

September 25, 2025 (revised per client review)

Ms. Lauren Clementino, Heritage Preservation Officer/Senior Planner

**City of Flagstaff**

Comprehensive and Neighborhood Planning Program /  
Current Planning / Planning & Development Services Division  
211 West Aspen Avenue  
Flagstaff, Arizona 86001  
lclementino@flagstaffaz.gov



*RE: Cultural Resource Study Letter Report for State Land Parcel off South Woody Mountain Road, City of Flagstaff, Coconino County, Arizona (LA Neal Consulting, LLC Project No. 1109-25)*

Dear Ms. Clementino:

At the request of property owner Roberts Resorts & Communities and in compliance with City of Flagstaff Zoning Code 10-30.30.050, LA Neal Consulting, LLC is submitting this letter report as documentation of completing a Cultural Resource Study involving an Arizona State Trust parcel under a certificate of purchase for private ownership. The parcel currently referred to as Starlight Trail is located off South Woody Mountain Road and Interstate 40. The 446.5-acre parcel surrounds the Equestrian Estates subdivision in west Flagstaff, Arizona (see *Appendix A for parcel location map*). The overall legal location is Township 21 North, Range 7 East, Section 30. The land has not yet been assigned a parcel number in the Coconino County Parcel Viewer since it is still technically owned and managed by the Arizona State Land Department (ASLD). Roberts Resorts & Communities has signed a certificate of purchase with ASLD, and they understands that any future development of the parcel would be subject to City of Flagstaff planning and zoning requirements.

The first step of the study was to conduct records searches of AZSITE (Arizona's online database identifying previous cultural projects and known properties/sites managed by Arizona State Museum [ASM] and accessible to permitted and approved archaeologists) and historic General Land Office (GLO) maps available online. The AZSITE search showed that the entire parcel had been surveyed for cultural resources in 2004 (Breternitz and Robinson 2004, ASM Accession No. 2004-756) prior to a proposed land exchange between the State and a private realty company. Three archaeological sites and 13 isolated occurrences were found. It was not until 2021, when the land was part of a purchase application (No. 53-122456-00-100) to the Arizona State Land Department (ASLD), that the prospective buyer contracted some supplement cultural survey (Pitts and Stewart 2022, ASM Accession No. 2022-25.ASM and SHPO Undertaking No. SHPO-2022-0173) to ensure coverage of the full sale parcel (481.2 acres).

No new cultural sites were documented during the 2021 survey, and every effort was made to relocate the three archaeological sites recorded in 2004. Sites AZ I:14:384(ASM) and AZ I:14:385(ASM)—both sparse historic artifact scatters possibly representing short-term logging camps occupied ca. 1900—were not relocated in 2021 and were determined ineligible for listing to the National or Arizona Registers of Historic Places (NRHP, ARHP) by the Arizona State Historic Preservation Office (SHPO) on 3/3/2022. Site AZ I:14:386(ASM), a large historic artifact scatter with livestock herding features dating between 1920 and 1950, was relocated in 2021. This site was recommended ineligible for listing to the NRHP or ARHP, and SHPO concurred on 3/3/2022. None of the isolated occurrences were considered significant when recorded in 2004. As such, none of the cultural resources found within the subject parcel were deemed significant or National/Arizona Register eligible, and the parcel was cleared for sale by ASLD with SHPO concurrence.

This previous work was not yet disclosed by ASLD to Roberts Resorts & Communities and was revealed through this Class I Records Review Cultural Resources Study. Based on these results, the parcel to be transferred to private ownership is considered clear of any significant cultural resources requiring protection/avoidance. ***Since there will be no effect on any historic properties/archaeological sites, LANC recommends that cultural resources clearance be granted and compliance with City Code 10-30.30.050 be considered complete for any proposed future development of the Starlight Trail parcel. No further archaeological work should be required regarding this 446.5-acre parcel or portions thereof.*** If you have any questions or require additional information, please do not hesitate to contact me at (928) 606-2258 or via email at [lynnaneal@outlook.com](mailto:lynnaneal@outlook.com).

Sincerely,



Lynn A. Neal, RPA / M.A.  
Sr. Archaeologist / Historic Preservation Consultant

cc: **Roberts Resorts & Communities**, Anticipated Property Owner, 16427 N Scottsdale Road, Suite 400, Scottsdale, Arizona 85254  
Chris Harrison, [charrison@robertsrc.com](mailto:charrison@robertsrc.com) and Hartley Rodie, [hrodie@robertsrc.com](mailto:hrodie@robertsrc.com)

#### **Attachments**

Parcel Location Map (Appendix A)

#### **References**

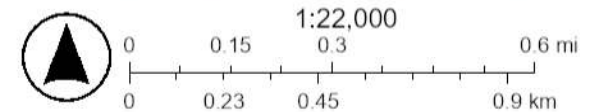
- Breternitz, Cory Dale, and Christine K. Robinson  
2004 *A Cultural Resources Survey of Approximately 455 Acres of State Trust Land in Flagstaff, Coconino County, Arizona*. Soil Systems Technical Report No. 04-33. Phoenix. ASM Accession No. 2004-756.ASM.
- Pitts, Michael, and Caitlin Stewart  
2022 *Class I Review of 481.2 Acres and a Class III Cultural Resources Survey of 8.2 Acres of Arizona State Trust Land near Woody Mountain Road in Flagstaff, Coconino County, Arizona*. Cornerstone Environmental Consulting Report No. 21-145. Flagstaff. ASM Accession No. 2022-25.ASM.

**APPENDIX A**  
**PROPERTY LOCATION MAP**

# Starlight Trail Parcel



Figure 1. Parcel location map as of September 2025.



Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community, Maxar