



# TOHONO O'ODHAM NATION

## CULTURAL AFFAIRS PROGRAM

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Ms. Jeanine Derby  
Forest Supervisor  
Coronado National Forest  
300 West Congress  
Tucson, Arizona 85701

RECEIVED FEB 03 2010

Dear Supervisor Derby:

Thank you for consulting with the Tohono O'odham Nation on a variety of issues related to the proposed Rosemont Mine.

This letter contains comments and questions relating to the cultural resources report prepared by SWCA Environmental Consultants for the USDA Forest Service, Coronado National Forest on behalf of the Rosemont Copper Company.

The Tohono O'odham Nation appreciates the efforts of SWCA Environmental Consultants in conducting the field inventories and preparing a well written and detailed report.

The Tohono O'odham Nation has the following comments and questions:

1. Page XXIV – discrepancy in number of sites – National Register eligible, ineligible and indeterminate eligibility total 96 – at bottom of page XXIV – site total is listed as 93 ? This same discrepancy occurs on page 9
2. Concur with the National Register eligibility recommendations.
3. Page XXIV – paragraph 5 reads “ the next step in the compliance process should be to develop a research design and data recovery plan.” The next step in the compliance process should be to develop a plan for avoiding impacts on the cultural resource sites recorded in this survey. This is also found on page 9.
4. There are some aspects of this proposed project such as an access road that will impact on the “ballcourt” site that are not included in this report – Appendix reports will likely have to be prepared for review.
5. Pages 72-75 – excellent discussion of cultural landscapes
6. Pages 145-484 – Survey Results - well described, excellent maps and photographs
7. Pages 488-562 – Section on survey results and comparisons with the early Anamax surveys was helpful.

8. Survey Management Recommendations and Research Needs – pages 563-565 – this section lacks a direction towards the avoidance and preservation of the cultural sites recorded during the survey.
9. The Tohono O’odham Nation recommends that the United States Forest Service-Coronado National Forest begin the process of creating the Santa Rita Mountain Traditional Cultural Place, to be known as “ The Ce:wi duag Traditional Cultural Place.” Ce:wi duag is the name of the Santa Rita Mountains in the O’odham language. It means “long mountains.”

The boundary of the Ce:wi duag Traditional Cultural Place would follow the Coronado Forest boundary and would include the entire Santa Rita Mountains roughly from Mount Fagan on the North to the Patagonia-Sonoita Creek Preserve on the south and from Elephant Head on the west to Fort Crittenden on the east.

This would provide the Coronado National Forest with an opportunity to develop a management plan for this large area that has such significant cultural and natural resources.

This would also provide the Coronado National Forest with a unique opportunity to preserve and protect the unique and significant cultural and natural landscape of the Santa Rita Mountains.

10. The proposed Rosemont Mine would have devastating adverse effects on the cultural sites recorded during this survey and on the cultural and natural landscapes of the Santa Rita Mountains.
11. The impacts of this proposed mine on the cultural sites and the cultural and natural landscapes of the Santa Rita Mountains cannot be mitigated. They are too far reaching for this type of mining project that will impact over 4,000 acres of land.
12. If the Rosemont Mine is approved and moves forward for the life of the mine, the significant cultural sites and the cultural and natural landscapes will be destroyed. It will become a wasteland for not only cultural resources but also for such aspects of the natural environment as wildlife and plants.
13. The Santa Rita Mountains represent a significant Traditional Cultural Place for the Tohono O’odham as a place where the Tohono O’odham and their Archaic and Hohokam ancestors are buried.  
  
The Santa Rita Mountains have been and are still used as a place for the Tohono O’odham to go to visit the sites of their ancestors, to collect basket-making materials, to collect plant medicines, to hunt and collect plant foods, and to visit shrines. If this mine development is allowed to move forward, the Tohono O’odham use of the area would no longer be possible.
14. In order to preserve and protect this unique cultural and natural environment, the Tohono O’odham Nation recommends that the Forest Supervisor select the “no action alternative” and not permit the proposed Rosemont Mine project.

Sincerely,

A handwritten signature in black ink that reads "Peter L. Steere". The signature is written in a cursive style with a large, looped initial "P".

Peter L. Steere  
Tribal Historic Preservation Officer  
Tohono O'odham Nation

Cc: Mary Farrell, Archaeologist Coronado National Forest