GILA RIVER INDIAN COMMUNITY
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TRIBAL HISTORIC PRESERVATION OFFICE

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December 5, 2019

Richard Tremblay, Vice President | Operations
Florence Copper Inc.
1575 W. Hunt Highway
Florence, Arizona 85132

RE: Compliance with Section 106 of the National Historic Preservation Act, Transmittal of of Draft Final Data Recovery Report for the Florence Copper Production Test Facility (FC PTF), Florence, Arizona

Dear Vice President Tremblay,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received the draft final data recovery report dated October 22, 2019. The draft final data recovery report entitled, *Adventures in the Tankai-veco Site Group: Archaeological and Ethnographic Investigations and Associated Mitigation Measures in Support of the Florence Copper Inc. In-situ Copper Recovery Project Production Test Facility, Florence, Pinal County, Arizona,* prepared by Western Cultural Resource Management Inc. (WCRM) reports on the results of the implementation of the Historic Property Treatment Plan (HPTP) has been submitted for review and comment. The Environmental Protection Agency, Region IX (EPA) is the lead federal agency for this undertaking.

The report documents the results of archaeological data recovery at seven (7) archaeological sites in advance of construction of the FC PTF, Florence, Pinal County, Arizona. After review if the document, the GRIC-THPO has the following comments:

1. The title of the report, *Adventures in the Tankai-veco Site Group: Archaeological and Ethnographic Investigations and Associated Mitigation Measures in Support of the Florence Copper Inc. In-situ Copper Recovery Project Production Test Facility, Florence, Pinal County, Arizona,* is not considered an appropriate or acceptable report title. Please remove the word Adventures from the title and apply a global change to the report document.

2. References to personnel titles and facilities require global text changes. References to GRIC-CRMP representatives for burial recovery (consultant) should be changed to GRIC-CRMP Bioarchaeologists. Documentation of Ancestral Remains will occur at the GRIC-CRMP Bioarchaeology Laboratory. Housing of Ancestral Remains will be located at the GRIC-THPO Repository, Sacaton, Arizona. Dr. J. Andrew Darling should be listed as Principal Investigator, SWHR.

3. The GRIC-THPO requests global changes to the report text in reference to Ancestral remains and discussion involving the escort, housing, and repatriation of Ancestral remains:

    a. Mortuary remains, skeletal remains should instead be referenced as Remains or Human Remains, or individual(s).
    b. Associated funerary items, accompaniments, burial accompaniments, grave goods, burial-related cultural remains should instead be referenced as Associated funerary objects.
    c. Remains are not removed. Remains are excavated.
    d. Remains are not analyzed. Remains are documented.
    e. Remains are not transported. Remains are escorted.
    f. Remains are not stored. Remains are housed.
    g. Burial report should instead be referenced as Report of remains.
    h. Grave should instead be referenced as funerary/mortuary/burial feature.
    i. Remains are not locked in a room, lab, or cabinet. Remains are secured.
    j. Skeletal samples should be referenced as a group of remains or individuals.
    k. Inventory of remains should be referenced as a roster.
    l. Subadult(s) should be referenced as a juvenile(s).

4. There are scattered typos throughout the text including Tañkai-vecho on page 14-5 of the ethnohistoric overview and hoever on page 14-13 of the ethnohistoric overview. We trust that the report authors will make a good faith effort to correct all the typos in the draft data recovery report.

The GRIC-THPO looks forward to reviewing the revised draft data recovery report, once our requested changes have been incorporated into the report text. The GRIC THPO will continue to participate in the Section 106 consultation process for this undertaking. The proposed project area is within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'Odham Nation).

Thank you for consulting with the GRIC-THPO. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,

Barnaby V. Lewis
Tribal Historic Preservation Officer
Gila River Indian Community



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