

Douglas A. Ducey
Governor



Lisa A. Atkins
Commissioner

Arizona State Land Department

1616 West Adams, Phoenix, Arizona 85007
(602) 542-4631

September 1, 2022

Michael Romero
Land Disp. Project Leader
Arizona State Land Department
1616 W. Adams
Phoenix, Arizona 85007

RE: Cultural Review for Application 14-123251-00-100 (Rosemont Copper Company)

Dear Mr. Romero:

Rosemont Copper Company filed a new Right of Way (ROW) application (14-123251-00-100) with the Arizona State Land Department (ASLD) for the installation and maintenance of an access road, fresh water pipeline, tailings pipeline, process water return pipeline, electrical services and telecommunications on State Trust Land in Pima County (T18S, R15E, Sections 16 and 21), encompassing 11.433 acres. Therefore, per the 2016 Interagency Service Agreement (ISA) between the ASLD, the State Historic Preservation Office (SHPO), and the Arizona State Museum (ASM), the area cited in the above-captioned application has been reviewed in comparison to ASLD's cultural resource records. This review is undertaken to make a recommendation to ASLD's ROW Section regarding any properties which may be eligible for the Arizona Register of Historic Places that are known to be located within or nearby the requested ROW. In addition, to make a recommendation to ROW Section regarding of any efforts ASLD should ask the applicant to undertake to identify currently unknown Register eligible properties potentially affected by ASLD granting the ROW application (14-123251-00-100).

The results of this research revealed that two cultural resources inspections have been completed within and covered the entire area cited in the application (1987-264.ASM and 2010-368.ASM). No cultural resources have been identified within the subject area. Per SHPO Guidance Point No. 5 about relying on survey data from projects conducted more than 10 years earlier, ASLD Cultural Resources Section reviewed documentation for the outdated records and found that the methods used meet current standards. However, ASLD Cultural Resource Section Recommends new survey for projects completed prior to 1995 when the ASM site definition was revised.

Therefore, the ASLD Cultural Resources Section recommends that the applicant arrange for an archaeologist permitted by the Arizona State Museum (ASM) to inspect and evaluate the areas

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surveyed prior to 1995 of this area of State Trust land prior to ASLD granting ROW application 14-123251-00-100.

By copy of this letter to Rosemont Copper Company the Arizona State Museum (ASM) has a list of permitted contract companies with the qualifications to complete standard scientific field work in Arizona. ASM can be contacted at 520-621-2096 or a list of permitted consultants can be downloaded at <https://statemuseum.arizona.edu/crm/document/aaa-qualified-consultants>. Once the inspection has been completed, reports submitted to the ASLD Cultural Resources Section must conform to SHPO Standards (<https://azstateparks.com/shpo-survey-report-standards>) for review in compliance with ASLD's statutory obligations under the State Historic Preservation Act (SHPA) (A.R.S. § 41-861 et al). The cultural resources inspection will provide a document to assist the ASLD Cultural Resources Section in determining if any cultural resources eligible for nomination to the State and Federal Registers of Historic Places are present. If register-eligible properties are present, and avoidance is not feasible, then additional fieldwork may be required.

Your continued cooperation with this office in considering the potential for impacts to Arizona's cultural resources is appreciated. If you have any comments or concerns, please contact the ASLD Cultural Resources Section at arch@azland.gov.

Sincerely,



Archaeological Compliance Specialist
As agent for Arizona State Land Department

CC: Erin Davis, SHPO
Robin Barnes, Rosemont Copper Company

Enclosure: Tribal Consultation List
ASLD Cultural Resources Report Submittal Requirements

Arizona State Land Department Cultural Resources Section

Tribal Consultation List

If you have any comments or concerns, please provide them at this time. If there are none, this document may be retained for your records. Should you require additional documentation, i.e. maps or reports, please request via email for digital copies.

Application No.: 14-123251-00-100

Date: 9/1/2022

Tribes:

- Ak-Chin Indian Community
- Chemehuevi Indian Tribe
- Cocopah Indian Tribe
- Colorado River Indian Tribes
- Fort McDowell Yavapai Nation
- Fort Mojave Indian Tribe
- Fort Sill Apache Tribe
- Fort Yuma-Quechan Tribe
- Gila River Indian Community
- Havasupai Tribe
- Hopi Tribe
- Hualapai Tribe
- Kaibab Band of Paiute Indians
- Mescalero Apache Tribe
- Moapa Band of Paiute Indians
- Navajo Nation
- Paiute Indian Tribe of Utah
- Pascua Yaqui Tribe
- Pueblo of Zuni
- Salt River Pima-Maricopa Indian Community
- San Carlos Apache Tribe
- San Juan Southern Paiute
- Tohono O'odham Nation
- Tonto Apache Tribe
- Ute Mountain Ute
- White Mountain Apache Tribe
- Yavapai-Apache Nation
- Yavapai-Prescott Indian Tribe
- Pueblo of Acoma

**Arizona State Land Department
Cultural Resources Section
Cultural Resources Report Submittal Requirements**

If cultural resources work has been requested by ASLD, reports are subject to review and consultation with the State Historic Preservation Office (SHPO), under the State Historic Preservation Act, A.R.S. 41-861 *et seq.* As such, reports submitted for compliance review should be in conformance to the current reporting standards.

PLEASE NOTE: The AZSITE resource database is not reliable as a source of recent projects. Class I background records checks must include an inquiry to the Arizona State Museum's Archaeological Records Office (ASM ARO).

- For reports, please refer to the Standards for Inventory Documents Submitted for SHPO Review in Compliance with Historic Preservation Laws: https://d2umhuunwbec1r.cloudfront.net/gallery/asp-archive/SHPO/downloads/SHPO-Survey_Report_Standards-2016.pdf
- For Survey Report Summary Forms (SRSF), refer to SHPO Guidance Point No. 10: https://d2umhuunwbec1r.cloudfront.net/gallery/asp-archive/SHPO/downloads/SHPO-Guidance_Point10-2016.pdf

In addition to conformance to reporting standards, the ASLD Cultural Resources Section requests document submittals as follows:

- Two bound original reports;
- A pdf of the report, emailed or mailed as a disc.

In all cases, all submittals should come from the consultant that has prepared the report to ensure the document is in its original form.

All mailed documents should be sent directly to the Cultural Resources Section; not the ASLD Administrator.

If emailed, documents should be emailed directly to ARCH@azland.gov. If known, Administrator should be copied on the email.

Mail all physical documents to:

Arizona State Land Department
Cultural Resources Section
1616 West Adams Street
Phoenix, Arizona 85007