



Salt River
PIMA-MARICOPA INDIAN COMMUNITY

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Tribal Historic Preservation Office

TO: Danielle Gosselin
 Director
 Office of Environmental Analysis
 Surface Transportation Board
 Washington, DD 20423

DATE: 6/27/2023

FROM: Shane Anton, Tribal Historic Preservation Officer

RE: Docket No. FD 36501, Union Pacific Railroad Company – Construction and Operation Exemption – In Maricopa County, Ariz., Continuation of National Historic Preservation Act Section 106 Consultation on Historic Properties Treatment Plan

Dear Director Gosselin

The Salt River Pima-Maricopa Indian Community Tribal Historic Preservation Office (SRPMIC THPO) has received your consultation documents dated June 16, 2023. The Office of Environmental Analysis (OEA) is continuing Section 106 consultation and soliciting comments regarding the treatment of historic properties, as described in the Historic Properties Treatment Plan (HPTP). Based on the results of the Class III cultural resource surveys (Rainey and Stubing 2022; Powell 2023), four cultural resources sites [REDACTED] are within the APE and require further treatment. The HPTP contains the research design and methods to guide data recovery fieldwork, analysis, and reporting for these sites; a Monitoring and Discovery Plan for project cultural resources construction monitoring; and other general provisions.

The OEA recognizes that these four sites are part of a larger cultural landscape within the Queen Creek Delta that is significant to the Four Southern Tribes. The HPTP contains a general discussion for the development of a historic context study and a cultural landscape study to identify and evaluate the intangible significance of these places.

The SRPMIC THPO has reviewed the HPTP and finds it to be an adequate planning document for the purposes of the undertaking. SRPMIC THPO has the following comments and questions.

1. Section 2.3, first paragraph. Remove the first two sentences. Start the paragraph with, “The Akimel O’Odham maintain deep ancestral ties to the landscape through their rich oral traditions and song culture” (or something to that effect). The theories of early archaeologists doesn’t matter to our current thinking on continuity.
2. Section 2.4.2.3 Midvale Site. This site is also known as “Two Ponds” by the O’Odham. Turney mapped two reservoir features (or wells) at this site in the 1940s.
3. Section 2.4.3, end of second paragraph: This description fits with the historic village drift pattern identified by Ezell (Darling and Raveslout) and post-Classic/protohistoric settlement pattern as you reference in the research design section on Settlement and Community Organization.
4. Section 3.1 Chronology: Should include a research question regarding Protohistoric/Historic use of the APE
5. Section 3.2 Settlement Patterns and Community Organization. A question about Protohistoric/Historic settlement pattern, community organization.
6. Section 4.1. Tribal Involvement. Is it the case that the GRIC CRMP is participating in fieldwork and analysis? Are arrangements already made that GRIC CRMP will provide the bioarchaeological support? If so, please state as such.
7. 5.3.1. Ceramic Analysis. Will there be any attempt to identify historic O’Odham ceramics? Does the Jacobs analyst(s) have experience identifying historic O’Odham and Piipaash ceramics? If not, then GRIC CRMP ceramicists could be consulted.
8. Section 6.1 Third Paragraph. Should GRIC THPO also be identified here?
9. Section 6.3 Historic Context Study. Will this be completed according to SHPO standards for distribution by SHPO? If so, please state as such.
10. Section 8.2. Tribal Monitoring. This paragraph may not be necessary but SRPMIC THPO defers to GRIC THPO to make this determination.

The proposed project area is within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; *Ak-Chin* Indian Community and the *Tohono O’Odham* Nation). The SRPMIC THPO will continue to participate in this undertaking, but defers to the GRIC THPO as lead in consultation for the project.

Thank you for consulting with the SRPMIC THPO. Should you have questions and/or concerns about this project, please contact me directly at (480) 362-6331.

Sincerely,



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