

The Great Spirit created Man and Woman in his own image. In doing so, both were created as equals. Both depending on each other in order to survive. Great respect was shown for each other; in doing so, happiness and contentment was achieved then, as it should be now.

The connecting of the Hair makes them one person; for happiness or contentment cannot be achieved without each other.

The Canyons are represented by the purples in the middle ground, where the people were created. These canyons are Sacred, and should be so treated at all times.

The Reservation is pictured to represent the land that is ours, treat it well.



The Reservation is our heritage and the heritage of our children yet unborn. Be good to our land and it will continue to be good to us.

The Sun is the symbol of life, without it nothing is possible - plants don't grow - there will be no life - nothing. The Sun also represents the dawn of the Hualapai people. Through hard work, determination and education, everything is possible and we are assured bigger and brighter days ahead.

The Tracks in the middle represent the coyote and other animals which were here before us.

The Green around the symbol are pine trees, representing our name Hualapai - PEOPLE OF THE TALL PINES -

Damon R. Clarke, Ed.D.
Chairman

HUALAPAI TRIBE
OFFICE OF THE CHAIRPERSON

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Phillbert Watahomigiz, Sr.
Vice Chairman

November 14, 2019

Kimberly D. Bose, Secretary
Department of Energy
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, D.C. 20426

Re: Docket Nos. P-14992 and P-14994, Pumped Hydro Storage LLC Notice of Preliminary Permit Application Accepted for Filing and Soliciting Comments, Motions to Intervene and Competing Applications

Dear Secretary Bose:

On behalf of the Hualapai Tribe, we write to express our concerns regarding the applications for preliminary permits submitted by Pumped Hydro Storage, LLC, pursuant to section 4(f) of the Federal Power Act (FPA), proposing to study the feasibility of pumped storage facilities in Coconino County, Arizona. These proposed projects, presumably only one of which would come to fruition if approved, are located on the Little Colorado River, not far above its confluence with the Colorado River in Grand Canyon National Park. The land jurisdiction for the proposed projects is the Navajo Nation, although they are within the ancestral territory of several other Native American tribes, including the Hualapai.

The Little Colorado River valley has been considered to be the northeastern extent of Hualapai ancestral territory since time immemorial. This has been substantiated through traditional histories, ethnohistoric evidence, and Indian Claims Commission proceedings. Archaeological data further provides evidence of ancestral occupation of the area throughout the eastern Grand Canyon region. A number of springs and other landmarks with Hualapai place names are known as well, extending to the east toward the Hopi villages. In fact, there has historically been longstanding trade and other forms of cooperation between the Hualapai and Hopi for generations, and the Little Colorado River valley was one of the primary travel corridors.

In this light, the Hualapai Tribe is deeply concerned about the devastating cultural and ecological impacts that would result from the construction of a dam and related infrastructure and facilities should a pumped storage project move forward. A project such as this would forever disturb a traditional cultural landscape that maintains historic and sacred values and that is part of the cultural identity of the Hualapai people and other neighboring tribes.

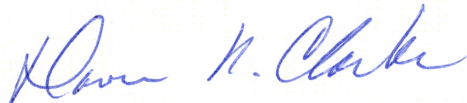
We note that in the permit application, under Section (2), there are two items that deserve mention. Subsection (2)(iv) pertains to "other political subdivisions in the general area of the project that there is a reason to believe would likely be interested in, or affected by, the application." Subsection (2)(v) pertains to "Indian tribes that may be affected by the project." Both considerations certainly should be considered relevant to the interests and potential affects to a number of regional tribes, regarded as sovereign nations by the US government, including the Hualapai Nation. Aside from the Navajo Nation, why are only federal and state agencies and utilities only considered to be "interested in, or affected by" the proposed actions?

The Hualapai Tribe has economic concerns about the proposed projects in addition to cultural issues. Tourist enterprises in the western Grand Canyon on the Colorado River, including raft trips and boat tours, are among the most important contributors to the tribal economy. Any disruptions upstream could have serious consequences to these activities, including loss of jobs to tribal members and lost revenues.

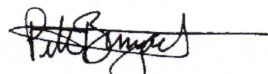
Further, the Hualapai Nation and four other tribes, including the Hopi, Navajo, Southern Paiute Consortium, and Zuni Pueblo, are active participants in the Glen Canyon Dam Adaptive Management Program (GCDAMP). For over 20 years this program has expended untold human and financial capital in order to strike a sustainable balance among the numerous and varied stakeholder interests, including protecting the vitality of the Colorado River ecosystem and the successful management of endangered native species, in compliance with the Endangered Species Act. As the Little Colorado River is an integral part of this greater ecosystem, the adverse effects likely to result from the construction and operation of a dam upstream from the confluence will upend the fragile and delicate balance that has taken so much work to achieve. Tribal values regard proper stewardship of the natural world as yet another aspect that would be endangered by either of the proposed projects.

We therefore urge the Federal Energy Regulatory Commission to reject the preliminary application at this early stage, as surely future efforts, including a National Environmental Policy Act (NEPA) analysis, will only serve to highlight these and other insurmountable issues. Thank you for your consideration, and we are happy to answer any questions you may have or provide further information.

Sincerely,



Dr. Damon R. Clarke
Chairman



Mr. Peter Bungart
Tribal Historic Preservation Officer

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