the Tribe opposes using a standardized and inaccurate 1/2-mile APE.

The ecosystem within Oak Creek for the Hopi Tribe is also a vital part of our cultural and geographic landscape. The Cornville and Little Cornville villages also orient to the Creek, a life-giving being. The Hopi people are traditional stewards of the Earth and have recognized for millennia the interdependency of people and the ecological life that sustains all of us. These relationships between humans and ecological life are fragile.

The nature of this proposed Tilson undertaking is the introduction of artificial 4GLTE and 5G electromagnetic microwave radiation to the surrounding setting, which will significantly disturb the natural electromagnetic fields of the air and the Earth. The Tribe foresees, adverse ecological and biological impacts on the surrounding wildlife and habitats from the cell tower. The FCC RF

guidelines per *EHT et al. vs. FCC*, on August 13, 2021, were found not to protect these vulnerable wildlife species, ecosystems, or habitats. The Hopi Tribe opposes the proposed tower siting for its extreme proximity to the Creek because of this surrounding natural setting.

I thank the FCC for considering the Hopi Tribe's opposition and requesting the denial of this tower at this location. Please contact me at SKoyiyumptewa@hopi.nsn.us or (928) 734-3615.

Sincerely,



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

Cc: Kathryn Leonard, State Historic Preservation Officer
Office of the Chairman
Carrie Joseph, Director, DNR

Exhibits A and B attached