

December 16, 2020

Coronado National Forest Supervisor Kerwin Dewberry
Email: kerwin.dewberry@usda.gov

**Subject: Renew Section 106 Consultation for Columbine Recreational Structures
and Cancel Plans to Re-Issue Permits for the Bible Camp**

Dear Supervisor Dewberry:

I am almost 80 years old and have dedicated most of my career to carrying forward to younger Apache (Ndee) generations, our greatest birthright—our Apache language and culture. I also serve as the White Mountain Apache Tribe's Cultural Resource Director/ NAGPRA Representative, Chair of the Cultural Advisory Board, and in related capacities.

The White Mountain Apache Tribe's Heritage Program understands that the Coronado National Forest (CNF) is proposing continued use of the Columbine recreational structures and Bible Camp. This situation is distinct from what CNF presented to the Ndee (San Carlos, Tonto, and White Mountain Apache) during the National Environmental Policy Act (NEPA) and National Historic Preservation Act (NHPA) process for the 2014 permit renewals for the Columbine Recreation Residences. We request that plans for the recreational structures and Bible Camp address the fact that Mount Graham Red Squirrel (Na'iltso Łisogé) has had most of its Critical Habitat destroyed and now faces extinction at the hands of CNF and the University of Arizona astronomers. The Columbine residential structures and Bible Camp occupy the best available habitat and should be reclaimed right now to help Na'iltso Łisogé.

Our tribes have legal and traditional cultural rights to participate in all CNF decisions affecting Mount Graham. On July 10, 1990 and June 4, 2001, the San Carlos Apache Tribe passed resolutions which state, in part,

"this mountain, Mt. Graham, is the site of a sacred spring, a variety of sacred plants and animals all of which are necessary for performance of certain traditional religious Apache ceremonies."

Our July 15, 1999 statement supporting the National Register determination of eligibility for Mount Graham (White Mountain Apache Tribe Resolution. 07-99-153), states in part,

"the vast and unique mountain range known to non-Apaches as Mt. Graham, is a sacred site of long-standing and ongoing historical, cultural, and religious importance to many Apaches; ... Coronado National Forest, manages *Dzil nchaa si an* in the public trust and continues to process and approve requests for projects and activities that threaten and diminish the characteristics and values that define and perpetuate the mountain's cultural and religious significance to Apache people."

CNF's May 2001, Determination of Eligibility (DOE) for the National Register of Historic

Places for Mt. Graham (*Dzil nchaa si an*) states:

"Source of Supernatural Power ... Each thing in the world -- the animals, the plants, the sky and stars and lightning -- has a power behind it that makes it do what it does. What you can see is only a little of the whole thing. The power is in the spirit part. Some people can learn to reach the spirit part of something, and they become its shaman. There is power in everything! (Haley, 1981:63)."

For Ndee, the concept of spiritual power is termed *diyih*. Everything that exists has life and all life has *diyih*. *Diyih* must be respected so that it serves goodness. *Diyih* may be acquired by humans and, if respectfully treated, may allow itself to be used for beneficial purposes.

CNF's 2001 DOE further states:

"The mountain is associated with a pattern of events both spiritual and historical as evidenced by information provided by consultants in the 1930s and 1990s. Cultural themes for the mountain include a home of the mountain spirits (gaan); a source of natural resources and traditional medicine gathering for ceremonial uses; a place of prayer (spiritual significance, sacred place); and, a source of spiritual power (certain places, overall presence, and related to specific animals)" (DOE 2001: 57).

The CNF September 2014, Final Environmental Impact Statement New Special-Use Permits for Recreation Residences on the Safford Ranger District states:

"the entire Pinaleño mountain range comprises the Western Apache traditional cultural property (TCP), *Dzil Nchaa Si'an*, which is eligible for listing on the National Register of Historic Places (NRHP). Western Apache people believe that *Dzil Nchaa Si'an*, (translated as big-seated mountain) has both cultural and religious significance as a source of divine power.... the Forest Service concluded that neither the presence nor [PAGE v] absence of the recreation residences has an adverse effect on the qualities that make *Dzil Nchaa Si'an* eligible for the NRHP (2014: vi-v).

That FEIS (2014:19) also says a NHPA determination of "no adverse effect" on historic properties was made, per 36 CFR 800.5 (b)." The facts and rationales for CNF's 2014 no adverse effect determination no longer apply. The CNF determination that the recreation residences have no "adverse effect on the qualities that make *Dzil Nchaa Si'an* eligible for the NRHP" probably was not true in 2014 and is certainly incorrect in late 2020.

The survival of Na'iltso Łisogé, our relative, is central to Ndee views of the integrity of *Dzil Nchaa Si'an* as a Traditional Cultural Property and sacred site. Na'iltso Łisogé now faces a crisis. The area occupied by the Columbine structures and Bible Camp offers the only good forest ready for rehabilitation in time to expand good squirrel habitat. The recreational structures and Camp need to be part of the solution instead of continuing to degrade habitat.

In our earlier Resolutions, and in prior consultations, Ndee representatives have affirmed the sacred nature and spiritual power of our plant and animal relatives as integral to Mount Graham's integrity. CNF has failed to embrace and employ our affirmations or to create good opportunities for Na'iltso Łisogé to thrive. CNF failures make it **imperative for CNF to apply specific information about the sacred nature and spiritual power of Na'iltso Łisogé.**

CNF is advised to take all steps required to rehabilitate habitat occupied by the Columbine recreational structures and Bible Camp for use by Na'iltso Łisogé. Start by withdrawing the determination that the recreational structures have "no adverse effect" on our holy mountain. **Continued presence of these structures is denying Na'iltso Łisogé opportunities to expand where it lives and to assist in restoring ecosystems degraded by recreation.**

Management of CNF lands, and Dził Nchaa Si'an in particular, needs to consider the Ndee oral traditions and ecological knowledge pertinent to Na'iltso Łisogé and other species integral to sacred places and ecosystems. Ndee traditions identify Na'iltso Łisogé as the original keeper of Kq' (Fire). Na'iltso Łisogé forever bears on their fur the indelible strike-mark of Hada'didla' (Lightening), the Power by which they received Kq' (Fire).

Na'iltso Łisogé still guards Kq'. All one needs to do is look upon the highest mountains in our homelands on chilly mornings and late afternoons. There one sees treetops aglow with the fires tended by Na'iltso Łisogé since time immemorial. All one needs to do is to look closely at Na'iltso Łisogé's back. There one sees the orange color and scorched texture emblazoned by the Power of Hada'didla' and 10,000 generations of sleeping next to Kq'.

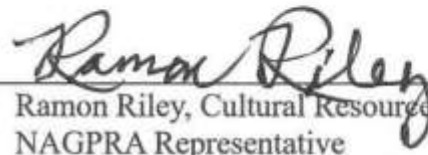
In Ndee ecological knowledge and cultural traditions, the ever-jealous, egotistical, and mischievous Bá'tso'sé (Coyote) faked illness to trick Na'iltso Łisogé into bringing Kq' to his healing ceremony. The Trickster tied *chinlazzzi* (bunch grass) to his tail so that, as he danced in his medicine, he could sweep it into the fire, ignite it, and flee with his dangerous prize.

Humans received Kq' from the Bá'tso'sé trickster, but not the lessons to respect Na'iltso Łisogé, Kq' (Fire), and all our other relations. Learning and showing this respect is not easy for most of us. It requires years of concentration and practice, but there is no alternative to respect. Indeed, the degraded ecosystems that dominate CNF-managed lands show that failures to learn about and show respect to natural Powers are killing lands we all depend on.

Demonstrating respect requires hard choices, sacrifices. The CNF intention to issue new permits for the Columbine recreation structures and Bible Camp is easy to understand. Recreation and summer camps are fun. We all want fun. But fun is not important compared to the survival of our non-human relatives or to the showing of respect for Powers in sacred places. **Permitting for the recreational residences and Bible Camp cannot proceed without risking the survival and recovery of Na'iltso Łisogé.** Any further disrespect for Na'iltso Łisogé or disregard of the priority mandate to assure the presence of Na'iltso Łisogé over the presence of recent structures and camps violates the National Historic Preservation Act and the CNF mandate to take steps to avoid and minimize "physical destruction," "damage," "alteration," "change of the character," or "change...of physical features within the property's settings that contribute to its historic significance" (36 C.F.R. § 800.5).

Please make immediate plans to **remove the Columbine recreational structures and Bible Camp and to restore the area to help Na'iltso Łisogé survive, recover, and teach us all the importance of respectful stewardship.** Please let us know how we can further assist.

Sincerely and Respectfully,


Ramon Riley, Cultural Resources Director/
NAGPRA Representative
Nohwike' Bagowah Culture Center
White Mountain Apache Tribe