



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

May 19, 2022

Ms. Kathryn Leonard
 State Historic Preservation Officer
 Arizona State Parks
 1110 West Washington St., Suite 100
 Phoenix, Arizona 85007

Re: Docket No. FD 36501, Union Pacific Railroad Company – Construction and
 Operation Exemption – in Maricopa County, Ariz.; Informational Letter
 Regarding Class III Cultural Resources Survey Methods

Dear Ms. Leonard:

The Surface Transportation Board's Office of Environmental Analysis (OEA) recently initiated formal consultation with you pursuant to Section 106 of the National Historic Preservation Act on the proposed Pecos Industrial Rail Access and Train Extension (PIRATE) project, located in Maricopa County, Arizona. Initial Section 106 consultation provided an overview of the project and solicited comments on the proposed Area of Potential Effects (APE) for potential direct and indirect effects of the project on historic properties. A Class III cultural resources survey of the project APE is now being planned, and OEA is providing this short informational letter to the project's consulting parties to outline the field and reporting methods that the Class III survey will employ.

Survey Methods and Recording Standards

Jacobs Engineering Group Inc. (Jacobs) archaeologists will conduct the Class III cultural resources survey. The survey will be under the general supervision and oversight of a qualified principal investigator and a qualified project director, both listed on Jacobs' current Arizona Antiquities Act (AAA) permit (No. 2022-018bl) issued by the Arizona State Museum (ASM). The APE contains private, state, county, and municipal land. Therefore, the survey will be conducted under the provisions of Jacobs' AAA blanket permit, and ASM will issue a project-specific accession number.

A crew of four archaeologists will conduct the Class III cultural resources survey of the APE. The survey will utilize systematic, parallel pedestrian transects spaced no more than 20 meters (66 feet) apart, constituting complete (100 percent) coverage of the APE.

The Jacobs field crew will employ tablets (Samsung Galaxy TAB A) paired with Trimble R1 global navigation survey system receivers via Bluetooth, allowing for submeter

accuracy. Tablet software utilizes the Environmental Systems Research Institute Field Maps application for geospatial data collection and integrated Samsung tablet photographic capabilities. All Universal Transverse Mercator coordinates will be collected in Zone 12 North, North American Datum of 1983, Continental United States.

Prior to the field survey, Jacobs staff will upload the APE boundary and the location of previously recorded cultural resources site locations onto the Field Maps application, allowing the field crew to accurately identify the survey limits and previously recorded resources. The field crew will maintain photologs and field notes using Samsung Notes transferred to Microsoft Word documents and uploaded to the Jacobs server. The collected spatial data will be uploaded to secure cloud facilities and used to generate project and site maps.

During a field reconnaissance conducted on May 2, 2022, Jacobs confirmed that portions of the APE are completely paved and developed, and no native ground surface remains. These areas are primarily located along Rittenhouse Road (see enclosed APE map). Jacobs will photodocument, map, and discuss these areas in the project's technical report. Additional areas are located within agricultural fields and may be inaccessible at the time of the survey due to crop coverage. The field crew will revisit these areas when the crops have been harvested and incorporate the results into the project's technical report at that time.

Jacobs will define and record cultural resources sites within the APE to the standards outlined in the ASM *Archaeological Site Recording Manual*¹ and recent ASM guidance on "Historical-Period Waste Piles."² Any cultural resources not meeting site criteria will be recorded as an isolated occurrence or isolated feature. In-use historic structures (such as roads, canals, and railroads) will be recorded using Historic In-Use Structure Forms, as approved by the State Historic Preservation Office (SHPO)³ and ASM.

Reporting Standards and Project Curation

Jacobs will prepare a technical report detailing the results of the Class III survey according to SHPO Survey Report Standards.⁴ OEA will distribute the draft report through Section 106 consultation to the project's consulting parties for review and comment. Jacobs will address any requested revisions in a final report, which OEA will redistribute through Section 106 consultation. Following acceptance of the final report, Jacobs will curate all project documentation with ASM, as per the requirements of the AAA blanket permit.

Field Schedule

The Class III fieldwork is scheduled to begin the week of May 23, 2022. The survey and site recording are anticipated to take between 8 and 10 days to complete. If additional survey is required based on right-of-entry or agricultural crop coverage, it will be scheduled as needed.

¹ Fish, Paul R. 1995. *Archaeological Site Recording Manual*. Arizona State Museum, University of Arizona, Tucson.

² ASM. 2021. *Policy and Procedures Regarding Historical-Period Waste Piles*. Arizona State Museum, University of Arizona, Tucson.

³ SHPO. *A Guide to Documenting Historical In-Use Structures*. Phoenix, Arizona.

⁴ SHPO. *Survey Report Standards*. Phoenix, Arizona.

Contact Information

If you have any questions or comments regarding the content of this informational letter or the PIRATE project, please contact Adam Assenza, OEA's project manager for the environmental review, at Adam.Assenza@stb.gov (202-245-0301), or Alan Tabachnick, OEA's historic preservation specialist, at Alan.Tabachnick@stb.gov (202-245-0367).

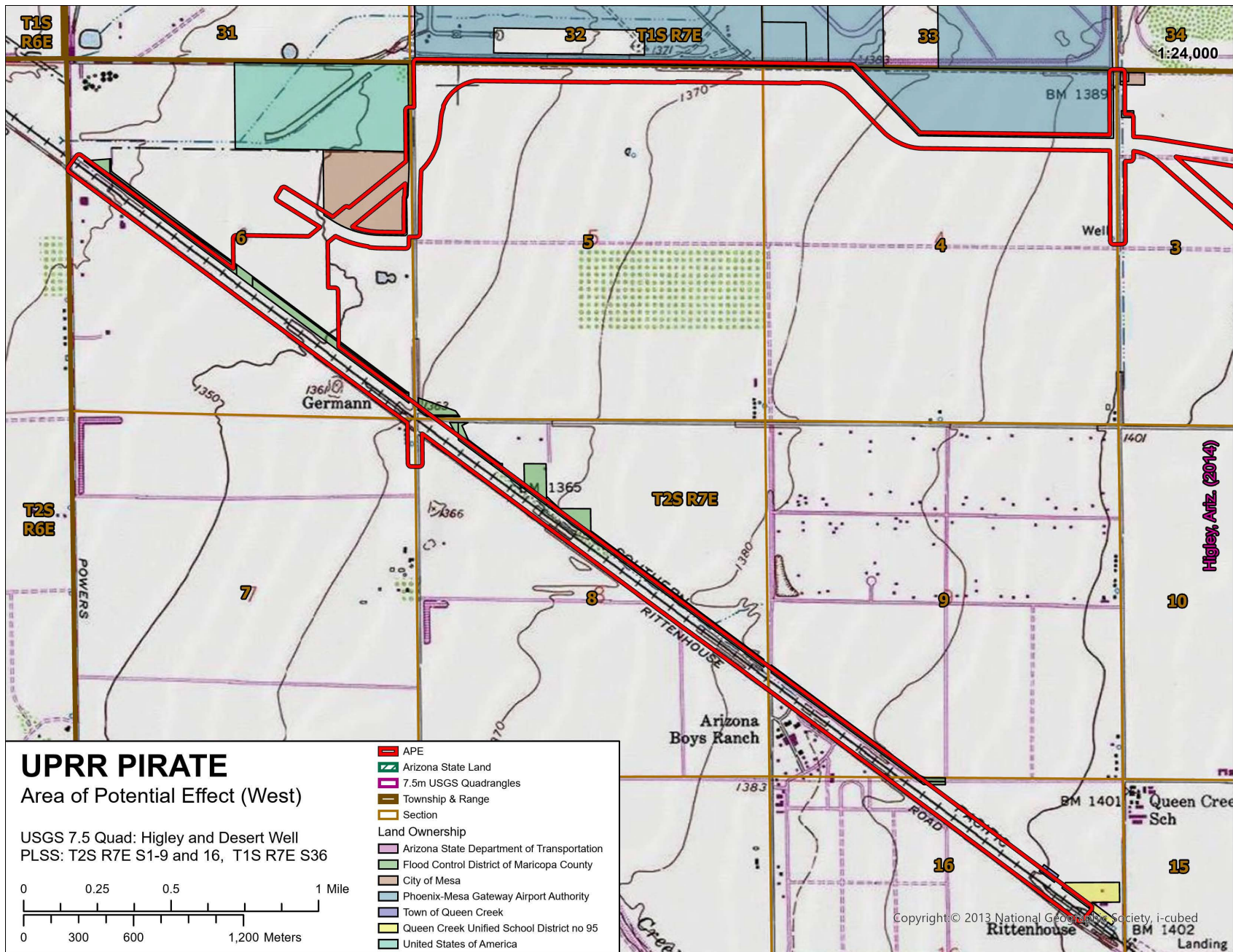
Sincerely,

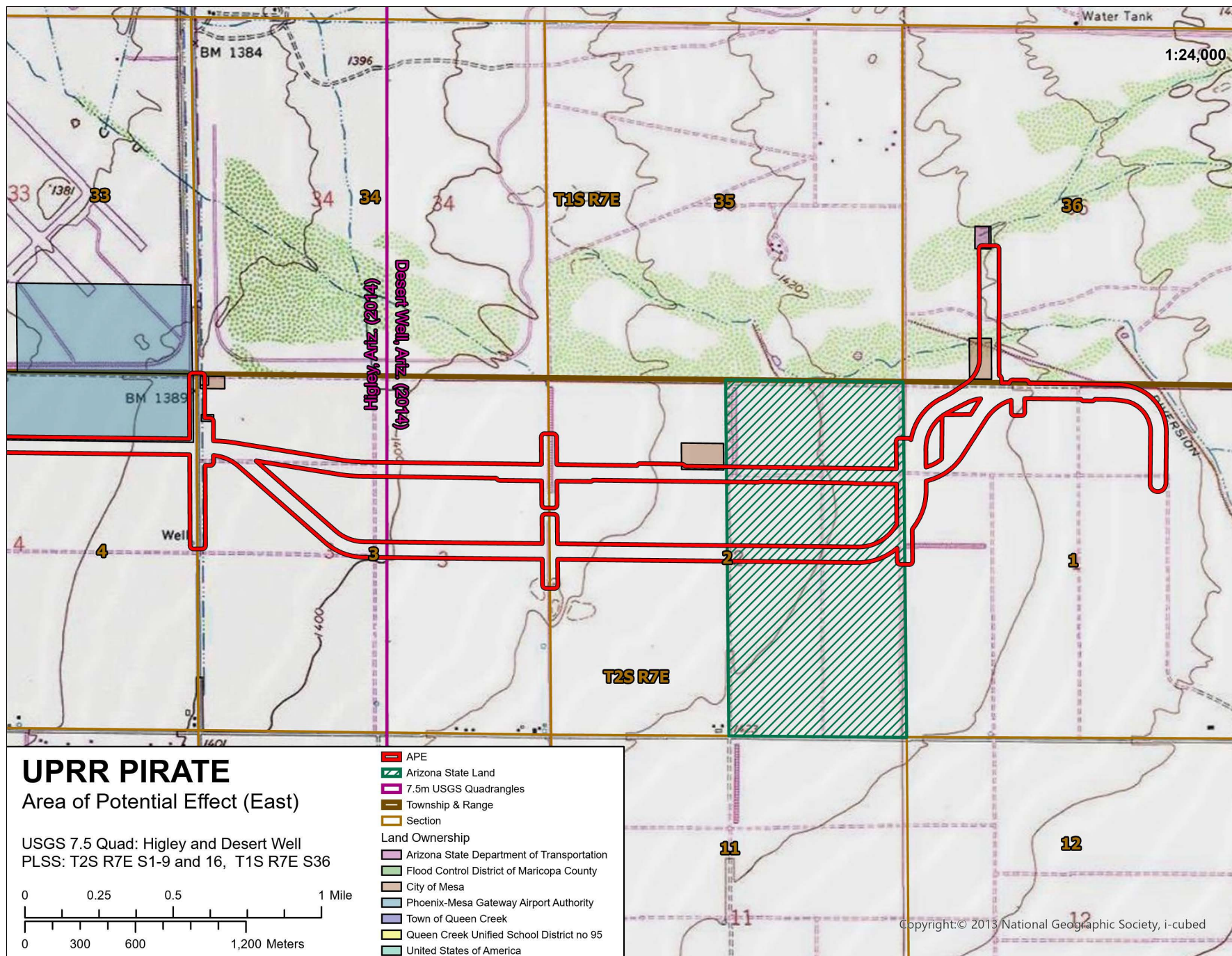
A handwritten signature in black ink, appearing to read "Danielle Gosselin". The signature is fluid and cursive, with the first name being more prominent.

Danielle Gosselin
Director
Office of Environmental Analysis

Enclosure: APE Map (two sheets)

cc: Adam Assenza, OEA Environmental Protection Specialist, Adam.Assenza@stb.gov
Alan Tabachnick, OEA Historic Preservation Specialist, alan.tabachnick@stb.gov
Maggie Buckley, Jacobs Project Manager, Maggie.Buckley@jacobs.com





1b - Field Survey Memo (May 19, 2022) Distribution List

Agency/Tribe	Contact Name	Position
Ak-Chin Indian Community	Robert Miguel	Chairman
Ak-Chin Indian Community	Elaine Peters	Him-Dak Museum Director
Arizona Museum of Natural History	Emily Early	Archaeology, Ethnology, and Art Collections
Arizona Museum of Natural History	Alison Stoltman	Director
Arizona State Land Department	Mark Edelman	Director, Planning and Engineering
Arizona State Land Department	David Schroeder	Archaeological Project Specialist
Arizona State Museum	Shannon Plummer	Arizona Antiquities Act Administrator
Arizona State Museum	Patrick Lyons	Director
Bureau of Indian Affairs	Tamera Dawes	Realty Specialist
Bureau of Indian Affairs	Garry Cantley	Archaeologist
U.S. Army Corps of Engineers	Sallie Diebolt	Arizona Branch Chief
U.S. Army Corps of Engineers	Lisa Robinson	Regulatory Assistant
Federal Aviation Administration	Mike Williams	Manager
Flood Control District of Maricopa County	Michael Fulton	Director
Gila River Indian Community	Stephen Roe Lewis	Governor
Gila River Indian Community	Barnaby Lewis	THPO
Gila River Indian Community	Larry Benallie, Jr.	Archaeological Compliance Specialist
Hopi Tribe	Timothy L. Nuvangyaoma	Chairman
Hopi Tribe	Stewart B. Koyiyumtewa	THPO
City of Mesa	J.D. Beatty	Senior Economic Development Project Manager
Mesa Historical Museum	Susan Ricci	Executive Director
Mesa Historic Preservation Office	Michelle Dahlke	Historic Preservation Supervisor
Mescalero Apache Tribe	Gabe Aguilar	President
Mescalero Apache Tribe	Holly Houghten	THPO
Queen Creek Irrigation District	Maaiké Hough	George Cairo Engineering, Inc.
Pascua Yaqui Tribe	Peter Yucupicio	Chairman
Pascua Yaqui Tribe	Dr. Karl Hoerig	THPO
Salt River Pima Maricopa Indian Community	Martin Harvier	President
Salt River Pima Maricopa Indian Community	Shane Anton	THPO
Salt River Pima Maricopa Indian Community	Martha Martinez	NAGPRA Coordinator
Salt River Pima Maricopa Indian Community	Angela D. Garcia-Lewis	Cultural Preservation Supervisor
San Tan Historical Society	Keith Johanson	President
SHPO	Kathryn Leonard	SHPO
SRP	David Rousseau	President
Tohono O'odham Nation	Jefford Francisco	Cultural Resources Specialist

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Agency/Tribe	Contact Name	Position
Tohono O'odham Nation	Peter Steere	THPO
Tonto Apache Tribe	Calvin Johnson	Chairman
Tonto Apache Tribe	Jeri DeCola	Cultural and NAGPRA Representative
Yavapai-Apache Nation	Jon Huey	Chairman
Yavapai-Apache Nation	Chris Coder	Tribal Archaeologist
Pueblo of Zuni	Val R Panteah	Chairman
Pueblo of Zuni	Kurt Dongoske	THPO