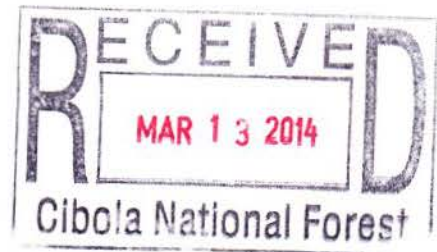




Herman G. Honanie  
CHAIRMAN

Alfred Lomahquahu Jr.  
VICE-CHAIRMAN



March 3, 2014

Elaine Kohrman, Forest Supervisor  
Attention: Cynthia Benedict, Tribal Liaison  
U.S. Forest Service, Cibola National Forest  
2113 Osuna Road NE  
Albuquerque, New Mexico 87113-1001

Dear Supervisor Kohrman,

This letter is in response to your correspondences dated January 6 and February 5, 2014, regarding the Cibola National Forest Schedule of Proposed Actions and undertakings on the Mt. Taylor Ranger District. The Hopi Tribe claims cultural affiliation to earlier identifiable cultural groups on the Mt. Taylor Ranger District. The Hopi Cultural Preservation Office supports the identification, preservation and protection of our ancestor's sites, which we consider be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Cibola National Forest's continuing solicitation of our input and efforts to address our concerns.

The Hopi Cultural Preservation Office requests consultation on any proposal or miscellaneous recurrent project that has the potential to adversely affect prehistoric archaeological sites on the Mt. Taylor Ranger District, and any proposal with the potential to adversely affect the Mt. Taylor Traditional Cultural Property. We note the enclosed table of miscellaneous recurrent projects includes projects that involve ground disturbing activities that require cultural resources surveys.

We have reviewed the enclosed project list and we understand the 20,000 acre Black Mesa Wildlife Habitat Improvement Project and 74,050 acre Puerco Landscape Restoration Project cultural resource surveys are not completed. We look forward to receiving copies of the survey reports for review and comment as well as continuing consultation on the Zuni Mountains Trail Project.

Regarding of the Forest Land and Resource Management Plan revision, in the enclosed letter dated November 5, 2012, we responded to the Forest's correspondence dated October 26, 2012, regarding the Cibola National Forest revising its 1985 Land and Resource Management Plan pursuant to the 2012 Forest Service Planning Rule.

We stated we have consulted with several Forests on their Forest Plan revisions and have noted that every recent Forest Proposed Plan and DEIS has had Alternative B, ecological restoration, as the preferred alternative. We have stated that the consistency of the preferred alternative in each Forest's Proposed Plan and DEIS reflects a continuing national management direction that de-emphasizes regional and Native American interests. And we have concluded that the Forest Service continues to make decisions consistent with national management preferences, for example ski and mining industry proponents, and continues to minimize and attempt to mitigate the adverse effects of such decisions on Native American Sacred Sites and Native American people.

We stated we understood the 2012 Planning Rule identifies 15 ecological and sociological topic areas that are to be addressed during the revision process including "areas of tribal importance" and "cultural and historic resources and uses, native knowledge and ethics." In light of the Forest Service's Sacred Sites listening sessions, we stated we appreciate that cultural resources and Traditional Cultural Properties are identified as an area where there are priority needs in change for program direction. As the Sacred Sites report to the Secretary states, "To disrespect the value of Native American sacred sites would perpetrate the cycle of trauma." Therefore, we support improved heritage resources management as a priority need for change in program direction in the Plan revision.

Another recommendation we have made is that the Department of Agriculture and Forest Service incorporate the United Nations Declaration on the Rights of Indigenous Peoples into its policies and procedures and commit to abide by its terms.

Regarding locatable minerals subject to the General Mining Law of 1872, as amended, "being outside the authority of national forest planning," in our November 14, 2011 letter to Secretary Vilsak regarding some of the Sacred Sites threatened by Forest Service, including Mt. Taylor, we supported the Direction/Policy Recommendations in the report, specifically Competing Statutory Obligations. 1. Explore changes to the 1872 mining law...to permit greater agency discretion when Sacred Sites may be impacted, and 2. Use mineral withdrawal authorities to proactively protect areas that include Sacred Sites.

Multiple uses based in 19<sup>th</sup> Century law are creating multiple use conflicts in the 21<sup>st</sup> Century. We consider the overall goal of managing National Forest System lands to sustain the multiple uses of its resources in perpetuity to be incompatible with the 21<sup>st</sup> Century, when increasing and conflicting uses further alienate Native people from our traditional lands and our uses of them.

Therefore, we reiterate that we believe the Forest Service must consider designated uses as a basis for future Forest management to address "areas of tribal importance" and "cultural and historic resources and uses, native knowledge and ethics." We recommend the Forest Service



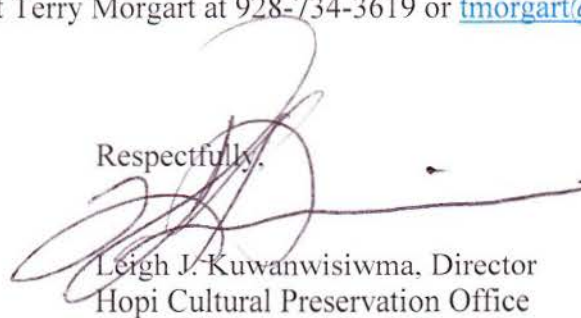
Elaine Kohrman  
March 3, 2014  
Page 3

dedicate lands for protection in perpetuity, because multiple uses have been demonstrated to destroy our traditional cultural landscapes in perpetuity. And therefore, we support the identification of special management areas that could be designated for their unique or special features or characteristics. We look forward to receiving a copy of the assessment of natural and cultural resources for review and comment.

In the enclosed letter dated January 22, 2014, we stated we understood that the scenery resources concern level maps will ultimately help to identify needs for change to the 1985 Cibola Forest Plan during plan revision. Therefore, we reiterate that would like to schedule a consultation meeting to discuss the Schedule of Proposed Actions and scenery evaluation and the new collaborative mapping tool, and Plan revision.

To schedule a date for a consultation meeting or if you have any questions or need additional information, please contact Terry Morgart at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you for your consideration.

Respectfully,

A handwritten signature in dark ink, appearing to be "Leigh J. Kuwanwisiwma", written over a horizontal line.

Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

Enclosure: November 5, 2012, January 22, 2014 letters  
xc: New Mexico State Historic Preservation Office



Herman G. Honanie  
CHAIRMAN

Alfred Lomahquahu Jr.  
VICE-CHAIRMAN

January 22, 2014

Elaine Kohrman, Forest Supervisor  
U.S. Forest Service, Cibola National Forest  
2113 Osuna Road NE  
Albuquerque, New Mexico 87113-1001

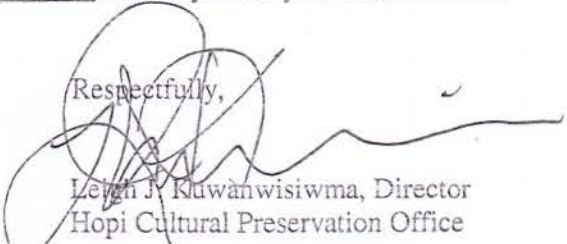
Dear Supervisor Kohrman,

This letter is in response to your correspondence dated December 17, 2013, regarding the Cibola National Forest undertaking an evaluation of scenery resources on its forested mountain districts in New Mexico. The Hopi Tribe claims cultural affiliation to earlier identifiable cultural groups on the Cibola National Forest. The Hopi Cultural Preservation Office supports the identification, preservation and protection of our ancestor's sites, which we consider be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Cibola National Forest's continuing solicitation of our input and efforts to address our concerns.

The Hopi Cultural Preservation Office understands the current visual management system has been in place for nearly 30 years, and a more modern and accepted approach to evaluating aesthetics of the land referred to as the scenery management system is being undertaken. We support a more modern and accepted approach to evaluating aesthetics of the land. However, we note the 1872 Mining Law is now one hundred forty two years old, and a more modern and accepted approach to evaluating aesthetics of the land cannot be fully undertaken while this archaic law continues to preempt any other Forest Service evaluation processes. Will the scenery management system that designates the Mount Taylor Traditional Cultural Property as a high concern level be addressed in mining proposals pursuant to the 1872 Mining Law?

We understand that these concern level maps will ultimately help to identify needs for change to the 1985 Cibola Forest Plan during plan revision. Therefore, we would like to schedule a listening session to discuss the scenery evaluation and the new collaborative mapping tool. To schedule a date for a consultation meeting or if you have any questions or need additional information, please contact Terry Morgart at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you for your consideration.

Respectfully,

  
Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

xc: New Mexico State Historic Preservation Office





LeRoy N. Shingoitewa  
CHAIRMAN

Herman G. Honanie  
VICE-CHAIRMAN

November 5, 2012

Nancy Rose, Forest Supervisor  
Cibola National Forest  
2113 Osuna Road NE  
Albuquerque, New Mexico 87113-1001

Dear Supervisor Rose,

This letter is in response to your correspondence dated October 26, 2012, regarding the Cibola National Forest revising its 1985 Land and Resource Management Plan pursuant to the 2012 Forest Service Planning Rule. The Hopi Tribe claims cultural affiliation to the prehistoric cultural groups in the Cibola National Forest. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore we appreciate the Cibola National Forest's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has consulted with several Forests on their Forest Plan revisions and have noted that every recent Forest Proposed Plan and DEIS has had Alternative B, ecological restoration, as the preferred alternative. We have stated that the consistency of the preferred alternative in each Forest's Proposed Plan and DEIS reflects a continuing national management direction that de-emphasizes regional and Native American interests. And we have concluded that the Forest Service continues to make decisions consistent with national management preferences, for example ski and mining industry proponents, and continues to minimize and attempt to mitigate the adverse effects of such decisions on Native American Sacred Sites and Native American people.

We understand the 2012 Planning Rule identifies 15 ecological and sociological topic areas that are to be addressed during the revision process including "areas of tribal importance" and "cultural and historic resources and uses, native knowledge and ethics." In light of the Forest Service's Sacred Sites listening sessions, we appreciate that cultural resources and Traditional Cultural Properties are identified as an area where there are priority needs in change for program direction. As the Sacred Sites report to the Secretary states, "To disrespect the value of Native American sacred sites would perpetrate the cycle of trauma." Therefore, we support improved heritage resources management as a priority need for change in program direction in the Plan revision.

Nancy Rose  
November 5, 2012  
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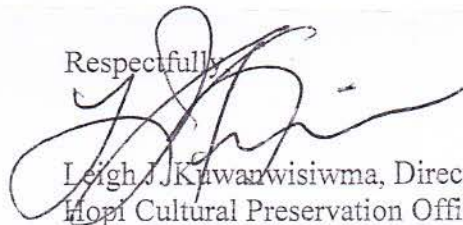
Another recommendation we have made is that the Department of Agriculture and Forest Service incorporate the United Nations Declaration on the Rights of Indigenous Peoples into its policies and procedures and commit to abide by its terms. Therefore, please cite the Declaration in the Decision Framework section of the revised Plan.

Regarding locatable minerals subject to the General Mining Law of 1872, as amended, "being outside the authority of national forest planning," in our November 14, 2011 letter to Secretary Vilsak regarding some of the Sacred Sites threatened by Forest Service, including Mt. Taylor, we supported the Direction/Policy Recommendations in the report, specifically Competing Statutory Obligations. 1. Explore changes to the 1872 mining law...to permit greater agency discretion when Sacred Sites may be impacted, and 2. Use mineral withdrawal authorities to proactively protect areas that include Sacred Sites.

Multiple uses based in 19<sup>th</sup> Century law are creating multiple use conflicts in the 21<sup>st</sup> Century. The Forest Service must consider designated uses as a basis for future Forest management to address "areas of tribal importance" and "cultural and historic resources and uses, native knowledge and ethics."

We appreciate the Forest's request for consultations in the development of the revised Plan and look forward to participating in future workshops or listening sessions, as well as the Forest making presentations on the latest Plan revision information. If you have any questions or need additional information, and please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you for your consideration.

Respectfully,



Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

xc: State Historic Preservation Office