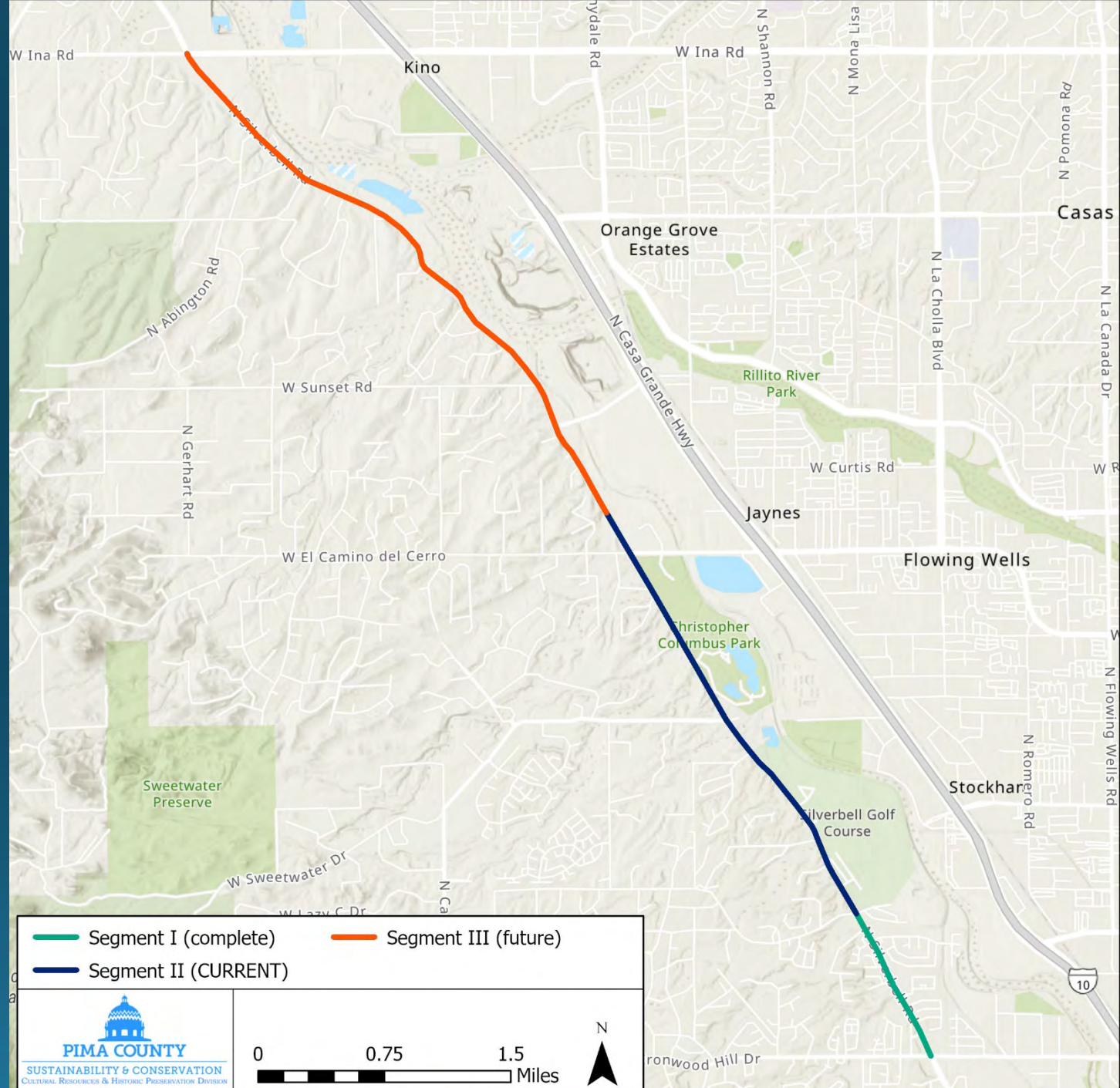


SILVERBELL WIDENING PROJECT SEGMENT 2 – Goret to El Camino del Cerro

CULTURAL RESOURCES OVERVIEW

1. Cultural Resources Compliance Framework and Background Info
 - a) Local (*Grant to Goret*)
 - b) Federal (*Goret to Ina*)



SILVERBELL WIDENING PROJECT SEGMENT 2 – Goret to El Camino del Cerro

Cultural Resources Overview

1. Cultural Resources Compliance Framework and Background Info
 - a) Local (*Grant to Goret*)
 - b) Federal (*Goret to Ina*)

2. Goret to Camino del Cerro - Stages of Compliance Activities
 - a) Previous Work
 - b) Pre-construction Stage Fieldwork
 - c) Utility Relocation Stage
 - d) Construction Stage



SILVERBELL WIDENING PROJECT SEGMENT 2 – Goret to El Camino del Cerro

Cultural Resources Overview

1. Cultural Resources Compliance Framework and Background Info
 - a) Local (*Grant to Goret*)
 - b) Federal (*Goret to Ina*)

2. Goret to Camino del Cerro - Stages of Compliance Activities
 - a) Previous Work
 - b) Pre-construction Stage Fieldwork
 - c) Utility Relocation Stage
 - d) Construction Stage

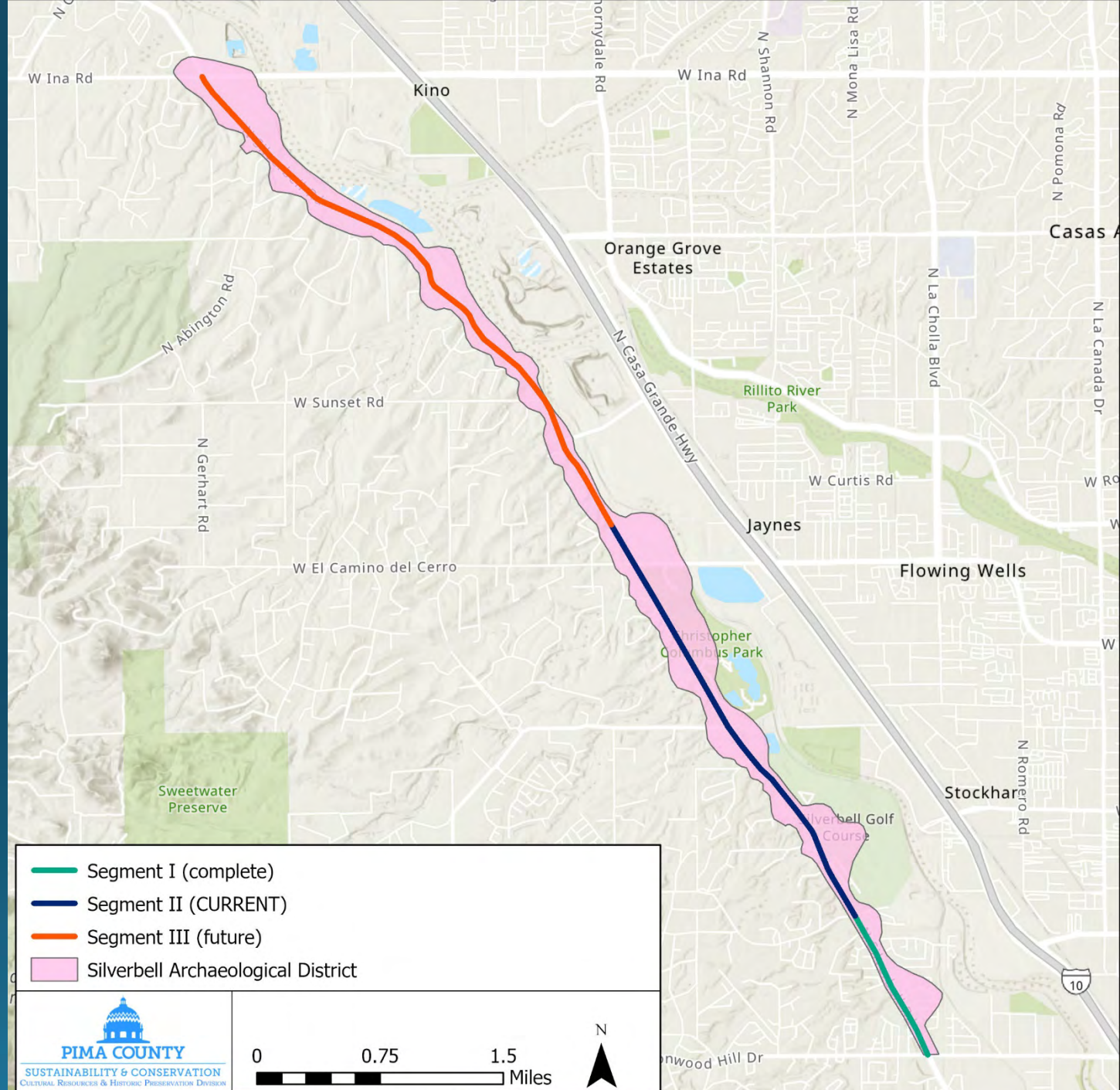
3. Results of Pre-Construction Stage Compliance Activities



LOCAL COMPLIANCE FRAMEWORK

2010 – Archaeological Survey

- Documented 39 sites
- “Uninterrupted deposit of cultural resources”
- Silverbell Archaeological District



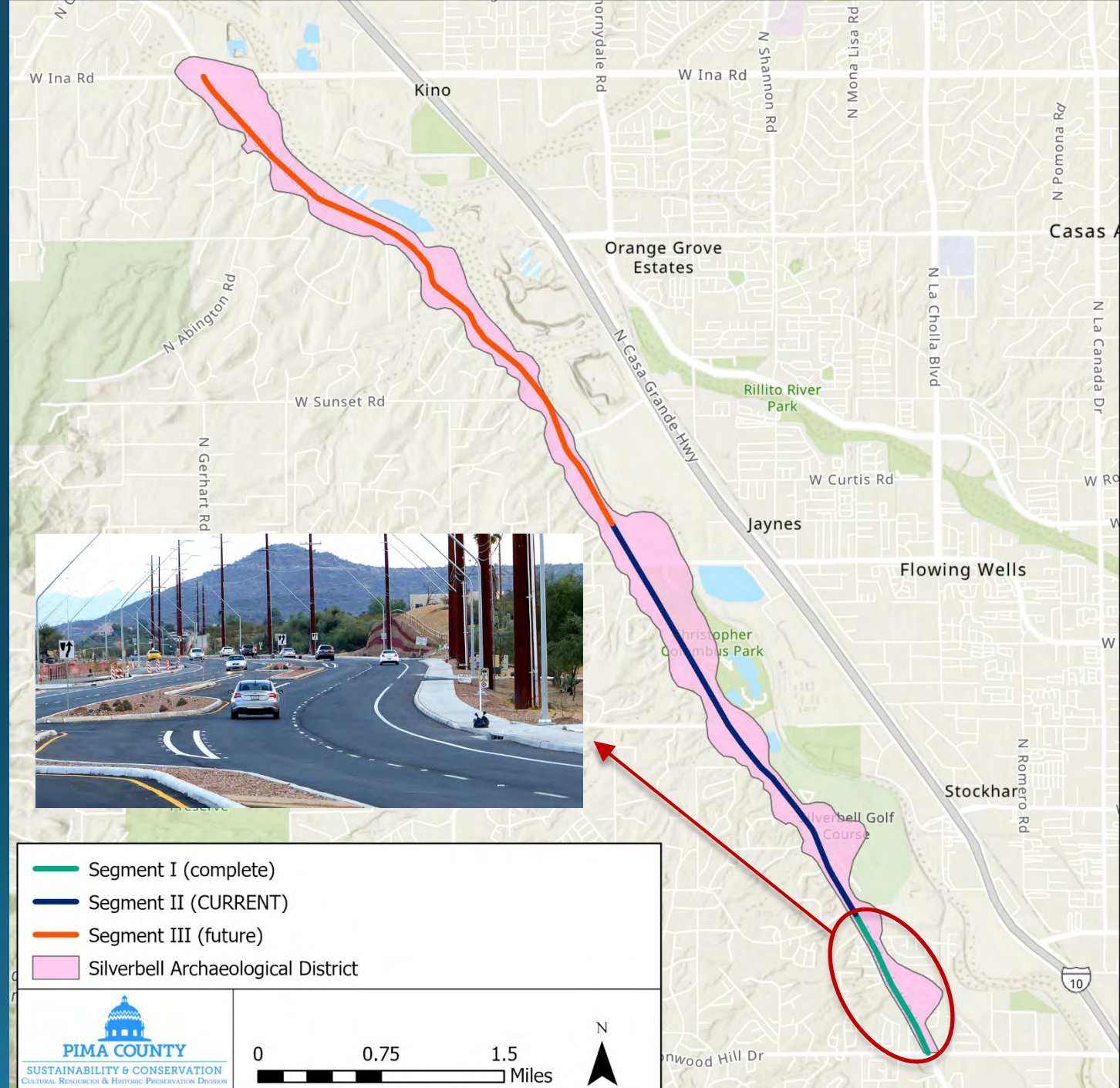
LOCAL COMPLIANCE FRAMEWORK

2010 – Archaeological Survey

- Documented 39 sites
- “Uninterrupted deposit of cultural resources”
- **Silverbell Archaeological District**

2014: Segment 1 Design & Construction

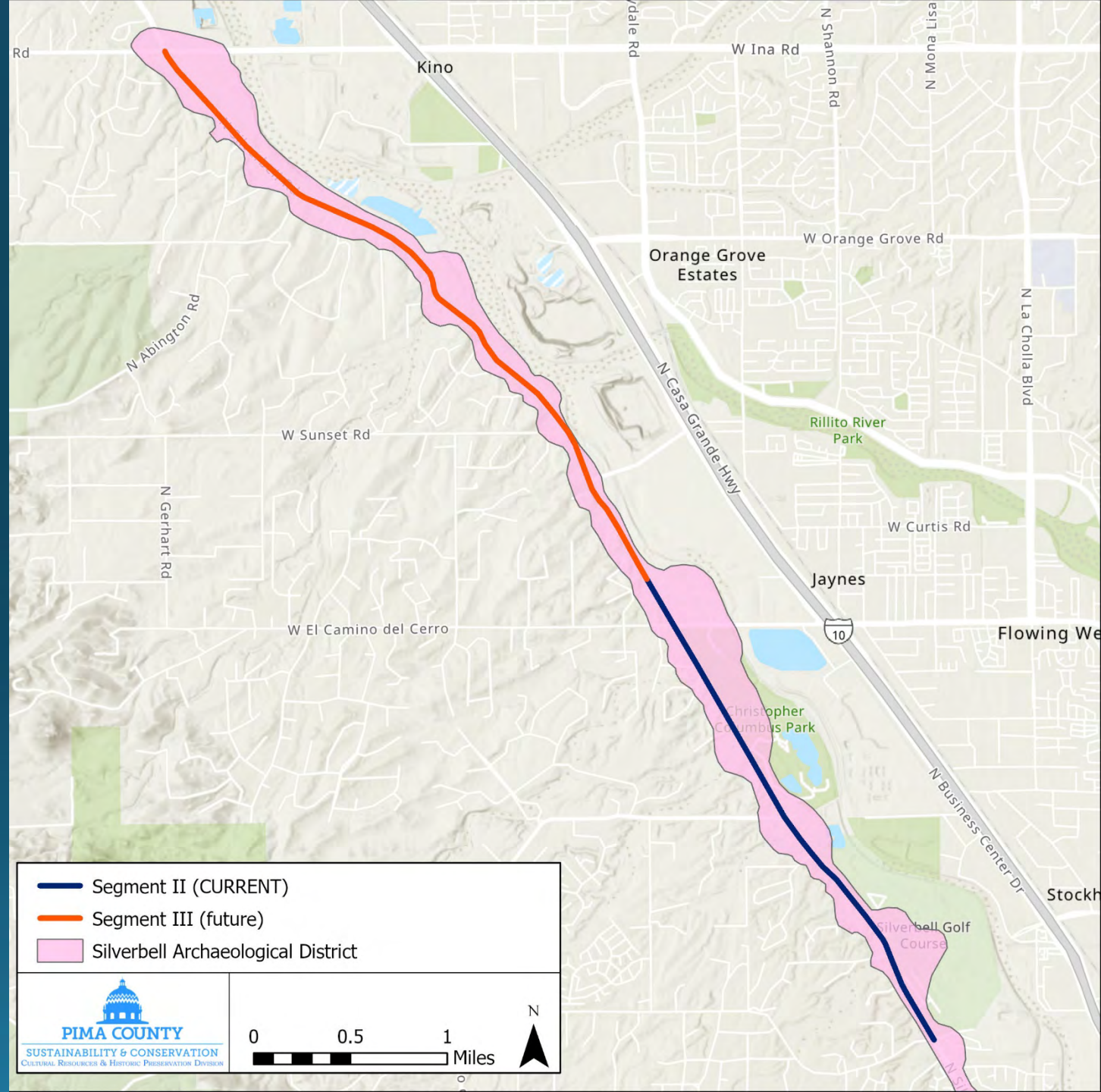
- City of Tucson Designed and Constructed
- No federal nexus
- Survey findings were negative
- Precautionary subsurface testing identified 2 sites that had no surface expression
- Testing confirmed array of buried cultural deposits that required mitigation



FEDERAL COMPLIANCE FRAMEWORK

Goret Road to Ina Road

- **Section 404 (Clean Water Act) triggers federal nexus and compliance with Section 106 of the National Historic Preservation Act**
- **Lead Federal Agency: U.S. Army Corps of Engineers**
- **Section 106 Programmatic Agreement**
 - **Define Stakeholders/Consulting Parties**



FEDERAL COMPLIANCE FRAMEWORK

Goret Road to Ina Road

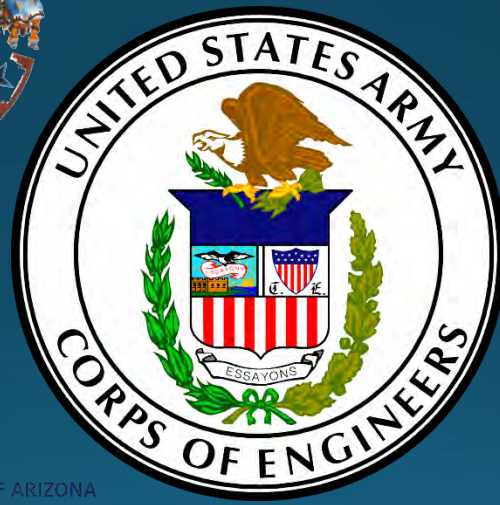
Consulting Parties

Tribes

- Ak-Chin Indian Community
- Fort McDowell Yavapai Nation
- Gila River Indian Community
- Hopi Tribe
- Pascua Yaqui Tribe
- Pueblo of Zuni
- Salt River Pima Maricopa Indian Community
- San Carlos Apache Tribe
- Tohono O'odham Nation
- Tonto Apache Tribe
- White Mountain Apache Tribe
- Yavapai-Apache Nation

Agencies

- Arizona State Museum
- City of Tucson
- Pima County
- Regional Transportation Authority
- State Historic Preservation Office
- Town of Marana
- U.S. Army Corps of Engineers



Salt River Pima-Maricopa Indian Community



THE UNIVERSITY OF ARIZONA
ARIZONA STATE MUSEUM



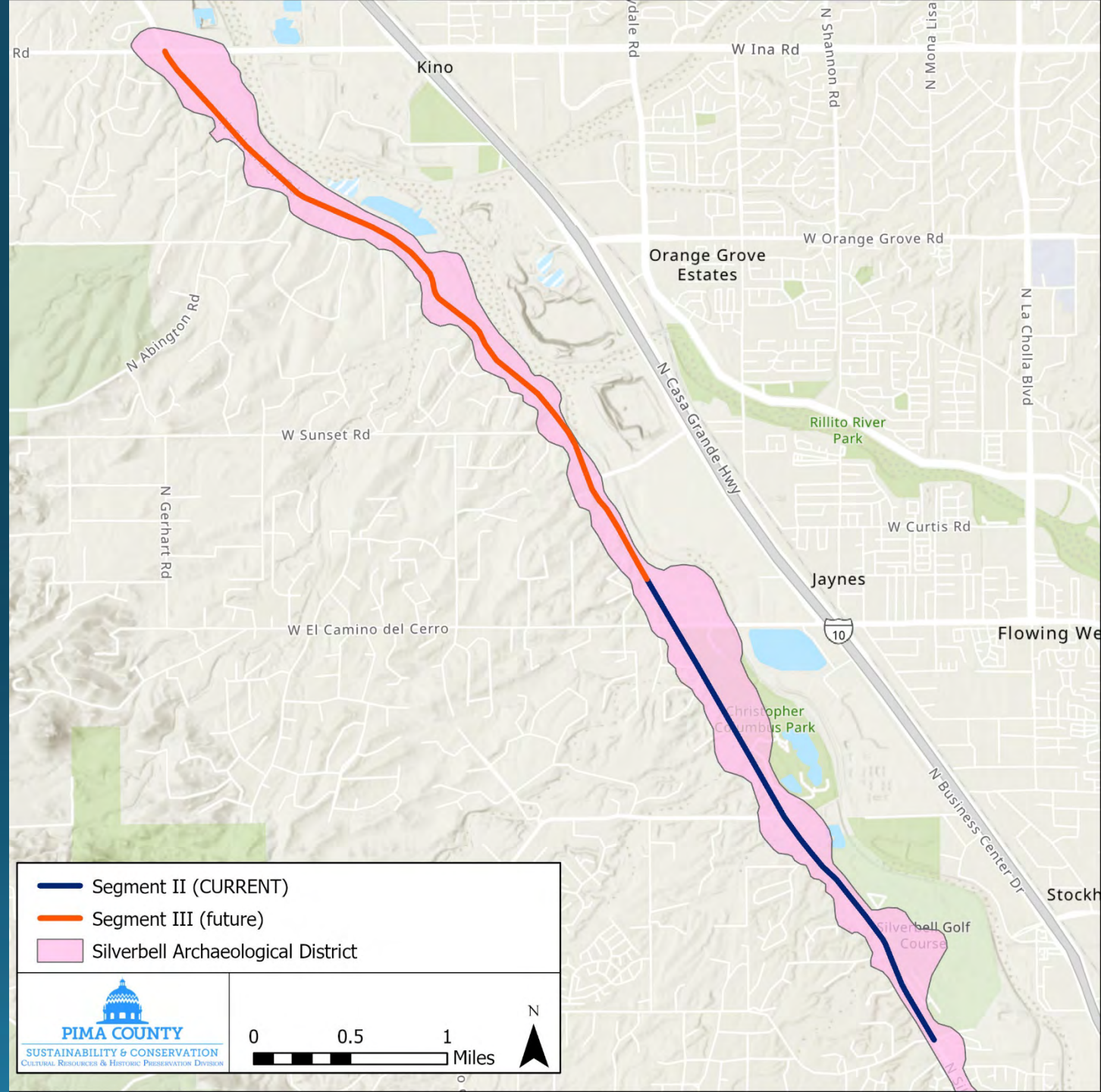
STATE HISTORIC PRESERVATION OFFICE



FEDERAL COMPLIANCE FRAMEWORK

Goret Road to Ina Road

- Section 106 Programmatic Agreement
 - Define Stakeholders/Consulting Parties
- **Historic Properties Treatment Plan**



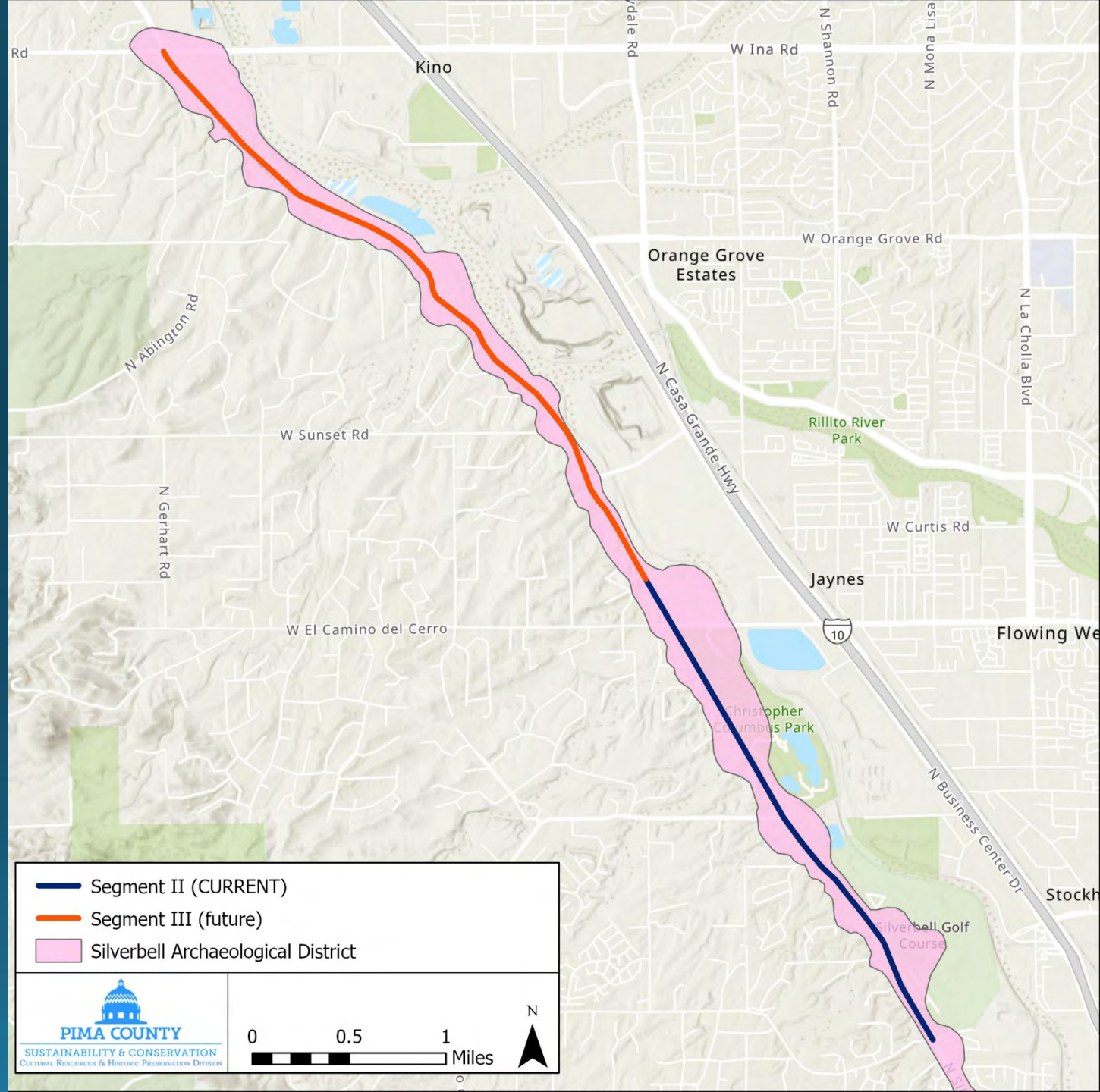
FEDERAL COMPLIANCE FRAMEWORK

Goret Road to Ina Road

- Section 106 Programmatic Agreement
 - Define Stakeholders/Consulting Parties
- Historic Properties Treatment Plan

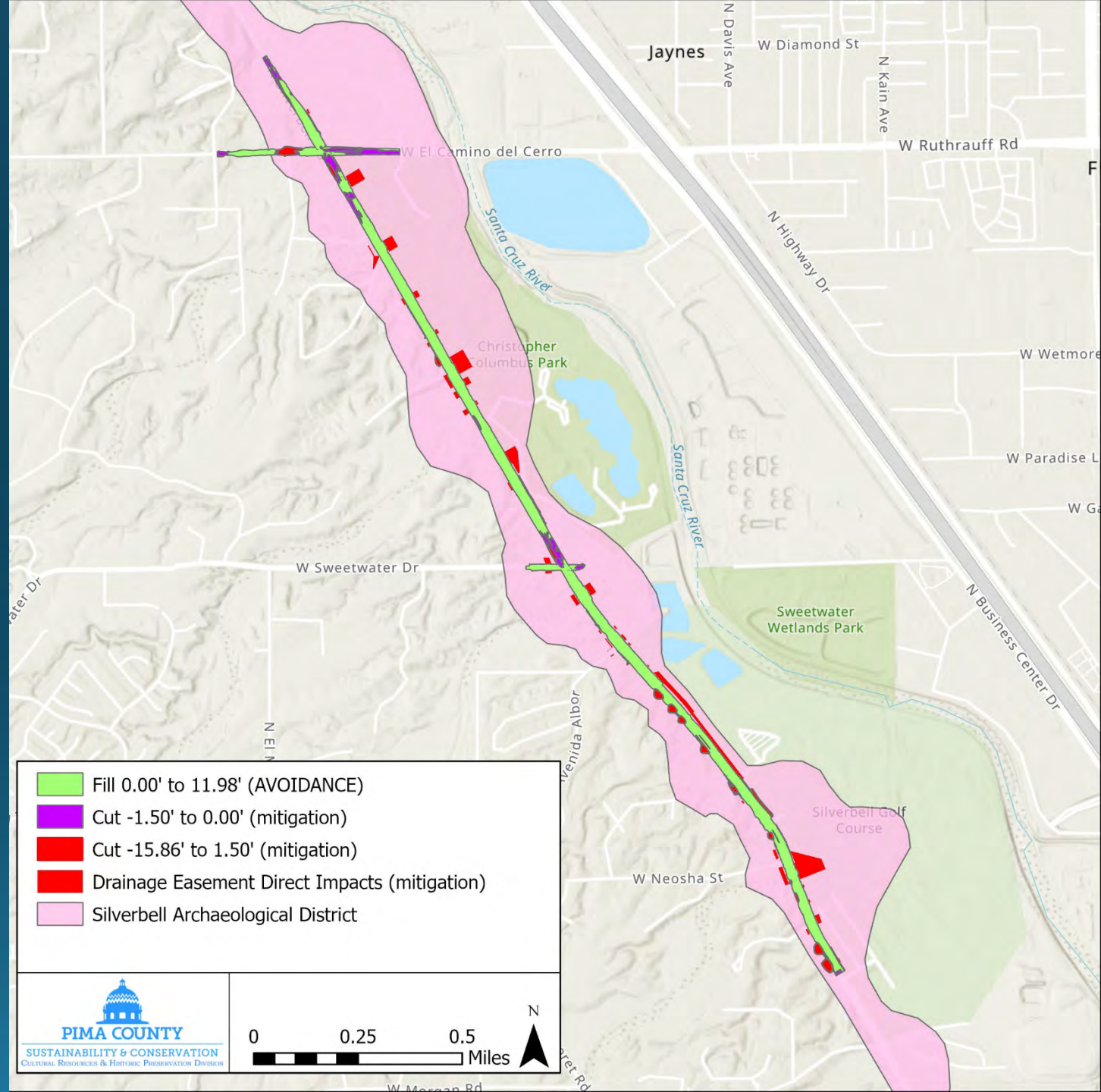
PROJECT CONSENSUS
AVOID
MINIMIZE
MITIGATE

**(applies to all aspects of the project,
not just cultural resources)**



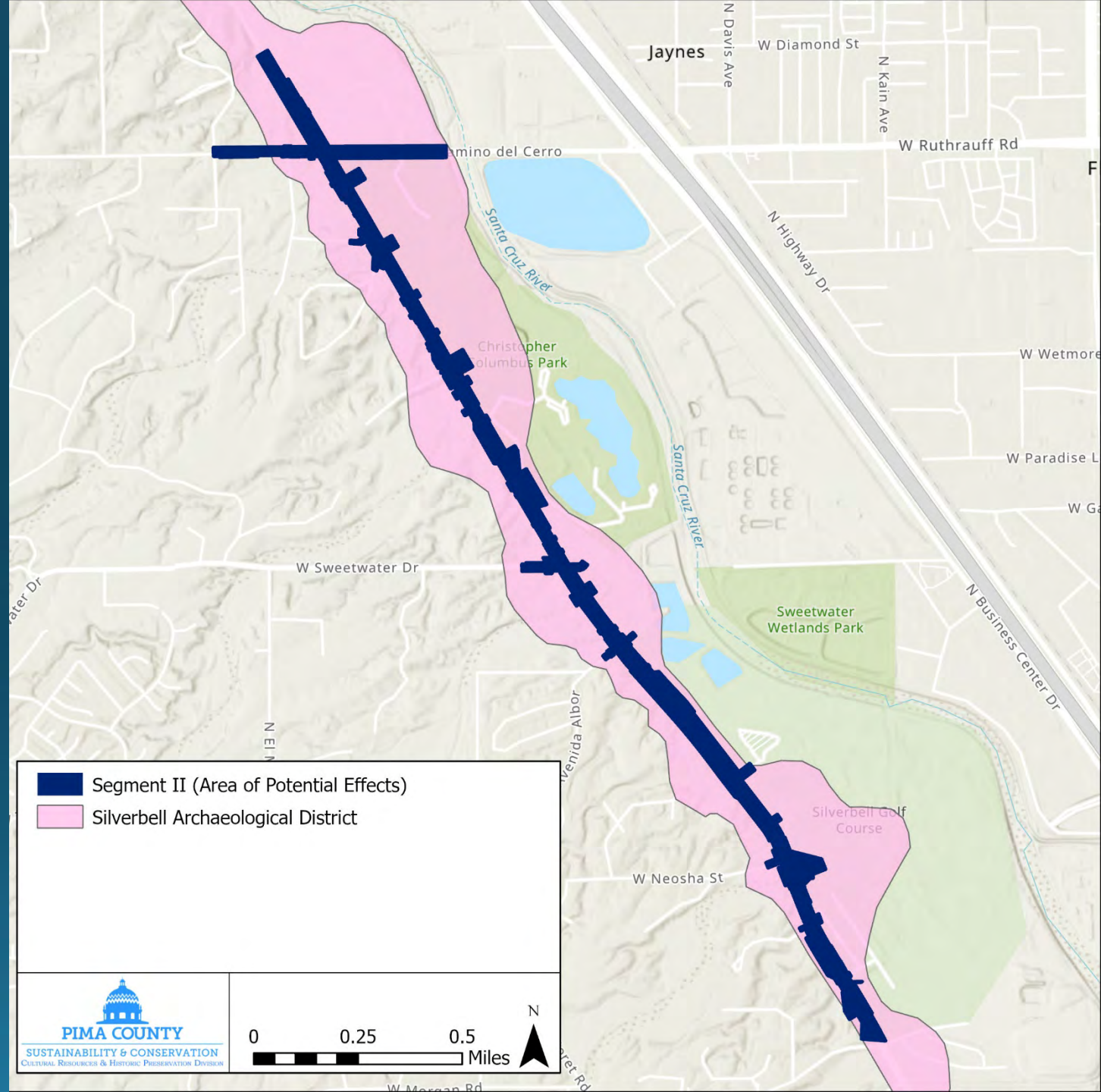
SEGMENT 2 – Goret Road to El Camino del Cerro

- Potential effects to cultural resources considered in design



SEGMENT 2 – Goret Road to El Camino del Cerro

- Potential effects to cultural resources considered in design
- **Area of Potential Effects**



SEGMENT 2 – Goret Road to El Camino del Cerro – ARCHAEOLOGICAL COMPLIANCE

PRE-CONSTRUCTION STAGE

October 2020-May 2021

- Analyze & investigate areas outside existing road prism - Complete

UTILITY RELOCATION STAGE

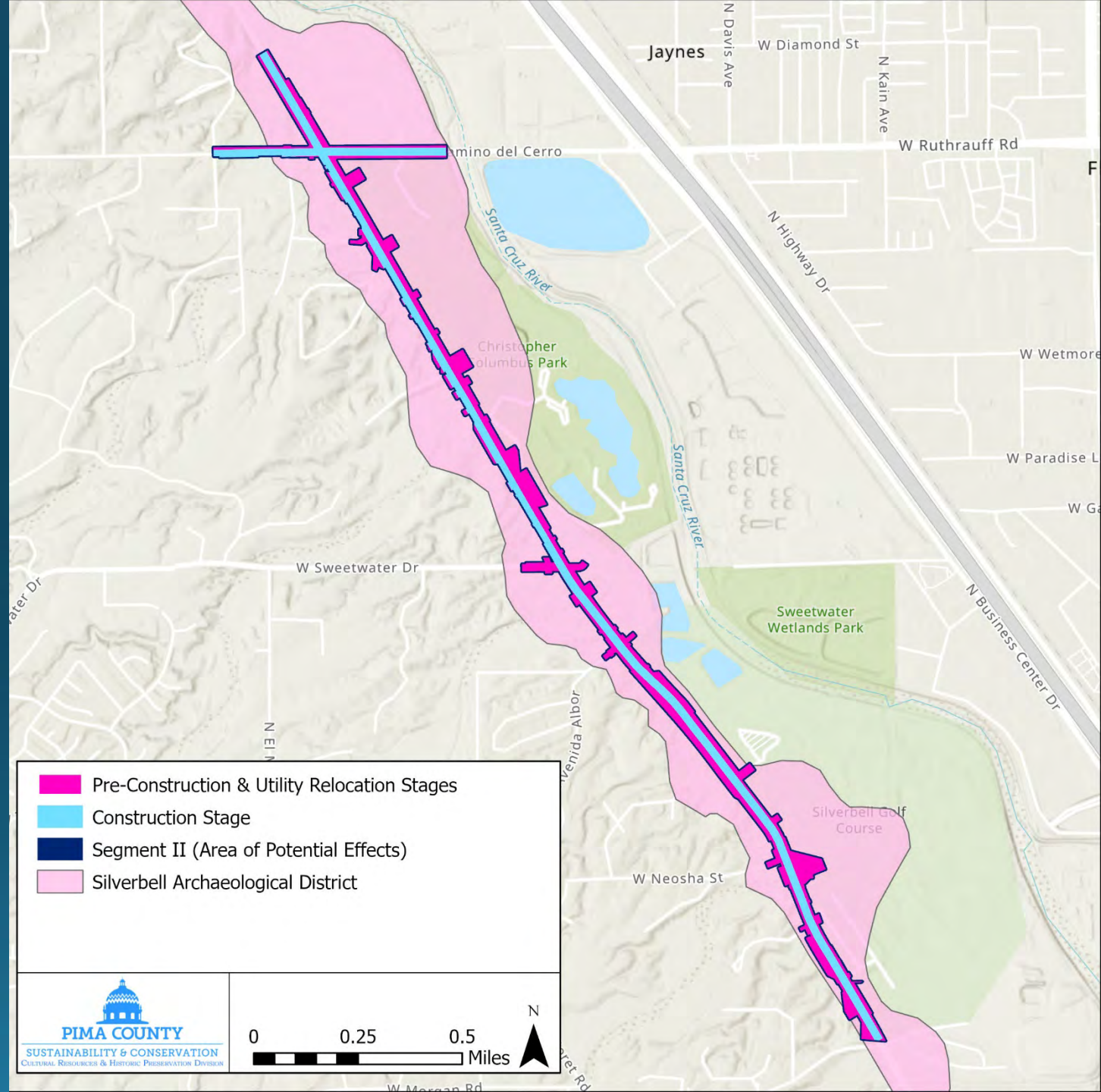
June 2021-July 2022

- Analyze utility relocation plans
- Monitor/mitigate all utility relocations requiring ground disturbance

CONSTRUCTION STAGE

Summer 2022

- Monitor earthwork
- Ensure protection and in-place preservation of AVOIDED resources
- Mitigate disturbances below existing road prism



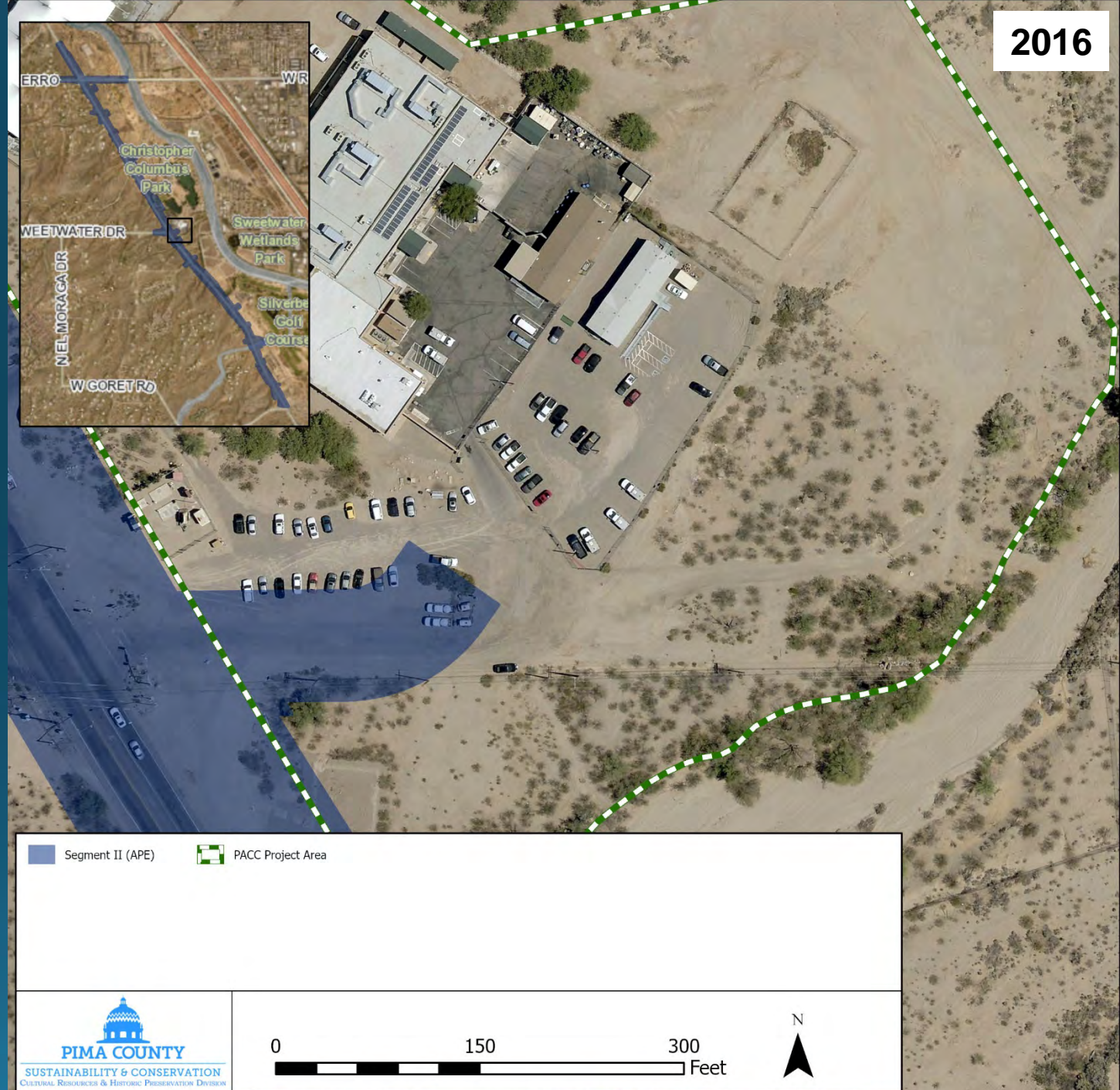
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Potential effects to cultural resources considered in design
- Area of Potential Effects (APE)
- Previous Archaeological Work
 - Pima Animal Care Center Expansion



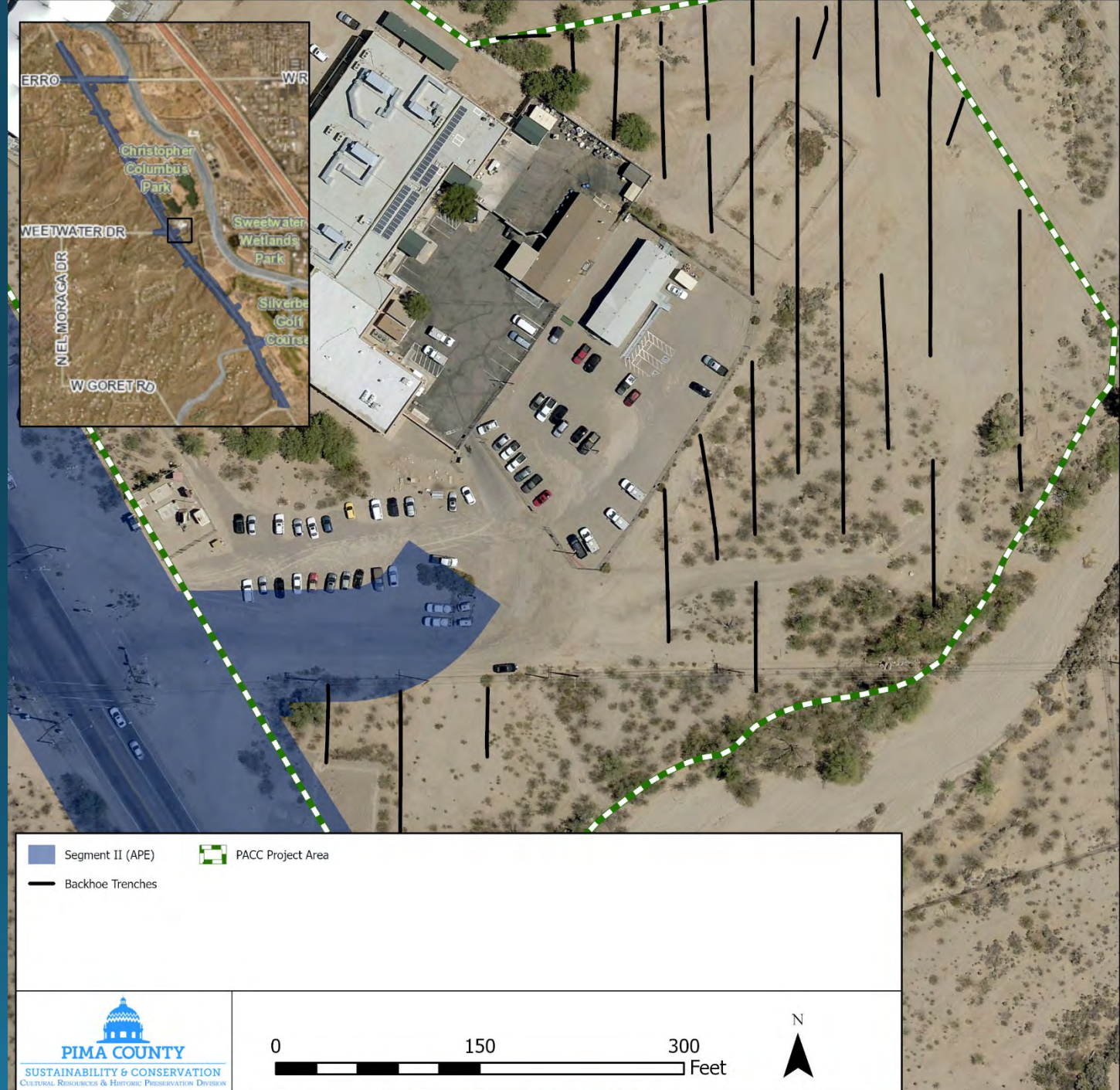
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Potential effects to cultural resources considered in design
- Area of Potential Effects (APE)
- **Previous Archaeological Work**
 - **Pima Animal Care Center Expansion**



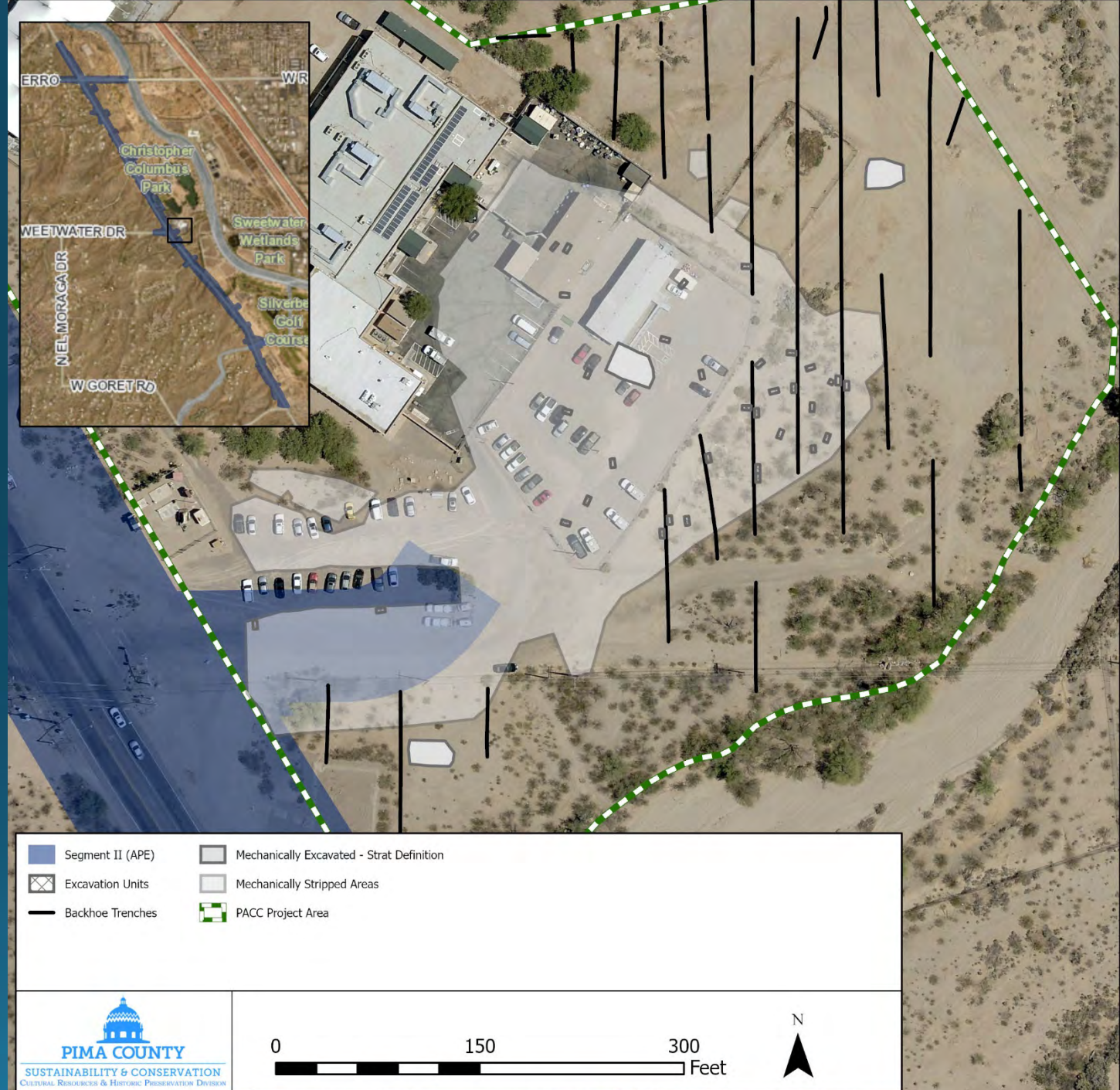
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Potential effects to cultural resources considered in design
- Area of Potential Effects (APE)
- Previous Archaeological Work
 - Pima Animal Care Center Expansion
 - **Known archaeological site**
 - **Trenching**



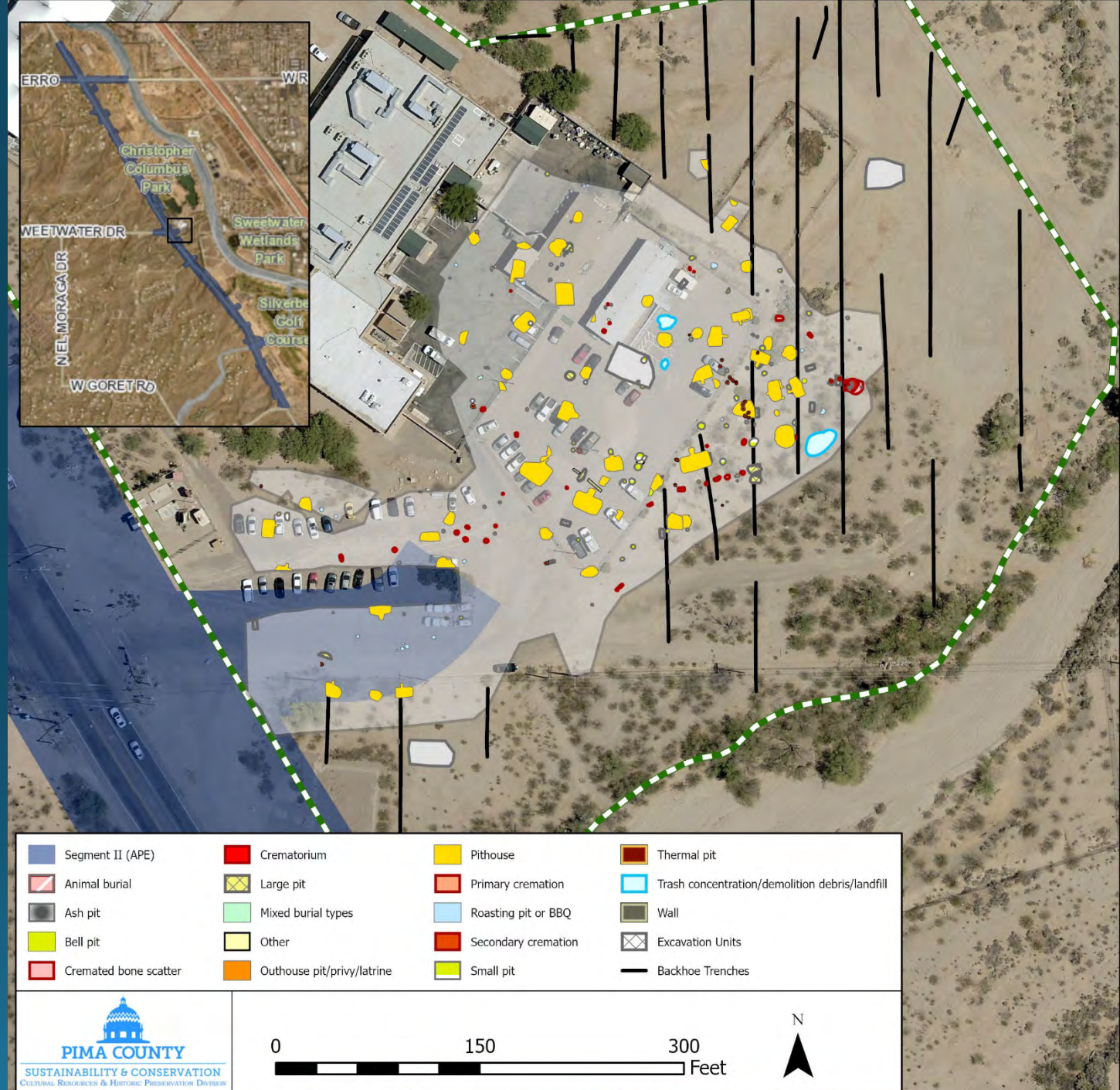
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Potential effects to cultural resources considered in design
- Area of Potential Effects (APE)
- Previous Archaeological Work
 - Pima Animal Care Center Expansion
 - Known archaeological site
 - Trenching
 - **Excavation**



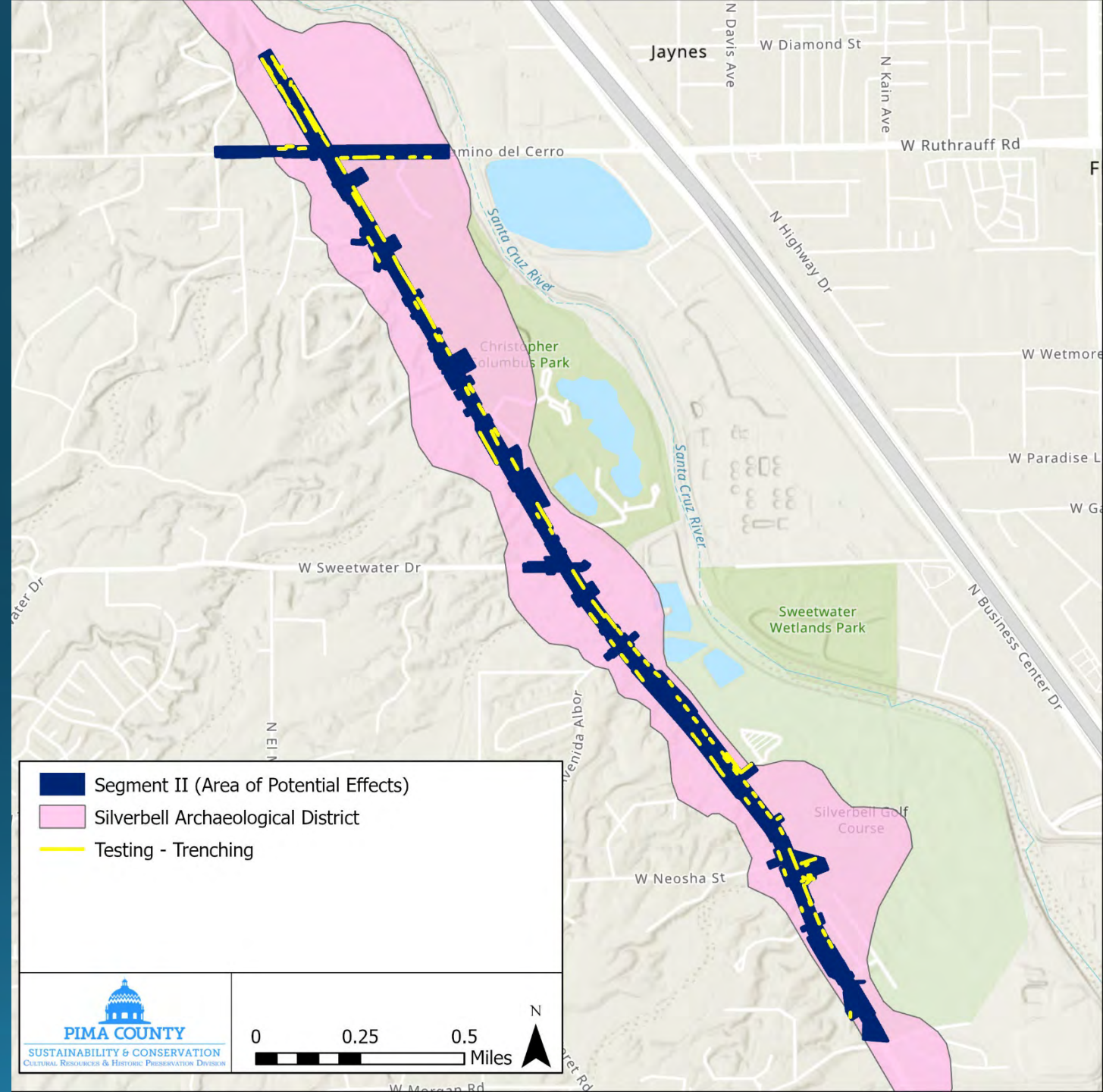
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Potential effects to cultural resources considered in design
- Area of Potential Effects (APE)
- Previous Archaeological Work
 - Pima Animal Care Center Expansion
 - Known site
 - Trenching
 - Excavation
 - **Misconception of “previously disturbed”**



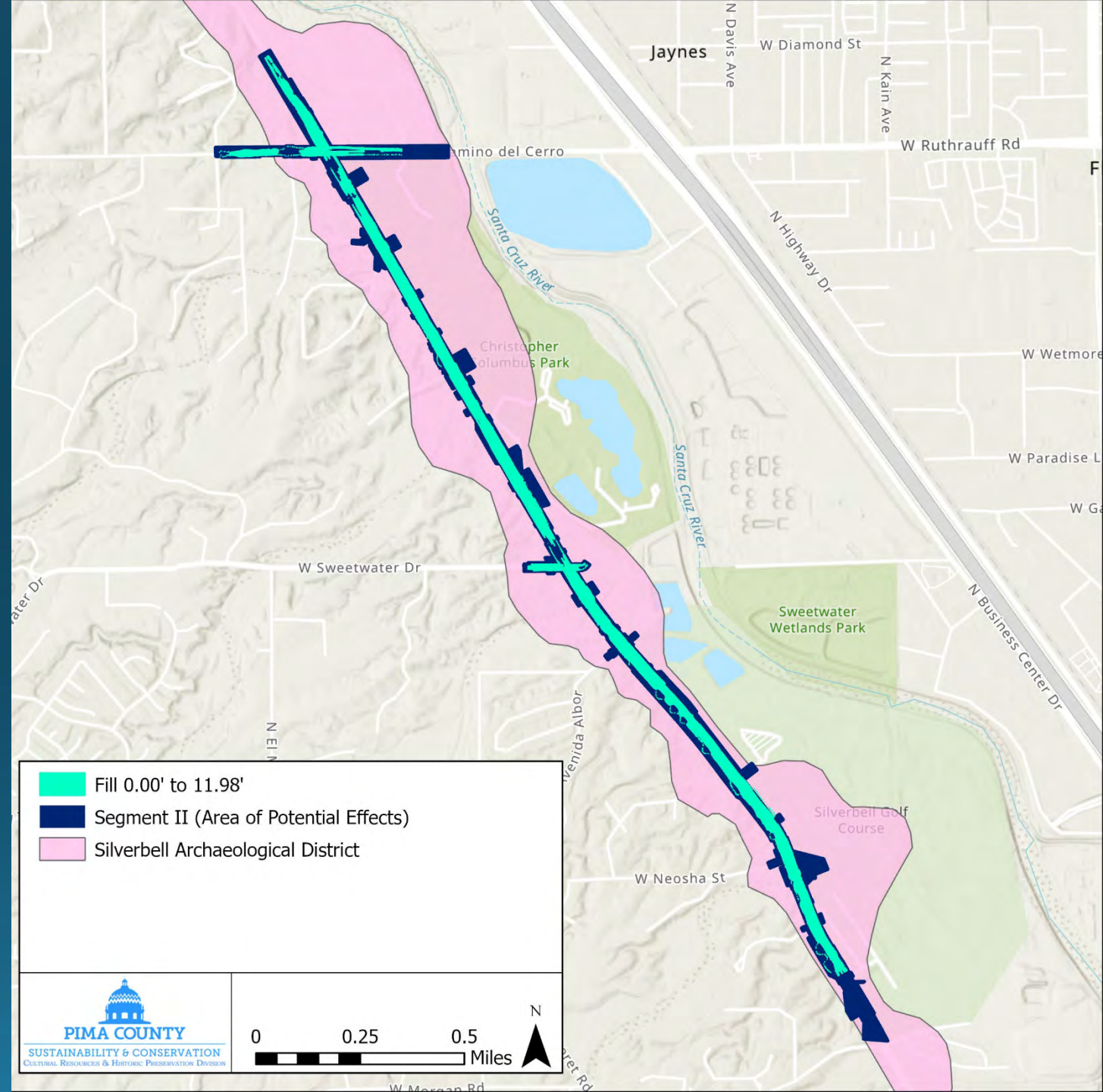
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits



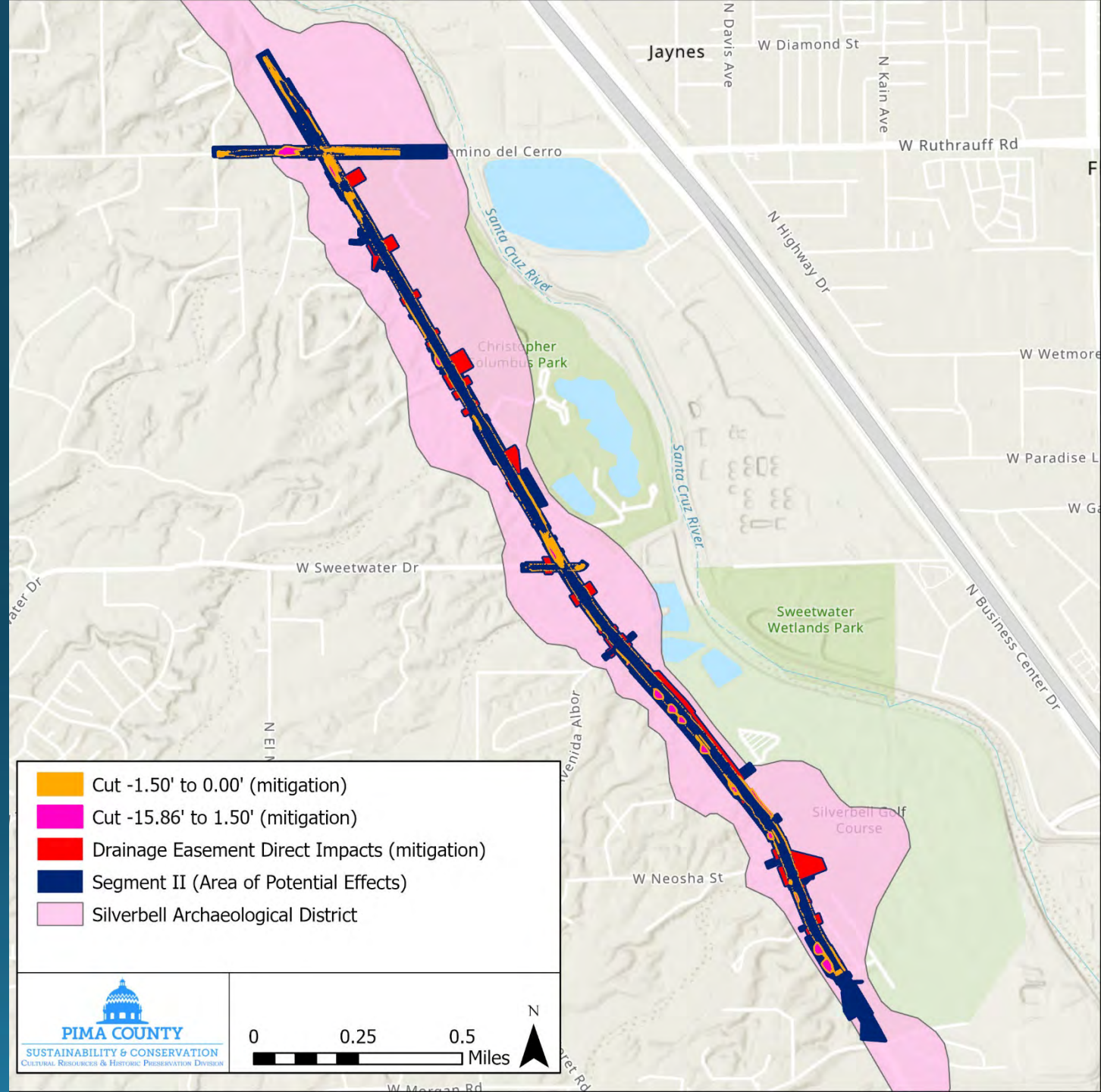
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits
- Targeted Archaeological Mitigation Program
 - AVOID/PROTECT “Fill” areas



SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

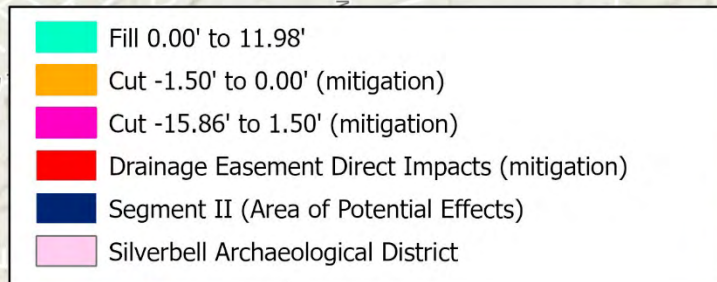
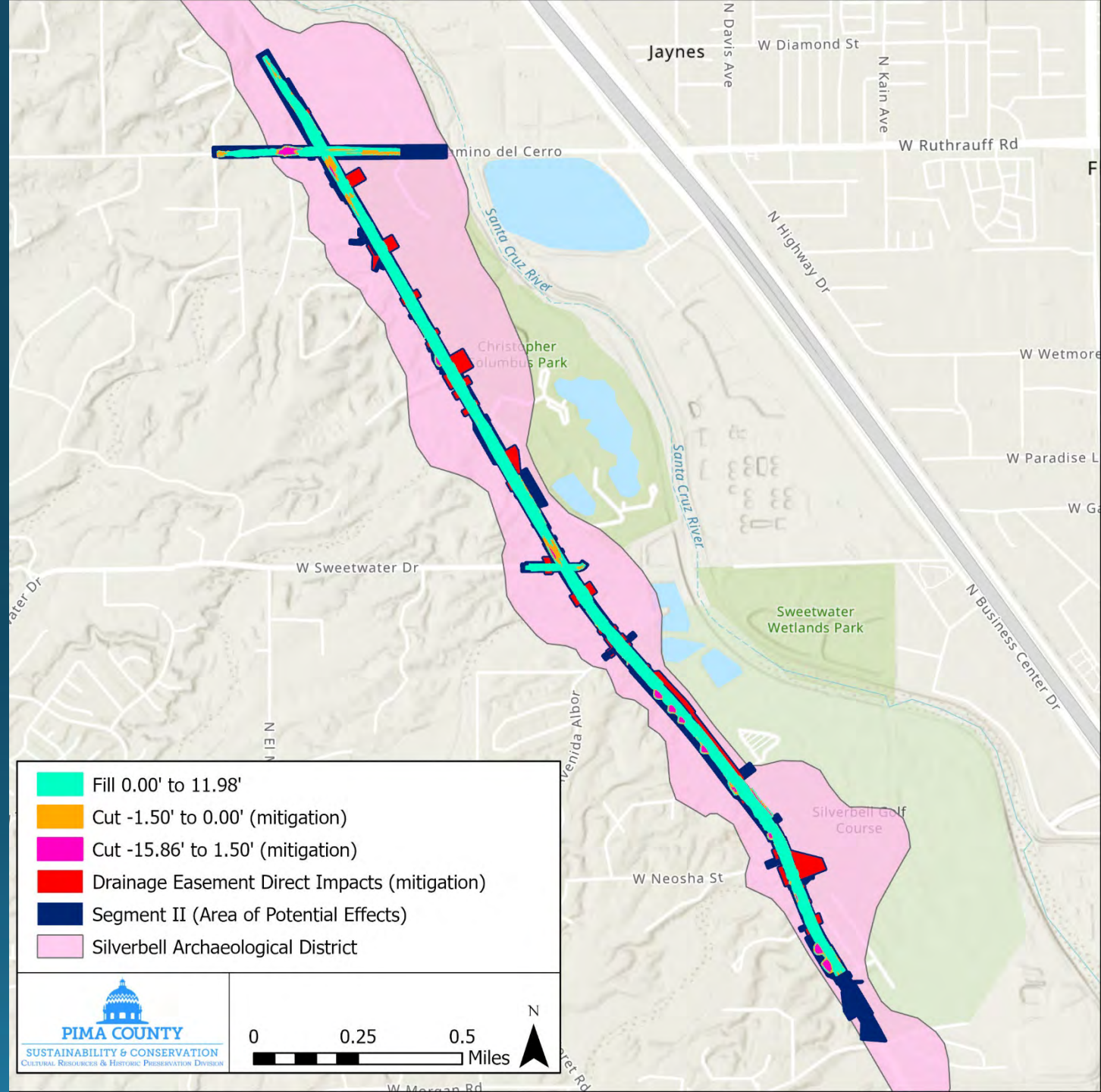
- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits
- Targeted Archaeological Mitigation Program
 - AVOID/PROTECT “Fill” areas
 - MINIMIZE/MITIGATE “Cut & Drainage Easement” areas



SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

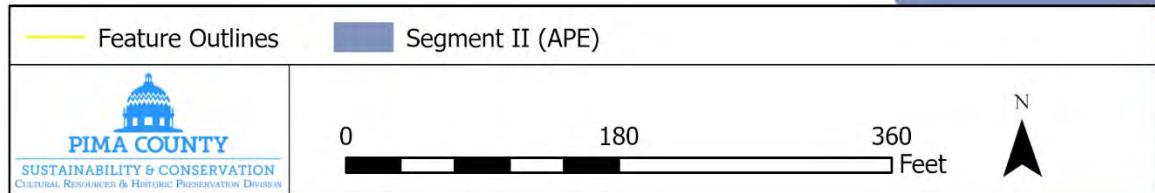
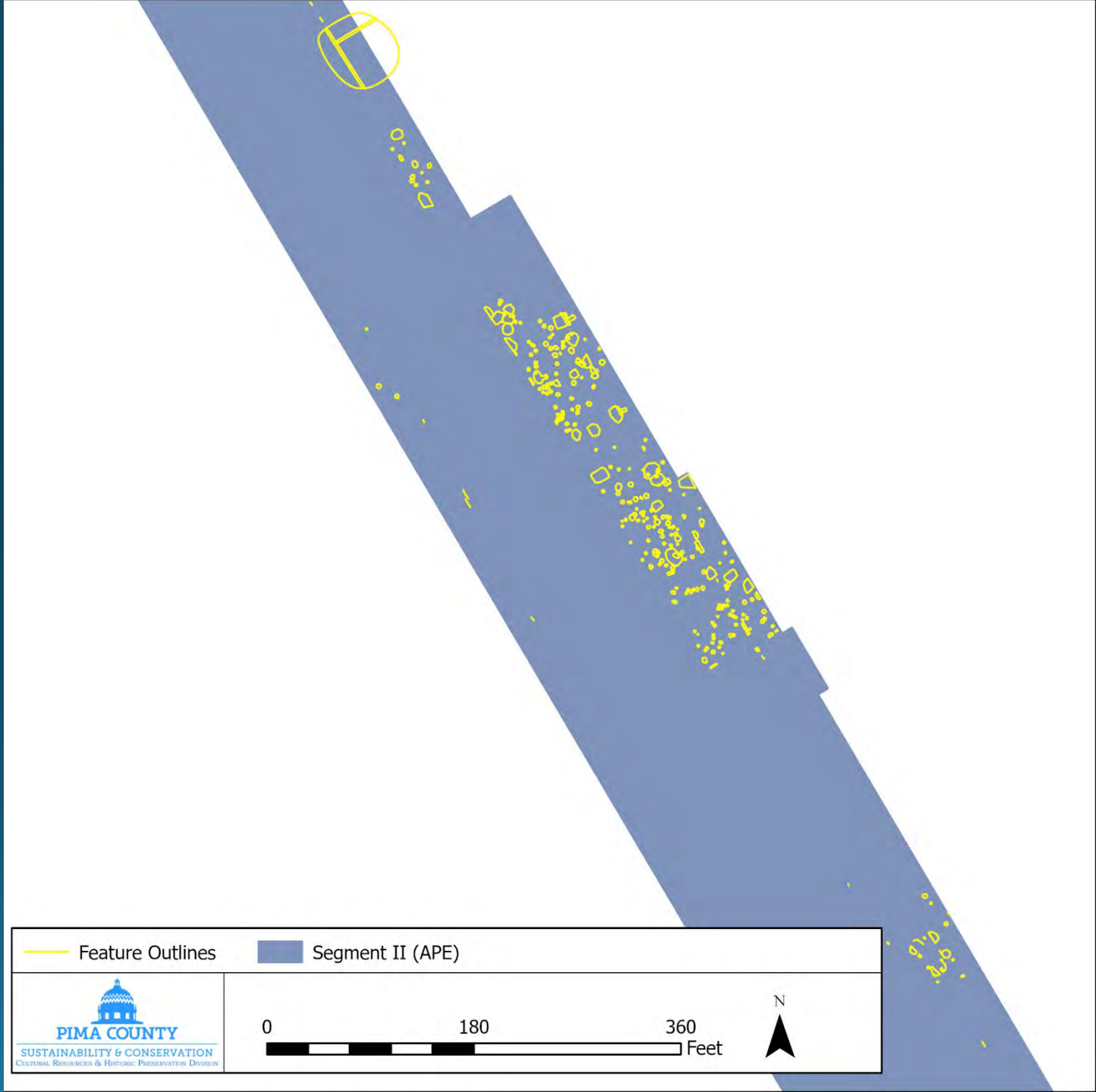
- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits
- Targeted Archaeological Mitigation Program
 - AVOID/PROTECT “Fill” areas
 - MINIMIZE/MITIGATE “Cut & Drainage Easement” areas

Disturbance Type	Acreage
Fill	38.65
Cut < -1.5'	5.31
Cut 1.5' to -15.86'	3.11
Drainage Easements	9.5
Utilities (estimated)	< 1



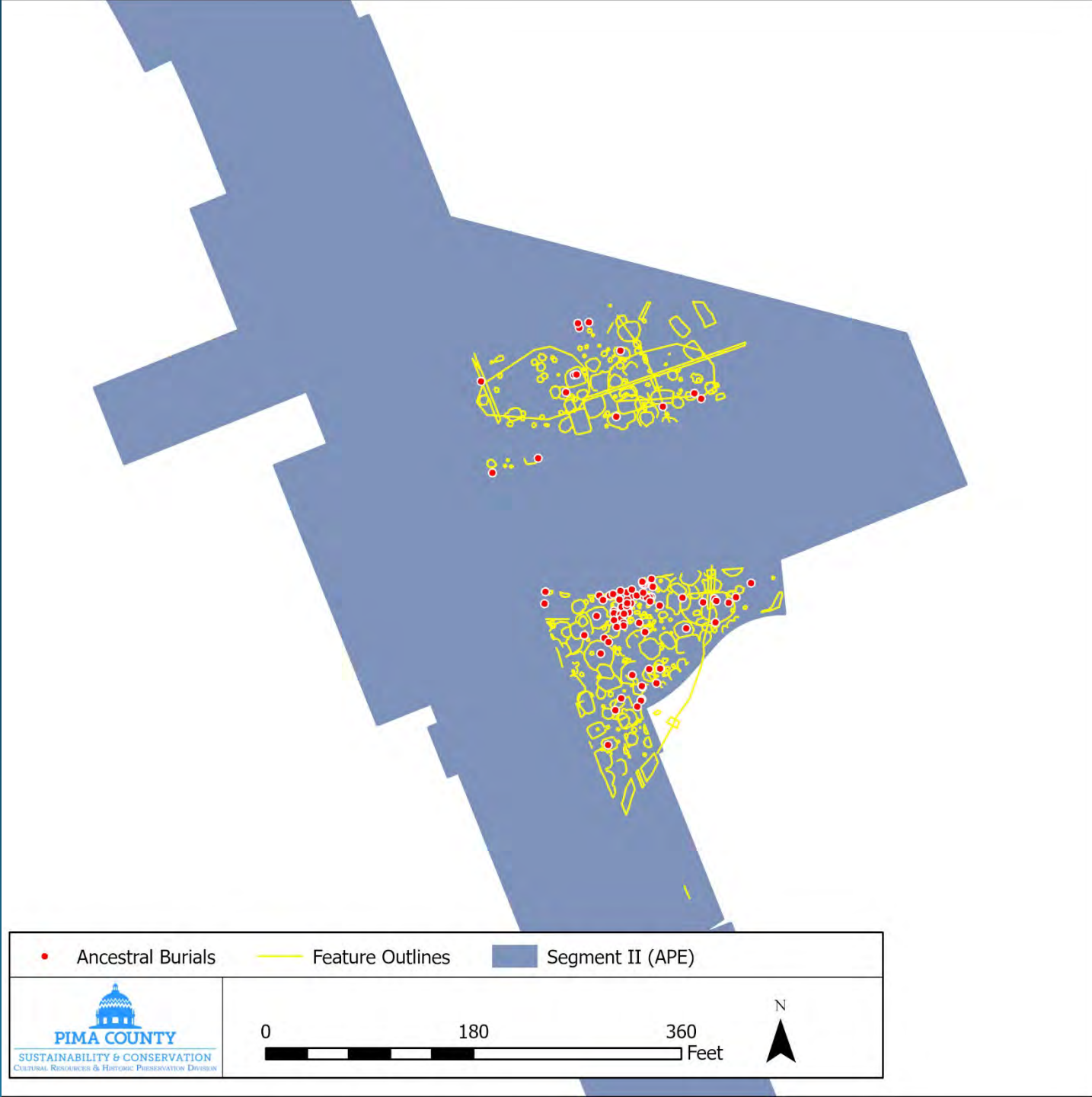
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits
- Targeted Archaeological Mitigation Program
 - AVOID/PROTECT “Fill” areas
 - MINIMIZE/MITIGATE “Cut & Drainage Easement” areas
- Example Results of Pre-Construction Stage Fieldwork



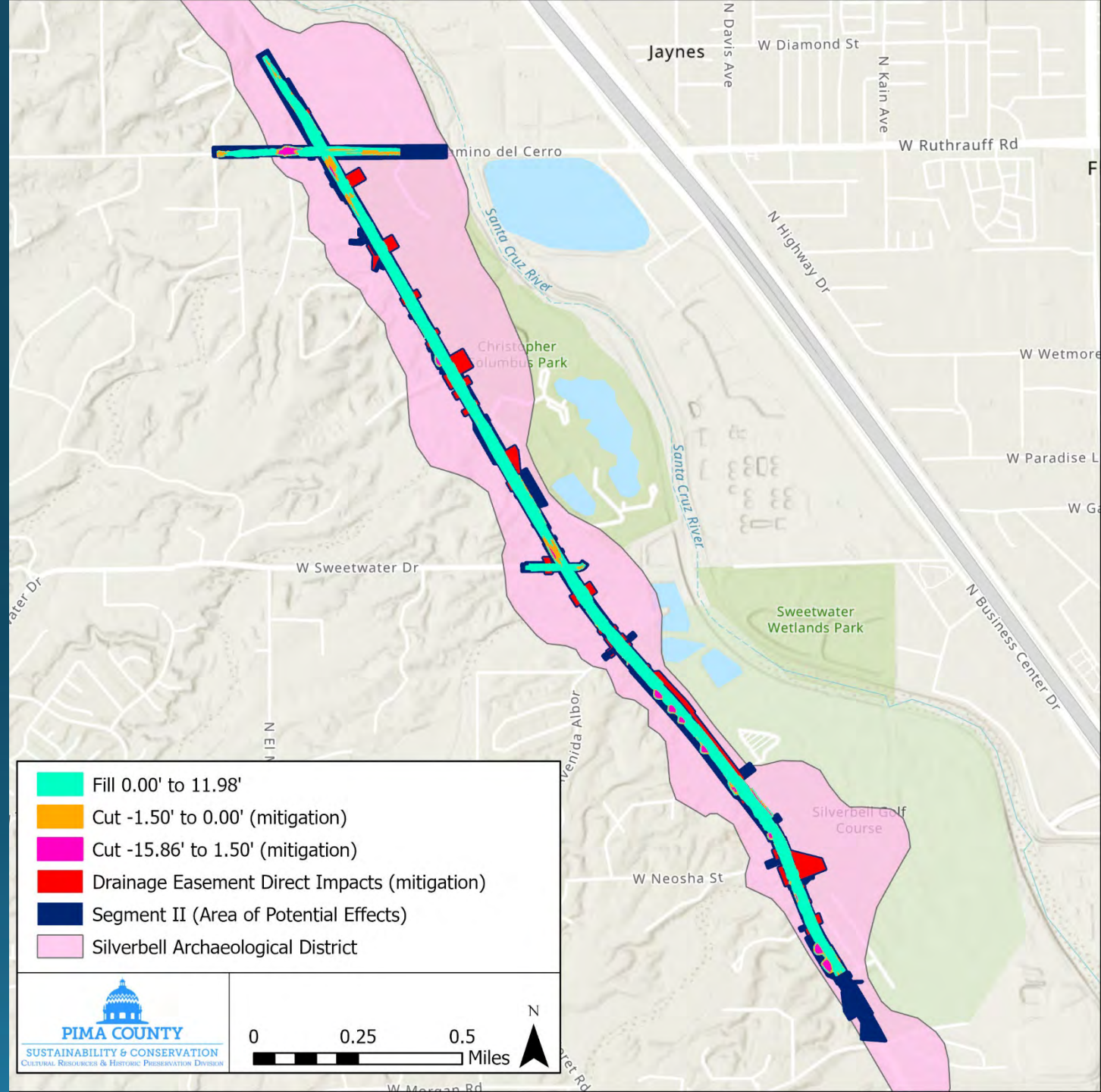
SEGMENT 2 – Goret Road to El Camino del Cerro – PRE-CONSTRUCTION STAGE

- Comprehensive Archaeological Testing Program
 - Examine distribution of cultural deposits
- Targeted Archaeological Mitigation Program
 - AVOID/PROTECT “Fill” areas
 - MINIMIZE/MITIGATE “Cut & Drainage Easement” areas
- Example Results of Pre-Construction Stage Fieldwork



SEGMENT 2 – Goret Road to El Camino del Cerro

- Confirmed dense distribution of cultural deposits spanning 7,000 years of human history
- Unique opportunity to preserve in place

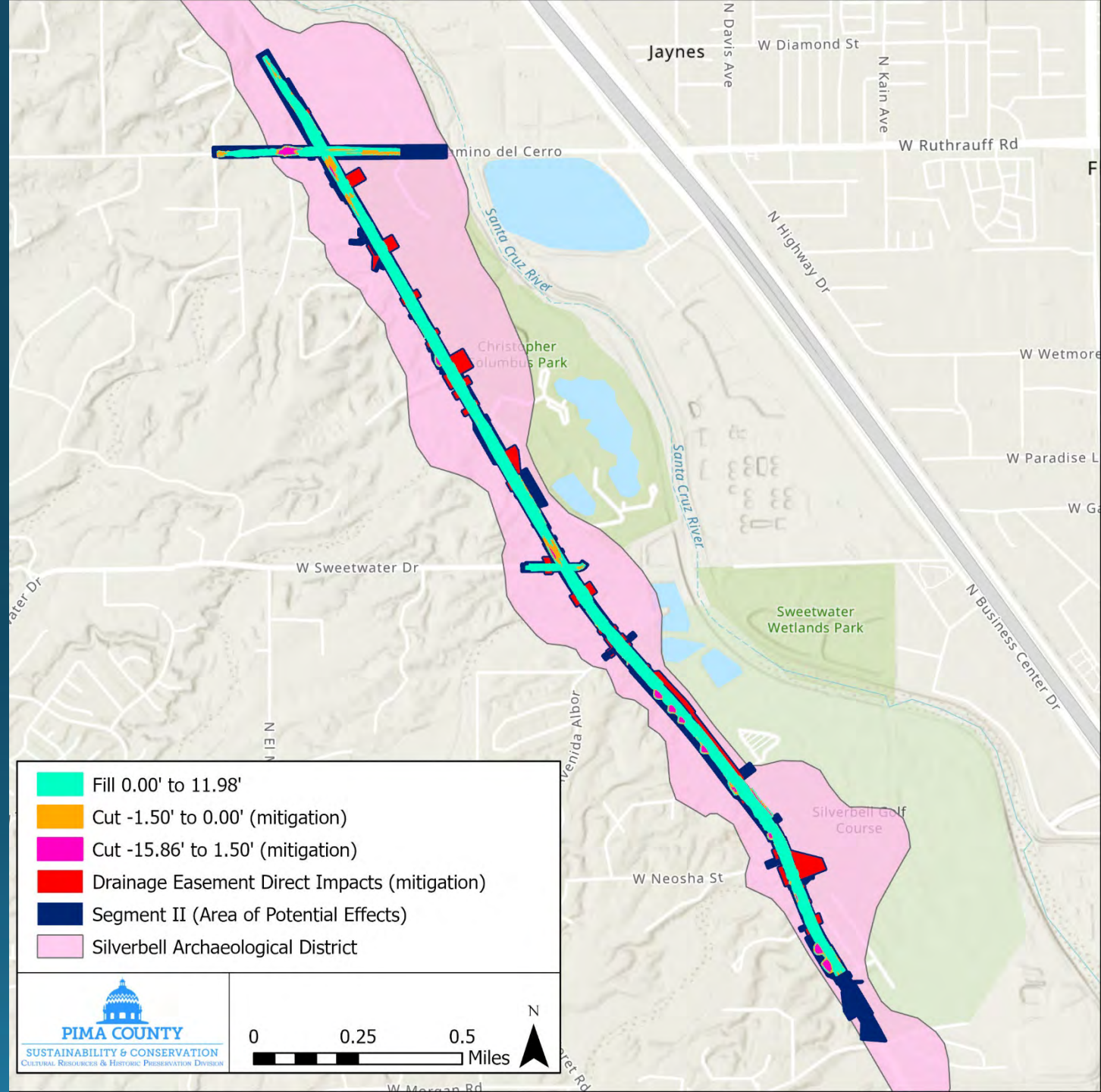


SEGMENT 2 – Goret Road to El Camino del Cerro

- Confirmed dense distribution of cultural deposits spanning 7,000 years of human history
- Unique opportunity to preserve in place

Variance Approval

Disturbance Type	Acreage
Fill	38.65
Cut < -1.5'	5.31
Cut 1.5' to -15.86'	3.11
Drainage Easements	9.5
Utilities (estimated)	< 1

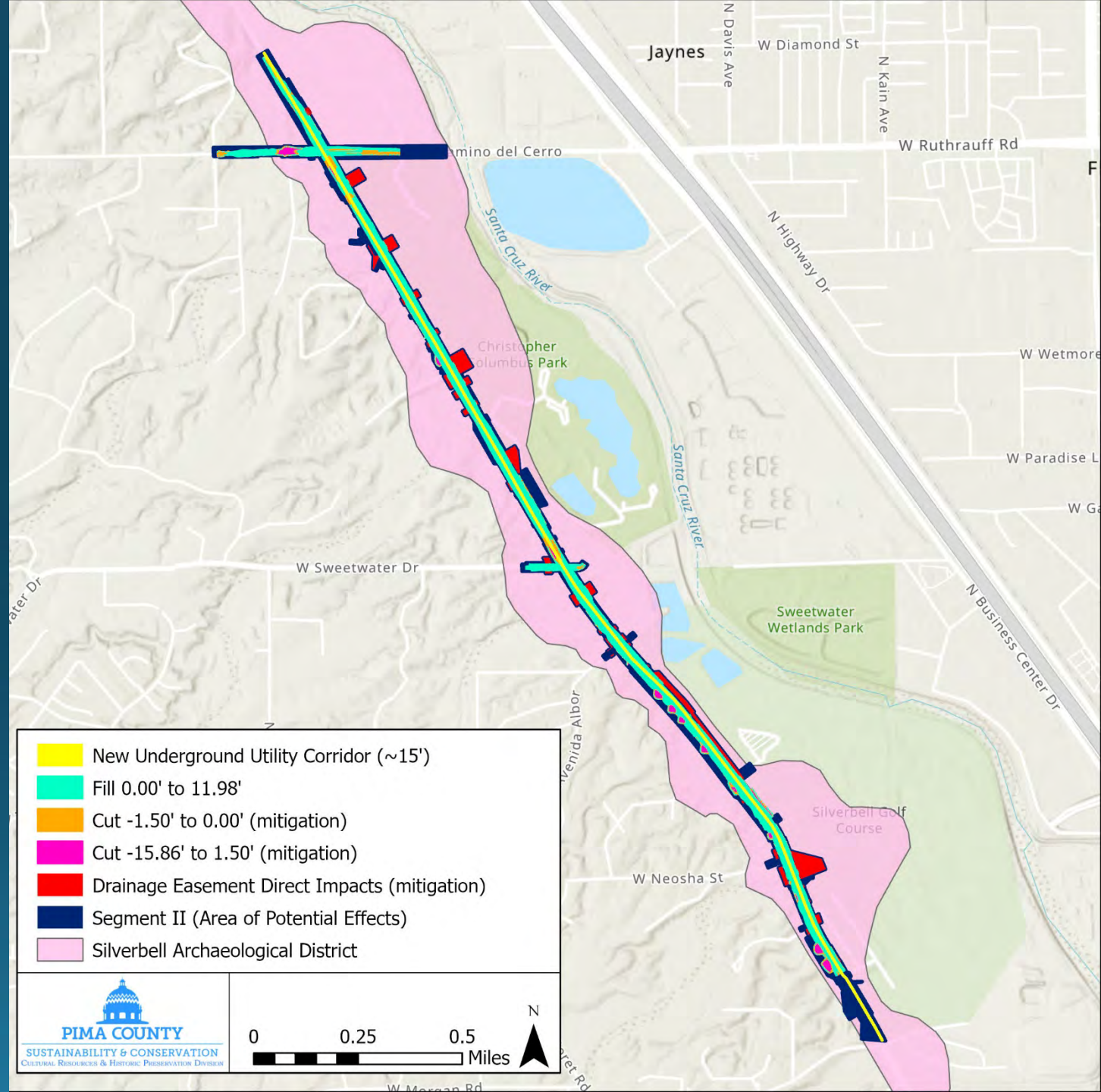


SEGMENT 2 – Goret Road to El Camino del Cerro

- Confirmed dense distribution of cultural deposits spanning 7,000 years of human history
- Unique opportunity to preserve in place

Disturbance Type	Variance Approval Acreage	Variance Denial Acreage
Fill	38.65	33-55
Cut < -1.5'	5-31	
Cut 1.5' to -15.86'	3-11	
Drainage Easements	9-5	
Utilities (estimated)	< 1	5.1

~30% increase
in disturbance



SEGMENT 2 – Goret Road to El Camino del Cerro

CONCLUSION & RECOMMENDATIONS

DENIAL

- Risks affecting 404 permit that regulates voter-approved project
- Unnecessarily destroys and disturbs ancestral remains
- Sets precedent that scenic considerations are of greater value than heritage resources
- Endangers severing project stakeholder relationships

SEGMENT 2 – Goret Road to El Camino del Cerro

CONCLUSION & RECOMMENDATIONS

DENIAL

- Risks affecting 404 permit that regulates voter-approved project
- Unnecessarily destroys and disturbs ancestral remains
- Sets precedent that scenic values are of greater importance than heritage resources
- Endangers severing project stakeholder relationships

APPROVAL

- **Fulfills obligations set in federal compliance framework to impact resources only when necessary**
- **Preserves ancestral resources & remains in place**
- **Protecting our material heritage is more important than scenic values**
- **Supports the values of 12 federally recognized Tribal governments & 7 Agencies**



THE UNIVERSITY OF ARIZONA
ARIZONA STATE MUSEUM



Salt River
Pima-Maricopa
Indian Community