



United States Department of the Interior

NATIONAL PARK SERVICE
National Trails –Intermountain Region
P.O. Box 728
Santa Fe, New Mexico 87504-0728



IN REPLY REFER TO: SACOG–UT NTIR comments

October 2, 2014

Mr. Jeff Irwin
Environmental Projection Specialist
Surface Transportation Board
Washington, DC 20423

Dear Mr. Irwin:

Thank you for your letter of September 5, 2014 regarding the SACOG project in Utah. We have reviewed the document and maps that you sent. We have confirmed through our GIS that the project area as currently configured will cross the congressionally designated alignment of the Old Spanish National Historic Trail (NHT), which we co-administer with the Bureau of Land Management. The exact location of the Old Spanish NHT has not been confirmed on the ground in this area. This part of the project appears to lie on private land that either is or has been cultivated. It is not entirely clear to me if the area where the trail is crossed has been surveyed archaeologically or not. If the project could be moved north a quarter-mile or so, it would avoid the trail entirely.

Assuming that it has not been surveyed and the project cannot be moved, we recommend that an intensive archaeological survey be conducted within 100 m of the trail's projected alignment on the ground. This intensive survey should be conducted at no greater than a 5 m survey interval within the project APE. We also recommend analysis of existing satellite and aerial photography to determine if the trail might be visible in color imagery, or an alternate spectrum. In addition, we recommend that at least two zigzag metal detector transect sweeps be conducted at 10 m interval from the trail's projected alignment on the ground within your APE. If nothing is observed or located during these investigations, then we would consider the project to have no direct adverse effect to trail resources.

However, as you mentioned, the project could still have indirect visual impacts to the trail setting in this area, though. While we have not identified any high potential sites or segments in the immediate area, these potential visual impacts to the designated alignment should be evaluated as plans for the project progress. The severity of these impacts would depend on the design elements of the railroad and any associated support structures. If the project will create adverse visual impacts to the trail setting, then compensatory mitigation of one or more forms may be appropriate as part of the Section 106 consultation process.

Thank you for considering our comments. I am leaving my current position soon, so if you have any questions, please contact Michael Taylor of our office at 505-988-6742, or michael_taylor@nps.gov.

Sincerely,

A handwritten signature in black ink that reads "Michael L. Elliott". The signature is written in a cursive style with a large, stylized "M" and "E".

Michael L. Elliott
Cultural Resources Specialist