

STB Docket Number FD 36501**Union Pacific Railroad Company – Construction and Operation Exemption – In Maricopa County, Ariz.****Section 106 Consulting Parties Review: Draft Historic Properties Treatment Plan****Please return to the Office of Environmental Analysis (OEA) by July 15, 2023****Tribe or Agency: Arizona State Museum****Contact Person: Shannon Plummer – splummer@arizona.edu**

#	Section	Line(s)	Comment
1	Throughout document		Arizona's Tribal nations have unanimously asked the archaeological community to refrain from using colloquial site names and to rely on site numbers instead. It is acceptable to use the colloquial site names in parentheses to clarify discussions. Please correct throughout the document.
2	1.2, 2 nd paragraph	3 rd	The statutes cited in association with State Historic Preservation Act are incorrect. The AZ SHPA is ARS § 41-864 et seq. ARS § 41-841 et seq. is the Arizona Antiquities Act (AAA).
3	1.2 2 nd paragraph	last	Arizona Revised Statute § 41-844 outlines protocols for the treatment and disposition of human remains, funerary objects, sacred ceremonial objects, and objects of national or tribal patrimony. Arizona Revised Statute § 41-865 pertains to the treatment and disposition of human remains and funerary objects only. Please correct this statement. Animal mortuary features are not named in the statutes but are requested for repatriation as sacred ceremonial objects.
4	2.1.4, 1 st paragraph	5	Western Regional Climate Center 2023 is not in the references
5	2.2.1, page 14, 2 nd paragraph	3	Water and Ravesloot 2001 is in the references as Waters and Ravesloot. Which is correct?
6	2.4.3		There are maps depicting the locations of previous research within the project area within the boundaries of [REDACTED] but not for the other sites. Please add.
7	4.2.4, 1 st paragraph		Please explain how it will be determined which features are "warranted" for Phase II investigation.
8	4.3		Please note that all artifacts recovered from features on city, county, or state land must be collected.
9	4.3.1, page 51		Please include a map of each site depicting the specific locations where work will occur, based on the text. For example Where is "the southeast side of the Phoenix Substation...between construction stations 1471+50 and 1595+50"?
10	4.3.1, page 52	Last	Subsurface collection: Rare or unique historic artifacts should be collected. Also, there is no discussion of the historic period anywhere else in the report. If a historic component is anticipated at any of the sites, please add more information about that.
11	4.6		Please note that all artifacts recovered from features on city, county, or state land must be collected.
12	4.7		Please be advised that ASM cannot enforce the treatment and repatriation of sacred ceremonial objects or objects of national or tribal

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			patrimony on private land, as § 41-865 extends only to human remains and funerary objects. However, a landowner may choose to repatriate additional items known to be significant to descendant communities, and the treatment and disposition of these objects may be outlined in the BDA.
13	Section 4.7		Change “funerary belongings” to “funerary objects” here and throughout document
14	4.7 Header		Revise heading to “Human Remains, Funerary Objects, Sacred Ceremonial Objects, and Objects of National and Tribal Patrimony” to follow language in A.R.S. 41-844 and 41-865
15	4.7, Entire		Please change “burial” to “mortuary” and change “excavate” and “excavation” to “recovered” and “recovery” to follow preferred respectful terminology when discussing human remains and protected cultural materials. The full table can be found here: https://statemuseum.arizona.edu/crm/document/respectful-terminology-repatriation
16	4.7, 2 nd paragraph		Please be advised that ASM does not enforce work stoppage when sacred ceremonial objects and objects of national or patrimony in non-funerary contexts are encountered.
17	4.7, 3 rd paragraph	1	The first part of this sentence includes cultural materials that may occur outside of mortuary contexts, while the second half refers to “ the burial feature.” For clarity, please just refer to the “feature” or revise to indicate that you are referring to mortuary features.
18	4.7, 3 rd paragraph		Please add that cremated remains will be recovered with the sedimentary matrix in which they were deposited (unscreened), and the surrounding sediment will be screened through 1/8-inch mesh. Also add that the contents of intact cremation vessels will not be disturbed for documentation.
19	4.7, 3 rd paragraph		Add that mortuary features will be fully recovered, and recovered remains and funerary objects will be housed in all natural materials.
20	4.7, Entire		Change “cultural materials of national or tribal patrimony” to “objects of national or tribal patrimony”; change “sacred ceremonial cultural materials” to “sacred ceremonial objects”; and change “animal burial” to “animal mortuary feature”
21	4.7, 1 st three bullets		These lists of materials that may be subject to repatriation are from the GRIC Standard Burial Discovery Agreement and are the result of consultation between ASM and GRIC. This should be acknowledged in the text because if remains with a different cultural affiliation are encountered, then the potential sacred ceremonial objects may be different for that descendant community. Alternatively, the lists of sacred ceremonial objects and objects of national or tribal patrimony do not need to be included in the work plan; they may be provided by claimant tribe or, in the case of the SRP-MIC and GRIC Standard BDAs, listed in the BDA.
22	4.7, pg. 59	Last bullet	Revise to “preventing photography of human remains, funerary objects, and other cultural materials subject to repatriation”
23	4.7, pg. 59	Last	Please remove “laboratory” before “facility” to avoid terminology associated with research specimens when discussing human remains.
24	4.7		Include the procedures and standards that will be used for human remains documentation and include reference(s). State that no destructive documentation of human remains and funerary objects will occur.
25	5.1, 4 th paragraph	2 nd	Please note that artifacts recovered from city, county, or state land cannot be “culled” without prior approval from ASM.

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26	5.2.1, pg. 61, 3 rd paragraph	Last	Please add the year associated with the Kapp et al. reference
27	5.3.6		Historic artifacts are mentioned earlier in the text. If they are anticipated, please include the standards that will be used in the analysis of various historic artifact classes.
28	7.1		State that if human remains are encountered, a Report of Remains will be submitted to ASM and claimant tribes.
29	7.2, 1 st paragraph		Materials recovered from city, county, or state land must be curated at ASM or an ASM-approved facility.
30	7.2, 3 rd paragraph		Change "secure laboratory" to "secure facility"
31	7.4.1		It states here that an AAA permit will not be required for data recovery; however, it specifies elsewhere in the report that work will occur on land owned by the City of Mesa and Maricopa County. Please clarify.
32	7.7		Please note that if the project is terminated, the final report submitted in support of AAA compliance must still meet ASM's minimum standards.
33	8.4		Table 6: This information would be easier to understand if the locations were also presented on a map.
34	8.5		General Methods: "Non-feature artifacts" is confusing. Please rewrite to indicate that artifacts identified outside of features will not be collected (if I'm understanding the phrase correctly).
35	8.6, 1 st paragraph		Revise to "human remains, funerary belongings, sacred ceremonial objects, and objects of national or tribal patrimony" to follow the language in A.R.S. 41-844 and 41-865.
36	8.6.1, page 78, 4 th paragraph		All artifacts recovered from features on state land must be collected.
37	8.6.2 2 nd paragraph		Please refer to comments #12 and #16
38	8.9, 3 rd paragraph		Revise to "If human remains are identified, a Report of Remains..."
39	Appendix B		Please add a map depicting the project area and sites with a USGS topographic map background at a 1:24,000 scale, neither reduced nor enlarged. Please also include a map depicting both land ownership and site locations. This information can be added to one of the maps in this Appendix, it doesn't have to be a separate map.