## FLATTOPS ARCHAEOLOGICAL CONSULTANTS

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October 25, 2016

RECEIVED

Steve Turner State Historic Preservation Officer History Colorado 1200 Broadway Denver, Colorado 80203 OCT 272015 GRAND JUNCTION FIELD OFFICE DIVISION OF RECLAMATION MINING & SAFETY

RE: Class III Cultural Resource Inventory for the Proposed Pride of America Mine C-2 Mine Development Plan (CHS #57066)

Dear Mr. Turner;

This letter is a follow-up to the SHPO response dated October 18, 2016. In Paragraph 3 you ask about the quarry being evaluated for NRHP eligibility. There are two quarries the Yule Quarry was recorded as 5GN1774 in 1985 and was determined officially eligible for inclusion on the National Register of Historic Places (NRHP) in 1985. It was subsequently re-recorded in 1988 with a field evaluation of eligible (Joyner, Kathryn L., 1988, Results of a Cultural Resource Inventory of the Marble Quarry Road, Gunnison County, Colorado [GN.FS.R10]). This property has changed ownership several times since that survey, and is now an active quarry (please see attached site location map). One of the proposed expansion areas subject to the current Class III inventory (the Franklin Parcel) is located to the east (across Yule Creek) and north of the Yule Quarry, and the Osgood Quarry is located in this parcel. The Osgood Quarry was recorded as part of 5GN6292 for the current project, and was field evaluated eligible for inclusion on the NRHP under criteria A and B.

In paragraph 4 additional information is requested concerning avoidance of sites 5GN.5292 and 5GN.6293. The clients will be constructing a road that passes by 5GN.6293, and it is currently their position that they will avoid the primary feature (Feature 1) of this site, but given the steep-sided valley and geology of the area, Features 2 and 3 may be impacted. Given the proposed expansion of the Osgood quarry, it is unlikely that the cabin (Feature 1) and quarry (Feature 2) can be avoided, and the expansion will likely be an adverse effect on 5GN6292. Under the management recommendations for 5GN6292 and 5GN6293, I stated "Typically, avoidance is the preferred mitigation measure for all NRHP-eligible properties. If 5GN6292/5GN6293 cannot be avoided, mitigation will be necessary. It is recommended that mitigation be Level I photographic documentation as described in History Colorado Publication No. 1595 (History Colorado 2013). This entails a detailed recordation of the cabin and

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associated features in an archival summary report that includes 4 by 6-inch archival, black-and-white, photographic prints and measured drawings."

Finally, in paragraph 6 SHPO's requests involvement in the consultation process with the local government. To that end, I have already contacted Mike Pelletier (<u>MPelletier@gunnisoncounty.org</u>)-- the staff contact for Gunnison County's Certified Local Government/Historic Preservation Board--and have submitted the report to him for comment. His e-mail response is included as an attachment.

Sincerely, Kae McDonald, Ph. D., RPA

Principal Investigator

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Cc: Dustin Czapla, Environmental Protection Specialist, Colorado Division of Reclamation, Mining, and Safety, Grand Junction, Colorado.