



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Bill Harmon, District Engineer
Arizona Department of Transportation
2082 E. Highway 70
Safford, AZ 85546

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Harmon:

As you are aware, the Section of Environmental Analysis (SEA) of the Surface Transportation Board (Board) is conducting an environmental review in Finance Docket No. 34836, Arizona Eastern Railway (AZER) – Construction and Operation – In Graham County, Arizona. The proposed rail line would connect Phelps Dodge's proposed San Juan mining operation with an existing 113.5-mile AZER line that operates between Miami, Arizona, and Bowie, Arizona. An Environmental Assessment (EA) for this project is being prepared by SEA pursuant to the National Environmental Policy Act (NEPA) and other Federal laws, including the National Historic Preservation Act (NHPA). The public review and comment period for the Draft EA began on February 25, 2008, and ended on May 1, 2008.¹ SEA is in the process of completing the final or Post EA for this proceeding, which will respond to comments on the Draft EA and make final environmental recommendations to the decision-maker, the Board.

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Tucson, Arizona, and peer-reviewed by William Self Associates, Inc., also of Tucson.² A copy of the draft treatment plan, *Historic Properties Treatment Plan for Historic Properties Affected by the Arizona Eastern Railroad*, dated September 26, 2008, is enclosed for your review.

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We would appreciate receiving your comments on the treatment plan and NRHP evaluation report within 30 days after receipt of this letter. Please send your comments to:

John C. Ravesloot, Ph.D.
William Self Associates, Inc.
2424 E. Broadway Blvd., Suite 100
Tucson, Arizona 85719

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If you have any questions regarding this letter or require further information, please do not hesitate to contact Diana Wood, SEA Project Manager, at 202-245-0302 or woodd@stb.dot.gov. If you prefer, you may also contact John Raveslout of William Self Associates at 520-624-0101 (jraveslout@williamself.com).

Sincerely,

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Victoria Rutson
Chief
Section of Environmental Analysis

Enclosures: (2)



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Michael Delleo, P.E.
Arizona Department of Transportation
Rm. 357, MD 618E
205 S. 17th Avenue
Phoenix, AZ

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Delleo:

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Victoria Rutson
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Enclosures: (2)



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Donald Butler, Director
Arizona Department of Agriculture
1688 West Adams Street
Phoenix, AZ 85007

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Butler:

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Victoria Rutson
Chief
Section of Environmental Analysis

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Madan Singh, Director
Arizona Department of Mines and Mineral Resources
1502 West Washington
Phoenix, AZ 85007-73210

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Singh:

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Section of Environmental Analysis

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Duane Shroufe, Director
Arizona Game and Fish Department
2221 West Greenway Road
Phoenix, AZ 85023

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Shroufe:

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Enclosures: (2)



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

Gordon Taylor, Planning Section Manager
Arizona State Land Department
1616 W. Adams
Phoenix, AZ 85007

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Taylor:

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SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

John Madsen
Arizona State Museum
The University of Arizona
PO Box 210026
Tucson, AZ 85721

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

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Victoria Rutson
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Office of Economics, Environmental Analysis and Administration

October 16, 2008

Michael Bryce, County Engineer
Graham County
Planning and Zoning Department
921 Thatcher Boulevard
Safford, AZ 85546

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

Dear Mr. Bryce:

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As the lead Federal agency charged with complying with Section 106 of the NHPA, we are informing you that a draft treatment plan for historic properties potentially affected by the proposed rail line has been prepared by WestLand Resources, Inc., of

¹ The Draft EA is available for review on the Board's Web site (www.stb.dot.gov) by clicking on the "Decisions and Notices" link, then "E-LIBRARY" and searching by the Service Date (February 25, 2008) or Docket Number (FD 34836).

Tucson, Arizona, and peer-reviewed by William Self Associates, Inc., also of Tucson.² A copy of the draft treatment plan, *Historic Properties Treatment Plan for Historic Properties Affected by the Arizona Eastern Railroad*, dated September 26, 2008, is enclosed for your review.

You will recall that a Class III cultural resources inventory was conducted of the area of potential effect (APE) of the proposed rail line. The report of the inventory, *A Class III Cultural Resources Inventory of the Arizona Eastern Railroad Extension of Service Right-of-Way near Solomonville, Graham County, Arizona*, and a supplementary inventory report, *A Class III Cultural Resources Inventory of the Arizona Eastern Railroad Extension of Service Right-of-Way near Solomonville, Graham County, Arizona: Supplementary Archaeological Survey* (both by WestLand Resources, Inc.), have been reviewed by the Arizona State Historic Preservation Office (SHPO). Ten historic properties and one stone scatter site identified in the Class III inventory as a possible grave feature would require treatment before the start of the construction project; all eleven properties are discussed in the enclosed draft treatment plan.

Following review of the Class III inventory reports, the Arizona SHPO requested that three properties recorded in the original inventory as isolated features — and hence recommended as ineligible for listing in the National Register of Historic Places (NRHP) — be reevaluated for NRHP eligibility as archaeological sites. WestLand Resources, Inc., has since reevaluated the three sites and assigned each an Arizona State Museum (ASM) archaeological site number. The reevaluation, which recommends that all three sites are NRHP eligible, is reported in the draft *National Register of Historic Places Evaluation of Soil Conservation Service and Civilian Conservation Corps Checkdam Sites in the Proposed Arizona Eastern Railroad Construction Corridor*, a copy of which is enclosed here for your review. The three sites are among the ten historic properties covered by the enclosed treatment plan.

We would appreciate receiving your comments on the treatment plan and NRHP evaluation report within 30 days after receipt of this letter. Please send your comments to:

John C. Ravesloot, Ph.D.
William Self Associates, Inc.
2424 E. Broadway Blvd., Suite 100
Tucson, Arizona 85719

² William Self Associates, Inc., is serving as SEA's independent third-party consultant in this process and will work under SEA's sole directing control and supervision to assist in the consultation process.

If you have any questions regarding this letter or require further information, please do not hesitate to contact Diana Wood, SEA Project Manager, at 202-245-0302 or woodd@stb.dot.gov. If you prefer, you may also contact John Ravesloot of William Self Associates at 520-624-0101 (jravesloot@williamself.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Victoria Rutson". The signature is fluid and cursive, with the first name "Victoria" written in a larger, more prominent script than the last name "Rutson".

Victoria Rutson
Chief
Section of Environmental Analysis

Enclosures: (2)



SURFACE TRANSPORTATION BOARD
Washington, DC 20423

Office of Economics, Environmental Analysis and Administration

October 16, 2008

U.S.D.I. Office of American Indian Trust
Department of the Interior
1849 C Street, NW
Washington DC 20240

RE: STB Finance Docket No. 34836, Arizona Eastern Railway – Construction and Operation – In Graham County, Arizona; **Request for Review of Draft Historic Properties Treatment Plan and Draft National Register of Historic Places Evaluation of Checkdam Sites**

To Whom It May Concern:

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Victoria Rutson
Chief
Section of Environmental Analysis

Enclosures: (2).