

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: SHPO

Contact Person: Caroline Klebacha

#	Section	Pg(s)	Comment
1	TOC: Appendices and Appendix A	V, A-1 and following	The MOA does not belong in the HPTP. Remove.
2	Abstract	Viii	Other Involved Agencies: Why is ADEQ included? They are not part of the MOA. If they are only involved for Dust or SWPPP, they do not need to be listed here.
3	Abstract	Viii	Description of Project/Undertaking: Paragraph 2 of section, include the addendum report as well as the original Class III.
4	Abstract	Viii	Description of Project/Undertaking: Move paragraphs 2-4 of this section to the comments. They do not describe the undertaking.
5	1.1 Introduction	1	Paragraph 2: The PIRATE yard is not defined in the APE description. This may need to be added to the MOA as well.
6	1.1 Introduction	2	Last paragraph: include the addendum report as well as the original Class III.
7	1.2 Regulatory Context	4	Last sentence: Change “document” to “treatment plan” or “HPTP.” It is unclear if you are referring to the MOA or the HPTP.
8	1.3 APE Definition	4	Include acreage and land owners.
9	Map figures		Include station numbers on the maps.
10	Figure 2a Figure 2b	6, 7	This map needs to be updated to reflect the addendum survey. Also, “buffer” is confusing as it is a part of the APE. You can just describe it as “Unsurveyed – Not Acquired. No Project Ground Disturbance”
11	Figure 3	8	Add the PIRATE Yard to the map.
12	2.1.4 Climate	10	Close parenthesis on “(Western Regional Climate Center 2023.”
13	Table 1	19-20	Specify in the Table title that the sites are outside of the APE.
14	2.4.2.3 Midvale Site and general comment for all site names	22 and througho ut	Add the site number to the header. Please remove all site names from the document and refer to sites by their site numbers.
15	4.3 (general) Treatment		For each site, add a map showing the prescribed treatments. These maps should include site boundary, site boundary buffer, APE, station numbers, trench locations, stripping areas (when known), hand

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	maps		excavation units (when known), and any areas that cannot be tested and will be monitored instead.
16	4.3 (general) Affected Acres		How many acres of the site (total) are within the APE? Please include for each Site-Specific Data Recovery Plan.
17	4.3.1	51	No site buffer is provided for [REDACTED]
18	Site buffers		Ten feet a sufficient boundary buffer. Fifty feet is standard. If cultural resources are identified within the boundary buffer, what procedures will follow?
19	5.2.1 Pollen	61	Last sentence: Provide date for Kapp et al.
20	6.1 G2G Consultatio n	66	Specify that GRIC THPO has been delegated as the lead.
21	6.2 TCP Evaluation	66-67	The TCP Evaluation is not a part of this document. After the first paragraph, you can say that the parameters of the survey will be developed and outlined in a separate document in coordination with OEA and the Four Southern Tribes and that distribution of any subsequent documents will be restricted.
22	7.2 Curation	69	Per section 7.4.1, the report will be curate as ASM. Move the following language in section 7.4.1 to section 7.2 and reword as necessary: ASM is not accepting collections from private land projects and would not serve as the data recovery repository. Artifacts and other project records would be curated at a separate institution meeting the requirements of 36 C.F.R. Part 79.
23	Table 5	70-71	Add "calendar" to Rows 10, 11 and 15 under Duration. Or specify in a footnote that "All days are calendar days."
24	7.4 and 7.4.1	72	Add "Agreements" to the headers.
25	7.4.3	72	Please confirm that no Dust Control Permit is required from Maricopa County per Rule 310.
26	8.3.1	75	A word is missing following "construction" in this sentence: The purpose of the pre-field meeting would be to introduce the cultural resources monitor(s) and tribal monitor to the <u>construction</u> , inspectors, and supervisory personnel, ...
27	Appendix C	C-1	What treatment will be applied to the portion of the APE within [REDACTED]?