
From: Powell, Kris
Sent: Friday, August 15, 2025 10:23 AM
To: Alison Stoltman
Cc: Tabachnick, Alan; Assenza, Adam; McNeish, Sabra; Phoebus, Elizabeth (Betsi); Buckley, Maggie; Luhnnow, Glennda
Subject: UPRR PIRATE - Continuing Section 106 Consultation - September 15, 2025 Meeting
Attachments: PIRATE Restart Sec 106 Ltr_FAA.pdf

Dear Ms. Stoltman:

As the Surface Transportation Board's (Board) Office of Environmental Analysis (OEA) stated in previous Section 106 consultation conducted under the National Historic Preservation Act, on June 30, 2022, the Union Pacific Railroad Company (UP) filed a petition with the Board requesting authority to construct and operate approximately six miles of new rail line in Maricopa County, Arizona (the proposed Pecos Industrial Rail Access and Train Extension [PIRATE] rail line).

In July 2023, while the environmental and historic review process was still pending, the Board's OEA learned that there had been significant ground disturbance and damage to archaeological resources in the Area of Potential Effects. Between July 2023 and June 2025, OEA completed a damage assessment and on June 3, 2025, the Board issued a decision stating that it would not issue a finding that Section 110(k) of the National Historic Preservation Act applies to PIRATE. Accordingly, the attached letter reinitiates the Section 106 process, explains next steps, and provides notice of a virtual consulting parties meeting to be held on September 15, 2025. A formal Teams invitation will be provided in the coming days.

Please feel free to contact Alan Tabachnick, STB's Federal Preservation Officer, at Alan.Tabachnick@stb.gov with any questions.

Thank you,

Kris Powell, M.A., RPA (she/her) | JACOBS | Senior Archaeologist and Principal Investigator
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1501 West Fountainhead Parkway, Suite 401 | Tempe, Arizona 85282 | USA



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

August 15, 2025

Ms. Alison Stoltman
Arizona Museum of Natural History
53 N. Macdonald
Mesa, AZ 85201

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

Dear Ms. Stoltman:

Union Pacific Railroad Company (UP) is seeking authority from the Surface Transportation Board (Board) to construct and operate approximately 6.0 miles of new rail line in Maricopa County, Arizona (Docket No. FD 36501) (Pecos Industrial Rail Access and Train Extension or PIRATE) (See attached map). In July 2023, while the environmental and historic review process was still pending, the Board's Office of Environmental Analysis (OEA) learned that there had been significant ground disturbance and damage to archaeological resources in the Area of Potential Effects (APE). Between July 2023 and June 2025, OEA completed a damage assessment and on June 3, 2025, the Board issued a decision stating that it would not issue a finding that Section 110(k) of the National Historic Preservation Act (NHPA) applies to PIRATE. Accordingly, the purpose of this letter is to reinitiate the Section 106 process, explain next steps, and provide notice of a consulting parties meeting to be held on September 15, 2025.

Status of the Section 106 Process

Prior to July 2023, OEA had completed three of the four steps in the Section 106 process (initiating the Section 106 process, identifying historic properties, assessing adverse effect) and was close to finishing the final step, addressing the undertaking's adverse effect on historic properties. OEA had prepared a Memorandum of Agreement (MOA) and an Historic Properties Treatment Plan (HPTP) in consultation with the Section 106 consulting parties and was about to circulate the final version for signatures when the damage was discovered.

Because the Board recently issued a decision holding that it would not issue a finding that Section 110(k) applies in this proceeding, OEA is now resuming the Section 106 process and will update three documents that had not been finalized prior to the discovery of damage within the APE. OEA will work closely with the Section 106 consulting parties to: 1) revise and finalize the Class III Addendum Report to address remaining comments from 2023 (this report primarily documents fieldwork in additional areas of the APE that were inaccessible during the initial 2022 survey); 2) revise the MOA to address the damage and any potential updates to the mitigation

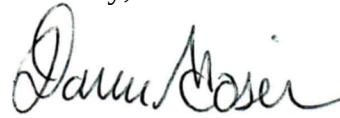
measures; and 3) revise the HPTP to reflect any modifications to the research approach and the mitigation measures and to address any outstanding comments.

Consulting Parties Meeting

OEA will provide additional information on the next steps in the Section 106 process at an upcoming virtual consulting party meeting on **Monday, September 15, 2025, from 11:00 a.m. to 12:00 p.m.** (PDT) (2:00 p.m. to 3 p.m. EDT). A meeting invitation will follow by email.

Please contact Alan Tabachnick, Alan.Tabachnick@stb.gov, with any questions or concerns.

Sincerely,

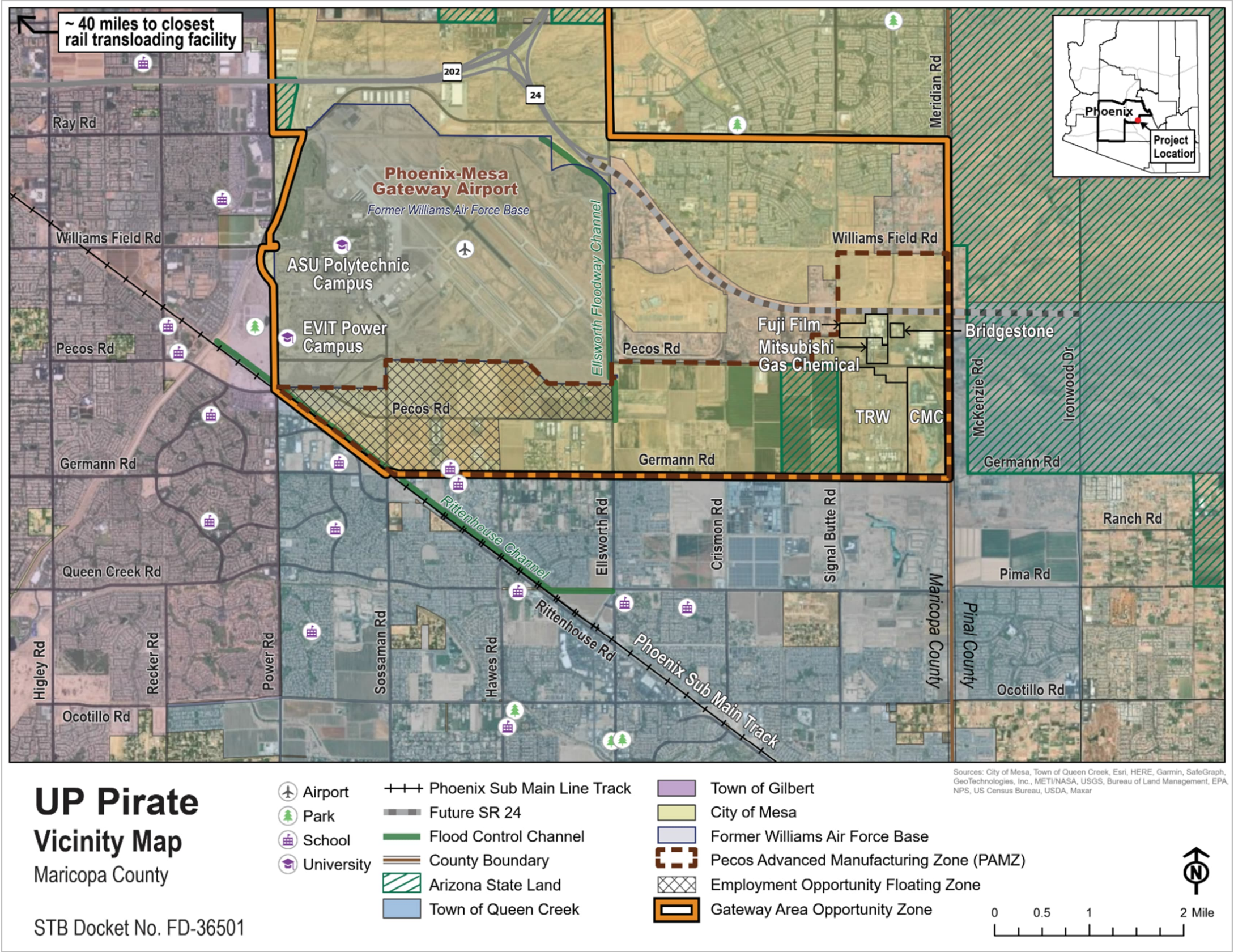
A handwritten signature in black ink, appearing to read "Danielle Gosselin".

Danielle Gosselin
Director
Office of Environmental Analysis

Enclosure: Project Location Map

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

ATTACHMENT A – PROJECT LOCATION



Company/Tribe	Contact	Position	Email
ACHP	Jamie Lochlinger		jloichinger@achp.gov
ACHP	Rachael Magnum		rmangum@achp.gov
Ak-Chin Indian Community	Robert Miguel	Chairman	rmiguel@ak-chin.nsn.us
Ak-Chin Indian Community	Tracy Wind		twind@ak-chin.nsn.us
ALSD	Mark Edelman	Director, Planning and Engineering	medelman@azland.gov
ASLD	Tiffany Grew	Archeological Compliance Specialist	tgrew@azland.gov
Arizona State Museum	Patrick Lyons	Director	plyons@arizona.edu
Arizona State Museum	Brad Stone	Arizona Antiquities Act Administrator	bstone@arizona.edu
AZ Museum of Natural History	Alison Stoltman	Acting Director	Alison.Stoltman@MesaAZ.gov
Gila River Indian Community	Stephen Roe Lewis	Governor	executivemail@gric.nsn.us
Gila River Indian Community	Larry Benallie Jr	Archaeological Compliance Specialist	Larry.BenallieJr@gric.nsn.us
Gila River Indian Community	Reylynne Williams	Cultural Resource Specialist	Reylynne.Williams@gric.nsn.us
Gila River Indian Community	Darius Enos	Cultural Resource Specialist	Darius.Enos@gric.nsn.us
Hopi Tribe	Timothy Nuvangyaoma	Chairman	tnuvangyaoma@hopi.nsn.us
Hopi Tribe	Stewart Koyiyumptewa	THPO	skoyiyumptewa@hopi.nsn.us
FCDMC	Paul Baughman	Chief Engineer	Paul.baughman@maricopa.gov
FCDMC	Tom Hanson	Right-of-Way Use Permitting Branch Manager	Tom.Hanson@maricopa.gov
Mesa Historical Museum	Susan Ricci	Executive Director	exec@mesamuseum.org;
Mesa Historic Preservation Office	Mary Kopaskie-Brown	Planning Director	Mary.Kopaskie-Brown@mesaaz.gov
Mesa Historic Preservation Office	Matthew Kriegl	Historic Preservation Officer	Matthew.Kriegl@mesaaz.gov

Mesa Historic Preservation Office	Kellie Rorex	Historic Preservation Supervisor	Kellie.Rorex@MesaAZ.gov
Pascua Yaqui Tribe	Julian Hernandez	Chairman	jhernandez1@pascuayaqui-nsn.gov
Pascua Yaqui Tribe	Karl Hoerig	THPO	Karl.Hoerig@pascuayaqui-nsn.gov
Mesa Gateway Airport	Scott Brownlee		sbrownlee@gatewayairport.com
Mesa Gateway Airport	Carl D'Acosta	Environmental Coordinator	CD'Acosta@gatewayairport.com
Salt River Pima Maricopa Indian Community	Martin Harvier	President	gary.bohnee@srpmic-nsn.gov
Salt River Pima Maricopa Indian Community	Shane Anton	THPO	Shane.Anton@srpmic-nsn.gov
Salt River Pima Maricopa Indian Community	Martha Martinez	NAGPRA Coordinator	Martha.Martinez@srpmic-nsn.gov
Salt River Pima Maricopa Indian Community	Angela Garcia-Lewis	Cultural Resources Compliance Supervisor	Angela.Garcia-Lewis@srpmic-nsn.gov
Salt River Pima Maricopa Indian Community	Sunday Eiselt	THPO Archaeologist	Sunday.Eiselt@srpmic-nsn.gov
Salt River Project	David Rousseau		david.rousseau@srpnet.com
Salt River Project	Dan Garcia	Senior Cultural Resources Management Specialist	Dan.garcia@srpnet.com
SanTan Historical Museum	Keith Johanson	President	santanhistoricalmuseum@gmail.com
Arizona State Parks, SHPO	Caroline Klebacha	Archaeological Compliance Specialist	cklebacha@azstateparks.gov
Arizona State Parks, SHPO	Mary Walsh	Archaeological Compliance Specialist	mwalsh@azstateparks.gov
Arizona State Parks, SHPO	Kathryn Leonard	SHPO	kleonard@azstateparks.gov
Tohono O'Odham Nation	Verlon Jose	Chairman	verlon.jose@tonation-nsn.gov
Tohono O'Odham Nation	Jefford Francisco	Cultural Resources Specialist	Jefford.francisco@tonation-nsn.gov

Tohono O'Odham Nation	Samuel Fayuant	Cultural Resources Specialist	Samuel.fayuant@tonation-nsn.gov
USACE	Shannon Morgan	Project Manager	Shannon.R.Morgan@usace.army.mil
USACE	Sallie Diebolt		splregulatoryaz@usace.army.mil
Zuni Tribe	Arden Kucate	Chairman	arden.kucate@ashiwi.org
Pueblo of Zuni	Kurt Dongoske	THPO	kdongoske@gmail.com
UPRR	Kevin Rice	Senior Manager	kprice@up.com
Desert Archaeology	Sarah Herr	President	sherr@desert.com
Town of Queen Creek	Dave Lipinski	Capital Improvements Director	Dave.lipinski@queencreekaz.gov
Mescalero-Apache Tribe	Holly Houghten	THPO	Holly@mathpo.org
Mescalero-Apache Tribe	Thora Walsh Padilla	President	tpadilla@mescaleroapachetribe.com
Town of Queen Creek	Heather Wilkey		heather.wilkey@queencreekaz.gov
Tonto Apache Tribe	Calvin Johnson	Chairman	cjohnson@tontoapache.org
Tonto Apache Tribe	Jeri Decola	Cultural and NAGPRA Representative	jdecola@tontoapache.org
Mesa Office of Economic Development	Nick Juszcak		nick.juszcak@mesaaz.gov
Federal Aviation Administration	Tearanni Williams		tearanni.e.williams@faa.gov