

**Arizona Mining Reform Coalition –Access Fund –Concerned Citizens and  
Retired Miners Coalition – Concerned Climbers of Arizona – Earthworks –  
Patagonia Area Resource Alliance**

National Register of Historic Places  
National Park Service,  
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**Comments on *Chi'chil Bildagoteel* Historic District National Register Nomination**

**Comments sent via facsimile to: (202) 371-6447**

June 29, 2015

Thank you for the opportunity to comment on the ***Chi'chil Bildagoteel (Oak Flat) Historic District National Register Nomination***.

These comments are submitted on behalf of Arizona Mining Reform Coalition (“AMRC”), the Access Fund, Concerned Citizens and Retired Miners Coalition, Concerned Climbers of Arizona, Earthworks, and the Patagonia Area Resource Alliance.

**Arizona Mining Reform Coalition** works in Arizona to improve state and federal laws, rules, and regulations governing hard rock mining to protect communities and the environment. AMRC works to hold mining operations to the highest environmental and social standards to provide for the long term environmental, cultural, and economic health of Arizona. Members of the Coalition include: Apache – Stronghold, Center for Biological Diversity, Concerned Citizens and Retired Miners Coalition, Concerned Climbers of Arizona, Dragoon Conservation Alliance, EARTHWORKS, Empire Fagan Coalition, Environment Arizona, Groundwater Awareness League, Maricopa Audubon Society, Save the Scenic Santa Ritas, Grand Canyon Chapter of the Sierra Club, Sky Island Alliance, Spirit of the Mountain Runners, and Tucson Audubon Society.

The **Access Fund** is a national non-profit advocacy organization incorporated in 1991, with over 12,000 members. The organization is dedicated to keeping US climbing areas open and conserving the climbing environment. The Access Fund works with federal, state and local officials; climbers; climbing organizations; and land managers to develop and guide responsible use and sound climbing management policies for public and private lands. The Access Fund informs and educates climbers on the local impact of national policies, promotes and supports stewardship efforts and events, educates climbers on effective climbing management strategies and leave-no-trace ethics, and provides resources on how to manage and steward public and private lands.

The **Concerned Citizens and Retired Miners Coalition** is a group of citizens who: 1) reside in Superior, Arizona, or do not reside in Superior, Arizona, but are affiliated with relatives who are residents; 2) are retired hard-rock miners who previously worked in the now non-operational

mine in Superior, Arizona, and were displaced due to mine closure or personal disability; or 3) are individuals who are concerned that important U.S. public recreational land will be conveyed to a foreign mining company for private use.

The **Concerned Climbers of Arizona** was organized in 2010 for the purpose of preserving climbing access and the climbing environment. The group advocates for continued recreational access to climbing areas that are threatened by development or other forms of encroachment. Based in Phoenix, Arizona, the Concerned Climbers of Arizona is the primary group representing the interests of rock climbers in central Arizona.

**Earthworks** is a nonprofit organization dedicated to protecting communities and the environment from the adverse impacts of mineral and energy development while promoting sustainable solutions. Earthworks stands for clean air, water and land, healthy communities, and corporate accountability. We work for solutions that protect both the Earth's resources and our communities.

**Patagonia Area Resource Alliance** is a non-profit community watchdog organization that monitors the activities of mining companies, as well as ensures government agencies' due diligence, to make sure their actions have long-term, sustainable benefits to public lands and water resources in Patagonia and the State of Arizona.

We appreciate the opportunity to express our strong support for the addition of *Chi'chil Bildagoteel* (also known as "Oak Flat") to the National Register of Historic Places as a Traditional Cultural Property. *Chi'chil Bildagoteel* is a very important place for the Western Apache, Yavapai and other tribe's people in the region. It is also an important and historic place for non-Indians as well due to its diverse ecosystems and important landscape features that have drawn people to the area for countless years.

It is important to note that just a week ago, on June 24, 2015, the National Trust for Historic Preservation placed *Chi'chil Bildagoteel* on their America's 11 Most Endangered Historic Places list as an acknowledgement of its historic and cultural significance and due to potential threats of mining.

Many of us have personally enjoyed *Chi'chil Bildagoteel's* ecological and recreational importance. In addition to our personal connections to *Chi'chil Bildagoteel*, we recognize its importance to the spiritual, cultural, and physical wellbeing of Native American Tribes.

For groups that focus on the protection of recreational access, like the Access Fund and Concerned Climbers or Arizona, protection of *Chi'chil Bildagoteel* is critical both for its traditional, cultural and religious significance, but also because it is an exceptional place to recreate. *Chi'chil Bildagoteel* is a tranquil and majestic place to hike, climb, boulder, bird watch, and to relax from the frantic pace of most of our lives. We respect the traditional cultural importance of *Chi'chil Bildagoteel* to Native peoples and our recreational uses are tuned to not upsetting the balance between cultural and recreational use.

For conservational organizations, *Chi'chil Bildagoteel* is critical for the protection of the rare

desert riparian habitat is contains. Only 5% of Arizona's riparian desert habitat remains and *Chi'chil Bildagoteel* is important for its intact habitat as a home for wildlife and the endangered Arizona Hedgehog Cactus. The intact nature of the *Chi'chil Bildagoteel* ecosystem is one of the reasons that *Chi'chil Bildagoteel* is such an important traditional cultural area. Other than additional roads and the unobtrusive campsite facilities, the ecosystem is much as it was a hundred years ago. Conservation organizations understand that the connection between the protection of traditional cultural properties and the ecosystem is the same.

Members of the Concerned Citizens and Retired Miners Coalition (Concerned Citizens), one of our Coalition member groups, have their own cultural connections to *Chi'chil Bildagoteel* that go back generations. *Chi'chil Bildagoteel* is a place they have traditionally used to escape the summer heat of the lower, nearby town of Superior. Members of Concerned Citizens use *Chi'chil Bildagoteel* for picnicking, family gatherings, weddings, religious observances, and recreational uses. Members of Concerned Citizens are proud of the fact that many of the campground facilities were built during the Great Depression by CCC and WPA work projects and husband those features. Concerned Citizens find complete compatibility, comfort, and support in designating *Chi'chil Bildagoteel* as a Traditional Cultural Property.

As noted above, the nominated landscape contains places of exceptional value and significance in the histories, cultures, and religious traditions of Western Apache, Yavapai, and other tribal peoples. Many of our members have personally observed Native American uses at *Chi'chil Bildagoteel* over the years, including ceremonies, subsistence gathering, and the collection of native plants for religious, traditional and cultural purposes. We respect these uses and believe they should be acknowledged through the listing of this important place on the Historic Register.

We are also aware that sites within *Chi'chil Bildagoteel* include rare, distinctive and high integrity examples of Apache and potentially other tribal encampments dating to periods well prior to the mid to late 1800s and the Reservation confinements.

Additionally and perhaps most importantly, the nomination documents and acknowledges the national-scale significance of a series of places of unparalleled sacred traditional, cultural and religious significance to certain Native American cultures. We support this acknowledgment and believe that it is truly appropriate in this instance.

For these reasons, we respectfully ask you to place *Chi'chil Bildagoteel* on the Register as soon as possible.

We appreciate the opportunity to comment on this Nomination. Please continue to include Arizona Mining Reform Coalition, the Access Fund, Concerned Citizens and Retired Miners Coalition, Concerned Climbers of Arizona, Earthworks, and the Patagonia Area Resource Alliance as interested parties and direct all future public notices and documents to us at the addresses below.

Sincerely,

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