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Four Forest Restoration Initiative, Rim Country EIS

Tribal Relations Specialist Report

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Tonto National Forest for:
4FRI Rim Country EIS

Oct 31, 2018

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Introduction/Project Information

- The 4FRI project is situated across a landscape that is ancestral to at least 17 American Indian Tribes. Federal law, regulation, and policy require consultation between the U.S. Forest Service and federally recognized American Indian tribes. For this project in particular it is relevant to acknowledge the Forests and Tribes share a common interest in maintaining the health of the forests, which can be explored through consultation and partnership development. With the knowledge that American Indian people have inhabited Arizona for centuries, it is in the best interest of the Forest Service to utilize tribal knowledge and resources in order to restore and maintain a healthy forest ecosystem.

Relevant Law, Regulation, and Policy

- Tribal consultation is a critical step in meeting the agency's legal and fiduciary responsibilities to Tribes. Tribes have an interest in management and restoration of the lands within the project area. The Tribal consultation process is guided by a variety of regulations, Executive Orders, and Memoranda. Some of those laws include the National Environmental Policy Act (NEPA), National Historic Preservation Act (NHPA) and subsequent amendments, Archaeological Resources Protection Act (ARPA), American Indian Religious Freedom Act (AIRFA), and the National Forest Management Act (NFMA), Native American Graves Protection and Repatriation Act of 1992 (NAGPRA), and The Religious Freedom Restoration Act of 1993 (RFRA). Executive Order and Memoranda include Executive Order 13175-- Consultation and Coordination with Indian Tribal Governments, the Food, Conservation, and Energy Act of 2008 (Public Law 110-234), E.O. 13007 Accommodation of Sacred Sites, E.O. 12898 Environmental Justice, the 2009 Presidential Memorandum on Tribal Consultation reaffirming E.O. 13175, and the USDA Policy and Procedures Review and Recommendations: Indian Sacred Sites. A coordinated and clear process for carrying out these consultation is essential to ensure meaningful dialogue and positive outcomes.

Forest Plan Direction

The Kaibab, Coconino, Tonto, and Apache-Sitgreaves National Forest Plans provides management direction for tribal resources as follows:

- Establishing and maintaining strong, mutually beneficial working relationships with tribes is critical to future success in addressing tribal issues related to land management. Because all lands managed by the Forest Service were once tribal lands, the forests use a shared stewardship approach to land management based on meaningful consultations with Indian tribes. The forests and Indian tribes have a mutual interest in maintaining healthy, sustainable populations of plants and other resources important for traditional and cultural purposes. They promote a shared stewardship approach to land management across boundaries.
- Desired conditions for Traditional and Cultural Uses continues to be a goal for promoting the continued traditional and ceremonial use of the forest and its resources, and focusing on ensuring resources for future generations.

Affected Environment

- All of the lands in the 4 FRI project area are the ancestral homelands of American Indian tribes. The archaeological resources in the 4FRI area demonstrate a high level of traditional uses which continue today (see Heritage section for more details concerning Archaeological Resources). In lands occupied by their ancestors, tribal members continue traditions of hunting, collecting

medicinal plants, and conducting traditional ceremonies. This includes American Indian traditional use areas and places known as Traditional Cultural Properties (TCPs). TCPs are places traditionally used by cultural groups over generations. These TCPs hold a central and important place in American Indian culture. Through years of tribal consultation the Forests have learned that many natural springs, prominent bodies of water, mountains, subsistence areas, prayer areas, shrines, clan origin locations, holy places, trails, and shelters (ie. sweat lodges and brush shelters) are considered TCPs by numerous tribes.

- Tribal members make pilgrimages to the forest for ceremonial activities throughout the year. Springs in the 4FRI project area and throughout the forest are valued as TCPs and/or sacred sites. Many plants gathered for ceremonial use are collected on or near TCPs.
- Wildfires producing high-severity fire effects are a threat to all forest products. However, fire suppression on the forest has also caused damage by preventing the healthy production of juniper boughs, limiting the growth and production of small fir trees, and limiting the number of large ponderosa logs for ceremonial structures. Habitat for some native plants desired by tribal traditional collectors is disappearing and natural springs are drying up due to human activities. Some of the affected plant collection areas and springs that were used historically and still have associated cultural values that are important to the tribes.
- Some locations used by tribal members to conduct traditional activities such as plant collection and religious rites on the forests are known, but much of this information is closely held by traditional practitioners and is not, therefore, publicly available. For this reason, and to protect for confidentiality of culturally sensitive information, there is no accepted inventory of such places. Tribal consultation is necessary to identify and protect areas of traditional cultural and religious use.

Tribal Consultation

- The Forest Service and Tribes have legislative authority to partner under, but not limited to, the Indian Financing Act of 1974, the Cooperative Funds and Deposits Act of 1975, Forest and Rangeland Renewable Resources Research Act of 1978, the Federal Technology Transfer act of 1986, the Department of Interior, Environment and Related Agencies Appropriations Act of 1992, the Tribal Forest Protection Act of 2004 (TFPA), the Culture and Heritage Cooperative Authority of 2008 (CHCA), and the Wyden Amendment (Public Law 109-54, Section 434). These authorities provide opportunities to exchange technical expertise, funding, goods and services, to the mutual benefit of both parties. An effective government-to-government relationship will provide for the identification of common goals and partnership opportunities. For additional guidance, see FSM 1563.
- Consultation is guided by policy identified in a number of points in FSM 1500 and FSM 2000. 1509.13 – Policy 11.1-5 Consultation with Indian Tribes and Alaska Native Corporations. 1563.03 – Policy 1. Maintain a government-to-government relationship with federally recognized Tribes. 5. Coordinate Forest Service land and resources management plans and actions with tribal land and resource management plans and actions to promote the health of ecosystems. 10. Consult with Tribes on matters that may affect tribal rights and interests. 2020.3 – Policy 2. Develop goals and objectives within the framework defined by laws, Indian treaties, regulations, collaboratively developed public and Indian tribal values and desires, historical conditions,

current and likely future ecological capabilities, a range of climate change predictions, the best available science, information, and technical and economic feasibility.

- Government-to-government consultation may only occur between Forest Service Line Officers and tribal leaders who have authority to consult on behalf of their Tribe. In accordance with Forest Service Manual (FSM) 1230.6, the line of delegation passes from the Chief to the Deputy Chiefs and through Line Officers to the field. Tribal consultation may not be delegated from Line Officers to staff in the field. Line Officers should engage personally with tribal leaders (FSH 1509.13 §11.1).
- FS staff interactions are essential to set the stage for effective consultation and should be maintained and enhanced throughout the analysis and implementation of the project. Tribal Relations staff provide needed subject matter expertise, and sometimes provide the extensive relationships with tribal staff or leaders. Staff certainly can and should participate in consultation as well as in staff-to-staff and staff-to-leader discussions where it makes sense locally. Information will be shared with tribes via written correspondence, email and telephone calls. Tribes that do not participate in tribal consultation will receive information and updates. Information will be shared unless a tribe asks specifically to not be informed.
- Consultation will include the following Tribes (this list may not be conclusive as tribes that are not on this list may request consultation at any time during the project): Ft. McDowell Yavapai Nation, Gila River Indian Community, Havasupai Tribe, Hopi Tribe, Hualapai Tribe, Kaibab Band of Paiute Indians, Navajo Nation, Mescalero Apache Tribe, Salt River Pima–Maricopa Indian Community, San Carlos Apache Tribe, San Juan Southern Paiute Tribe, Tonto Apache Tribe, White Mountain Apache Tribe, Yavapai–Apache Nation, Yavapai–Prescott Indian Tribe, Pueblo of Acoma, and Pueblo of Zuni. Eight Navajo Chapters in proximity to the project area – the Alamo, Bodaway/Gap, Cameron, Coalmine Canyon, Dilkon, Lechee, Leupp, Ramah, Tolani Lake, and To’Nanees’Dizi Chapters.

Consultation Record

Date of Meeting	Tribes Attending	Meeting Location	Comments/Concerns
4/20/2016	Hopi Tribe	Flagstaff, Arizona	<ul style="list-style-type: none"> • Known golden eagle nesting sites should be monitored
08/16/2016	Pueblo of Zuni, Yavapai-Apache Nation, San Carlos Apache Tribe, Tonto Apache Tribe, White Mountain Apache Tribe	Payson, Arizona	<ul style="list-style-type: none"> • Tribes desire “pre-reservation conditions” for the forests. • Tribes are concerned with long term access to forest resources particularly forest products which are traditionally utilized. • Mechanical treatment should be culturally/tribally monitored to prevent destruction of traditional cultural properties and archaeological sites • Tribes (WMAT & SCAT) should be notified prior to rX burns.

			<p>Smoke effects the elderly in tribal communities.</p> <ul style="list-style-type: none"> • San Carlos would like logging materials for their mills • There should be a TCP inventory conducted • There should be a harvesting/subsistence site inventory • Hot fires destroy the sumac berry which is important to the Apaches • Mechanical thinning can destroy tobacco which is important to the Apaches
8/18/2016	Salt River Pima-Maricopa Indian Community and Gila River Indian Community	Sacaton, AZ	<ul style="list-style-type: none"> • Concerned about wooden and other fire sensitive archaeological sites. For example hogans with wood implements, cradle board scarred trees
11/21/16	Navajo Nation	Window Rock	<ul style="list-style-type: none"> • There have been smoke impacts to Bitter Springs and Cedar Point. Smoke is not good for the elderly. • Fire from lightning struck trees is harmful to Navajo people. There may be a need for medicine men to be involved with these fires that are encouraged and maintained by FS.
11/22/16	Pueblo of Zuni	Zuni, NM	<ul style="list-style-type: none"> • Zuni YCC crews are looking for work and work like to be involved. • Springs are Zuni TCPs • Zuni would like to participate in cultural plant inventory and spring inventories (specific to Kaibab)
11/29/16	Fort McDowell Yavapai Nation & Yavapai-Prescott Indian Tribe	TNF Headquarters	<ul style="list-style-type: none"> • Request for continued information sharing.
12/9/16	Mescalero Apache Tribe San Carlos Apache Tribe Tonto Apache Tribe	Payson, AZ	<ul style="list-style-type: none"> • Herbicide useage should be signed so tribal members don't collect plants in these areas. • agave parryi, acorn oaks, piñon, and cattails are important
12/13/16	Pueblo of Zuni	Zuni, NM	<ul style="list-style-type: none"> • Zuni has crews that could assist in implementation. They also have cultural resources survey crews.
12/30/16	Salt River Pima Maricopa Indian Community Gila River Indian Community	TNF Headquarters	<ul style="list-style-type: none"> • Gila River has thinning crews that could potentially assist in implementation

			<ul style="list-style-type: none"> • Salt River could provide cultural sensitivity training for contractors
4/10/17	WMAT Tribal Forestry and Pueblo of Zuni	Showlow, AZ	<ul style="list-style-type: none"> • Economic concerns about wood products flooding the market and negatively impacting tribes. Concern that Ecological Restoration be the driving force for the project instead of biomass production. FS needs to prioritize and treat areas to protect the highest resource values (i.e. cultural, wildlife, TES species, and watershed).
01/17/18	Hopi Tribes	Flagstaff, AZ	<ul style="list-style-type: none"> • Hopi would like the EIS to identify areas where springs, rock cairns, and plants such as wild tobacco, cattails, and osha are found in the areas stated for treatment. They want to be updated on the sampling strategies being developed.
01/11/18	Kaibab Band of Paiute Indians	Pipe Springs, AZ	<ul style="list-style-type: none"> • Tribe is interested in developing a SPA to provide thinning crews.
03/08/18	Pueblo of Zuni	Zuni, NM	<ul style="list-style-type: none"> • Pueblo of Zuni President signed the Tribal Crews Master Participating Agreement (MPA)
04/03/18	Havasupai Tribe, Hualapai Tribe, Hopi Tribe, Pueblo of Zuni	Kaibab NF Field Visit	<ul style="list-style-type: none"> • Discussed project development under the MPA. • Tribes need timbers and other forest products for traditional uses.
04/27/18	Gila River & Salt River Pima-Maricopa Indian Communities	TNF Headquarters	<ul style="list-style-type: none"> • Gila River would like to participate in forest restoration activities • Salt River would be interested in providing input to the Citizen-Science iNaturalist Program
05/01/18	Tonto Apache Tribe, San Carlos Apache Tribe, Yavapai Apache Nation, White Mountain Apache Tribe	Twin Arrows, Flagstaff	<ul style="list-style-type: none"> • Apache Tribes are very interested in the restoration, protection, and sustainability of emory oak trees. They are willing to assist in designed management actions. • Discussed Citisci iNaturalist project implementation • Discussed SPA development under the Tribal Crews Master Participating Agreement
05/03/18	Hopi and Zuni	Twin Arrows, Flagstaff	<ul style="list-style-type: none"> • Tribes are interested in assisting in forest restoration activities. Tribes use the forest to access timber and forest products not available on their reservations. • Discussed Citisci iNaturalist project implementation

			<ul style="list-style-type: none"> Discussed SPA development under the MPA
05/07/18	Havasupai Tribe	Supai, AZ	<ul style="list-style-type: none"> Discussed MPA and possibility of Havasupai Water Resources assisting with water restoration projects
05/14/18	San Carlos Apache Tribe & White Mountain Apache Tribe	Payson Ranger District	<ul style="list-style-type: none"> Strategy meeting to discuss how to move forward to partner in Forest Restoration Activities

During consultation the tribes have expressed concerns about the following:

- Springs that are important to tribal communities are drying up.
- A lack of low intensity fire is reducing regeneration of medicinal plants.
- Emory oak is a critical resource for the Western Apache tribes. Emory oak groves are disappearing at an alarming rate (urban encroachment) and immature oaks are failing to reach maturity due to grazing, lowering groundwater, competing species, and conversion of groves to other land uses.
- Active forest restoration is desirable so long as, mechanical equipment is monitored to ensure for the protection of archaeological sites and traditional cultural properties.
- Tribes would like to assist in forest restoration activities, especially along shared borders.
- Tribes are concerned about long-term access to forest products for traditional use.
- Traditional cultural properties, harvest sites, springs, cultural plants should be inventoried to ensure they are taken into consideration when planning project activities.
- Cultural plants are absent in treatment activities because they are not sensitive or rare. Cultural plants should be protected and encouraged to ensure availability for tribal traditional purposes.
- Hot fires destroy the sumac berry which is important to the Apaches
- Mechanical thinning can destroy tobacco which is important to tribes
- Fire can destroy fire sensitive archaeological sites (hogans, cradleboards, scarred trees, etc)
- There have been smoke impacts to Bitter Springs and Cedar Point. Smoke is not good for the elderly.
- Fire from lightning struck trees is harmful to Navajo people. There may be a need for medicine men to be involved with these fires that are encouraged and maintained by FS.
- Wildland fire smoke negatively impacts tribal communities, especially the health of the elderly.
- Fire and smoke from lightning struck trees is harmful to Navajo people. There may be a need for medicine men to be involved with these fires that are encouraged and maintained by FS.
- Herbicide useage should be signed so tribal members don't collect plants in these areas.

Issues/Indicators/Analysis Topics

- Traditional Collecting Areas - Dense tree growth and heavy ground fuels can have a negative effect to certain plant species, thinning the forest may provide a better habitat for these plants to thrive. Fire can also enhance certain plant species such as wild tobacco. Restoration activities could positively impact the sustainability and availability of traditionally important plant species and natural springs.
- Smoke Impacts - Increases in prescribed fire in all action alternatives (no action, alternative 2, and alternative 3) create the potential for increased smoke impacts. Most of the smoke from

prescribed fire on the Coconino and Kaibab NFs would carry from the southwest to the northeast, potentially affecting the Havasupai Reservation and western portions of the Navajo Nation Reservation; Many people living in these areas are seniors with health conditions and are sensitive to smoke. The effects of limited communications (they cannot get on a Web site to check out where we're burning, etc.), language barriers, or cultural differences make it difficult to get information to them and receive information in return about smoke impacts; and There is a general lack of smoke monitoring data on the reservations. Therefore, those living on these reservations may be disproportionately impacted by smoke from the various agencies (especially from multiple fires on multiple jurisdictions). Coconino County has a significantly higher poverty rate than the other counties and the states of Arizona and Utah. The incidence of poverty in Coconino County is not evenly distributed among racial and ethnic groups. Approximately 50 percent of American Indian residents in Coconino County live in poverty. The high proportion of American Indian residents in the county, therefore, increases the poverty rate relative to other study area counties and the State (Eichman and Jaworski 2011).

Assumptions and Methodology

- Assumptions made are as follows; no activities will adversely effect archaeological sites or traditional cultural properties; the removal of excess fuels is a benefit to cultural resources, traditional cultural properties, traditional use forest products, and adjacent tribal lands; Low heat prescription wildfires can result in the regeneration of medicinal plants; Mechanical thinning of specific species can protect other plant species of cultural importance (such as Emory Oak groves); restoration activities will benefit natural springs which are of universal importance to Indian tribes; Indian tribes will be consulted at critical points before project activities.

Summary of Alternatives and Resource Protection Measures (Design Features, Best Management Practices, Mitigation and Conservation Measures)

- Region 3 PA and Appendix J include lists of mitigation measures that have been pre-consulted on with the Arizona and New Mexico Tribes. Therefore these measures can be implemented during the field analysis phase. Additional mitigation measures may be recommended and considered by Indian tribes via government to government consultation on the project specific level. The following table lists the general design features and BMPs that can be utilized as part of the analysis of the individual task orders.

Design Feature	Description	Primary Purpose	Forest Plan Compliance	Specialist Recommendation
CT001	Minimize effects to archaeological sites from wildland fires by implementing the agreed-upon standard site protection measures from in Appendix J of the Southwestern Region Programmatic Agreement (PA) with AZ SHPO, or any additional mitigation measures recommended in consultation with the AZ SHPO and Tribes.	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X
CT002	All activities will comply with the NHPA, as appropriate. Effects to cultural resources would be determined in consultation with the SHPO, the tribes, and other consulting parties. Potential effects would be addressed through site avoidance strategies and implementing the site protection measures listed in Appendix J of the Southwestern Region Programmatic Agreement (PA) and in the 4FRI heritage strategy and section 106 clearance report.	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X

CT003	Consult with Native Americans, particularly when projects and activities are planned in sites or areas of known religious or cultural significance.	Regulatory requirement. Compliance with NHPA, AIRFA, Southwestern Region PA with AZ SHPO, EO 13007, EO 13175, and other applicable Executive Orders and legislation.	X	
CT004	Eligible, or potentially eligible, cultural resources would be managed to achieve a “no effect” or “no adverse effect” determination whenever possible, in consultation with the SHPO and ACHP (36 CFR 800).	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X
CT005	Monitoring during and after project implementation shall occur to document site protection and condition.	Compliance with Southwestern Region PA (Appendix J) with AZ SHPO.	X	X

CT006	Proposed treatment activities and schedules would accommodate tribal traditional and ceremonial access and use.	Compliance with the Food, Conservation, and Energy Act of 2008 (Public Law 110-234)	X	X
CT007	In accordance with regulations (43 CFR 10) governing application of the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA), if human remains, funerary objects, sacred objects, or objects of cultural patrimony are inadvertently encountered, operations in the area must immediately cease and the Forest Archaeologist notified. The Forest will work to initiate consultation with the affected tribe (s) to implement any requirements listed in NAGPRA and the PA and to develop a plan to mitigate for the effects to the find.	Regulatory requirement. Compliance with NAGPRA, NHPA and Southwestern Region PA with AZ SHPO. Forest plan compliance.	X	X

CT008	Should any previously unidentified cultural materials be discovered during project implementation, work must cease immediately and the Forest Archaeologist must be contacted to initiate the consultation process as outlined in the Advisory Council on Historic Preservation Regulations (36 CFR Part 800.13).	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO. Forest plan compliance.	X	X
CT009	Contracts, permits, or leases that have the potential to affect cultural resources shall include appropriate clauses specifying site protection responsibilities and liabilities for damage.	To insure that mitigations measures identified during the analysis phase to protect cultural sites from being adversely effected are addressed during the implementation portion of the project.	X	X
CT010	Fines, etc., for the costs of restoration and repair resulting from breaches of contracts, permits, or leases that cause inadvertent or intentional damages to cultural or tribal resources shall be strictly enforced.	ARPA, Site protection	X	X
CT011	Locate, record, and evaluate the General Crook and other significant historic trails within the project area well before implementation.	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X

CT012	Maintain historic and scenic integrity of the General Crook Trail and other historic trails, roads and National Recreation Trails.	NHT and NRT requirements, Recreation Opportunity Spectrum	X	X
CT013	Maintain historic and scenic integrity of National Register-eligible historic roads, including the preservation of associated historic features, tread width, curve radii, and other features that contribute to the National Register eligibility of the historic roads.	Site protection, ARPA (prevention of looting)	X	X
CT014	Plate over National Register-eligible and unevaluated sites located within roads that will be maintained or reconstructed	NHPA compliance, 4FRI Rim Country Site Plating protocol	X	X
CT015	Coordinate with forest cultural resource specialists to design and implement projects (or don't implement projects) located in areas of very high site density.	Site protection, ARPA (prevention of looting)	X	X
CT016	Culturally modified trees such as blazed trees, lookout trees, phone line trees, arborglyphs, peeled trees, etc.) will be avoided. Protection measures may include removing ladder fuels around the trees by hand, establishing buffer zones to keep equipment from damaging trees or affecting root systems, etc.	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X
CT017	Roads to National Register-eligible and unevaluated sites identified to be closed post implementation will be closed immediately after implementation is completed.	Regulatory requirement. Compliance with NHPA and Southwestern Region PA with AZ SHPO.	X	X

CT018	<p>All rock pit locations will be surveyed for cultural resources. All identified cultural resources that are considered eligible for the purposes of Section 106 of the National Register of Historic Places within or adjacent to the rock pit boundary shall be flagged prior to implementation. Flagged cultural resources shall be fully avoided.</p> <p>In addition to flagging, rock pit extraction areas shall include fencing along the pit boundary to minimize the potential for indirect impacts to cultural resources outside of the pit boundary where applicable.</p>	<p>Reduces disturbance footprint, protects cultural and historic sites, and retains seed sources for eventual reestablishment of residual plant cover, potentially enhancing fruit, seed, and plant production.</p>	X	X
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Environmental Consequences

Alternative 1 – No Action

- Direct effects as a result of No Action will result in the loss of native plant species, continued loss of springs due to ground water availability, and the drying up and a greater threat to devastating wild fires. Also, with continued drying trends across the southwest the Forest will issue forest closures and fire restrictions thus effecting traditional uses and ceremonies.
- TCPs are at risk to catastrophic fire because it can destroy the landscape, components, and viewshed that compose the TCP. Springs and plant collection areas are at risk to catastrophic fire because of excessive runoff from monsoon rain washing in ash and debris in a fire devastated landscape. Overstocked stands are reducing the sunlight available for cultural and medicinal plants and catastrophic fire can destroy seed and habitat for native plants. A lack of low intensity fire is reducing regeneration of plants collected by native people.
- Soil erosion due to uncharacteristic wildfires could have both a direct and indirect effect on traditional collecting areas. Rain and snow melt could cause channels to form, or mud slides from nearby slopes could deposit soil and debris over traditional areas leading to the loss of biological communities for both plant and animal species used by the tribes. Soil erosion can also compromise archaeological sites which are TCPs.
- A “No Action” may result in the possible reduction over time of pre-settlement adapted native plants, some of which have been collected since historical times by American Indians for food, medicine, and ceremonial use. Additionally, springs and seeps are important to American Indians

and other members of the public and increasingly overstocked forests may have some effect on those historic water sources.

- The No Action Alternative (A) is not keeping with the four forest plans, the respective forest plans propose to promote healthy forest through fuels reduction for fire prevention. This thinning will promote restoration of springs and reduce the risk of adversely affecting TCPs from catastrophic wildfires.

Effects Common to All Action Alternatives

- The ground disturbing activities associated with these two alternatives (2 & 3) are not significant enough to analyze separately.
- Alternatives 2 & 3 have the potential to increase the amount of ground-disturbing activities, including mechanical treatments, temporary road construction, skidding, stream restoration, fence construction and other ground disturbing activities. When considered together with the past present and foreseeable future actions, these activities have the potential to affect cultural resources such as traditional collecting, gathering and ceremonial use areas and TCPs. All undertakings that have the potential to affect cultural resources will go through tribal consultation. In addition, protection measures such as the possibility of tribal monitors during mechanical activities, keeping ground disturbing activities out of sensitive areas by flagging and avoiding the sensitive areas, and post prescribed burn monitoring to assess the effects of the low intensity burns, will help to minimize the effects. The potential cumulative effects to cultural resources and TCPs such as springs from increased ground disturbing activities and prescribed burning resulting from this alternative are therefore not considered to be adverse.
- The cumulative effects on TCPs, gathering and ceremonial areas resulting from any potential increase in erosion are also minimal. Reducing fuel loads and implementing low to moderate intensity prescribed fires does not cause soil sterilization or hydrophobic soils as high intensity wildfires do. Low intensity prescribed fires leave some vegetation in place and re-vegetation occurs soon afterwards if soils are not sterilized. However, as implementation occurs, monitors would check for erosion concerns by examining culturally sensitive locations like TCPs and ceremonial sites in the project areas, including focusing on slopes, drainages, and other high probability areas with cultural resources present. An increase in these types of activities will not result in an adverse effect to cultural resources as long as tribal consultation is conducted prior to project implementation, protection measures are imposed and post project implementation monitoring is conducted when appropriate.

Effects Unique to Each Action Alternative and Differences Among Them

- The ground disturbing activities associated with these two alternatives (2 & 3) are not significant enough to analyze separately. Identified activities have the same potential to affect traditional collecting and gathering, and ceremonial areas, and TCPs.

Cumulative Effects Analysis

No Action

If the proposed large scale, landscape level forest health project does not occur, there would be detrimental cumulative effects to resources of importance to tribes. High intensity wild fires and the

construction of fire breaks using bulldozers during a wild fire could severely damage traditional cultural properties, culturally important plant life, springs, and other values of tribal importance. Wild fires could also sterilize the soil or completely remove ground fuels making the sites vulnerable to soil erosion, and preventing the regrowth of traditional plants. Tree crowding makes the forest less accessible for traditional activities which often occur in clear areas, meadows, grasslands, and near water.

Effects Common to All Action Alternatives

Cumulative effects from mechanical treatments, temporary road construction, and other ground disturbing activities, as well as effects caused by prescribed burning, would be mitigated by identifying areas of tribal importance and modifying project activities to prevent adverse effects. Because all ground disturbing and prescribed fire undertakings require tribal consultation, and identified potential effects would be mitigated, the overall cumulative effects from these undertakings should be minimal. Therefore there should be little cumulative effects to areas of tribal concern including TCPs as a result of the activities proposed in this EIS.

Road closures could potentially interfere with access to areas. Road closures should be included in consultation to facilitate access for traditional cultural activities.

Reducing fuel loads and implementing low to moderate intensity prescribed fires does not cause soil sterilization or hydrophobic soils like high intensity wildfires. Low intensity prescribed fires leave some vegetation in place and re-vegetation occurs soon afterwards. Several cultural important plants thrive in fire refreshed soils.

The proposed restoration activities in grasslands, riparian, streams and seeps would cause beneficial cumulative effects. Tribes resoundingly support the restoration and protection of all forms of water. The physical removal of encroaching trees from grasslands, will restore the lands to what the tribes call “pre-reservation conditions,” which is the desired condition. Tree removal and grassland restoration also serves to protect archaeological sites from the effects of wildfire.

Irreversible and Irretrievable Commitments of Resources

Identification and analysis of the cultural and tribal resources within the analysis will be accomplished when the individual task orders are identified. The majority of the cultural sites and traditional cultural properties encountered during the implementation of this EIS are not likely to be committed for use for the purposes of recreation, tourism or public interpretation. Therefore there is not likely to be a loss of future options or loss of production as a result of this EIS.

Unavoidable Adverse Effects

As long as archaeological sites are avoided and protected, and each forest does their due diligence to engage in tribal consultation as directed, it is not anticipated there will be any adverse effects to tribal resources.

Short-term Uses and Long-term Productivity

The short-term uses of tribal members may be affected in terms of road closures and forest access while treatments take place. The long-term activities recommended within the Rim Country EIS will most likely have a beneficial relationship to tribes and forest access and products by improving the resources tribes utilized.

Discussion of Literature

The discussion of tribal concerns is based off comments heard through government-to-government consultation with federally recognized Indian tribes.

Acronyms

TCP - Traditional Cultural Property.

References Cited (use Endnote!)

- Eichman, H., and D. Jaworski 2011. Draft Socioeconomic Resource Report, TEAMS Enterprise Unit, 30 p.
- USDA Forest Service.2003. First Amended Programmatic Agreement between the Southwestern Region the New Mexico Historic Preservation Office, and the Arizona State Historic Preservation Office Regarding Historic Property Protection and Responsibilities. Ms. on file at the Coconino National Forest Supervisor's Office, Flagstaff, AZ.

Finalizing Your Report

- Make sure pages are numbered and there is a document title in the header or footer.
- Sign and date your original report and put it in the project record. Keep a copy in your resource files. Supply a signed and electronic copy to the writer/editor along with a copy of the data, field notes, correspondence, any modeling calculations, e-mails, maps, and other information used in the report. The final signed and dated report should be used with the EIS, not a draft.
- If a specialist report is revised in response to public comment or objections, it should be labeled as such with a new date and signature. This review of public comment is an opportunity to analyze criticisms of the report prior to the project being final, and to fix any problems or vague discussions in the report. Coordinate with interdisciplinary team members so no conflict arises with other responses. The original should always be kept in the project record.