Data Submitted (UTC 11): 9/16/2021 6:00:00 AM
First name: Melvin
Last name: Baker
Organization: Southern Ute Undian Tribe
Title: Chairman
Comments: RE: Southern HD's Landscape Restoration Project, San Juan National Forest, Columbine Ranger District

Dear Mr. Simino;

Thank you for your letter dated August 17, 2021, conceming the opportunity of the Southern Ute Indian Tribe ("Tribe") to comment on the pre-decisional draft Environmental Assessment ("EA") for the Southern HD's Landscape Restoration Project ("Project"). As an initial matter, we believe your proposed forest treatments for the Southern HD's are appropriate and important for reducing catastrophic wildfire risk and retuming the forest to a healthier and more sustainable pre-settlement condition. Your proposal is compatible and aligns well with the forest management goals on neighboring Southem Ute trust lands. However, we do have the following initial comments on the Project.

The HD Mountains are known by the Southern Ute as Kwiyagharuchichi, which translates into Oak Mountain. As you are aware, there are important cultural resources within and around the Project area. These cultural resources are not only in the form of archeological sites, but Ute cultural sites, harvesting areas of traditional use plants, trees and shrubs for spiritual ceremonies, and the viewshed from ceremonial vantage points. In addition, the HD's have important deer and elk populations that utilize travel corridors, feeding areas and birthing [iquest]reas. These animals have important applications to Southern Ute Tribal members, not only as food, but for traditional clothing, cradleboards, drums, and other usages.

Given these areas of cultural significance, moving forward consultation with the Tribe, including the Cultural Preservation Department, is particularly important. Consulting and integrating both NEPA and NHPA early would support discussion on the effects to the human environment and consideration of historic properties that have cultural and religious significance with other environmental factors.

We would like to emphasize our strong opposition to the exp[oslash]nsion of motorized or nonmotorized recreation in the Southern HDs, due to the importance of preserving intact, undisturbed wildlife habitat and the effect such traffic will have on cultural resources. The creation of any new roads or trails within the Southern HDs should be limited to those essential for forest health and fire management purposes. Any temporary roads or trails created in conjunction with this project should be fully reclaimed as quickly as practicable, with follow-up monitoring and management of reclaimed ground to prevent weed invasion.

Finally, we request clarification on two issues.

l. First, how will the potential impact to surface water quality be mitigated? Do you have a plan in place to mitigate surface water quality impacts from flooding as a result of surface disturbances such as timber harvesting, construction, and controlled burns?

2. Second, how will cumulative air quality impacts, that have potential to cause unhealthy levels of particulate matter, be mitigated. Specifically, how will the project mitigate air quality impacts from controlled burn smoke concurrent with regional wildfire smoke? Are control measures in place to avoid burning during times of temperature inversions preventing particulate matter impacts from smoke in valleys and topographical lows?

Thank you for the opportunity to comment on the pre-decisional draft EA. We look forward to continued consultation.

Please feel free to contact me with any further questions.

Sincerely,

Melvin J. Baker, Chairman

Southern Ute Indian Tribe