

UP PIRATE - Continuing Section 106 Consultation (SHPO) - HPTP

From: Luhnnow, Glennda
Sent: Thursday, May 14, 2026 10:35 AM
To: Kathryn Leonard
Cc: AZSHPO - AZPARKS; Caroline Klebacha; mwalsh@azstateparks.gov; Gosselin, Danielle; Tabachnick, Alan; Assenza, Adam; Buckley, Maggie; Phoebus, Elizabeth (Betsi); Powell, Kris; Boerst, Alyssa
Subject: UP PIRATE - Continuing Section 106 Consultation (SHPO) - HPTP
Attachments: PIRATE_revised draft HPTP_050626.pdf; PIRATE_S106 letter_revised draft HPTP_051426_SHPO.pdf

Dear Ms. Leonard:

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 6 miles of new rail line in Maricopa County, Arizona (the Pecos Industrial Rail Access and Train Extension [PIRATE] rail line).

On March 13, 2026, the Board authorized UP to construct and operate the new rail line, subject to environmental and historic conditions. The historic condition imposed by the Board requires UP to carry out the terms of the project's executed Memorandum of Agreement (MOA) (February 26, 2026) and Historic Properties Treatment Plan (HPTP) (MOA Stipulation IX.C).

On June 16, 2023, OEA circulated a draft HPTP to consulting parties. Comments received were addressed in the attached revised draft HPTP. The HPTP comment resolution matrix is enclosed in the attached Continuing Section 106 consultation letter.

We look forward to your concurrence on the revised draft HPTP. If you wish to provide comments, please submit them by **June 13, 2026**. Please feel free to contact Alan Tabachnick, the Board's Federal Preservation Officer, at Alan.Tabachnick@stb.gov with any questions about the Section 106 process or the revised draft HPTP. Thank you for your continued participation in the Section 106 process for the PIRATE project.

Sent on behalf of Alan Tabachnick, the Board's Federal Preservation Officer.

Regards, Glennda

Glennda Luhnnow, M.A., RPA | JACOBS | West Central Cultural Resources Group Lead |

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Upcoming PTO: May 18, 2026



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Environmental Analysis

May 14, 2026

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

Re: Docket No. FD 36501, Union Pacific Railroad Company – Construction and Operation Exemption – in Maricopa County, Arizona: Revised Draft Historic Properties Treatment Plan for Final Review

Dear Ms. Leonard:

In 2022, Union Pacific Railroad Company (UP) sought authority from the Surface Transportation Board (Board) to construct and operate approximately 6.0 miles of new rail line in Maricopa County, Arizona (Pecos Industrial Rail Access and Train Extension or PIRATE). The Board's Office of Environmental Analysis (OEA) completed the Section 106 process under the National Historic Preservation Act (initiation, identification of historic properties, and assessment of effects) between 2022 and 2026. OEA identified five historic properties and determined that the proposed project would have an adverse effect on cultural resources. During this process, OEA conducted extensive consultation with federal, state, and local agencies and organizations, as well as with Tribes that have strong interests and ancestral ties to the project area.

The consultation efforts led to the development of a Memorandum of Agreement (MOA), which was executed on February 23, 2026. Execution of the MOA completed the final step in the Section 106 process (resolution of adverse effects). The MOA contains stipulations that detail required tasks that must be completed by UP, under OEA's direction, and in consultation with the Section 106 consulting parties. The MOA also includes the overarching framework for a much more detailed and comprehensive Historic Properties Treatment Plan (HPTP).

On March 13, 2026, the Board authorized UP to construct and operate the new rail line, subject to environmental and historic conditions. The historic condition imposed by the Board requires UP to carry out the terms of the MOA and the associated HPTP, under the direction of OEA.

Historic Properties Treatment Plan

Prior to the execution of the MOA, a Draft HPTP was circulated to the Section 106 consulting parties on June 16, 2023. OEA received comments from the Arizona State Museum, the City of Mesa Historic Preservation Office, Desert Archaeology, Inc. (on behalf of UP), the State Historic Preservation Office, and the Salt River Pima-Maricopa Indian Community Tribal

Historic Preservation Office. The 2023 Draft HPTP has been revised in accordance with Stipulation IX.C of the MOA (Attachment A—Revised Draft HPTP), and the previous comments have been addressed in this Revised Draft HPTP (Attachment B—HPTP Comment Resolution Matrix).

Request for Review and Concurrence

OEA is continuing Section 106 consultation with your office and is requesting your concurrence on the Revised Draft HPTP and the treatments proposed for the historic properties in the Area of Potential Effects for this project. Please provide any comments by June 13, 2026. Thank you very much for your continued involvement. Please feel free to contact Alan Tabachnick, the Board's Federal Preservation Officer, Alan.Tabachnick@stb.gov with any questions regarding the Revised Draft HPTP.

Sincerely,



Danielle Gosselin
Director
Office of Environmental Analysis

Enclosures:

Attachment A – Revised Draft HPTP
Attachment B – HPTP Comment Resolution Matrix

Cc: Adam Assenza, OEA Environmental Protection Specialist, Adam.Assenza@stb.gov
Alan Tabachnick, Board's Federal Preservation Officer, Alan.Tabachnick@stb.gov
Maggie Buckley, Jacobs Project Manager, Maggie.Buckley@jacobs.com
Caroline Klebacha, Archaeological Compliance Specialist, cklebacha@azstateparks.gov
Mary-Ellen Walsh, Cultural Resources Compliance Program Manager,
mwalsh@azstateparks.gov

UP PIRATE (FD 36501) Continuing Section 106 Consultation
Distribution List for the Revised Draft Historic Properties Treatment Plan (May 14, 2026)

Consulting Party	Contact	Position	Email
Ak-Chin Indian Community	Gabriel Lopez	Chairman	glopez2@ak-chin.nsn.us
Ak-Chin Indian Community	Tracy Wind	Cultural Resources Specialist	twind@ak-chin.nsn.us
Ak-Chin Indian Community	Elaine Peters	Cultural Resources Specialist	epeters@ak-chin.nsn.us
Arizona Museum of Natural History	Alison Stoltman	Director	Alison.Stoltman@MesaAZ.gov
Arizona State Historic Preservation Office (SHPO)	Kathryn Leonard	State Historic Preservation Officer	kleonard@azstateparks.gov
Arizona SHPO	Caroline Klebacha	Archaeological Compliance Specialist	cklebacha@azstateparks.gov
Arizona SHPO	Mary-Ellen Walsh	Archaeological Compliance Specialist	mwalsh@azstateparks.gov
Arizona State Land Department	Mark Edelman	Director, Planning and Engineering	medelman@azland.gov
Arizona State Land Department	Tiffany Grew	Archeological Compliance Specialist	tgrew@azland.gov
Arizona State Museum	Dr. Patrick Lyons	Director	plyons@arizona.edu
Arizona State Museum	Brad Stone	Arizona Antiquities Act Administrator	bstone@arizona.edu
Federal Aviation Administration	Tearanni Williams	Management and Program Analyst	tearanni.e.williams@faa.gov
Flood Control District of Maricopa County	Tom Hanson	Right-of-Way Use Permitting Branch Manager	tom.hanson@maricopa.gov
Flood Control District of Maricopa County	Paul Baughman	Chief Engineer	paul.baughman@maricopa.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	Tribal Historic Preservation Officer (THPO)	Reylynne.Williams@gric.nsn.us
Gila River Indian Community	Darius Enos	Cultural Resource Specialist	Darius.Enos@gric.nsn.us

Consulting Party	Contact	Position	Email
Hopi Tribe	Lamar Keevama	Chairman	laKeevama@hopi.nsn.us
Hopi Tribe	Stewart Koyiyumptewa	THPO	skoyiyumptewa@hopi.nsn.us
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Mesa Gateway Airport Authority	Carl D'Acosta	Environmental Coordinator	CD'Acosta@gatewayairport.com
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Mesa Office of Economic Development	Nick Juszczak	Senior Project Manager	nick.juszczak@mesaaz.gov
Mescalero Apache Tribe	Thora Walsh Padilla	President	tpadilla@mescaleroapachetribe.com
Mescalero Apache Tribe	Holly Houghten	THPO	Holly@mathpo.org
Pascua Yaqui Tribe	Julian Hernandez	Chairman	jhernandez1@pascuayaqui-nsn.gov
Pascua Yaqui Tribe	Dr. Karl Hoerig	THPO	Karl.Hoerig@pascuayaqui-nsn.gov
Pueblo of Zuni	Arden Kucate	Governor	arden.kucate@ashiwi.org
Pueblo of Zuni	Kurt Dongoske	THPO	kdongoske@gmail.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	Native American Graves Protection and Repatriation Act (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

Consulting Party	Contact	Position	Email
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Salt River Project	Dan Garcia	Senior Cultural Resource Management Specialist	Dan.garcia@srpnet.com
San Tan Historical Museum	Keith Johanson	President	santanhistoricalmuseum@gmail.com
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Tohono O’odham Nation	Eric Verwys	Assistant Director, Natural Resources Department	eric.verwys@tonation-nsn.gov
Tohono O’odham Nation	Samuel Fayuant	Cultural Resources Specialist	Samuel.fayuant@tonation-nsn.gov
Tohono O’odham Nation	Richard Saunders	Director, Natural Resources Department	richard.saunders@tonation-nsn.gov
Tonto Apache Tribe	Calvin Johnson	Chairman	cjohnson@tontoapache.org
Tonto Apache Tribe	Jeri DeCola	Cultural and NAGPRA Representative	jdecola@tontoapache.org
Town of Queen Creek	Heather Wilkey	Intergovernmental Relations Director	heather.wilkey@queencreekaz.gov
Town of Queen Creek	Dave Lipinski	Capital Improvements Director	dave.lipinski@queencreekaz.gov
U.S. Army Corps of Engineers	Sallie Diebolt	Chief, Arizona Branch	splregulatoryaz@usace.army.mil
U.S. Army Corps of Engineers	Shannon Morgan	Project Manager	Shannon.R.Morgan@usace.army.mil
Union Pacific Railroad Company	Kevin Rice	Senior Manager	kprice@up.com
Desert Archaeology (on behalf of UP)	Sarah Herr	President	sherr@desert.com
Yavapai Apache Nation	Buddy Rocha, Jr.	Chairman	brochajr@yan-tribe.org
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Yavapai Apache Nation	Marley Juan	Culture Manager	mjuan@yan-tribe.org
Yavapai Apache Nation	Olivia McMahon	Tribal Archaeologist	omcmahon@yan-tribe.org