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Title: Tribal Historic Preservation Officer

Comments: MEMORANDUM

DATE: July 14, 2016

TO: Annette Fredette, 4FRI Planning Coordinator, Coconino National Forest

FROM: Peter L. Steere, Tribal Historic Preservation Officer, Tohono O'odham Nation

RE: 4FRI - Rim Country Project

Thank you for consulting with the Tohono O'odham Nation on the 4FRI-Rim Country Project (letter to Chairman Edward Manuel - July 1, 2016).

We understand that project is aimed at restoring forest resiliency and ecosystem function in ponderosa pine forests across four national forests in Arizona, including the Coconino, Kaibab, Apache-Sitgreaves and Tonto National Forests.

On page 3 of the 4FRI Rim Country project - you indicate that one of the purposes of this project is to "preserve cultural resources." And on page 5 you expand on this by stating that "there is a need to reduce threats to cultural resources by overly dense vegetation and soil erosion." The primary threat here to cultural resources high severity fires. By reducing fuel loads accumulation around cultural resources you would reduce threats to these cultural resources.

Page 3 - could you please define "natural range of variation"

The Tohono O'odham Nation's Tribal Historic Preservation Office would support this effort to protect cultural sites.

When fuel reduction activities start in the proximity of a cultural site there should be a forest archaeologist on site to mark and monitor any such activity.

On page 9 you state "that there are 411 known springs in the Rim Country project area." Many tribes regard springs as sacred sites. Any work in the vicinity of springs needs to be carefully monitored

Page 10 - we assume that the major mechanical treatment is thinning, is this correct ?

Page 11 - one of the treatments is controlled fires - care should be taken when doing controlled burns in the vicinity of cultural sites - forest archaeologist should monitor

Page 12 - can you explain how travel management rules (TMR) which may include improvement, removal or relocation

- please expand discussion to explain what measures will be implemented to protect cultural sites in the event of road improvements, removal or relocation

Page 13 - please define "other restoration activities."

Page 14 - construction activities - 200 miles of protective barriers around springs, aspen, Bebb's willows and big-tooth maples will need to be monitored - as stated earlier springs are regarded as sacred sites by many tribes.

Appendix A - Proposed Forest Plan Amendments

Page 29 - no discussion of project impacts on cultural sites on the Coconino National Forest

Page 30 - in discussion of cultural resources on the Tonto National Forest - please define when Programmatic Agreement (PA) you are referring to,

You state that the Tonto National Forest has " a standard that directs management to achieve a no "no effect" determination for cultural resources

You then state "the Forest Service will comply with the National Historic Preservation Act of 1966 (as amended) and the Programmatic Agreement

You then state that " An amendment specific to the 4FRI Rim County EIS would remove the following "no effect" language: sites listed in, nominated to, eligible for, or potentially eligible for the National Register will be managed during the conduct of undertakings to achieve a "No Effect" finding in consultation with State Historic Preservation Officer."

This paragraph is unclear - are you removing " no effect" management as regards cultural sites - this section need to be rewritten in clearer manner.

In Summary

I assume that on any area slated for mechanical treatment - a cultural resource survey would be completed, a report prepared and consultation letters will be sent to tribes with copies of cultural reports for review and comment.