PIMA COUNTY

Sustainability ~ Conservation ~ Historic Preservation

October 4, 2017

Edwin S. Townsley
Chief, Operations and Regulatory
South Pacific Division
U.S. Army Corps of Engineers
1455 Market St.
San Francisco, CA 94103-1399

Re: Action No. 2008-00816-MB Cultural Resources Inventory of the Sonoita Creek Ranch Proposed Compensatory Mitigation by Hudbay for the Rosemont Copper Project

Dear Mr. Townsley:

I am in receipt of your letter dated September 20, 2017, referencing the subject project that requests concurrence with a determination of eligibility to the National Register of Historic Places of "12 archaeological sites and 30 isolated occurrences within the APE," as well as concurrence with a determination of "no adverse effect to historic properties" from this project.

I will not comment on this project or provide any concurrence with these determinations without any supporting documentation. I have not received the cultural resources inventory report for the two proposed mitigation parcels or any information regarding justification for determination of sites as eligible or ineligible for listing in the National Register, or copies of correspondence regarding consultation with Tribal Nations or the State Historic Preservation Office. Nor have I received any construction or restoration plans for Sonoita Creek from which I can make an independent evaluation of effect.

I understand that the Sonoita Creek Ranch mitigation project is currently not included in the Programmatic Agreement (PA) and Historic Properties Treatment Plan (HPTP) for the proposed Rosemont Mine project within Coronado National Forest. Because compensatory mitigation is a related action to the mine, I wonder why this undertaking was not addressed in the PA and HPTP.

Once we have received the supporting documents, we will review and comment on the eligibility of the various sites to the National Register and evaluate the effect of the proposed undertaking.

Sincerely,

Linda Mayro

Linda Mayro, Director
Sustainability, Conservation, & Historic Preservation

CC: Christopher M. Parrish, US Army Corps of Engineers
Roger Anyon, Pima County

201 N. Stone Ave, 6th flr Tucson, Arizona 85701 Phone: (520)724-6940 Fax: (520) 724-9491

DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, U.S. ARMY CORPS OF ENGINEERS
1455 MARKET STREET
SAN FRANCISCO, CALIFORNIA 94103-1399

September 20, 2017

REPLY TO
ATTENTION OF

SUBJECT: Action No. 2008-00816-MB; Cultural Resources Inventory of the Sonoita Creek Ranch Property, Santa Cruz County, Arizona

Linda Mayro
Cultural Resources Manager
Pima County Cultural Resources and Historic Preservation Office
201 N. Stone Ave.
Tucson, AZ 85701

Dear Ms. Mayro:

In accordance with the National Historic Preservation Act of 1966, as amended, and all applicable regulations, we are requesting your review and comment on the determination of effect on historic properties within the proposed mitigation project area. Hudbay Minerals (Hudbay) proposes to develop the Rosemont Copper Project (Project) on lands under the administration of the Coronado National Forest. As part of Project-related compensatory mitigation proposed to the U.S. Army Corps of Engineers (Corps), Hudbay has acquired the Sonoita Creek Ranch, which is located within the Santa Cruz Watershed (see attached map). The core of the mitigation activities for the Project involves the restoration of Sonoita Creek, including the re-establishment of its historic floodplain and rehabilitation of the existing channel. The proposed scope of work also includes establishing new riparian habitat, enhancing existing habitat, and restoring flow channels through the historic floodplain. The proposed mitigation is located on private land and will be funded by the applicant.

The area of potential effect (APE) for mitigation activities includes two separate parcels of the Sonoita Creek Ranch property. Parcel 1 is an irregularly shaped parcel measuring 2,720 feet northwest-southeast by 1,920 feet northeast-southwest (in maximum dimension) and encompassing approximately 62.5 acres. Parcel 2 is an irregularly shaped parcel measuring 17,380 feet north/ northeast-south/southwest by 2,125 feet northwest-southeast (in maximum dimension) and encompassing 472 acres. Rosemont contracted Westland Resources (Westland) to conduct a cultural resources inventory of the APE.

Westland's cultural resources inventory resulted in the identification of 12 archaeological sites and 30 isolated occurrences within the APE. Eight of the sites identified are previously discovered sites; the remaining four are newly discovered. In addition, Westland confirmed that two additional previously recorded sites purported to occur within the APE, are, in fact, located beyond the APE. Westland updated the boundaries of these two sites to reflect their actual location and extent.

The archaeological sites and components recorded in the APE relate to prehistoric, protohistoric, and Early Historic Native American resource procurement/processing and habitation activities, as well as Historic period Euroamerican habitation, agriculture, transportation, and utility land-use activities. One site is an in-use natural gas pipeline that is exempt from Section 106 review by federal agencies (67 FR 9429, March 1, 2002 [ACHP]). Four sites and the 30 isolated occurrences are recommended ineligible. The sites recommended ineligible for the National Register of Historic Places (NRHP) include an artifact scatter consisting of fired brick and concrete fragments that suggests a collapsed structure, a historic agricultural site with five interconnected features, including two ponds, a concrete-lined irrigation canal, a concrete weir, and a wellhead; and two newly recorded historic water management/irrigation agriculture sites associated with the impoundment and dispersal of water.

The remaining seven sites within the APE are recommended eligible for inclusion in the NRHP under Criterion D for their information potential. These include a former grade of the New Mexico & Arizona Railroad, an abandoned alignment of State Road (SR) 82, a complex of mounded earth features associated with a scatter of historic artifacts, a scatter of historic artifacts associated with structural elements and midden areas, and three protohistoric/historic Sobaipuri sites. Of these, all but the abandoned alignment of SR 82 will be avoided by construction activities at the Sonoita Creek mitigation site.

In regard to the abandoned alignment of SR 82, Westland provides the following discussion addressing potential effects from the proposed construction activities:

> The location and function of this abandoned road segment will not be impacted by project activities. Two features will be impacted, but both are common features (i.e., a culvert and a bank protection) that do not, in themselves, contain the kinds of information that contributes to the NRHP eligibility of the road as a whole. The features have been mapped, described, and documented in this report. Therefore, Westland recommends that burial of the two features associated with this historic property will not alter the characteristics that qualify it for inclusion in the NRHP and thus does not constitute an adverse effect.

The Corps concurs with this assessment.

Regarding indirect effects, none of the historic properties are considered significant for architectural, engineering, or other visual characteristics. Furthermore, Rosemont proposes to restore the Sonoita Creek floodplain to its historical flow regime, which is expected to result in the gradual return of large portions of the APE to a riparian environment similar to that which would have characterized this area throughout most of prehistoric and historic times. Therefore, the Corps has determined that there will be no indirect adverse effect to the historic properties in the APE.

The State Historic Preservation Officer concurred with the Corps recommendations of eligibility and determination of effect on September 1, 2017 (Log Number SHPO-2017-1129 [138705]).

In sum, we are providing this information for your review of our determination of **no adverse effect to historic properties** by this project. If you have questions or concerns, or require additional information regarding the Corps determination of effect for the Sonoita Creek mitigation project, please contact Chris Parrish, Cultural Resources Specialist at (505) 342-3374 or christopher.m.parrish@usace.army.mil by October 20, 2017.

Building Strong!

Sincerely,

NL Eddle for

Edwin S. Townsley
Chief, Operations and Regulatory
South Pacific Division

Enclosure

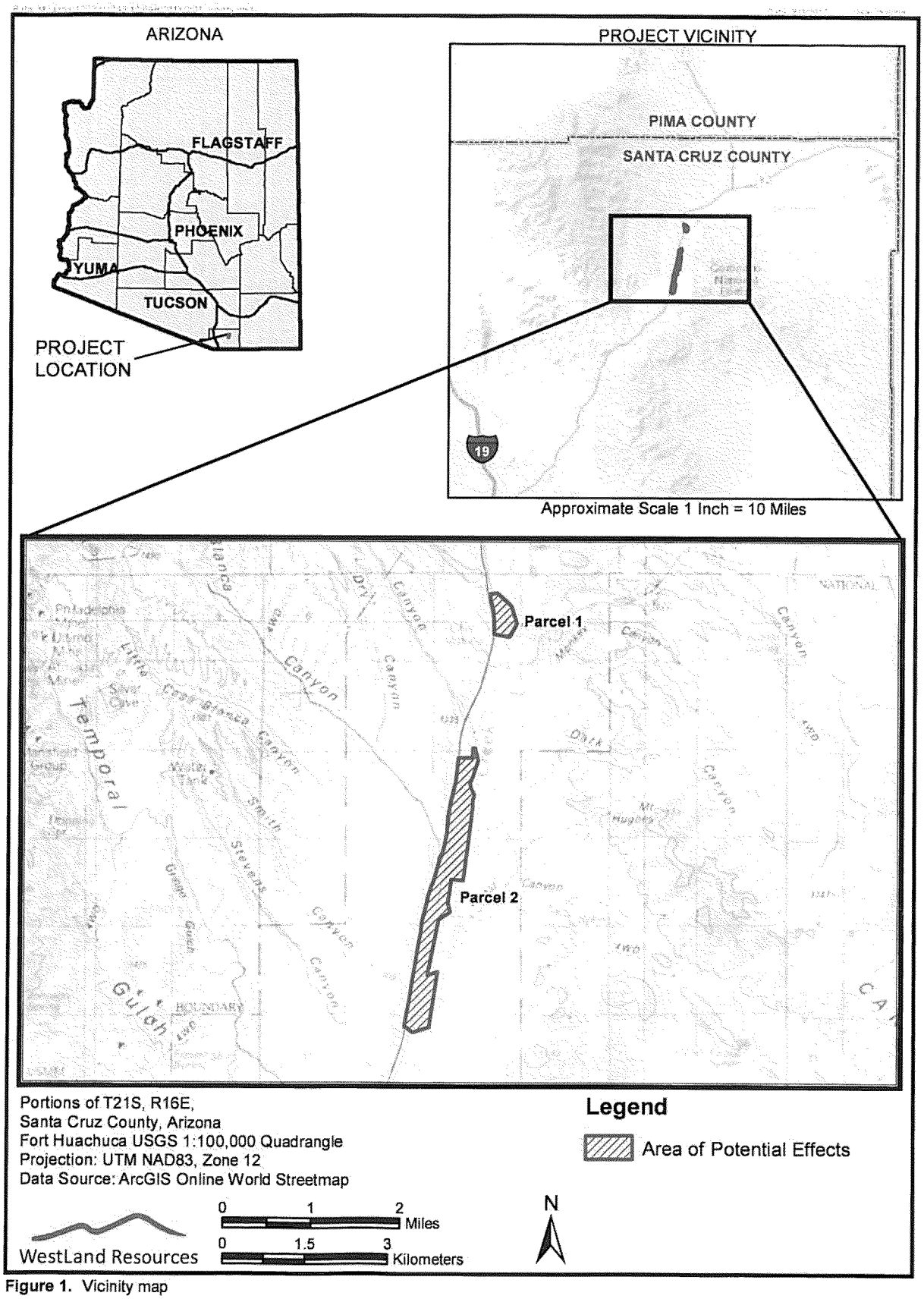

Figure 1. Vicinity map