

Lake Powell Pipeline Project Draft Environmental Impact Statement

Supplement Number 3 Environmental Justice:

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February 6, 2020

Environmental Justice

Environmental Justice became one of approximately 23 variables to be considered and evaluated in a full Environmental Impact Study (EIS) in accordance with Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (59 FR 7629; February 16, 1994). Its purpose is to focus federal attention on the environmental and human health effects of federal actions on minority and low-income populations with the goal of achieving environmental protection for all communities.

The regulation was founded on the work of scholars from across the country and most notably the Institute for Social Research (ISR) at the University of Michigan, Ann Arbor, Michigan. Bunyan Bryant, a professor at ISR and the School of Natural Resources studied the differential impacts of urban development on the African Ancestry communities (Bryant 1990; Bryant and Mohar (eds.) 1992). His research data supported and concluded that poor African Ancestry people and communities located in urban areas suffered mental and physical health issues and adverse impacts to their society due to various ground-disturbing urban development especially associated with the construction of roads and other infrastructure. This work became the basis for formulating a new Environmental Justice variable for consistent application across the nation in environmental assessments and corresponding NEPA documents (<https://www.youtube.com/watch?v=hbUSzzw-b0Y>) and (<https://www.epa.gov/laws-regulations/summary-executive-order-12898-federal-actions-address-environmental-justice>).

Since that time, the environmental justice variable has been appropriately applied in assessments of Native American differential impacts including a wide range of proposed ground disturbing projects and associated federal undertakings. One notable example is the Nevada Test Site-Site Wide EIS (SWEIS) (1996, Volume 1, Appendix G), wherein Native American Environmental Justice was expanded to include Holy Land impacts, access violations along with health and social effects. The timeline for assessing Holy Land impacts caused the analysis to be expanded to include the initial periods when Native Americans living within the study area were encroached upon and forced to seek refuge in other areas. These encroachments were not approved by formal treaties and thus derived from the informal movement of United States citizens since approximately 1849 (Sutton 1996). Department of Energy concluded that Native American tribes whose Holy Lands were identified in the SWEIS would not be required to have a proportional percentage of the local population or required to be currently residing in the study area because of their unique circumstances and corresponding federal relationship and trust responsibility. These understandings continue to be acknowledged in environmental assessment work associated with numerous federal agencies within the region including but not limited to the Departments of Energy and Defense along with the United States Forest and Fish and Wildlife Services (American Indian Writers Subgroup 1996, 1999, 2013, 2016; CGTO Document Review Subgroup 2016; Stoffle et al. 2018).

The proposed LPP Area of Potential Effect (APE) crosses the Holy Land of the Southern Paiutes. It especially impacts the San Juan Southern Paiute Tribe, the Kaibab Band of Paiute Indians, and various bands represented by the Paiute Indian Tribe of Utah. The Aboriginal lands of the Southern

Paiute people, that is, those lands held exclusively by them in 1849 when the US nation assumed political control of this area from the Mexican government, were adjudicated by the US federal government in the Indian Claims Commission (Sutton 1996). Map in Figure A represents their aboriginal lands in 1849 and the Map in Figure B represents the federally recognized reserved lands of the Southern Paiute people today.

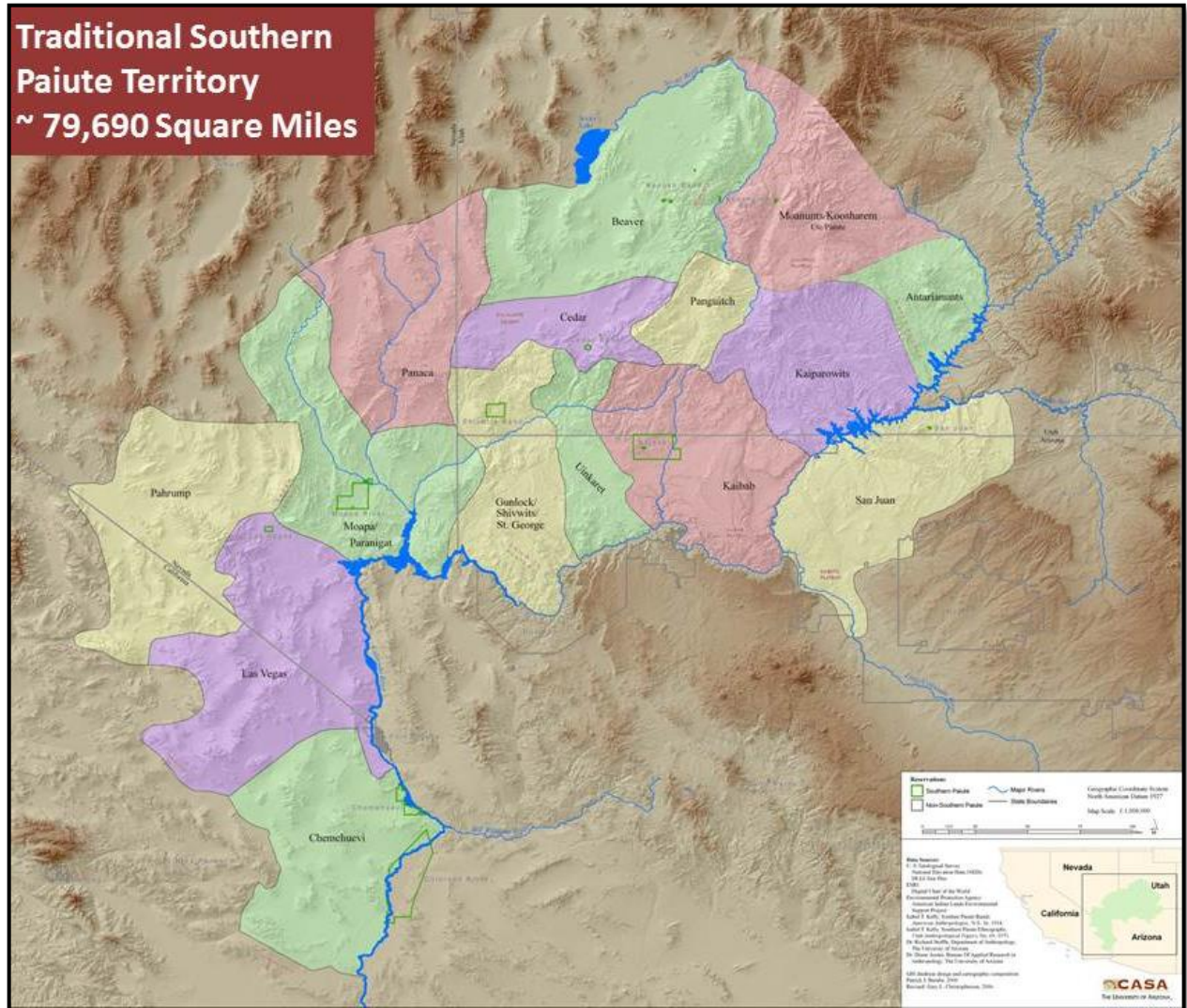


Figure A: Map of Aboriginal Southern Paiute Lands as Defined by the Indian Claims Commission and Subsequent Ethnographic Research

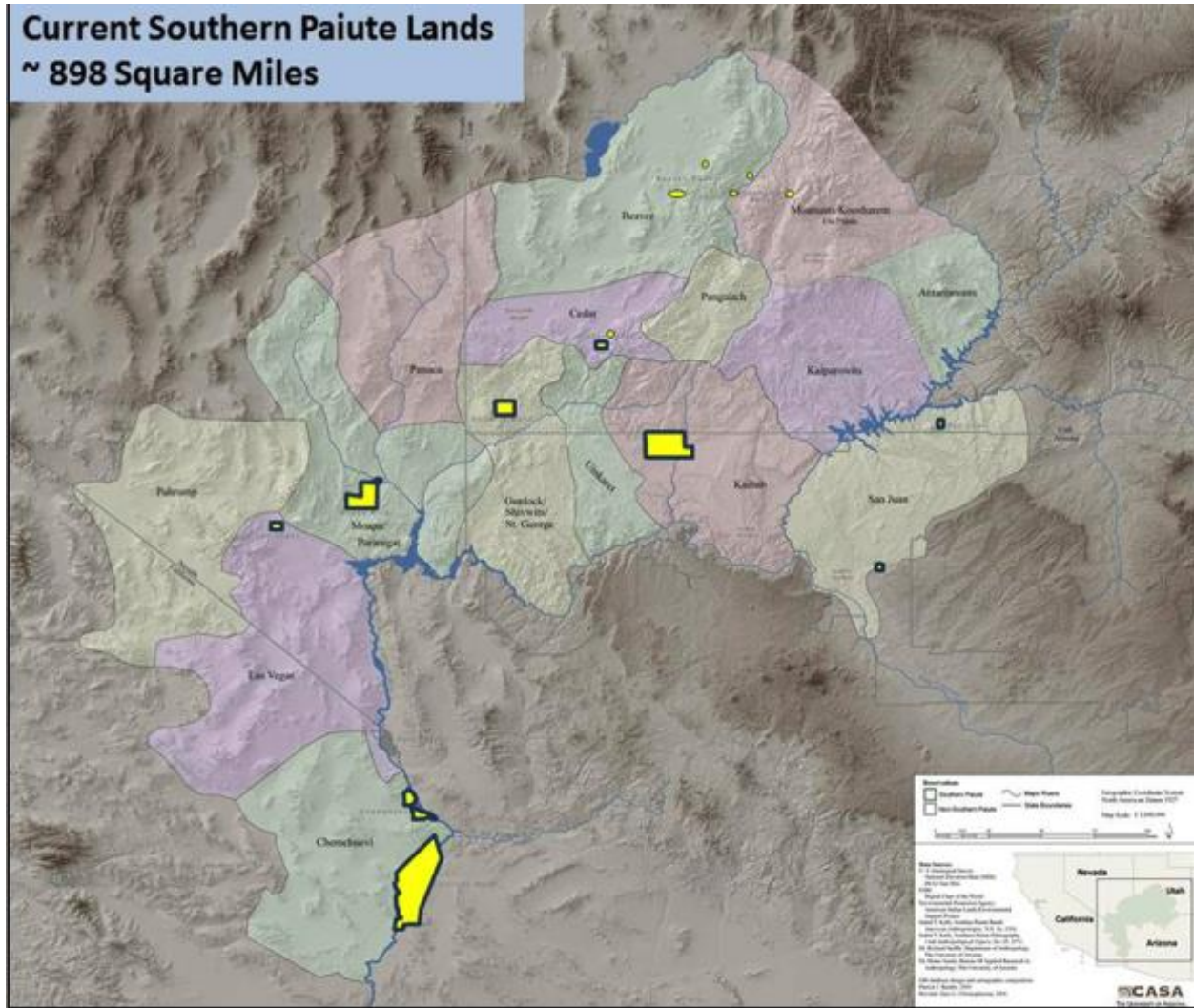


Figure B: Current Federally Reserved Southern Paiute Lands

Together these maps illustrate the major loss of aboriginal territory experienced by the Southern Paiute people. Loses are measured from about 80,000 aboriginal square miles down to 898 square miles or about .011% remaining under control by Paiute people today. This fact and its implications for health, economy, social organization, religion, and spirituality are a foundation for considering further Environmental Justice effects from LPP land disturbances. This is also the foundation for understanding Paiute cumulative impacts.

Environmental Justice and Equity

Federal agencies are directed by Executive Order 12898 to detect and mitigate potentially disproportionately high and adverse human health or environmental effects of its planned programs, policies, and activities to promote nondiscrimination among various populations in the United States. In order to accomplish this goal, the Lake Powell Pipeline must be evaluated in terms of (1) holy land violations, (2) potential health effects, and (3) access to cultural places. Evidence for each of these Environmental Justice issues is discussed below.

Holy Land

These are the lands of Creation where the Southern Paiute people were placed in mutual relationships with the world around them and given a Birth Right responsibility to use appropriately the natural resources and protect them and themselves from harm. So it was, at the moment of Creation, and so it is today.

It is difficult to explain important beliefs to someone who is not from your culture, especially in public settings and so it is rarely done. Thus it is essential to remember that over the past 13 years Paiute people have repeatedly warned in public meetings that they have deep concerns that the LPP would cause major imbalances and that the water would become angry. Balance is health for animals, plants, water, wind, soil, and people, whereas imbalance is a source of sickness and even death.

The foundation of LPP imbalance is moving the Colorado River from where the Creator placed it across a hundred miles of landscape and depositing it where it does not belong. The Colorado River is perceived as the veins of earth carrying life from one distant place to another distant place. It is central in the spiritual and physical lives and cultures of all Native American people living on the Colorado Plateau and beyond. Anything that disrupts the Creation design of the Colorado River threatens to imbalance the world.

The kinds of spiritual and cultural impacts that are expected to occur can be summarized as deriving from (1) The angry water, (2) Removing bodies and graves, (3) Disrupting ceremonial offerings, and (4) Breaking Spiritual Connections along trails.

It is a fundamental belief in Paiute culture that the world is alive as it has been since Creation. This is called an epistemological postulate and with this understanding many aspects of Paiute culture and behavior become clear. At Creation all elements of the Earth were given a spark of life that is called Puha in the Paiute language. This Creation energy permits the elements of the earth to be alive, to think, to act, to have feelings, to respond to each other and to the behaviors of humans. Achieving balance among the elements of the earth is a goal that is sought by humans through prayer and ceremony and by living and acting in an appropriate manner with the Earth.

All elements of the Earth are special and have their creation-defined purpose. Some are especially powerful and central in the integration of life. Among these are the Colorado River, the veins of mother earth moving the essential element water. At Creation the Colorado River's place and purpose was defined. The LPP project proposes to remove the Colorado River from its appropriate place and to move it elsewhere to be used in different ways. This action will make the river angry and confused, the results of which are unknown but clearly a source of imbalance in the world.

When people die they are ceremonially placed in the ground accompanied by extensive funeral ceremonies. They are told this is their resting place for all time. Paiute people do not dig them up. When non-Indians dig up the graves of the old ones it causes an imbalance. The old ones still exist elsewhere but watch over their resting places and their people. They become upset when their graves are disturbed and come to their families to ask for an explanation. Only with prayer and ceremony and a new resting place can balance be reestablished.

Prayers, activities, and offerings accompany ceremony. The latter can be bundles of special plants, valued stones, paint, and broken pottery. These offerings accumulate at locations that are visited again and again over time for ceremony. The offerings are intended to remain where they were ceremonially placed because they maintain the spiritual connection between the people, the place, the natural elements, and old ones. Removing these offerings causes a disconnection and creates an imbalance.

There are many spiritual trails established by the Creator for various purposes. These have been traveled since Time Immemorial and link together people, places, and the world. A well documented spiritual trail is a pilgrimage trail. It has a beginning, places it passes on the way, and a destination. It exists physically and spiritually. Disruption of the trail is like breaking the ties that hold the earth together. This creates a major imbalance and can result in the people being unable to pass along the trail to their destination.

The Southern Paiute Salt Song Trail to the Afterlife also exists in physical and spiritual dimensions. It was determined by the California Energy Commission that a large proposed solar facility potentially could disrupt the flow of deceased spirits along this trail preventing them from reaching the afterlife (Arnold 2013; California Energy Commission 2012). A similar impact assessment was made for radioactive waste potentially spilled on the Salt Song Trail (Stoffle and Arnold 2003; Stoffle, Arnold, Bullets 2015). The proposed LPP crossed this trail to the afterlife.

Kinds of Environmental Justice issues Along the LPP APE

Two examples of environmental justice issues that are expected to occur along LPP APE are provided here. They are effects to (1) the Milk Mountain Pilgrimage Trail and (2) an Area of Critical Plant Habitat.

The Milk Mountain Pilgrimage Trail

The pilgrimage to Milk Mountain (also known as Molly's Nipple or *Kavaicunmac* in Southern Paiute) is a large integrated cultural resource that is located within the LPP APE. This pilgrimage trail originates along the Paria River near traditional Southern Paiute agricultural communities. Once pilgrims prepared themselves spiritually and physically for their journey, they headed west towards Catstair Canyon and as they exited this narrow canyon, they traveled northward up Five Mile Valley until they reached the trail's first major water source, Five Mile Spring. From high above Five Mile Spring, the pilgrims were able to see Milk Mountain for the first time and as a result they left offerings and sent prayers across the landscape towards the mountain peak. After conducting ritual activities at Five Mile Spring, the pilgrims followed the hydrological system towards Kitchen Coral Wash and then ultimately towards the top of Milk Mountain (Van Vlack 2018).

Southern Paiutes possess a deep cultural understanding about this pilgrimage ceremony, the places visited, and relationships Southern Paiute pilgrims formed with the trail since Time Immemorial. Southern Paiute people believe that pilgrimage places and the offerings left behind contain the prayers forever and they continue to send their Puha across the landscape long after the pilgrim has finished his or her pilgrimage. This forever links, people, places, and ceremonial objects together to Southern Paiute history and cultural memory (Van Vlack 2018).

Area of Critical Plant Habitat

The Area of Critical Plant Habitat is located to the east of the Hurricane Cliffs near Gould's Pond Basin. The Southern Paiute Advisory Committee members deemed this place as an area of critical plant habitat. The Committee was concerned that those working on the vegetation studies would not devote attention to important Southern Paiute use plants outside of the Kaibab reservation boundary therefore, they wanted to designate an area specifically for ethnobotanical study to illustrate such potential impacts.

During a 2009 site visit, the Southern Paiute Advisory Committee identified twenty-nine traditional Southern Paiute plants at this location. It is believed that the construction of the holding reservoir, and associated access roads would result in massive ground disturbances that would have serious negative impacts to the plants found at this site and surrounding areas. Southern Paiutes relied upon plants for their survival, making ethnobotanical knowledge essential to their transhumant adaptive strategy for living in the desert (Stoffle and Evans 1976). An intimate knowledge of plant genetics has been suggested as a major cultural focus of desert-dwelling American Indian people (Anderson 1956; Shipek 1970). Being agriculturalists also is a cultural characteristic that separates Southern Paiutes from closely related groups in the Great Basin (Dobyns and Euler 1980).

The Highway Alternative

The Highway Alternative will directly impact traditional Paiute farming villages that were occupied from about AD 500 to AD 1300 when the weather was warmer and wetter. What are now intermittent streams were once permanent streams fed from the highlands to the north including the Vermillion Cliffs. Then as now the water flows south until it reaches Kanab Creek and from there on to the Colorado River. Former farming villages will be crossed by the LPP APE south of the Vermillion Cliffs where these streams emerge from the highlands.

Whenever a farming village is contacted the lives of the old ones will be dissected and their feelings will be upset. This is especially true when burials are dug up, but it holds for the homes, yards, and fields of the old ones.

Paiute people expressed great anguish when the expansion of High 89 disturbed these farming villages and resulted in removal of burials and artifacts and destruction of the homes of the old ones.

The Southern Alternative

The Southern Alternative has great potential to impact important Southern Paiute cultural places south of the Kaibab Paiute Reservation. These places include the (1) Ghost Dance Site, (2) the Southern Paiute Prophecy Area, (3) the Solar Observatory that includes Indian Knoll, (4) Moonshine Spring (5) Moonshine Ridge and (6) Elephant Foot. The spiritual and cultural interrelationship of these places, each of which is a Traditional Cultural Property, was the cultural rationale for the nominating them together and the spaces between as the Kanab Creek Traditional Cultural District (Figure C).

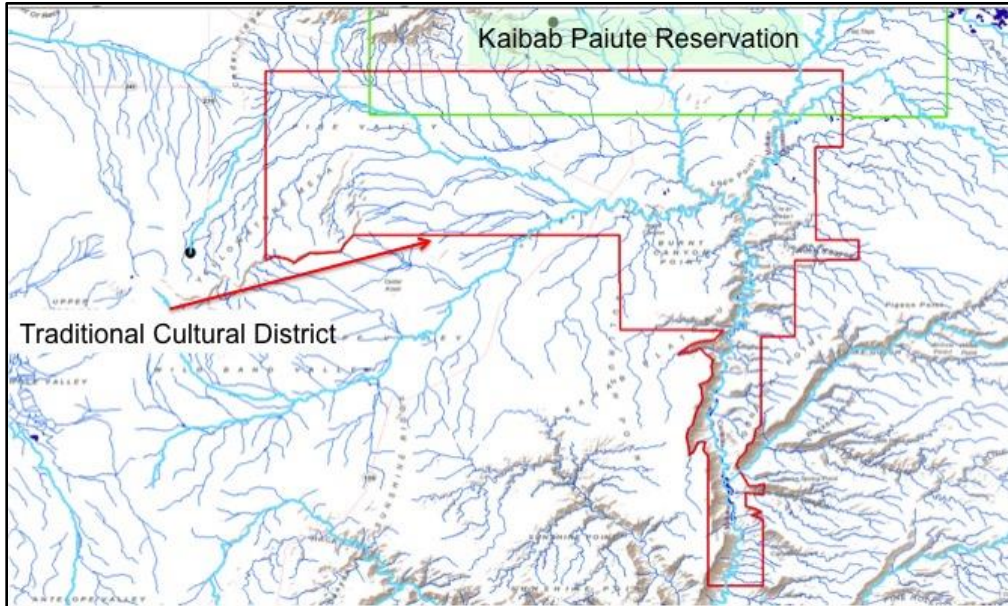


Figure C: Kanab Creek Traditional Cultural District

The Ghost Dance Site

The Ghost Dance Site would have been the main area of refuge within this landscape (Stoffle et al. 2000). The Ghost Dance Site is highly secluded, with no visibility into the area, unless one is directly over the entrance of the canyon along a bend in Kanab Creek. This area would have been adequately secluded from non-Indian settlement in the area (Carroll 2007). The canyon itself was noted as a place of power in earlier ethnographic studies of the region (Stoffle et al. 2000). The Ghost Dance of 1890 was a large world balancing ceremony that occurred throughout Native North America. Certain types of resources are required for conducting this ceremony. Many of them are found only in Kanav'uipi such as ceremonial white pigments.

This Ghost Dance ceremony was conducted at an isolated location where the canyon of Kanab Creek begins to form. At the time of the ceremony, white paintings were placed on a sandstone cliff. It is not clear from this oral testimony whether the paintings were part of the ceremony or a record of the ceremony. Either way, the rock paintings mark where the Ghost Dance occurred, according to Kaibab Paiute oral tradition.

The Ghost Dance ceremony is best understood as a response by Indian people to stresses produced when Euro-Americans encroached on Indian holy lands (Osterreich 1991). These stresses include depopulation from diseases (Thornton 1986), animal disruption of native plant areas (Crum 1994:62-63), decline of Indian food animals (Lesser 1933), dislocation from springs and rivers resulting in the loss of access to farming areas (Dobyns and Euler 1967), social disruption (Jorgensen 1986), a power shift from competition to domination (Stoffle and Evans 1976), and even religious disruption deriving from the failure of traditional religions to either explain or deal with the encroachments (Dobyns and Euler 1967:vii).

Kanab Creek Canyon and the Southern Paiute Prophecy Area

During times of extreme hardship, Southern Paiute people often retreated and sought refuge in and around Kanab Creek Canyon (Kanav'uipi). All of the Kanav'uipi is a culturally sacred ecological landscape within the larger Grand Canyon regional landscape. Culturally, the Kanav'uipi is defined by its contribution to the spiritual and cultural life of all the Southern Paiute people, especially the Kaibab Paiute people. Kanav'uipi contains special ceremonial places essential to the practice of Paiute religion.

Kanav'uipi is also like a Zion (as this term was originally used in the Holy Lands of the Near East) or Region of Refuge in that it served, and continues to serve, as a permanent place in which the Paiute people can go and be safe from threat. Regions of refuge are defined as areas that are isolated from the mainstream culture. This isolation is both physical and social, meaning that these areas are often revered and, under normal conditions, would have access and behavioral restrictions (Beltrán 1979).

As settlers began to encroach upon traditional Southern Paiute territory, Southern Paiutes began to depend on Kanav'uipi as an area of refuge. This was especially prominent between 1870 and 1900. “This was a period marked by the 1870 treaty between the Mormons and the western Navajos. After this treaty, Mormon reliance on Southern Paiute labor declined, and they were systematically excluded from labor positions in Mormon settlements” (Stoffle 1995). Because of this treaty, the Southern Paiutes found themselves suffering from raiding Navajo parties who had been invited to Kanab to trade with the Mormons. Ecological threats to Southern Paiute traditional territory also arose when gold was discovered at the mouth of Kanav'uipi, leading to a short but destructive rush on the area. This damage was furthered in throughout 1870s as dams were erected and land was cleared for cattle and sheep, disrupting the flow of natural waterways and heightening erosion in the area (Stoffle 1995). All of this disruption amplified the Southern Paiutes' need to retreat further into their natural territory, thus making the use and access to Kanav'uipi crucial. Because of this need, secluded spots of refuge, sites previously used for other sacred ceremonies such as the Ghost Dance Site, arose.

In her analysis of Paiute shamanism, Isabel Kelly (1939:151-152) recorded the names of recent but not then living shamans. Kelly's informants knew the names of twenty shamans from the Kaibab Paiute district, and only two of these were women. One of these women shaman was named Tcantuya (slashed forehead) and she lived in Kana diuip (willow canyon; Kanab Creek). Tcantuya was the only shaman known to Kelly's informants to have lived in the Kanab Creek area, so Tcantuya must have been powerful to singlehandedly attend to all spiritual needs of the people living in her area. It can be assumed that Tcantuya practiced with her Kanab Creek people in the late 1880s, before the Kaibab Paiute reservation was established and the Paiute people in the district were all moved to the new reservation in 1907.

Moonshine Spring (Pahkanivits)

Moonshine Spring also known as Pahkanivits is located approximately 26 miles southwest of Kanab, UT and 8.56 miles southwest of Pipe Spring National Monument. The site is located in Arizona, south of the Kaibab Paiute Indian Reservation.

Pahkanivits is the closest water source to Wutiviungkunt and Indian Knoll. While a more permanent community lived nearby on Yellowstone Mesa, Pahkanivits provided ample distance and isolation needed for those who were involved in ceremonial activity. Distance away from home communities is critical because non-initiated men, women, and children can be greatly harmed by the amount of power a ceremonial area contains. Only trained cultural specialists can use these areas, thus their living areas must be separate during times of religious activity.

Puha'gants used the spring to prepare themselves for the use of Wutiviungkunt and Indian Knoll. While at the spring, they would gather medicinal plants and prepare them for use. They also would tend the spring by cleaning out sand and other materials that might have settled at the tank bottom. For Numic-speaking people, rock tanks are powerful places that require specific practices. A combination of physical and spiritual interactions is necessary to ensure that the flow of water is maintained.

Cleaning the large rock tank in the canyon was always an integral part of all ceremonial activities that occurred at Pahkanivits. When people arrived at this place, they traveled directly to the rock tank to remove sediment. It was seen as a duty a person must perform since it was their given rite by the Creator to be stewards of the land. Water could be collected at a later point in time to use as offerings or blessings in the various ceremonial activities.

Song and prayer were essential for ceremonial activities that occurred at Pahkanivits, Wutiviungkunt, and Indian Knoll. At Pahkanivits, unique features have been identified that would aid these activities. Tonal rocks are found perched above the ground along the canyon edge. During ceremonial activities, these stones are tapped similarly to drums during a song. Because they are perched, the sounds resonating from the rocks are amplified. This, combined with the acoustics of the canyon, helps carry the songs and prayers across landscape.

Wutiviungkunt Camp and Ceremonial Area

Wutiviungkunt Camp and Ceremonial Area is approximately seven miles southwest of Pipe Spring National Monument and is located along the edge of Pipe Valley in the north and Antelope Valley in the south. From the ridge, a person has a clear view of places like Kanav'uipi and Pipe Springs. Wutiviungkunt Camp is a unique area that raises above the relatively flat surrounding plains. The ridge is approximately 300 feet higher in elevation than the plains below.

Ceremonies held at the camp and ceremonial area used large fires so they could be coordinated with other ceremonies held nearby and farther away at Pipe Spring and Kanab Creek.

This area has been occupied for about 13,000 years as evidenced by a Clovis Point found in the LPP APE and continued to be an important area in the historic period for Southern Paiute people. In the 1930s, anthropologists Isabel Kelly and Edward Sapir documented Southern Paiute names and ethnographic information on this area. When Kelly visited this area during her fieldwork in 1933 and 1934, she recorded the name of one of the springs located in and around Wutiviungkunt Camp. Her informant identified the spring as Tiŋkaniac, or Antelope Spring. During her fieldwork, she documented that a man named Puisari (Eye Dog) traditionally owned spring. He lived at this site with his wife, Aʔnawanc (Badger Breast) and their five children. She also noted that an unmarried man named Maʔapituku (Painted Hip) along with several others lived at Tiŋkaniac as well. Kelly's informant recalled that the people living at Tiŋkaniac interacted with Paiute people living in and

around Pipe and Moccasin Springs. The people from these other communities came to Tiñkaniac during the winter and spring months. During their stay, they gathered agave, a type of cactus that Kelly identified as *tasi*, and juniper berries with permanent Tiñkaniac residents. During the summer, everyone would gather seeds along the base of the ridge on the plain below. Members of these communities would also travel to the Grand Canyon, Vermillion Cliffs, and the Kaibab Plateau (Kelly 1971: 12).

Kelly also recorded that people from a place called Waʔakari were frequent visitors to Tiñkaniac. Waʔakari was first recorded by Sapir in 1930. He offered a slightly different spelling, Weáqarirumpa (2015). During the time of her fieldwork, Kelly could not locate this spring but she believed it to be located to the northwest of Tiñkaniac.

Wutiviungkunt (Elephant Foot)

Wutiviungkunt is located 24.45 miles southwest of Kanab, UT and is due south of the Kaibab Paiute Reservation. Wutiviungkunt is connected to other study sites within the area, including Pahkanivits, Wutiviungkunt Camp, and Indian Knoll. Wutiviungkunt is one of the most prominent features in this local landscape and it is a destination place for those seeking power and knowledge associated with time keeping and astronomical movements. It is believed that Wutiviungkunt functioned in a similar manner as Fajada Butte in Chaco Canyon (Stoffle et al. 1994).

Indian Knoll

Indian Knoll is located 21.45 miles southwest of Kanab, UT and 2.11 miles south of Arizona State Route 389. This site is found south of the Kaibab Paiute Indian Reservation. Indian Knoll is a prominent feature located in Pipe Valley.

Southern Paiute representatives documented the presence of pottery, including pieces of black on white and punctate pottery. In addition, they noted several rock structures, *Pohs* (depressions in rocks used for water storage), and grinding stones that are used for medicine and ceremony. Dozens of small structures can be identified today by low wall remnants. These structures held ceremonial paraphernalia which exclusively was used at the site. The key component of this site was found on the edges of the three high spots along the south side of the knoll. These spots had a series of large deep oval shaped peckings with a deep pecked line bisecting the oval.

These peckings are the astronomical markers and serve as clear indicators of ceremonial activities associated with the movement of celestial bodies, time keeping, and spiritual learning. These astronomical alignment peckings were used during certain times of the year, such as the solstices. Committee members also commented on the connection between this area and nearby Kanav'uipi in that the Indian Knoll peckings are similar to ones found near the Ghost Dance Site, which is part of the Kanav'uipi landscape.

Time keeping has traditionally been an important activity in Southern Paiute culture. Southern Paiute people had specially trained Puhaʔgants to track solar, lunar, and stellar movements (Stoffle, Dobyns and Evans 1983; Stoffle et al. 2008).

Health

The LPP proposal has caused continued psychological stress due to the uncertainty about the cultural transmission and future of the Southern Paiute people, most notably the Kaibab Paiute people. As a result of this culturally complex phenomena of cultural loss, Kaibab Paiutes have expressed concern of both adults and youth experiencing psychological stress or trauma resulting in what is correctly identified as Ontological Insecurity.

Cultural Survival and Access

One of the most potentially detrimental consequences of LPP construction is the survival of Paiute culture, religion, and society. The pipeline potentially could lead to reduced or even denial of access to portions of their traditional lands and resources. Already angry or just cautious landowners and ranchers with grazing leases are placing locks on fence gates, some of which belong to the BLM and State of Arizona. The apparent purpose of these locks is to reduce “outsider” traffic related to the LPP proposal from coming on these lands, many of which are public. Loss of access to traditional foodstuffs and medicine have greatly contributed to undermining the cultural well-being of Indian people. These Indian people have experienced, and will continue to experience, breakdowns in the process of cultural transmission due to lack of access to these cultural lands and resources. The Southern Paiute Advisory Committee maintains present and future activities associated with LPP are or will disproportionately impact the Southern Paiute people.

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