



July 13, 2021

To Whom It May Concern:

Great Old Broads for Wilderness acknowledges, supports and celebrates the sovereignty of the Ute Tribal Nation comprised of many bands with individuals residing both on and off reservations and with formal tribal governments in Ignacio, Colorado (Southern Ute;) Towaoc, Colorado and White Mesa, Utah (Ute Mountain Ute;) and Fort Duchesne, Utah (Ute Tribe of Ouray and Uintah Reservation.)

Great Old Broads for Wilderness is a national grassroots organization, led by women, that engages and inspires activism to preserve and protect wilderness and wild lands. Based in Durango, Colorado, the organization has 40 local chapters in 18 states. As a national organization committed to protection of public lands and waters, we cannot advocate for conservation of US federal lands without acknowledging these places as Indigenous ancestral lands and recognizing Indigenous communities' connection to and dependence upon these landscapes for hunting, fishing and gathering as well sacred sites and cultural and spiritual practices.

We advocate for robust, authentic Tribal Consultation between the US government and sovereign tribal nations as required by law in Section 106 of the National Historic Preservation Act (NHPA) and in the Council on Environmental Quality regulations. We expect nothing less than genuine, good-faith correspondence and full compliance with the US Constitution, federal statutes, treaties, court decisions and executive orders. Engagement in formal government to government relations during overarching land management planning processes (such as USFS Forest Plans, BLM Resource Management Plans and Travel Management Plans) and pertaining to site-specific proposed projects is essential and will result in more informed decisions.

We are well aware that often the mandatory Tribal Consultation process takes the form of a letter or email to an individual tribal leader or staff, and if no response is received, the federal agency assumes they complied with the law. We do not consider such action reflective of the "reasonable and good-faith" clause in Section 106 of the NHPA. We strongly encourage regular, honest and sincere dialogue between federal land management agencies and Tribal governments/sovereign nations that respect and capitalize on the generations of knowledge and experience of Indigenous people on landscapes we now call "public lands." We enthusiastically support incorporating traditional knowledge into all aspects of land and water management and conservation. We believe that a co-management model that integrates traditional ecological knowledge and lifeways with western science is our best practice for addressing climate change, wildland fires, species extinction, and ecosystem integrity and resiliency.

We also recognize that public lands are home to Indigenous people whose ancestors were forcibly removed from these landscapes upon which they depended and stewarded for their survival. Decision-makers must restore and even expand Indigenous rights to access these traditional fishing, hunting and harvesting places and to utilize sacred sites for formal ceremony and individual spiritual practice. The US government must not deny rights of Indigenous people to these traditional homelands from which their ancestors were relocated against their will.

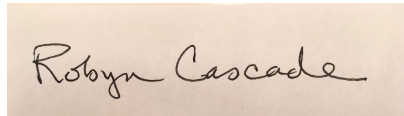
As an organization committed to conserving unfragmented habitat, we typically do not support new road construction or additional motorized trails on public lands. We believe the value of roads and other extractive uses must be carefully weighed against their negative impact on the climate and biological diversity crises. We whole-heartedly support a co-management model for stewarding our federal lands for future generations. We regard Tribal Consultation as a critical process to ensure input of valuable knowledge from Indigenous communities and will continue to advocate for compliance with the spirit and intent of the National Historic Preservation Act. We also support native language education and revitalization of lifeways as a component of traditional knowledge and connection to place.

We appreciate your attention to our concerns and recommendations. Please do not hesitate to contact either or both of us if you have questions or need for additional information regarding our support for Tribal sovereignty and traditional uses of public lands.

Respectfully,



Shelley Silbert
Executive Director



Robyn Cascade
Northern San Juan Broadband Leader