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Cultural Affairs

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To: Courtney Rose From: Peter L. Steere

Fax: _____ Pages: _____

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Re: _____ cc: _____

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COUNTY ADMINISTRATOR'S OFFICE

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July 12, 2010

Peter Steere, Tribal Historic Preservation Officer
Cultural Affairs Office
Tohono O'odham Nation
P.O. Box 837
Sells, AZ 85634

Subject: Pima County Wireless Integrated Network (PCWIN) – Tumamoc Hill

Dear Mr. Steere:

This correspondence represents consultation and a request for review and concurrence on the Pima County Wireless Integrated Network (PCWIN) project regarding facilities on Tumamoc Hill. Pima County Information Technology Department and Pima County Sheriff's Department have joined with a number of public safety entities to develop and put to use a regional public safety radio system (PCWIN) in order to improve public safety services. One of the critical towers to the PCWIN project is located on Tumamoc Hill, a Tohono O'odham Traditional Cultural Place and significant Historic Property. Plans call for the consolidation of communications equipment onto one tower and building and the removal of two towers and buildings. No new impacts to cultural resources are expected with the implementation of this plan.

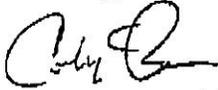
The Tumamoc Hill tower site is located in the northern portion on the top of the hill in parcel no. 116-24-1070, on lands administered by the University of Arizona Board of Regents, T14S, R13E, Section 15. Both the Tumamoc Hill archaeological site, designated AZ AA:16:6(ASM), and the Desert Laboratory National Historic Landmark are listed in the National Register of Historic Places. Tumamoc Hill is also a Traditional Cultural Place and an ancestral site of cultural significance to the Tohono O'odham, Akimel O'odham, and Hopi. Research on Tumamoc Hill has revealed habitation and use over a period of at least 2,000 years. Cultural features on the hill include cemeteries, rock art, *trincheras* architecture, habitation structures, and farming and resource processing features. The cultural importance of this significant site makes its preservation of high importance.

The PCWIN proposed work on Tumamoc Hill is in accordance with policy stated in the University of Arizona *Tumamoc Hill Cultural Resources Policy and Management Plan* (September 2008), which mandates that the cultural resources shall be protected, with the ultimate goal of removing modern facilities as they become outdated. PCWIN is entering in an agreement with the City of Tucson (COT) and KUAT – University of Arizona to consolidate facilities on Tumamoc Hill into an existing KUAT facility. The proposed plan involves the removal the existing Pima County 70 ft tower and building currently located to the west of the KUAT building as well as the COT 60 ft tower and building, which is located to the east of the KUAT building (See attached map). An existing KUAT 40 ft tower located on the northeastern end of the KUAT building will also

be removed. All the equipment will be moved into the existing KUAT building and all the County, COT, and KUAT tower antennas will be consolidated onto a single 125 ft tower to be installed in a previously disturbed area directly adjacent to the west side of the KUAT building. An additional advantage to relocating the original KUAT tower is that it will be moved away from cultural features, including a *trincheras* wall that has been identified on the northern side of the KUAT building. The foundations of the existing buildings will be left in place upon removal of the structures. Although no new negative impacts are expected as a result of the implementation of this plan, an archaeological monitor shall be present during all activities that involve the removal of the towers and buildings and the installation of the replacement tower. The County will keep the Tohono O'odham Nation apprised of the PCWIN schedule of activities on Tumamoc Hill and invites representatives from the Nation to observe at any time.

Enclosed is a plan map and background on the cultural resources status documented in *Pima County Wireless Integrated Network, Tumamoc Hill Class 1 Cultural Resources Records Search*/ SWCA Project No. 16220 for your review. The PCWIN consolidation plan on Tumamoc Hill will reduce the number of towers and buildings and not incur any new impacts to NRHP-listed cultural resources. I respectfully request your support and concurrence with the recommendation of No Adverse Effect to Historic Properties for the PCWIN undertaking at the Tumamoc Hill tower facility. A signature line is provided below for your concurrence.

Sincerely,



Courtney Rose, Ph.D.
Program Coordinator

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