OFFICE OF SURFACE MINING RECLAMATION AND ENFORCEMENT ANNUAL EVALUATION REPORT

For Evaluation Year – 2004 (July 1, 2003 through June 30, 2004) **on the**

HOPI ABANDONED MINE LAND RECLAMATION PROGRAM



INTRODUCTION

This annual evaluation report is produced by the Office of Surface Mining (OSM) in fulfillment of its Statutory responsibility [under the Surface Mining Control and Reclamation Act of 1977, (SMCRA)] to annually assess the accomplishments of the Hopi Abandoned Mine Lands Reclamation Program (Hopi AML Program). The annual report consists of OSM's oversight findings based on field inspections and meetings with the Hopi Abandoned Mine Land Program during the 12-month evaluation period beginning July 1, 2003 and ending June 30, 2004.

The Office of Surface Mining Reclamation and Enforcement (OSM) has responsibility under SMCRA for approving State and Tribal Abandoned Mine Land Programs, to carry out the goals of Title IV of SMCRA. The primary goal of Abandoned Mine Land Programs is to mitigate the effects of past coal mining, by reclaiming abandoned mines. The primary emphasis is placed on correcting the most serious problems endangering public health, safety, general welfare, and property. Once this is accomplished, secondary emphasis is placed on the remediation of mining related impacts to impacted communities. This remediation is through the funding of public facility or infrastructure projects.

On behalf of the Secretary of the Department of the Interior, OSM administers the Abandoned Mine Reclamation Fund by awarding grants to States and Tribes, to cover the administration and reclamation costs of running their Programs. The OSM Western Regional Coordinating Center's (WRCC) Albuquerque Field Office (AFO) provides assistance to the Program and, through oversight, annually monitors the Hopi AML Program's performance.

PART I GENERAL INFORMATION

Program History:

The Hopi inhabit twelve villages and one community on the Hopi Reservation. Under its 1936 Constitution and By-Laws, the Hopi Tribe consists of a Union of 12 self-governing Villages or Communities.

- ➤ June 28, 1988 OSM approved the Hopi AML Program. Hopi AML did not apply for an Emergency AML Program, so OSM retains the responsibility for reclamation of "emergency" AML projects.
- ➤ June 9, 1994 approximately six years after the Program was approved, the Secretary of the Interior concurred with the Hopi AML's certification that all known eligible priority-1 and priority-2 abandoned coal mines were reclaimed. A total of \$1,188,524 was spent by Hopi AML reclaiming abandoned coal mines on the Hopi Reservation.

Aside from its responsibility to maintain past mine reclamation work or to reclaim any newly identified abandoned coal mine hazards, the Program is no longer actively involved with mine hazard remediation work of either coal or non-coal mines. Having certified completion of all known coal reclamation, the Program is eligible to use AML funds to construct Public Facility Projects (PFPs) or Community Impact Projects (CIPs). Since June 1994, the Program has almost exclusively focused its efforts on the construction of PFPs. The Hopi AML Program Manager in

cooperation with the Hopi Tribe has strived to distribute PFP funds equitably among the Villages (\$200,000 each). One Village has elected not to accept the funds and therefore will not sponsor a PFP nomination.

Program Staffing:

The Program consists of six employees, the Office of Mining and Mineral Resources Director (40% funded by AML), a Construction Superintendent, a Project Manager, an Administrative Secretary, an Equipment Pool Coordinator, and an Equipment Operator. All but the Director position are 100% funded by Hopi AML. The Hopi AML office is a manufactured building located in Kykotsmovi, Arizona on the north side of Highway 264.

Hopi Public Facility Program:

Sections 411(e) and (f) of SMCRA provide for infrastructure development projects as a means of offsetting both current and past mining related impact to Hopi communities. PFPs are considered priority-3 and -4 infrastructure or public facility projects and are perceived by SMCRA as a means of off-setting mining related impacts to State and Tribal populations and by contributing to the development or expansion of local infrastructure and other public facilities.

Although active coal mining still occurs on the Hopi Reservation, production has substantially decreased. None the less, because of mining the Hopi are subjected to increased noise, dust, traffic and increased demands on existing infrastructure. The Hopi were also impacted by past coal mining activity. Hopi AML determined that all 12 Hopi villages or communities were impacted by mining to some degree and, therefore, are eligible to receive PFP funding under SMCRA.

Infrastructure needs on the Hopi Reservation are substantive. Senior citizens and others need health care facilities and educational opportunities and facilities that offer such educational opportunities. Basic human needs greatly exceed the funds available from AML and from other Tribal, State, and Federal sources.

The AML Program has conducted substantial public outreach to explain what types of facilities are eligible for AML funding, has provided guidance and assistance to each village regarding the funding criteria for PFPs and has allocated approximately \$200,000 for each village that responds with a project proposal. Villages which have submitted project proposals, first held public meetings to determine their priorities and pass internal resolutions. Each village government independently determines which of their prospective projects will ultimately be submitted for funding.

The Hopi government also determines their own priorities for Tribal-wide PFPs. Hopi AML approved funding of the Hopi Conference and Wellness Center PFP which started construction in June 2004. Unlike most Village projects, this Tribal-wide project is being done under contract to a licensed contractor.

Several of the Public Facility Projects completed to date were funded in partnership by Hopi AML and other Agencies. Other sources of funding include Village, Tribal, State, Private funds,

or funding from other Federal agencies. [See Table-1 of this report for a listing of Public Facility Projects and their funding status.] The AML Program uses a Memorandum of Agreement or Memorandum of Understanding with the lead agency (first line administrator of the project), to delineate program limitations regarding the use and accounting of AML funds.

Project Management:

The Program has funded both Village specific and Tribal-wide AML Projects. Two Tribal-wide PFPs were completed to date, the Hopi High School Reverse Osmosis Water Treatment System and the Hopi Westside Wildland Fire Station. [See Table-1 for a complete list of projects and project costs.]

Some PFPs have been constructed by Village employees and others were constructed by contractors. Due to the high unemployment on the Hopi reservation, several Hopi Villages have chosen to design or administer construction activities using local labor. This has helped to generate jobs and provide income, and to provide skills in the building trades. When necessary, contracts are awarded to outside firms for design, engineering, construction or to obtain NEPA compliance documents.

After a project is funded, the Hopi AML Program works with the project development task team. The team typically consists of Village administrators, contractors and tribal representatives from other Departments or federal agencies such as Indian Health Service. Project development typically includes:

- 1) obtaining environmental clearances and hiring contractors if necessary to perform biological or cultural & historic surveys and to write environmental documents;
- 2) securing all necessary permits and to meet National Environmental Policy Act (NEPA) requirements;
- 3) developing geo-technical surveys, to perform legal property assessments;
- 4) performing hazardous property assessments; and,
- 5) development of architectural / engineering specifications and contract specifications for the project.

Hopi AML submits a project package to OSM with the necessary National Environmental Policy Act (NEPA) compliance documents such as environmental assessments (EAs) or Categorical Exclusions (CXs) and environmental / cultural & historic clearances. OSM may then issue a Finding of No Significant Impact (FONSI) and grant an Authorization to Proceed (ATP) with construction. The Hopi AML Program works with the Tribal government and Villages to monitor the project construction work and to account for expenditures. In addition, the AML Program is responsible for keeping the Tribal government and village governing boards informed of project status and concerns. The Hopi AML Program does not oversee compliance with building code or design specifications for structurally significant buildings. However, Hopi AML has developed the contracts that specify compliance with the Uniform Building Code. For some completed projects the Hopi AML Program bid out the contract, selected the lowest responsible bidder (contractor) through a competitive bidding process and monitored the construction activity for compliance with schedules, NEPA, etc.

Grants and Financial Information:

According to data publish on OSM's Web Page, the undistributed Tribal Share Balance for the Hopi Tribe as of March 31, 2004 is \$5,119,902. The Tribal Share Balance data for the end of the evaluation period (June 30, 2004) is not yet published and available.

The following table shows grants that were active during the evaluation period:

Grant Number	Awarded	Amount
GR 107800	09/01/01	\$ 2,441,021.00
GR 207800	09/01/02	\$ 382,667.00
GR 307800	09/15/03	\$ 484,579.00

Program Maintenance (AML Plan):

There are no oversight issues with regard to Program maintenance (maintaining a current AML Plan / regulations) nor do any Program maintenance deficiencies currently exist with regard to the Hopi AML Plan. Timeliness of Program maintenance has never been an issue. To date, the Hopi AML Program has submitted to OSM two substantive amendments to their AML Plan. These amendments to the AML Plan provided the necessary authority to allow the AML Program to commence public facility projects.

PART II. NOTEWORTHY ACCOMPLISHMENTS

OSM would like to highlight the following accomplishments for EY-2004:

- 1. The Program has done an admirable job getting two Public Facility Projects to construction during EY-2004. These projects are the Hotevilla Youth/Elderly Center (\$200,000) and the Hopi VMC, Conference and Wellness Center (\$1.8M).
- 2. The Hopi AML Program also did an exemplary job with its Equipment Rental Program. This program has generated sufficient income (\$40,000 to \$50,000 per year) to make the Rental Program self-sufficient and has generated a positive image for the Program among the Hopi Villages.

PART III. RESULTS OF ENHANCEMENT AND PERFORMANCE REVIEWS

After certifying completion of all coal priorities in June 1994, the primary emphasis of the Hopi AML Program changed from abatement of AML hazards to the construction of public facility projects (PFPs) as authorized under Sections 411(e) and (f) of SMCRA. The following two evaluation principles or topics were selected to evaluate of the Hopi AML Program during EY-2004.

Principle 1: Planning and Implementation of Public Facility Projects under Section 411 (e) and (f) of SMCRA

In EY-2004, OSM evaluated the AML Program's effectiveness in getting projects through the project development stage and into construction in a timely manner. This principle was evaluated based upon project development work completed by the Program during the evaluation period. OSM was not able to evaluate if projects were completed on schedule and if the project scope and contract specifications were satisfied, because no PFPs were completed or scheduled for completion during the evaluation period.

OSM does not inspect the quality of construction or compliance with applicable building code(s). Neither the Hopi AML Program nor OSM-AFO staff are qualified to inspect PFPs such as buildings, power lines, sewer lines, water lines or roads for compliance with engineering or architectural design or for code violations. Oversight serves to verify that the projects are progressing through project development and construction. Oversight also verifies that PFPs are being developed, administered in a cost effective manner, and that completed projects meet the original scope of work and intended function stated in the grant request. Compliance with engineering designs and building codes is beyond the scope of OSM oversight.

Successful performance by the AML Program for Principle-1 is based on showing that PFPs enter into construction in a timely manner and that construction progresses in accordance with approved design specifications.

During EY-2004 the Hopi AML Program was exclusively involved in implementing Public Facility Projects (PFPs) as an authorized activity under Sections 411(e) and (f) of SMCRA. No reclamation or maintenance work was done by the Hopi AML Program nor were any reclamation projects in project development.

1. Project Development:

In 2003 three PFPs were funded, two of the three were Village Projects funded for \$200,000 each and one is a tribal-wide project funded for \$1.8M. The tribal-wide project is the largest PFP undertaken by the Hopi AML Program.

Because no new submissions were received during EY-2004, OSM is not anticipating any new projects to enter into construction during EY-2005 except for the Tewa modular building (\$200,000) which has been in the planning stages for some time now.

The Hopi AML Program has been working to get three projects through the project development

and approval phase for two years now, the Hopi Conference and Wellness Center, Hotevilla Elderly/Youth Center and the Tewa Office Complex. These efforts led to contract awards for two of the projects (Hopi Conference and Wellness Center and Hotevilla Elderly/Youth Center) during EY-2003. The Hopi AML Program has expressed concern that their annual appropriation of only about \$400,000 limits their ability to pursue larger Tribal-wide projects. AFO has agreed to discuss this issue with OSM headquarters to determine if larger multi-year grants can be awarded. If so, it may be possible for Hopi AML to take on another large Tribal-wide project like the Hopi Conference and Wellness Center. AFO recommends that Hopi AML strive to have projects in the project development stage and in construction. This would provide the continuous stream of projects that is needed to show that the AML Program can realistically utilize its \$5M tribal-share balance that currently exists in unallocated state/tribal share funds.

2. Project Construction:

a. Hotevilla Elderly/Youth Center Project -

The Hotevilla project entered into construction in the fall of 2003. About half way through the construction phase, the Program Director asked OSM-AFO to attend a meeting with the Village on April 14, 2004. The Hopi Office of Mining & Mineral Resources / AML Program Manger did not attend the meeting but prior to the meeting, he told OSM that the reason for the meeting is that the Village wanted more money and that he wanted OSM to support his position that funds are equally distributed at \$200,000 per Village and that Village compliance with the Project Sub-Agreement is very important.

In the meeting, the Hopi AML Program's position was that Hopi AML requires that the Village adhere to project construction specifications as well as the Sub-Agreement between the Hopi Tribe and Hotevilla Village. The Village contended that Hopi AML staff had required field changes to the building design without going through the project design engineer. (Hopi AML had recommended at a meeting with the Hotevilla Project Architect, that the snow load be increased from 20 to 40 pounds. This recommendation was in accordance with building requirements for this area. The Village subsequently made changes that involved redesigning the roof trusses.

The meeting of April 14, 2004 was to let the Village know that Hopi AML is concerned that building specifications are not being followed by the construction crew and Village Administration, which is a violation of conditions set by the Construction Documents (Design Specifications) and the Sub-Agreement. After the meeting, a letter from the project design engineer and the Village Board of Directors was submitted informing the Hopi AML Program that they will take responsibility for any adverse affects that may result from the deviation from approved Project Specifications. This acknowledgement document became part of the Project records and is on file at Hopi AML.

Hopi AML's goal is to provide the Village with a soundly constructed building that will last well into the future. Any deviations from the approved building specifications may jeopardize the structural integrity of the building and any manufacture's warranty.

b. Hopi Conference & Wellness Center Project -

It took about three years for this Tribal-wide project to go through planning and development and to finally reach the construction phase.

c. Tewa Modular Office Building Project -

This project is in the planning stages and has not been submitted to Hopi AML for funding.

Principle 2 AML Program Accomplishments During the Evaluation Period (Directive AML-22, Principle 5).

OSM is required to report annually on the status of AML reclamation projects and/or public facility / infrastructure accomplishments of the Hopi AML Program. There are no performance standards for AML reclamation set forth in SMCRA. Likewise, there are no performance standards for PFPs. OSM considers a successfully completed project to be one in which the product delivered matches the specifications of the project proposal that was funded.

Hopi AML Project Funding and Project Status

Status of AML reclamation projects:

The Hopi AML Program did not have any AML reclamation or maintenance work planned or scheduled for EY-2004.

Status of PFPs:

- 1. Completed Public Facility Projects: Hopi AML did not complete construction of any PFPs during EY-2004.
- 2. Ongoing Public Facility Projects:
- a. Hopi Conference and Wellness Center Project (located at the Veterans Memorial Center).

This is a \$1.8 million dollar tribal-wide project that will be built adjacent to the existing Hopi Veterans Memorial Center in Kykotsmovi, Arizona. This is the largest PFP undertaken by the Program to date. The Hopi AML Program and the Office of Surface Mining- AFO held a public forum on June 8, 2000 to discuss the need for a Conference & Wellness Center. Comments received from the public forum were unanimously in support of the proposed Conference & Wellness Center. In March 2001, the Hopi Tribal Council passed Tribal Resolution H-35-2001 to support the proposed PFP.

The project was bid under a "design & build" contract procedure. The Hopi Tribe, through competitive bid proposals, selected a contractor (Kitchell Contractors, Ink. of Arizona) for the design and construction of the project. The final contract was issued on May 5, 2003.

The project is to be completed in two phases. Phase-I is the building design and architectural services, which was completed in 2002. Phase-II is the actual project construction. The project consists of the construction of a new 10,542 square foot building (Conference and Wellness Center) to accommodate the social, nutrition and health needs of the community. The structure is intended to provide a modern conference room(s) for local, tribal, civic, social, school and organizational events; and promote nutrition, health, fitness and related wellness programs. The existing Veterans Memorial Center lacks certain amenities which limits its current use. The Conference & Wellness Center will address these Tribal needs including:

• Conference Area with a capacity to seat approximately 80 people

- Retractable partitions to accommodate three separate groups
- Exercise & Aerobic rooms
- Day Care room
- Kitchen
- Men & Women restrooms / locker rooms
- Office Space
- Storage rooms
- Maintenance rooms

OSM was asked to quickly provide a FONSI to the Hopi AML so that project designs can be completed and so that project construction could begin by summer 2003. However, construction did not start until the summer of 2004. Hopi AML was able to realize cost savings in mobilization costs, as Kitchell Contractors is working on another large elementary school project in the general area. OSM issued a FONSI on March 7, 2003.

A project team was established for the project. The team consists of members from several Tribal programs and the Indian Health Service. Hopi AML asked OSM to provide assistance by meeting with the team on October 29, 2003 in Sedona, Arizona to discuss the schedule for the project and timeframes for the grant. Later the septic system that the facility would discharge into was determined to be under sized to handle the increased demand from the new building. Peabody Coal Company donated additional funds to address the septic system problem of increased volume resulting from the new building. A ground breaking ceremony for the project was held on April 14, 2004 and construction is scheduled for completion by December 2004.

b. Hotevilla Youth and Elderly Center Project.

The Village of Hotevilla selected the construction of a 5,571 square foot Youth and Elderly Center with a 2,481 square foot covered patio as their PFP. The Village took lead responsibility for the planning portion of the project. The Village, working through the Hopi Tribal Chairman's office, was able to secure funding for the planning portion of the project from the Arizona State Senior Center Legislation. The Village elected a new governing board in 2003 and hired a project manager for the project. The building permit application was approved by the Tribal Council on September 10, 2003.

The Hopi AML Program funded \$28,000 for preparation of an Environmental Assessment for the project and \$200,000 for construction costs of the interior electrical, HVMC system, doors, windows, and roof. The Village is contributing an additional \$300,000 for construction costs to cover the foundation, exterior & interior walls and framing.

All land clearances were obtained as of June 2003. The sub-grant agreement with the Hopi Tribe was entered into with the Village of Hotevilla on December 9, 2003.

3. PFPs in Planning or Project Development.

a. Tewa Modular Office Building (Administrative Office Building).

A potential Hopi AML PFP is for the Village of Tewa to purchase and set-up a 3,920 square foot (56 ft. X 57 ft.) modular building. The Village will contribute additional funds to provide water, sewer, and electrical utilities to the building. The village has a land use plan that includes construction of the building. Environmental / NEPA clearances have been obtained for the project except for the archaeological clearance from the State of Arizona. The status of this project has not changed from what was reported in the 2003 annual evaluation report.

b. Walpi Community Building & Kiva Renovation / Slope Stabilization Project.

The Village of Walpi is one of the oldest inhabited establishments in North America. It is situated on top of a very narrow rocky finger-like peninsula, with shear cliffs on two sides. This traditional location for homes, long ago, provided a form of protection from outside raiders.

The Village Council submitted a Council Resolution for PFP projects, which include wall stabilizations, expansion to the existing bathhouse and Kiva expansion. The Village residents have expressed a need to implement stabilization / reinforcement measures to protect their homes and community. Expansion to the existing "bath house" building will include an administrative office, maintenance office, a kitchen area and storage space. The existing bath house provides shower facilities for area residents whose homes do not currently have running water and associated facilities.

A possible PFP for the Village of Walpi is still in preliminary (pre-proposal) stages. The project would potentially impact one of 56 acres covered by an existing EA. The status of this PFP has not changed from what was reported in the 2003 annual evaluation report.

TABLE 1 Status of Public Facility Projects

Project	Village	Status (Funded or	Amount Funded
		Completed)	by AML to Date
Bacavi Plaza Restoration	Bacavi	Completed 01/98	\$200,000. AML
			\$ 62,722. Az. H.Fnd.
Hopi HS reverse osmosis	Tribal-wide	Completed 11/98	\$100,000. AML
water purification		_	\$250,000. BOR
Moenkopi community &	Moenkopi	Completed 09/99	\$235,000.
youth center			\$100,000 Moenkopi
Sipaulovi cultural &	Sipaulovi	Completed 03/01	\$225,000. AML
historic resources			\$ 54,185. Sipaulovi
Mishongnovi sewage facility	Mishongnovi	Project abandoned	\$ 13,225. for EA
Polacca day school multi-	Polacca	Project abandoned.	\$ 2,066. for EA
purpose bldg.		(new school built in lieu of project).	
Westside Wildland Fire	Tribal-wide	Completed 2002	\$ 36,073. AML
Station		AML funded NEPA %	
		only.	
Kykotsmovi sewage	Kykotsmovi	Construction began	\$215,000. AML
lagoon treatment		10/17/01. Completed	\$200,000 IHS
		09/17/02.	\$350,000. USDA-RD
Yu-Weh-Loo Pah-ki	Spider Mound	Well Completed 2003.	\$215,000. AML
(Spider Mound) well &		Pump-house is pending.	(\$55K not used &
fluoride treatment			remains for Village)
Shongopavi Community	Shongopavi	Project is pending.	\$35,000 for project
Bldg. Renovation			development.
Hopi Veterans Memorial	Tribal-wide	Contract awarded.	\$1.8 Million
Center Conference &		Const. start 04/14/04	
Wellness Center	TT 4 '11	G + + + 00/02	Φ227 414 ANT
Hotevilla Youth / Elderly	Hotevilla	Const. start 08/03.	\$235,414. AML
Center Public Coal Project &	Tribal-wide	Ongoing energy program.	\$300,000 Hotevilla \$341,352
Equip. Rental Pgm.	Titoai-wide	Ongoing rental program	Self-sustaining
Tewa Modular Off. Bldg.	Tewa	Proj. Development	\$0 AML
Tewa Modulai Off. Blug.	16wa	Froj. Development	\$ Tewa
	Lower Moencopi	No project proposal	\$0
	1 st Mesa Consol.	No project proposal	\$0
	Old Oraibi	No project proposal	\$0
	Mishongnovi	No project proposal	\$0
Walpi – Bldg., Kiva &	Walpi	Hist. Renov. & Planning	\$0
Stabilization Project	•		
Turquoise Community	Tribal-wide	Planning ongoing by	\$4,888. AML for
		Tribal government	Arch. & Eng.

PART IV. ACCOMPLISHMENTS AND RECOMMENDATIONS

Conclusions and Recommendations:

In the previous evaluation period (EY-2003) OSM found that Hopi AML has done an excellent job with public outreach. Numerous meetings were held with the Villages of Yu-Weh-Loo Pah-ki (Spider Mound), Tewa, Walpi, Kykotsmovi, and Hotevilla Villages. In addition, at that time OSM had determined that the AML Program has worked with the Tribal Administration on Tribal-wide projects such as the Hopi Conference & Wellness Center project and the Westside Wildland Fire Station Project.

The Hopi AML Program Manager requested OSM-AFO attend meetings with PFP clients (Villages) on three separate occasions during the evaluation period. These meetings were held to address funding issues between the Village/Tribal sponsors of the Hotevilla Elderly / Youth Center and the Hopi Conference & Wellness Center projects. The village sponsors did not understand the nature of the AML funds and the role that OSM plays in overseeing the Hopi AML Program. During the course of the meetings, these concerns appeared to be resolved and the projects moved forward. The Hopi AML Program is often caught in a situation of having to balance cultural and tribal traditions and influences against Federal regulatory requirements. AFO has been able to assist villages with their understanding of the Program.

OSM reminds the Program that the AML Plan approval for the Hopi AML Program grants exclusive responsibility and authority to implement provisions of the approved Program to the Hopi AML Program (SMCRA, Section 405(d) and 30 CFR 756.17). OSM-AFO also recommends that Hopi AML review its orientation and outreach efforts with its clients so that Program objectives and restrictions are understood early in the process.

The Hotevilla Elderly & Youth Center project and the Hopi VMC, Health and Wellness Center project should be completed in EY-2005. OSM will inspect both of these projects in EY-2005 to verify that the projects were completed as proposed in the project proposal applications and grant applications.

Although it has taken three years for both the Conference/Wellness Center project and the Hotevilla Elderly/Youth Center project to reach construction, OSM believes that the project will be successfully completed and ultimately meet the objective of this Principle. The Tewa project was not submitted to OSM for authorization to proceed during EY-2004 as expected, however, it is anticipated that Hopi AML will submit the project proposal package to OSM sometime in EY-2005.

Past OSM oversight activity determined that the Hopi AML Program is cost effective and PFPs (completed) are of excellent quality; that the Program has adequately sought out public involvement on the Hopi Reservation in determining project priorities and selecting projects; that the Program has done an exemplary job of ensuring that projects proposed for funding meet the eligibility requirements of SMCRA; that the Program has routinely scheduled and sponsored

oversight tours of construction projects as necessary and has efficiently provided information to OSM when requested. AFO plans to pursue discussions with the Hopi AML Program on how to improve relations in EY-05, with a particular focus on OSM's role in relation to village sponsors.



Hotevilla Elderly & Youth Center Public Facility Project During Construction.



Village of Hotevilla Project Construction Team and Hopi AML Project Manager, Keith Pahovama.