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October 15, 2020

Travis Moseley, Forest Supervisor
Attention: Peggy Luensmann, Environmental Coordinator
Lincoln National Forest
3463 Las Palomas
Alamogordo, New Mexico 88310

Re: Integrated Non-Native Invasive Plant Management DEIS

Dear Supervisor Moseley,

This letter is in response to your correspondences dated September 24, 2017, regarding the Forest Service preparation of a draft environmental impact statement for treating non-native invasive plants across Lincoln National Forest. The Hopi Tribe claims cultural affiliation to earlier identifiable cultural groups in New Mexico. The Hopi Cultural Preservation Office supports the identification and avoidance of our ancestral sites, and we consider the prehistoric archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the Forest's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office requests consultation on any proposal with the potential to adversely affect prehistoric cultural resources in New Mexico. We understand the Forest Service identified an increase in infested acreage from an estimated 4,000 acres in 2002 to an estimated 13,600 acres in 2012 on the Forest. We understand the ecological and historical integrity of the forest landscapes are at risk from many sources, including invasive non-native species.

We have reviewed the draft environmental impact statement and we support the development and implementation of a new management plan for controlling invasive non-native plants. However, regarding Effects to Other Resource Areas, Heritage Resources, we do not support the use of herbicides within our ancestral sites. Therefore, we support Alternative C, No Herbicide Alternative, for treatment of Ancestral Pueblo sites on the Lincoln National Forest, as a specific management action that would insure that direct effects, and concomitantly indirect and cumulative effects, to these properties would be reduced to "no effect" or "no adverse effect."

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Regarding Incomplete and Unavailable Information, because much of the Lincoln National Forest remains un-surveyed and pre-implementation surveys will be conducted, we request continuing consultation pursuant to the National Historic Preservation Act and Programmatic Agreement, including being provided with copies of the survey reports for review and comment.

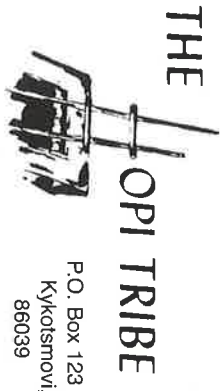
We also recommend that if any cultural features or deposits are encountered during project activities, these activities must be discontinued in the immediate area of the remains, and the State Historic Preservation Office must be consulted to evaluate their nature and significance, and if any Native American human remains or funerary objects are discovered during construction they shall be immediately reported as required by law. Thank you for your consideration.

Respectfully,



Stewart B. Koyiyumtewa, Program Manager/THPO
Hopi Cultural Preservation Office

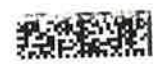
xc: New Mexico State Historic Preservation Office



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