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First name: Leigh

Last name: Kuwanwisiwma

Organization: Hopi Cultural Preservation Officer

Title: Director

Comments: July 28, 2016

Neil Bosworth, Laura Jo West, M. Stephen Best, Forest Supervisors

Coconino National Forest

Attention: 4FRI

1824 South Thompson Street

Flagstaff, Arizona 86001-2529

Re: Four Forest Restoration Initiative, 4 FRI Rim County Project Proposed Action

Dear Supervisors,

This letter is in response to your correspondence dated July 1, 2016, regarding the Four Forest Restoration Initiative and the enclosed 4FRI Rim Country Project Proposed Action. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups on the Coconino, Tonto, Apache-Sitgreaves and Kaibab National Forests. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Forests' continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office previously reviewed the Four Forest Restoration Initiative-Heritage Resources Strategy and NEPA Compliance, and the summary of up-coming and on-going Coconino National Forest cultural resource surveys and sample survey efforts in the 4FRI project area. Enclosed are our letters regarding the Four Forest Initiative dated March 21 and June 6, 2011, April 9, 2013, December 21, 2015 and February 16, 2016.

We understand the Rim Country Project proposal involves 1.24 million areas on the Apache Sitgreaves, Coconino and Tonto National Forests. Please note that our enclosed letters request continuing consultation with the Forests on the implementation and review of the cultural resources surveys, as well as Traditional Cultural Properties and ethnographic studies.

If you have any questions or need additional information, please contact Teny Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.ns.tl.us](mailto:tmorgart@hopi.ns.tl.us). Thank you for your consideration.

Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

Enclosures: March 21 and June 6, 2011, April 9, 2013, December 21, 2015, and February 16, 2016 letters

cc: Forest Supervisors, Coconino, Tonto, Apache-Sitgreaves  
Arizona State Historic Preservation Office

Laura Jo West, Forest Supervisor  
Attention: Craig Johnson, Tribal Relations Specialist  
Coconino National Forest  
1824 South Thompson Street

Flagstaff, Arizona 86001-2529

Re: Four Forest Restoration Initiative,

Summary of Heritage Resources Surveys and Sample Survey Efforts

Dear Supervisor West,

Hennan G. Honanie

CHAIRMAN

Alfred Lomahquahu Jr.

VICE-CHAIRMAN

This letter is in response to your correspondence dated January 28, 2016, regarding the Four Forest Restoration Initiative, Summary of Heritage Resources Surveys and Sample Survey Efforts. The Hopi Tribe claims

cultural affiliation to prehistoric cultural groups on the Coconino, Tonto, Apache-Sitgreaves and Kaibab National Forests. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Forests' continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office previously reviewed the Four Forest Restoration Initiative-Heritage Resources Strategy and NEPA Compliance, and we appreciate the enclosed summary of up-coming and on-going

cultural resource surveys and sample survey efforts in the 4FRI project area. In the enclosed letter dated December

21, 2015, we reviewed the cultural resources survey report for the Fort Valley area, and we understand heritage sample survey is currently on-going in the A-1, Upper Lake Mary-Johnneys and Pinegrove, Newman Park, Willard,

and Clints Well task order timber offering areas. We also understand Coconino National Forest is also conducting survey in 6,366 acres of areas proposed for prescribed fire as an initial treatment.

We look forward to continuing consultations with the Forests on the implementation and review of the cultural resources surveys, as well as Traditional Cultural Properties and ethnographic studies. If you have any questions or need additional information, please contact Teny Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you for your consideration~

Enclosures: March 21 and June 6, 2011, April 9,

xc: Arizona State Historic Preservation Office

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wanwisiwma, Director

ultirral Preservation Office

P.O. Box 123 KYKOTSMOVI, AZ 86039 (928) 734-3000

THE

December 21, 2015

Laura Jo West, Forest Supervisor

Attention: Craig Johnson, Tribal Relations Specialist

Coconino National Forest

1824 South Thompson Street

Flagstaff, Arizona 86001-2529

Herman G. Honanie

CHAIRMAN

Alfred Lomahquahu Jr.

VICE-CHAIRMAN

Re: Four Forest Restoration Initiative, Fort Valley Area Heritage Resources Survey Report

Dear Supervisor West,

. This letter is in response to your correspondence dated December 9, 2015, in response to our letter dated April 9, 2013, regarding an enclosed An Archaeological Survey and Cultural Resources Clearance Report for the Four Forest Restoration Initiative, Fort Valley Task Order Area, Coconino National Forest.

The Hopi Tribe claims cultural affiliation to the Archaic, Sinagua, and Cohonina prehistoric cultural groups in the Coconino National Forest. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and 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 previously reviewed the Four Forest Restoration Initiative-Heritage Resources Strategy and NEPA Compliance which states that 40% of the 817,151 acre project area in the Coconino National Forest has been surveyed and 3,366 cultural resources have been identified.

We have now reviewed the enclosed cultural resources survey report of the 5,683 acre project area that identifies two prehistoric sites determined to be ineligible for the National Register, AR-03-04-03-00395 and 00441, nine prehistoric sites of undetermined National Register eligibility, AR-03-04-03-00442, 00443, 00455, 00456, 00457, 00532, 00533, 01123, 01124, and three prehistoric National Register eligible sites, AR-03-04-03-0112, described as masonry rooms, 01133, described as two pictographs, and 01136, described as a rock shelter.  
P.O. Box 123 KYKOTSMOVI, AZ 86039 (928) 734-3000

Laura Jo West

December 21, 2015

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We concur that if the twelve National Register eligible and undetermined sites are avoided by project activities that the project within the Fort Valley Task Order area is unlikely to effect cultural resources significant to the Hopi Tribe. However, if any other 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 should be consulted to evaluate their nature and significance. If any Native American human remains or funerary objects are discovered they shall be immediately reported as required by law.

We look forward to continuing consultations with the Forests on the implementation and review of the cultural resources surveys, as well as Traditional Cultural Properties and ethnographic studies. .

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or tmorgart@hopi.nsn.us. Thank you for your consideration.

an - iwma, Director

ultural Preservation Office

Enclosures: March 21 and June 6, 2011 and April 9, 2013, letters

xc: Arizona State Historic Preservation Office

THE

Michael R. Williams, Forest Supervisor

Kaibab National Forest

800 South Sixth Street

Williams, Arizona 86046-2899

April 9, 2013

M. Earl Stewart, Forest Supervisor

Coconino National Forest

1824 South Thompson Street

Flagstaff, Arizona 86001-2529

Re: Four Forest Restoration Initiative-Coconino and Kaibab National Forests  
Draft Environmental Impact Statement

Dear Supervisors Williams and Stewart,

LeRoy N. Shingoitewa

' CHAIRMAN

Herman G. Honanie

VICE-CHAIRMAN

This letter is in response to the Draft Environmental Impact Statement for the Four Forest Initiative, Coconino and Kaibab National Forests regarding a proposal to conduct restoration activities within a 587,923 acres ponderosa pine ecosystem over 10 years. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Coconino, Kaibab, Apache Sitgreaves and Tonto National Forests. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Forest's continuing solicitation of our input and your efforts to address our concerns.

In the enclosed letter dated March 21, 2011, the Hopi Cultural Preservation Office reviewed the Four Forest Restoration Initiative-Coconino and Kaibab National Forest Purpose and Need and Proposed Action. We stated in initial consultations we have been informed that Appendix J, Standard Consultation Protocol for Large-Scale Fuels Reduction, Vegetation Treatment, and Habitat Improvement Projects pursuant to the First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities will apply to these projects.

In the enclosed letter dated June 6, 2011 we reviewed the Heritage Resources Strategy and NEPA Compliance for the Four Forest Restoration Initiative. The Strategy states that 46% of the 530,187 acre project area in the Kaibab National Forest has been surveyed for cultural resources and 3,843 cultural resources have been identified, and 40% of the 817,151 acre project area in the Coconino National Forest has been surveyed and 3,366 cultural resources have been identified.

P.O. BOX 123 KYKOTSMOVI, AZ 86039 (928) 734.3000

Michael R. Williams, M. Earl Stewart

April 9, 2013

Page2

The Strategy also states that Kaibab and Coconino National Forests have approached their methods of inventory in the ponderosa environments very differently, with the Kaibab conducting 100% survey and the Coconino conducting 100% survey in high site density areas, but only sample surveys of around 15-25% in low density areas. We understand that this multiple forest survey strategy generally adopts the Appendix J and Coconino approach, and that this strategy is intended to result in a determination of no adverse effect to historic properties.

In our June 6, 2011 letter we asked why the Forests don't adopt the approach Kaibab has employed since the 1970s, rather than the less rigorous Appendix J and Coconino approach to provide consistency in the way compliance is conducted. The Forest Service has acknowledged that the need to improve the health and condition of the forests has resulted from the fire suppression mismanagement of the forests over the last Century. If it has been possible for the Kaibab to conduct 100% surveys for over forty years, is that approach now being diluted because of the sheer size of this proposal?

We have also consulted on this proposal at our regular administrative meetings and have stated we looked forward to continuing consultations with the four Forests on the development and implementation of the cultural resources survey plans, and Traditional Cultural Properties and ethnographic studies.

We have now reviewed the Draft Environmental Impact Statement, and understand

Alternative C the Preferred Alternative responds to the issues of conservation of large trees and increased restoration and research. Our March 21, 2011 letter is not cited on page 35, Tribal Consultation. We also understand that in addition to Appendix J, a heritage strategy, initial Section 106 report, and tribal relations analysis have been developed for the project, and that effects on cultural resources from the action alternatives are not considered to be adverse. However, regardless of whether additional high impact or intense mechanical treatments occur under the preferred alternative, we look forward to continuing consultation on this project including the review of cultural resources survey reports, mitigation of adverse effects, identification and protection of Traditional Cultural Properties, and in the event of any inadvertent discoveries.

Regarding Forest Plan Amendment 3: Effect Determination for Cultural Resources, we understand this is a specific, one-time variance for the Coconino National Forest deletes the standard that addresses achieving a "no effect" determination and adds the words "or no adverse effect" to the remaining standard. More importantly than "no effect" or "no adverse effect" determinations, as demonstrated by both current and potential litigation in the Southwest and across the Country, the Forest Service has yet to integrate its Native American Sacred Sites and Traditional Cultural Properties consultations into its management decisions.

Mi-hael R. Williams, M. Earl Stewart

April 9, 2013

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Nevertheless, we also look forward to continuing consultation with the Forest Service in the hope that in the future, these consultations will lead to the integration of the content of tribal consultations into the Forest Service's management decisions. If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you for your consideration.

Enclosure: March 21 and June 6, 2011 letters

xc: Arizona State Historic Preservation Office

Henry Provencio, Coconino National Forest

Mike Lyndon, Kaibab National Forest

Craig Johnson, Coconito National Forest

Chris Knopp, Apache-Sitgreaves National Forest

Neil Bosworth, Tonto National Forest

u wisiwma, Director

opi Cultural Preservation Office

THE

June 6, 2011

M. Earl Stewart, Forest Supervisor

Attention: Craig Johnson, Tribal Relations Specialist

Coconino National Forest

1824 South Thompson Street

Flagstaff, Arizona 86061-2529

LeRoy N. Shirigoitewa

CHAIRMAN

Herman G. Honanie

VICE-CHAIRMAN

Re: Four Forest Restoration Initiative-Coconino and Kaibab National Forests

Heritage Resources Strategy and NEPA Compliance

Dear Supervisor Stewart,

This letter is in response to your correspondence dated May 12, 2011, regarding an enclosed Heritage Resources Strategy and NEPA Compliance for the Four Forest Restoration initiative, a proposal to conduct restoration activities within a 750,000 acres ponderosa pine

ecosystem over 10 years. The Hopi Tribe claims cultural affiliation to the Archaic, Sinagua, and Cohonina prehistoric cultural groups in the Coconino and Kaibab National Forests. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the Forests' continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has reviewed the enclosed Four Forest Restoration Initiative-Heritage Resources Strategy and NEPA Compliance. In our letter on this proposal dated March 21, 2011, we stated that in initial consultations on the Four Forest Restoration Initiative we have been informed that Appendix J, Standard Consultation Protocol for Large-Scale Fuels Reduction, Vegetation Treatment, and Habitat Improvement Projects pursuant to the First Amended Programmatic Agreement Regarding Historic Property Protection and Responsibilities will apply to these projects.

The Strategy states that 46% of the 530,187 acre project area in the Kaibab National Forest has been surveyed for cultural resources and 3,843 cultural resources have been identified, and 40% of the 817,151 acre project area in the Coconino National Forest has been surveyed and 3,366 cultural resources have been identified.

M. Earl Stewart

June 6, 2011

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The Strategy also states that Kaibab and Coconino National Forests have approached their methods of inventory in the ponderosa environments very differently, with the Kaibab conducting 100% survey and the Coconino conducting 100% survey in high site density areas, but only sample surveys of around 15-25% in low density areas. We understand that this multiple forest survey strategy generally adopts the Appendix J and Coconino approach, and that this strategy is intended to result in a determination of no adverse effect to historic properties.

To provide consistency in the way compliance is conducted, why don't the Forests adopt the approach Kaibab has employed since the 1970s, rather than the less rigorous Appendix J and Coconino approach? The Forest Service has acknowledged that the need to improve the health and condition of the forests has resulted from the fire suppression mismanagement of the forests over the last Century. If it has been possible for the Kaibab to conduct 100% surveys for over forty years, is that approach now being diluted because of the sheer size of this proposal?

We look forward to continuing consultations with the Forests on the implementation ~11d review of the cultural resources surveys~ as well as Traditional Cultural Properties and ethnographic studies. If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@cilhopi.nsn.us](mailto:tmorgart@cilhopi.nsn.us). Thank you for your consideration.

Leigh J. Kuwanwisiwma, Director

Hopi Cultural Preservation Office

Enclosure: March 21, 2011, letter to Kaibab and Coconino National Forests

cc: Michael R. Williams, Michael Lyndon, Kaibab National Forest

Arizona State Historic Preservation Office

THE I

Michael R. Williams, Forest Supervisor

Kaibab National Forest

800 South Sixth Street

Williams, Arizona 86046-2899

March 21, 2011

M. Earl Stewart, Forest Supervisor

Coconino National Forest

1824 South Thompson Street

Flagstaff, Arizona 86001-2529

Re: Four Forest Restoration Initiative-Coconino and Kaibab National Forest

Purpose and Need and Proposed Action

Dear Supervisors Williams and Stewart,

LeRoy N. Shingoftewa

CHAIRMAN

Herman G. Honanie

VICE-CHAIRMAN

This letter is in response to your correspondence dated January 27, 2011, regarding an enclosed proposal to conduct restoration activities within a 750,000 acres ponderosa pine ecosystem over 10 years, part of the Four Forest

Restoration Initiative. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Coconino, Kaibab, Apache Sitgreaves and Tonto National Forests. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and we consider the prehistoric archaeological sites of our ancestors to be "footprints" and 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 has reviewed the enclosed Four Forest Restoration Initiative Coconino and Kaibab National Forest Purpose and Need and Proposed Action." We routinely consult with Coconino, Kaibab, and Apache-Sitgreaves Forest Managers and Archaeologists during regular scheduled meetings

on the Forests' Schedule of Proposed Actions. In initial consultations on the Four Forest Restoration Initiative we have been informed that Appendix J, Standard Consultation Protocol for Large-Scale Fuels Reduction, Vegetation

Treatment, and Habitat Improvement Projects pursuant to the First Amended Programmatic Agreement Regarding

Historic Property Protection and Responsibilities will apply to these projects.

Therefore, we look forward to continuing consultations with the four Forests on the development and implementation of the cultural resources survey plans, and Traditional Cultural Properties and ethnographic studies.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or [tmorgart@hopi.nsn.us](mailto:tmorgart@hopi.nsn.us). Thank you for your consideration.

~ftJj:f1 J- K an~1ma, Director Cultural Preservation Office

xc: Forest Supervisor, Attention: Scott Wood, Tonto National Forest

Forest Supervisor, Attention: Melissa Schroeder, Apache Sitgreaves National Forests

Arizona State Historic Preservation Office

Mike Lyndon, Erin Woodard. Kaibab National Forest

Craig Johnson, Coconino National Forest

P.O. BOX 123 KYKOTS-OVI, AZ 86039