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Organization: White Mountain Apache Tribe

Title: Tribal Historic Preservation Office

Comments: March 20, 2014

M. Earl Stewart- Forest Supervisor

ATTN: Coconino National Forest Plan Revision Team

Re: Revised Land Management Plans / DEIS

1824 S. Thompson Street

Flagstaff, AZ 86001

Dear: Mr. Stewart,

The White Mountain Apache Tribe appreciates the opportunity to comment on the proposed Forest Management Plan and the draft environmental impact statement (DEIS) for the Coconino National Forest. Ndeé (Western Apaches) have longstanding and powerful cultural and spiritual ties to all of the lands, mountain ranges, water sources, and ecosystems within the Coconino National Forest.

The Tribe has been clear and consistent in advising the U. S. Forest Service, and other federal and state agencies responsible for the management of our aboriginal territory about the high significance of our ancestral landscapes and sacred sites. The Tribe has also been clear and consistent about the American Indian fiduciary and public trust mandates to protect these lands and sites from the many threats posed by disrespect for plants, animals, minerals, waters, and Native American heritage.

The White Mountain Apache Tribe has also been clear and consistent in supporting interests asserted by the Yavapai-Apache Nation, the Hopi Tribe, Zuni Pueblo, the Tonto Apache Tribe, and the Navajo Nation regarding the unique and irrevocable significances of the major mountains under Forest Service trusteeship, such as Dził Cho (San Francisco Peaks).

In recent decades the White Mountain Apache Tribe has acted as a constructive participant in Forest Service consultative and administrative processes relating to our aboriginal lands and sacred mountains. The Tribe has been repeatedly assured by federal officials that they have understood our positions and their trust responsibilities to Indian people, tribes, and ancestral lands. In previous statements and in the proposed land management plan and DEIS we read of Forest Service commitments to the integrity and vitality of the natural and cultural resources of public lands-foundations of good governance and appropriate stewardship, to be sure.

The Ndeé and White Mountain Apache Tribe always welcome the sorts of assurances contained in the "Tribal Relations" section of the Forest Management Plan and in that plan's many references to the promotion of ecosystem restorations and resiliencies. We will continue to observe Forest Service actions and await the arrival of the evenhandedness, good faith, and attention to trust responsibility that have been repeatedly pledged in the documents under review and revision.

At the same time, our detailed knowledge of Forest Service lands and decisions lead us to question Forest Service willingness and ability to make good on these pledges and commitments. Despite our patience and numerous attempts to guide Forest Service officials, however, we find that Forest Service stewardship and fiduciary pledges are seldom backed up by good decisions and right actions. More specifically, Forest Service decisions to enable and perpetuate the use of wastewater on the San Francisco Peaks are evidence of ongoing and especially harmful disrespect, desecration, and

destruction of our ancestral lands and our cultural heritage. Disrespect for our lands, our peoples, and our cultures is apparently escalating as the Forest Service continues to abandon so much of its public and tribal fiduciary responsibilities in service to powerful industrial permittees like Snow Bowl. From our vantage, the historical and ongoing Forest Service failures to attend to Indian and public trust responsibilities appear traceable to a lack of willingness to make tough decisions that limit and regulate the proponents of disrespect and destruction.

The Tribe regards the proposed forest management plan and programmatic draft environmental impact statement (DEIS) for Coconino National Forest primarily as an opportunity to institutionalize and operationalize Forest Service stewardship mandates and American Indian trust responsibilities. The proposed plan makes clear that Coconino National Forest is aware of the diverse and abundant values embedded in the Forest and is aware of the its fiduciary and stewardship duties. The Tribe's specific comments on the proposed plan and DEIS respectfully demand that Coconino National Forest, acting as our federal trustee, translate this awareness into action to protect the cultural and historical foundations for our Ndee way of life and other the wellbeing of all people and communities-Ndee and non-Ndee-who rely on Coconino National Forest lands for water, food, shelter, guidance, and inspiration.

White Mountain Apache Tribe looks forward to seeing Forest Management Plan revisions and final environmental impact statement confirmations of Coconino National Forest commitments to American Indian and public trust responsibilities. Far more importantly, the Tribe looks forward to the first steps in a long-awaited program of on-the-ground actions to protect the physical integrity of our sacred sites, especially San Francisco Peaks, and to restore the ecosystems across Coconino National Forest that have been damaged, degraded, and desecrated by disrespectful management and use.

Please continue consultations with the White Mountain Apache Tribe through communications with the WMAT Historic Preservation Office.

Sincerely,

Mark T. Altaha - THPO
White Mountain Apache Tribe
Tribal Historic Preservation Office