

CENTER FOR
DESERT
ARCHAEOLOGY

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a nonprofit corporation

William H. Doelle, Ph.D. **Travel Management Team Leader**
President and CEO Apache-Sitgreaves National Forest
PO Box 640
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Dear Team Leader:

The Center for Desert Archaeology is a non-profit organization operating in Arizona, New Mexico and portions of Mexico. With over a thousand members, our mission is to preserve the places of our shared past. For 25 years, we have pursued this mission on behalf of all who find meaning in such places. To this end, the Center strives to:

- *conduct research that addresses questions of broad interest and connects people of today with the past;*
- *achieve long-term protection of our cultural heritage—archaeological sites, historic buildings, and cultural landscapes—in the Greater Southwest, including promoting a stewardship ethic with the public and professionals;*
- *enable people to explore and learn about the Southwest's past through creative and varied means.*

Recently through a partnership with the National Trust for Historic Preservation, we have modestly extended our on the ground capacity to promote the long-term protection of our cultural heritage. Working with private and public landowners we are exploring ways to better protect our cultural heritage while meeting their needs and responsibilities as landowner and managers. Towards this end, the Center for Desert Archaeology appreciates the opportunity to comment on the Travel Management Rule DEIS for the Apache-Sitgreaves National Forest.

Through our work in the Southwest, it our experience that cultural resources on public lands are most threatened, at least in a collective sense, from inadvertent destruction (i.e. trucks or OHVs running over sites), surface artifact collecting (casual sherd or arrowhead collecting), looting, and in some instances, outright vandalism. These impacts are largely a reflection of the accessibility of the sites to the public; accessibility which is in turn is facilitated by vehicle use. Absent increased resources to more directly manage sites, monitor sites on the ground and to provide increased public education, travel management becomes an essential element of the National Forest's management of Heritage resources and may be the single most important Forest-wide action that can better steward cultural resources.

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Our comments are directed to the Cultural Resource section of the DEIS and are intended to improve upon what will be a significant step forward in travel management on the Apache-Sitgreaves National Forest.

I. Existing Impacts to Sites

Of the 6324 known sites on the Forest, roughly 900 sites did not have the potential to be impacted by the alternatives. Some explanation of why these sites were thought to be immune from additional impact is needed.

It is unclear whether the 300 foot buffer used around roads was 300 feet either side of the road or 300 feet centered on the road. Given that your earlier explanation was the 2107 sites were within a distance of 300 feet of the road, we assume the former and the narrative should be explicit in this regard.

We strongly support your discussion of the indirect impact of roads to sites, specifically those sites that are likely to experience intentional vandalism. To date, this is the most cogent assessment of motorized travel and cultural resource management that we have reviewed for TMP on Region 3 National Forests. Our work this summer in the Tonto National Forest where we assessed site condition and damage provides strong support that proximity to roads leads to greater incidences of vandalism. We also believe that the Spangler (2006) report referenced in the Heritage Specialist report should be acknowledged in the DEIS. Specifically is the finding by Spangler that a greater incidence of damage occurs to sites within 200 meters of a road. This is similar to our observations this summer on the Tonto National Forest. Sites prone to looting (above ground masonry structures and petroglyph/pictograph sites) experienced significantly more recent damage when located near a road regardless of road condition. Our unpublished report is included for your reference.

Based upon the information presented in the DEIS as well our own research this past summer, for sites that are likely to experience higher incidences of vandalism, the area of impact assessed should be expanded to at least 200 meters from a road/route.

II. Environmental Consequences

The 30 meter buffer to delineate the APE for existing or new roads/routes is inadequate. The information presented in the document indicates that sites within 300 feet are subject to greater impacts both direct and indirect. However your assessment of environmental consequences reduces the size of the APE by 60 meters with no justification. As noted above, for sites that are likely to experience higher incidences of vandalism (above ground masonry structures and petroglyph/pictograph sites), the APE should be expanded to a distance of 200 meters from a road/route. Similarly, the APE for dispersed camping corridor should be expanded 200 meters farther than the outside distance of the camping corridor. If someone can theoretically drive their vehicle 300 feet from a road, in essence the dispersed camping corridor functions as very wide road for purposes of facilitating

access to sites. For purposes of assessing indirect impacts, APE for dispersed camping corridors should be a fixed distance beyond the outside of the corridor.

III. Direct and Indirect Effects Common to All Alternatives.

The assessment of effects is incomplete without identifying the number of sites subject to impact that are NRHP eligible. At a minimum, we strongly oppose designating dispersed camping corridors in areas where known NRHP eligible sites are located. As eloquently pointed out in the Specialist report and DEIS, heritage resources are non-renewable resources. The likelihood of impact in dispersed camping corridors is high and therefore unacceptable for NRHP eligible sites. We propose that a minimum buffer area of 300 meters either side of known NRHP eligible sites be established and these road segments be withdrawn from designation as a dispersed camping corridor.

In a similar vein, it is unacceptable to add currently unauthorized routes to the system that are determined to impact NRHP sites. For sites that experience a higher incidence of looting/vandalism, the only acceptable alternative is to not designate these routes as open. To do so runs the risk of facilitating vandalism as indicated by the information presented in the DEIS and our research on the Tonto National Forest. This is a violation of the National Historic Preservation Act which seeks to avoid impact to NRHP sites. Given the insufficient resources on National Forests to adequately steward cultural resources, we do not believe that any acceptable mitigation exists for these types of sites.

While other sites may be protected through the implementation of mitigation measures, it is important to specifically identify the mitigation measures in relation to specific site types. It is not appropriate to rely on Sec 106 consultation that is disjunct from the NEPA process to develop adequate mitigation measures.

We strongly support the reduction in acres open to cross country motorized travel and restrictions on cross country travel Forest-wide outside these motorized travel areas. This is a tremendous step forward in the stewardship of our irreplaceable cultural heritage resources. We strongly support decisions to not designate the following routes as open:

9860M, 9860N, 9860R, 9806, 9806A-D, 9016, 567P, 567Q, roads and routes in T8S R30E sec 1 and 12.

Based on the proximity of sensitive sites, we also recommend the following roads/routes be removed from the designated road system: *217P, 8301, 8333 and 567P*. *475C* should be designated for solely for administrative access for purposes of providing the private property owner access to their property.


IV. Cumulative Effects on Cultural Resources

This section fails to indicate that the impacts to cultural resources are episodic and continual over time. Decisions to designate new unauthorized roads as open, continuing to designate system roads as open and to designate dispersed camping corridors that

impact directly or indirectly cultural resources will over time continue to degrade a non renewable resource to the point where such impacts may for all practical purposes destroy an irreplaceable resource. The nature of this cumulative impact and the non-renewable nature of the resource have significant ramifications that are not adequately addressed in the DEIS.

Thanks again for this comment opportunity and for your efforts to better steward our shared places of the past through more active management of roads on our National Forest land.

Sincerely,



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