



PHOENIX AREA OFFICE		
ACTION BY:		
RECEIVED:		
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DATE	SURNAME	ROUTE TO
CLASSIFICATION		
CONTROL NO.		
PROJECT		

ARIZONA DIVISION

July 11, 2012

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
(602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Reassessment of Historic Properties

Mr. Dave Gifford  
Bureau of Reclamation  
6150 West Thunderbird Road  
Glendale, Arizona 85306-4001

Dear Mr. Gifford:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Recently four historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen were reevaluated by AZTEC Engineering Group, Inc. The results of the reevaluation are presented in *South Mountain Transportation Corridor Study: Evaluation of Four Historic Buildings and Districts, Maricopa County, Arizona* (Solliday 2012), a copy of which is enclosed for your review and comment.

Consulting parties for this reevaluation include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The four historic properties near the Dobbins Road/59<sup>th</sup> Avenue intersection that were reevaluated include:

- 1) Hudson Farm, 9300 South 59th Avenue
- 2) Hackin Farmstead/Dairy, 10048 South 59th Avenue
- 3) Tyson Farmstead/Barnes Dairy, 6159 West Dobbins Road

2

4) Dobbins Road Streetscape, 6100 block of West Dobbins Road

Hudson Farm

The Hudson Farm, a historic district, was previously determined to be eligible for listing on the National Register of Historic Places (NRHP) under criterion A. The boundaries of the district encompassed nearly 40 acres. Reassessment of the farm and historic farming in the Laveen area determined that the boundaries should encompass nearly 80 acres rather than 40. From the earliest times, the family farms in this area included two quarter-quarter sections, both before the Western Canal irrigated Laveen, and after construction of the canal and the establishment of 40-acre farm units. The original 80-acre farm remains intact, minus rights-of-way for roads and irrigation features.

The cement stave silos at the farm were previously determined to be individually eligible for listing under criterion C. The reassessment agrees with this earlier determination.

Hackin Farmstead/Dairy

As a district, the Hackin Farmstead/Dairy was previously determined ineligible for listing on the NRHP. However, the dairy barn on the property was found eligible under criterion C. No changes are recommended for these previous determinations.

Tyson Farmstead/Barnes Dairy

As a district, the Tyson Farmstead/Barnes Dairy was previously determined ineligible for listing on the NRHP. However, the dairy barn on the property was found eligible under criterion C. No changes are recommended for these previous determinations.

Dobbins Road Streetscape

The Dobbins Road Streetscape District was previously determined eligible for listing on the NRHP under criteria A and D. The reevaluation has found that the district is ineligible. There are several characteristics of the Dobbins Road Streetscape that impact the integrity of the resource as a rural agricultural streetscape. Historic rural landscapes often include miles of roadway and surrounding agricultural properties. The 325 feet of roadway along Dobbins Road is of inadequate length to truly convey the rural agricultural character that once dominated this area. In addition, there are modern intrusions easily visible from the streetscape. At the west end there is a prominent 1977 house on the north side of the road and a mobile home on the south side of the road that was moved onto the site about 1970. A recently constructed subdivision of two-story houses is located just over a quarter-mile east of the streetscape, and is clearly visible from within the streetscape boundaries. Additionally, many components of the historic streetscape have lost their historic character, as detailed in the enclosed report. Therefore, FHWA recommends that this district is ineligible for listing on the NRHP.

Following is a summary of the reevaluation:


Inventory No.	Tax Parcel No.	Property Name and Address	Date	Primary Criterion
Eligible Historic Districts				
1	300 02 038 300 02 037A	Hudson Farm 9300 S. 59 <sup>th</sup> Avenue	ca. 1926	A

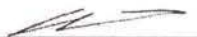


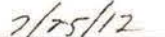
Individually Eligible Historic Buildings				
1.03	300 02 038	Hudson Farm - Cement Stave Silos 9300 S. 59 <sup>th</sup> Avenue	1949	C
2.03	300 02 033	Hackin Farmstead/Dairy – Dairy Flat Barn 10048 S. 59 <sup>th</sup> Avenue	1952	C
3.02	300 02 041	Tyson Farmstead/Barnes Dairy – Dairy Head-to-Toe Barn 6159 W. Dobbins Road	1951	C
Ineligible Historic Districts				
2	300 02 033	Hackin Farmstead/Dairy 10048 S. 59 <sup>th</sup> Avenue	1930	N/A
3	300 02 041	Tyson Farmstead/Barnes Dairy 6159 W. Dobbins Road	1930	N/A
4	300 02 041, 300 02 021J	Dobbins Streetscape 6100 Block W. Dobbins Road	1930	N/A

Please review the information provided in this letter, the attached project location map, and enclosed report. If you find the report adequate and agree with FHWA’s revised recommendation of eligibility, please indicate your concurrence by signing below. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [L.Davis2@azdot.gov](mailto:L.Davis2@azdot.gov).

Sincerely yours,

  
for Karla S. Petty  
Division Administrator

  
Signature for Reclamation Concurrence  
NH-202-D(ADY) Alexander Smith

  
Date

Enclosures

This letter was also sent to:

Mr. Steve Ross , Archaeologist, Arizona State Land Department  
Dr. Beth Grindell, Director, Arizona State Museum  
Ms. Sallie D. McGuire, Chief Arizona Section, U.S. Army Corps of Engineers  
Ms. Cheryl Blanchard, Archaeologist, Bureau of Land Management  
Mr. Garry Cantley, Western Regional Archaeologist, Bureau of Indian Affairs  
Mr. Bryan M. Lausten, Archaeologist, Bureau of Reclamation  
Mr. John Holt, Environmental Manager, Western Area Power Administration  
Mr. Richard A. Anduze, Archaeologist, Salt River Project  
Mr. Hugh Davidson, Environmental Program Manager, Maricopa County Department of Transportation  
Mr. Larry Hendershot, Property Manager, Flood Control District of Maricopa County  
Mr. Charlie McClendon, City Manager, City of Avondale  
Mr. Rich Dlugas, City Manager, City of Chandler  
Mr. Jon M. Froke, Historic Preservation Officer, City of Glendale  
Ms. Laurene Montero, Archaeologist, City of Phoenix  
Ms. Michelle Dodds, Historic Preservation Office, City of Phoenix  
Mr. Reyes Medrano, Jr., City Manager, City of Tolleson

Mr. Louis Manuel, Jr., Chairman, Ak-Chin Indian Community  
Mr. Charles Wood, Chairman, Chemehuevi Indian Tribe  
Ms. Sherry Cordova, Chairwoman, Cocopah Indian Tribe  
Mr. Eldred Enas, Chairman, Colorado River Indian Tribes  
Dr. Clinton Pattea, President, Fort McDowell Yavapai Nation  
Mr. Timothy Williams, Chairman, Fort Mojave Indian Tribe  
Mr. Keeny Escalanti, President, Fort Yuma-Quechan Tribe  
Mr. Gregory Mendoza, Governor, Gila River Indian Community  
Mr. Don E. Watahomigie, Chairman, Havasupai Tribe  
Mr. Leigh Kuwanwisiwma, Director, Cultural Preservation Office, Hopi Tribe  
Ms. Louise Benson, Chairwoman, Hualapai Tribe  
Mr. Manual Savala, Chairman, Kaibab Band of Paiute Indians  
Dr. Alan Downer, Tribal Historic Preservation Officer, Navajo Nation  
Mr. Peter Yucupicio, Chairman, Pascua Yaqui Tribe  
Mr. Arlen Quetawki Sr., Governor, Pueblo of Zuni  
Ms. Diane Enos, President, Salt River Pima-Maricopa Indian Community  
Mr. Terry Rambler, Chairman, San Carlos Apache Nation  
Ms. May Preston, President , San Juan Southern Paiute  
Mr. Peter Steere, Tribal Historic Preservation Officer, Tohono O’odham Nation  
Mr. Joe Joaquin, Cultural Affairs Office, Tohono O’odham Nation  
Ms. Louise Lopez, Chairwomen, Tonto Apache Tribe  
Mr. Ronnie Lupe, Chairman, White Mountain Apache Tribe  
Mr. David Kwait, President, Yavapai-Apache Nation





## ARIZONA DIVISION

4000 North Central Avenue  
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August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Jon M. Froke, AICP, Historic Preservation Officer  
City of Glendale  
5850 West Glendale Avenue #212  
Glendale, Arizona 85301

Dear Mr. Froke:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the

2

Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

The proposed Chandler Boulevard Extension is located in Section 36 of Township 1 South and Range 2 East. The land in Section 36 north of the existing City of Phoenix water line is owned by the City of Phoenix. The land in Section 36 south of the water line is administered by ASLD.

The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

In 1989, Archaeological Consulting Service, Ltd. (ACS), surveyed the APE in its entirety (Adams 1989). The results were reported in *An Archaeological Assessment of the Proposed South Mountain State Planning Permit Project for Burns International, Inc.* (Adams 1989). No sites were identified.

In 2000, Logan Simpson Design (LSD) performed an archaeological survey for a City of Phoenix water line which covered a 20-m-wide corridor along the centerline of the Chandler Boulevard Extension. The results are reported in *A Class I Inventory and A Class III Cultural Resources Survey for the City of Phoenix Waterline Route Around the Western and Southern Edges of South Mountain Park, Maricopa County, Arizona* (Shaw 2000). LSD recorded one site in the APE. Site AZ T:12:111 (ASM) is a historic mining site that include four features: a collapsed rock ring, a prospecting pit, a tailings pile, and a cleared area. The site was recommended as not eligible for inclusion in the National Register of Historic Places (NRHP).

In 2008, Desert Archaeology, Inc. (Desert) performed a Class III survey that covered the portion of the APE north of the centerline. The results are reported in *Cultural Resources Survey of 237 Acres Within the 620 Property, South of South Mountain Park, Phoenix, Arizona* (Darby and Bagwell 2008). Desert identified two sites near the proposed construction footprint for the Chandler Extension, AZ T:12:286 (ASM) and AZ T:12:287 (ASM). Because of their proximity to the construction footprint, the sites were included in the APE for the consideration of indirect effects, such as alterations to visual setting and the potential for vandalism as a result of increased access provided by the new roadway.



Site AZ T:12:286 (ASM) is a possible prehistoric agricultural site consisting of a set of rock clusters/piles. Desert recommended that the site was eligible for inclusion in the NRHP under Criterion D for its potential to yield information about prehistoric land use practices at the margins of the middle Gila River Valley.

Site AZ T:12:287 (ASM) consists of two rock features, one with a petroglyph on a portable stone at the center. The petroglyph is etched on to the stone, not pecked. The site lacks diagnostic artifacts and the age of the features is uncertain; the possibility exists that they are of modern origin. Given that the temporal context of AZ T:12:287 (ASM) was unknown, and that additional investigations of the features was unlikely to uncover this information, Desert could not establish a relevant historic context for the site, and therefore recommended that it was not eligible for inclusion in the NRHP. Desert also recommended that this type of site could represent a contemporary O’odham shrine. As discussed in the report, a meeting took place on August 28, 2008 between representatives from GRIC’s Cultural Resources Management Program (CRMP) and the City of Phoenix archaeologist to discuss the site. The CRMP representatives agreed it was probably a historic O’odham shrine.

Because the initial survey of the Chandler Boulevard Extension had been performed in 1989, and previously undocumented sites had been recorded in the area by more recent surveys, ADOT requested that HDR Engineering, Inc. (HDR) perform a new Class III survey of the APE. The results are reported in *A Class III Cultural Resources Survey for the Chandler Boulevard Extension, 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). No new sites were identified. The survey confirmed that AZ T:12:111 (ASM) had been obliterated by the City of Phoenix water line project. The survey also documented the condition of sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM).

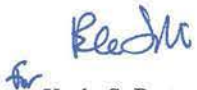
Site AZ T:12:286 (ASM) was found as described by Desert in 2008, in good condition, and with no new disturbances. FHWA recommends that the site is eligible for inclusion in the NRHP under Criterion D for its potential to contribute information on prehistoric agricultural practices.

The condition of site AZ T:12:287 (ASM) has changed since its 2008 recording. The petroglyph rock has been turned upside down so that the glyph is face down and the top is painted with graffiti. Also, some of the rocks in the outer circle had been shifted. The surrounding area has also been disturbed by off-road vehicles. Because the site could not be placed within a definable temporal context, FHWA recommends that AZ T:12:287 (ASM) is not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommends continuing consultation with the GRIC’s Tribal Historic Preservation Office to confirm its status as a potential traditional cultural property and regarding its management. Because sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM) are not located within the construction footprint of the Chandler Boulevard Extension and therefore can be avoided, neither site would be directly impacted. Furthermore, the construction of the Chandler Boulevard Extension would not increase the potential for significant indirect effects because they are already easily accessible given their location near existing roads, hiking trails, and residential development.

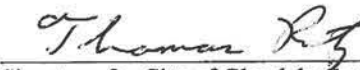
Based on the above, FHWA has determined that a finding of “no adverse effect” is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If you agree with the adequacy of the report and FHWA’s recommendations of NRHP eligibility

and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

  
Karla S. Petty  
Division Administrator

AUG 16 2012

  
Signature for City of Glendale Concurrence  
NH-202-D(ADY)

8/13/12  
Date

Enclosures



**From:** [Gifford, David J](#)  
**To:** [Linda Davis](#)  
**Subject:** 202L S Mountain DCR and EIS, Chandler BLVD Extension  
**Date:** Monday, August 13, 2012 10:18:06 AM  
**Attachments:** 202L, South Mountain, DCR and EIS.pdf

Linda,

Reclamation does not appear to have any agency lands or interests in this part of the project area. Per our internal direction, we do not sign concurrence letters when we have no project lands affected. However, feel free to use this email as documentation that we have received and responded to your letter.

Have a good one.

Dave

Dave Gifford  
Archaeologist  
Bureau of Reclamation  
6150 W. Thunderbird Road  
Glendale AZ 85306  
623 773-6262

U.S. Department of Transportation  
Federal Highway Administration

PHOENIX AREA OFFICE

RECEIVED: AUG 10 '12

DATE	SURNAME	ROUTE TO
		1500 TC

CLASSIFICATION  
CONTROL NO.  
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ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
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August 8, 2012

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NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Bryan M. Lausten, Archaeologist  
Phoenix Area Office  
Bureau of Reclamation  
6150 West Thunderbird Road  
Glendale, Arizona 85306-4001

Dear Mr. Lausten:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation (Reclamation), the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache



Janice K. Brewer  
Governor

Bryan Martyn  
Executive Director



Board Members

Walter D. Armer, Jr., Vail, *Chair*  
Maria Baier, State Land Commissioner, *Vice Chair*  
Kay Daggett, Sierra Vista  
Alan Everett, Sedona  
Larry Landry, Phoenix  
William C. Scalzo, Phoenix  
Tracey Westerhausen, Phoenix

August 13, 2012

Karla Petty, Arizona Division Administrator  
Federal Highway Administration, U.S Department of Transportation  
4000 North Central Avenue, Suite 1500  
Phoenix, AZ 85012-3500

Attention: Rebecca Swiecki

RE: NH-202-D(ADY), TRACS #202L MA H5764 01C  
SR 202L, South Mountain Freeway  
AZ T:12:287 Site Eligibility  
Continuing Section 106 Consultation  
SHPO-2003-1890 (106850)

Ms. Petty:

Thank you for consulting with the Arizona State Historic Preservation Office [SHPO] pursuant to the National Historic Preservation Act as implemented by 36 CFR Part 800 regarding the proposed construction of an extension of Chandler Boulevard between 19<sup>th</sup> Avenue and 27<sup>th</sup> Avenue in the City of Phoenix, Maricopa County, Arizona. A cultural resources survey was submitted with several archaeological sites identified within or next to the proposed project area, and recommendations of the eligibility status of the sites and a finding of effect were offered. We have reviewed the submitted materials and offer the following comments.

The submitted cultural resource assessment [A Class III Cultural Resources Survey for the Chandler Boulevard Extension, 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona] and several assessments of the project area conducted earlier have identified site AZ T:12:287 (ASM), located just outside the proposed project area. The eligibility of site AZ T:12:287 (ASM) has been recommended to be not eligible for inclusion in the National Register of Historic Places [NRHP] under Criterion D. Although not recommended as register-eligible, there have been earlier consultations in 2008 with the Gila River Indian Community [GRIC] by the Arizona State Land Department and the City of Phoenix that indicate the site in question may have significance as an O'odham shrine. Indeed, your cover letter recommends continuing consultation with GRIC's Tribal Historic Office to confirm its status. When that tribal consultation process is completed, and the status of the eligibility of site AZ T:12:287 (ASM) is determined, our office will then be prepared to comment upon the eligibility of the sites and an appropriate finding of effect.

PAGE 2

Our office appreciates your continued cooperation in complying with federal historic preservation requirements. If you have any questions or concerns, please feel free to contact me at 602/542-7140 or e-mail me at [djacobs@azstateparks.gov](mailto:djacobs@azstateparks.gov).

Sincerely,

David Jacobs  
Compliance Specialist/Archaeologist  
Arizona State Historic Preservation Office

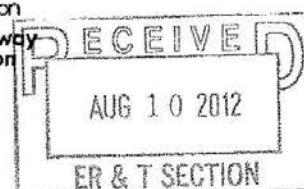
CC: Barnaby Lewis, GRIC  
Linda Davis, ADOT  
Laurene Montero, City of Phoenix





## ARIZONA DIVISION

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TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Steve Ross, Archaeologist  
Arizona State Land Department  
1616 West Adams  
Phoenix, Arizona 85007

Dear Mr. Ross:

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2

Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

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The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

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3

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4

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Sincerely yours,

*Karla S. Petty*  
for Karla S. Petty  
Division Administrator

*[Signature]*  
Signature for ASLD Concurrence  
NH-202-D(ADY)

*8/14/2012*  
Date

Enclosures

cc:  
Rueben Ojeda, Arizona State Land Department, Manager, Right-of-way Section, 1616 W. Adams, Phoenix, AZ 85007

- Although ASLD concurs with FHWA's determination of effect at this time, ASLD will review and comment on HDR's Report in consultation with SHPO once ADOT has filed a Right-of-Way Application.
- Furthermore, ADOT should have filed a Right-of-Way entry to allow a Cultural Resources inspection on state trust land. ~~As a~~ Technically, HDR was in trespass as they survey the proposed alignment. *Shawn*





## ARIZONA DIVISION

August 8, 2012



4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Leigh Kuwanwisiwma, Director  
Cultural Preservation Office  
Hopi Tribe  
P.O. Box 123  
Kykotsmovi, Arizona 86039

Dear Mr. Kuwanwisiwma:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab Band of Paiute Indians, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

2

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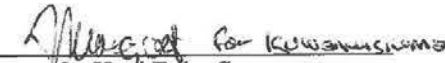
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Sincerely yours,

  
Karla S. Petty  
Division Administrator

AUG 17 2011

  
Signature for Hopi Tribe Concurrence  
NH-202-D(ADY)

8-14-12  
Date

Enclosure





Salt River  
**PIMA-MARICOPA INDIAN COMMUNITY**  
 10,005 EAST OSBORN ROAD/SCOTTSDALE, ARIZONA 85256/ PHONE (480) 362-6337

**Cultural Preservation Program**

August 14, 2012

Karla S. Petty, Division Administer  
 U.S. Department of Transportation  
 Federal Highway Administration  
 4000 North Central Avenue  
 Suite 1500  
 Phoenix, Arizona 85012-3500

RE: 202L, South Mountain Freeway, DCR and EIS Continuing Section 106 Consultation Chandler Boulevard Extension NH-202-D(ADY) HOP-AZ, the project would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix.

Dear Karla S. Petty:

This correspondence is in reference to 202L, South Mountain Freeway, DCR and EIS Continuing Section 106 Consultation Chandler Boulevard Extension NH-202-D(ADY) HOP-AZ. This site, the location would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix, is subject to Section 106 of the National Historic Preservation Act (Section 106). The Salt River Pima-Maricopa Indian Community (SRP-MIC) is in receipt of your consultation request and appreciates the opportunity to comment on this project. The location of this project area is within the adjudicated ancestral claims area of the Four Southern Tribes of Arizona (SRP-MIC, Gila River Indian Community, Ak-Chin Indian Community and the Tohono O'odham Nation).

The Four Southern Tribes of Arizona (Four Tribes) have an existing consultation management agreement to address consultation within the adjudicated ancestral claims area that divides the area into four geographic regions where one of the Four Tribes takes the lead and provides all Section 106 consultation (and all other federal, state, or local statutes as necessary) for specific areas on behalf of all of the Four Southern Tribes of Arizona. The Four Tribes in consensus agreed that the Gila River Indian Community will take the lead in providing comments in for this project.

Thank you for your time and consideration in this matter. Please contact me at (480-362-6337) or email [jacob.butler@srpmic-nsn.gov](mailto:jacob.butler@srpmic-nsn.gov) with additional questions or comments in regard to this or any other cultural resource issue in behalf of the Salt River Pima-Maricopa Indian Community.

Sincerely,

Jacob Butler  
 Cultural Resource Specialist  
 SRP-MIC



**ARIZONA DIVISION**

4000 North Central Avenue  
 Suite 1500  
 Phoenix, Arizona 85012-3500  
 Phone: (602) 379-3646  
 Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

August 8, 2012

In Reply Refer To:  
 NH-202-D(ADY)  
 HOP-AZ

NH-202-D(ADY)  
 TRACS No. 202L MA 054 H5764 01C  
 202L, South Mountain Freeway, DCR and EIS  
 Continuing Section 106 Consultation  
 Chandler Boulevard Extension

Ms. Louise Lopez, Chairperson  
 Tonto Apache Tribe  
 Tonto Apache Reservation #30  
 Payson, Arizona 85541

Dear Chairperson Lopez:

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Sincerely yours,

*Karla S. Petty*  
for Karla S. Petty  
Division Administrator

AUG 16 2012

*James P. Leubner*  
Signature for Tonto Apache Tribe Concurrence  
NH-202-D(ADY)  
ROADS/TRANSPORTATION COORDINATOR  
Enclosures

*August 14, 2012*  
Date



U.S. Department  
of Transportation  
Federal Highway  
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ARIZONA DIVISION

4000 North Central Avenue  
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August 8, 2012

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NH-202-D(ADY)  
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NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Ronnie Lupe, Chairman  
White Mountain Apache Tribe  
P.O. Box 1150  
Whiteriver, Arizona 85941

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Based on the above, FHWA has determined that a finding of “no adverse effect” is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If you agree with the adequacy of the report and FHWA’s recommendations of NRHP eligibility and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

  
for Karla S. Petty  
Division Administrator

Signature for White Mountain Apache Tribe Concurrence    Date  
NH-202-D(ADY)

Enclosure

cc:  
Mark Altaha, Tribal Historic Preservation Officer, Historic Preservation Office, P.O Box 507,  
Fort Apache, AZ 85926 (with enclosures)  
Ramon Riley, Cultural Resource Director, Historic Preservation Office, P.O Box 507, Fort  
Apache, AZ 85926



**White Mountain Apache Tribe**  
Office of Historic Preservation  
PO Box 507  
Fort Apache, AZ 85926  
Ph: (928) 338-3033 Fax: (928) 338-6055

**To:** Linda Davis, ADOT Historic Preservation Specialist  
**Date:** August 17, 2012  
**Prj:** NH-202-D(ADY) TRACS No. 202L MA 054 H5764 01C 202L South Mountain Freeway

.....  
The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the proposed project, August 8, 2012 . In regards to this, please attend to the following checked items below.

► *There is no need to send additional information unless project planning or implementation results in the discovery of sites and/or items having known or suspected Apache Cultural affiliation.*

N/A - The proposed project is located within an area of probable cultural or historical importance to the White Mountain Apache tribe (WMAT). As part of the effort to identify historical properties that maybe affected by the project we recommend an ethno-historic study and interviews with Apache Elders. The tribe's *Cultural Heritage Resource Director Mr. Ramon Riley* may be contacted at (928) 338-3033 for further information should this become necessary.

► Please refer to the attached additional notes in regards to the proposed project:

We have received and reviewed the information regarding FHWA/ADOT proposed continued studies in support of the Environmental Impact Statement for 202L, South Mountain Freeway, EIS/Design Concept Report project which would extend around the southern side of South Mountain from Interstate 10 in west Chandler to I-10 west Phoenix, and we have determined the proposed action/plans **will not have an adverse effect** on the White Mountain Apache tribe's (WMAT) historic properties and/or traditional cultural resources. We propose any/all ground disturbing activities be monitored **if** there are reasons to believe that there are human remains and/or funerary objects are present, and if such remains and/or objects are encountered all project activities should cease and the proper authorities and/or **affiliated tribe(s)** be notified to evaluate the situation.

Thank you. We look forward to continued collaborations in the protection and preservation of place of cultural and historical significance.

Sincerely,  
**Mark T. Altaha**  
White Mountain Apache Tribe  
Historic Preservation Office





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Larry Hendershot, Property Manager  
Flood Control District of Maricopa County  
2801 West Durango Street  
Phoenix, Arizona 85009

Dear Mr. Hendershot:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County (FCDMC), the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern

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In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

The proposed Chandler Boulevard Extension is located in **Section 36 of Township 1 South and Range 2 East**. The land in Section 36 north of the existing City of Phoenix water line is owned by the City of Phoenix. The land in Section 36 south of the water line is administered by ASLD.

The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

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Sincerely yours,



for  
Karla S. Petty  
Division Administrator

  
Signature for FCDMC Concurrence  
NH-202-D(ADY)

8-20-2012  
Date

Enclosures

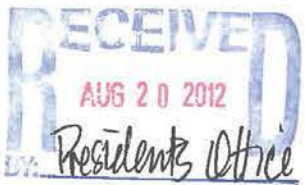




ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
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August 8, 2012



In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Dr. Clinton Pattea, President  
Fort McDowell Yavapai Nation  
P.O. Box 17779  
Fountain Hills, Arizona 85269

Dear President Pattea:

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3

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4

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Sincerely yours,



for Karla S. Petty  
Division Administrator

AUG 23 2012

 8-21-12  
Signature for Fort McDowell Yavapai Nation Concurrence Date  
NH-202-D(ADY)

Enclosures

cc:  
Erica McCalvin, Planning & Project Manager (with enclosures)  
Karen Ray, Culture Coordinator (with enclosures)





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
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August 8, 2012

In Reply Refer To:  
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NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Richard A. Anduze, Archaeologist  
Salt River Project  
M.S. PAB 352  
P.O. Box 52025  
Phoenix, Arizona 85072-2025

Dear Mr. Anduze:

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4

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Sincerely yours,

  
for Karla S. Petty  
Division Administrator

  
Signature for SRP Concurrence  
NH-202-D(ADY)

24 August 2012  
Date

Enclosures





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Ms. Sherry Cordova, Chairwoman  
Cocopah Tribe  
County 15th & Avenue G  
Somerton, Arizona 85350

Dear Chairwoman Cordova:

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Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab Band of Paiute Indians, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai-Apache Nation.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

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The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

FHWA is inquiring whether you have any concerns regarding historic properties of traditional, religious, cultural, or historical importance to your community within the project area. Any information you provide within 30 days of receipt of this letter will be considered in the project planning. If your office opts to participate in cultural resource consultation at a later date, FHWA will make a good faith effort to address your concerns.

In 1989, Archaeological Consulting Service, Ltd. (ACS), surveyed the APE in its entirety (Adams 1989). The results were reported in *An Archaeological Assessment of the Proposed South Mountain State Planning Permit Project for Burns International, Inc.* (Adams 1989). No sites were identified.

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Sincerely yours,

Rebecca Swiecki

Karla S. Petty  
Division Administrator

  
Signature for Cocopah Tribe Concurrence  
NH-202-D(ADY)

Date 8/27/12

Enclosure

cc:  
H. Jill McCormick, Cultural Resources Manager (with enclosures)  
RSwiecki  
LDavis (EM02)  
RSwiecki:cdm





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
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August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
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TRACS No. 202L MA 054 H5764 01C  
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Continuing Section 106 Consultation  
Chandler Boulevard Extension

Ms. Michelle Dodds  
CLG Contact, Historic Preservation Office  
City of Phoenix  
200 West Washington, 3rd Floor  
Phoenix, Arizona 85003

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Sincerely yours,



for Karla S. Petty  
Division Administrator

SEP 4 - 2012



Signature for City of Phoenix Concurrence  
Historic Preservation Office  
NH-202-D(ADY)

8-29-12  
Date

Enclosures

cc:  
Jodey Elsner, M.A. Historian, COP Historic Preservation Office, 200 W. Washington Street, 3rd floor, Phoenix, AZ 85003 (with enclosures)





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
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August 8, 2012

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TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Rich Dlugas, Chandler City Manager  
City Manager's Office  
P.O. Box 4008, Mail Stop 605  
Chandler, Arizona 85244-4008

Dear Mr. Dlugas:

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Site AZ T:12:286 (ASM) was found as described by Desert in 2008, in good condition, and with no new disturbances. FHWA recommends that the site is eligible for inclusion in the NRHP under Criterion D for its potential to contribute information on prehistoric agricultural practices.

The condition of site AZ T:12:287 (ASM) has changed since its 2008 recording. The petroglyph rock has been turned upside down so that the glyph is face down and the top is painted with graffiti. Also, some of the rocks in the outer circle had been shifted. The surrounding area has also been disturbed by off-road vehicles. Because the site could not be placed within a definable temporal context, FHWA recommends that AZ T:12:287 (ASM) is not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommends continuing consultation with the GRIC's Tribal Historic Preservation Office to confirm its status as a potential traditional cultural property and regarding its management. Because sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM) are not located within the construction footprint of the Chandler Boulevard Extension and therefore can be avoided, neither site would be directly impacted. Furthermore, the construction of the Chandler Boulevard Extension would not increase the potential for significant indirect effects because they are already easily accessible given their location near existing roads, hiking trails, and residential development.

Based on the above, FHWA has determined that a finding of "no adverse effect" is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If you agree with the adequacy of the report and FHWA's recommendations of NRHP eligibility

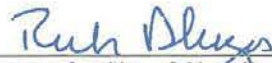
and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,



SEP 11 2012

Karla S. Petty  
Division Administrator

  
Signature for City of Chandler Concurrence  
NH-202-D(ADY)

9-10-12  
Date

Enclosures





## GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2140, SACATON, AZ 85147

### TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162  
Fax: (520) 562-5083

September 10, 2012

Karla S. Petty, Division Administrator  
U. S. Department of Transportation  
Federal Highway Administration, Arizona Division  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012-3500

RE: NH-202-D(ADY) TRACS No. 202L MA 054 H5764 01C 202L, South Mountain Freeway, DCR and EIS, National Historic Preservation Act Continuing 106 Chandler Boulevard Extension

Dear Ms. Petty,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received your consultation documents dated August 8, 2012. The documents describe a Federal Highway Administration (FHWA) and Arizona Department of Transportation (AZDOT) undertaking to extend Chandler Boulevard between 19<sup>th</sup> Avenue and 27<sup>th</sup> Avenue. This report is one in a series of technical reports supporting the 202 Loop, South Mountain Freeway, Environmental Impact Statement (EIS)/Design Concept Report (DCR). The project location is on the northern edge of District 6 of the Gila River Indian Community (Community), but entirely off Community lands. The extension of Chandler Boulevard is intended to provide access to residential subdivisions in the area. The construction zone area of potential effect (APE) will vary between 200 to 400 feet wide by 6,230 feet between 19<sup>th</sup> and 27<sup>th</sup> Avenues. The APE and surrounding areas have been archaeologically surveyed in 1989, 2000, 2008, and 2012. The 2012 survey covered a total area of 36.8 acres in size.

Three archaeological sites have been recorded near and within the APE: AZ:T:12:111(ASM) is described as a historic mine site with a rock ring, prospecting pit, tailings pile and a cleared area. The site was not considered a Register eligible property; AZ:T:12:286(ASM) a prehistoric agricultural site consisting of clusters/piles of rock. The site was considered an Register eligible property under Criterion D of the National Historic Preservation Act (NHPA); and AZ:T:12:287(ASM) an undated site consisting of two rock features and an etched deer(?) petroglyph on a small, potentially portable boulder. The site was not considered a Register eligible property. During the 2012 survey, these sites were relocated and reassessed. AZT:12:111(ASM) could not be relocated and was likely destroyed by the construction of a City of Phoenix waterline through the area. Site AZ:T:12:286(ASM) is still an intact cultural resource, outside of

the APE and is still considered Register eligible. AZ:T:12:287(ASM) has been impacted by off-road vehicles. The petroglyph boulder was turned over and the top covered with graffiti and some of the circular rock features have been disturbed through realignments of the stone. In 2008 Barnaby V. Lewis and J. Andrew Darling were consulted in regards to the site, and both confirmed that the site is an historic O'odham shrine. The site is still not considered a Register eligible property. Based upon this evidence, the FHWA has made a determination of no adverse effect for this part of the South Mountain 202 Loop Freeway project.

The GRIC-THPO concurs with a finding of no adverse effect for the undertaking. A site visit to AZ:12:287(ASM) is recommended in order to assess damage to the site. Perhaps collection of the petroglyph boulder should be considered before the petroglyph boulder is lost through accumulated disturbance to the site and/or theft.

The GRIC reiterates the cultural significance of South Mountain to the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'odham Nation). O'odham oral history and religion defines our life and relationship to the natural world and the cultural landscape. Akimel O'odham and Pee Posh oral histories, religion, creation stories, ceremonial practices, and the concepts of power and sacred places are inseparably tied to every part of the natural environment. Sacred places and Traditional Cultural Places (TCPs) must be treated with reverence and respect.

The GRIC-THPO looks forward to continuing consultation regarding the proposed 202 Loop. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,

Barnaby V. Lewis  
Tribal Historic Preservation Officer  
Gila River Indian Community





# ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Dr. Beth Grindell, Director  
P.O. Box 210026  
Arizona State Museum  
University of Arizona  
Tucson, Arizona 85721-0026

Dear Dr. Grindell:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum (ASM), the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

2

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

The proposed Chandler Boulevard Extension is located in Section 36 of Township 1 South and Range 2 East. The land in Section 36 north of the existing City of Phoenix water line is owned by the City of Phoenix. The land in Section 36 south of the water line is administered by ASLD.

The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

In 1989, Archaeological Consulting Service, Ltd. (ACS), surveyed the APE in its entirety (Adams 1989). The results were reported in *An Archaeological Assessment of the Proposed South Mountain State Planning Permit Project for Burns International, Inc.* (Adams 1989). No sites were identified.

In 2000, Logan Simpson Design (LSD) performed an archaeological survey for a City of Phoenix water line which covered a 20-m-wide corridor along the centerline of the Chandler Boulevard Extension. The results are reported in *A Class I Inventory and A Class III Cultural Resources Survey for the City of Phoenix Waterline Route Around the Western and Southern Edges of South Mountain Park, Maricopa County, Arizona* (Shaw 2000). LSD recorded one site in the APE. Site AZ T:12:111 (ASM) is a historic mining site that include four features: a collapsed rock ring, a prospecting pit, a tailings pile, and a cleared area. The site was recommended as not eligible for inclusion in the National Register of Historic Places (NRHP).

In 2008, Desert Archaeology, Inc. (Desert) performed a Class III survey that covered the portion of the APE north of the centerline. The results are reported in *Cultural Resources Survey of 237 Acres Within the 620 Property, South of South Mountain Park, Phoenix, Arizona* (Darby and Bagwell 2008). Desert identified two sites near the proposed construction footprint for the Chandler Extension, AZ T:12:286 (ASM) and AZ T:12:287 (ASM). Because of their proximity to the construction footprint, the sites were included in the APE for the consideration of indirect effects, such as alterations to visual setting and the potential for vandalism as a result of increased access provided by the new roadway.



Site AZ T:12:286 (ASM) is a possible prehistoric agricultural site consisting of a set of rock clusters/piles. Desert recommended that the site was eligible for inclusion in the NRHP under Criterion D for its potential to yield information about prehistoric land use practices at the margins of the middle Gila River Valley.

Site AZ T:12:287 (ASM) consists of two rock features, one with a petroglyph on a portable stone at the center. The petroglyph is etched on to the stone, not pecked. The site lacks diagnostic artifacts and the age of the features is uncertain; the possibility exists that they are of modern origin. Given that the temporal context of AZ T:12:287 (ASM) was unknown, and that additional investigations of the features was unlikely to uncover this information, Desert could not establish a relevant historic context for the site, and therefore recommended that it was not eligible for inclusion in the NRHP. Desert also recommended that this type of site could represent a contemporary O’odham shrine. As discussed in the report, a meeting took place on August 28, 2008 between representatives from GRIC’s Cultural Resources Management Program (CRMP) and the City of Phoenix archaeologist to discuss the site. The CRMP representatives agreed it was probably a historic O’odham shrine.

Because the initial survey of the Chandler Boulevard Extension had been performed in 1989, and previously undocumented sites had been recorded in the area by more recent surveys, ADOT requested that HDR Engineering, Inc. (HDR) perform a new Class III survey of the APE. The results are reported in *A Class III Cultural Resources Survey for the Chandler Boulevard Extension, 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). No new sites were identified. The survey confirmed that AZ T:12:111 (ASM) had been obliterated by the City of Phoenix water line project. The survey also documented the condition of sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM).

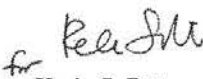
Site AZ T:12:286 (ASM) was found as described by Desert in 2008, in good condition, and with no new disturbances. FHWA recommends that the site is eligible for inclusion in the NRHP under Criterion D for its potential to contribute information on prehistoric agricultural practices.


The condition of site AZ T:12:287 (ASM) has changed since its 2008 recording. The petroglyph rock has been turned upside down so that the glyph is face down and the top is painted with graffiti. Also, some of the rocks in the outer circle had been shifted. The surrounding area has also been disturbed by off-road vehicles. Because the site could not be placed within a definable temporal context, FHWA recommends that AZ T:12:287 (ASM) is not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommends continuing consultation with the GRIC’s Tribal Historic Preservation Office to confirm its status as a potential traditional cultural property and regarding its management. Because sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM) are not located within the construction footprint of the Chandler Boulevard Extension and therefore can be avoided, neither site would be directly impacted. Furthermore, the construction of the Chandler Boulevard Extension would not increase the potential for significant indirect effects because they are already easily accessible given their location near existing roads, hiking trails, and residential development.

Based on the above, FHWA has determined that a finding of “no adverse effect” is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If you agree with the adequacy of the report and FHWA’s recommendations of NRHP eligibility

and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

  
Karla S. Petty  
Division Administrator

  
Signature for ASM Concurrence  
NH-202-D(ADY)

  
Date

Enclosures





ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
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Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

September 6, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Project Effect on the Dobbins Road Historic Properties

Dr. David Jacobs, Compliance Specialist  
State Historic Preservation Office  
Arizona State Parks  
1300 West Washington  
Phoenix, Arizona 85007

Re: SHPO 2003-1890 (106135)

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Most recently FHWA consulted on a reassessment of historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen. SHPO concurred to the reassessment (Jacobs [SHPO] to Petty [FHWA], July 16, 2012).

Consulting parties for this reevaluation of project effect on the Dobbins Road historic properties include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The purpose of this consultation is to address the project effects of four alternative alignments near these historic properties. AZTEC Engineering Group, Inc. recently prepared a report that assesses the direct and indirect effects from the four alignments on the historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue entitled *South Mountain Transportation Corridor Study: Assessment of Project Effects on Three Historic Buildings and a District, Maricopa County, Arizona* (Solliday 2012). A copy of the report is enclosed for your review and comments.

Historic Properties

Four historic properties have been identified near the Dobbins Road/59<sup>th</sup> Avenue intersection. These include:

- 1) Hudson Farm Historic District, ca. 1926, Criterion A
- 2) Hudson Farm - Cement Stave Silos, 1949, Criterion C
- 3) Hackin Farmstead/Dairy - Dairy Flat Barn, 1952, Criterion C
- 4) Tyson Farmstead/Barnes Dairy - Dairy Head-to-Toe Barn, 1951, Criterion C

Alternatives

The four alternatives near these historic properties are:

- 1) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Elevated Freeway
- 2) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Semi-Depressed Freeway
- 3) 62<sup>nd</sup> Avenue Alignment Half Diamond - Elevated Freeway
- 4) 62<sup>nd</sup> Avenue Alignment Half Diamond - Semi-Depressed Freeway

Project Effect

Direct Impact

All four of the alignment alternatives currently under consideration adequately avoid the Hudson Farm, the Dairy Flat Barn on the Hackin Farmstead/Dairy, and the Dairy Head-to-Toe Barn on the Tyson Farmstead/Barnes Dairy; none of the properties is located within the proposed ADOT right-of-way (ROW). However, the two semi-depressed freeway alternatives would require a realignment of access to the Tyson/Barnes barn. There would be a no adverse effect on the Tyson/Barnes barn as a result of the access modification.

Indirect Impact

Each of the four alignment alternatives would have a similar impact on the **Hudson Farm Historic District**. The freeway would be at least 200 feet west of the Hudson Farm property and 1,500 feet west of 59<sup>th</sup> Avenue, and the setting of the farmstead (farmhouse and associated structures) from the primary public view (from 59<sup>th</sup> Avenue) or from within the farmstead would be buffered by the dense windbreak of trees located on the north and west sides of the farmstead. The freeway would be more visibly intrusive from the secondary public view (from Dobbins Road) and from some places in the fields associated with the property, but these vantage points do not provide a view of the district's significant features, i.e., the farmstead buildings and structures seen within the context of the whole farm. A drainage basin adjacent to the southern boundary of the Hudson Farm would not be visible from the primary public view or from within the farmstead. Thus, any visual intrusion created by the project would be negligible and would not impact the National Register eligibility of the Hudson Farm or any of its contributing elements.

- There would be no adverse effect on the Hudson Farm due to general visual intrusion.
- There would be no adverse effect on the Hudson Farm due to increased traffic noise.
- There would be no adverse effect on the Hudson Farm due to nighttime lighting.



The freeway would pass approximately 1,500 feet west of the **Hackin barn**, 1,000 feet west of the **Hudson Farm silos**, and 10 feet east of the **Tyson/Barnes Dairy barn**. Since integrity of design, materials, workmanship, and association are most important for these property types, their National Register eligibility would not be impacted by a change in setting. Likewise, the placement of a drainage basin to the south and west of the **Hackin barn** would not impact its integrity of design, materials, workmanship, and association.

- There would be no adverse effect on the individually eligible properties due to general visual intrusion.
- There would be no adverse effect on the individually eligible properties due to increased traffic noise.
- There would be no adverse effect on the individually eligible properties due to nighttime lighting.

Summary of Indirect Impacts to the Dobbins Road Historic Properties

Property Name and Address	Primary Criterion	Collapsed Diamond – Elevated Freeway	Collapsed Diamond – Semi-Depressed Freeway	Half Diamond – Elevated Freeway	Half Diamond – Semi-Depressed Freeway
Eligible Historic Districts					
Hudson Farm 9300 S. 59 <sup>th</sup> Avenue	A	No adverse	No adverse	No adverse	No adverse
Individually Eligible Historic Buildings					
Hudson Farm - Cement Stave Silos 9300 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Hackin Farmstead/Dairy – Dairy Flat Barn 10048 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Tyson Farmstead/Barnes Dairy – Dairy Head-to-Toe Barn 6159 W. Dobbins Road	C	No adverse	No adverse	No adverse	No adverse

Cumulative Impacts

The City of Phoenix has designated this area as the core area of “downtown” Laveen. Local landowners have expressed a desire to develop their properties for commercial and/or residential uses. Housing developments and some associated commercial centers have been constructed nearby; the advancement of this urbanization was slowed only by the economic collapse. Some adjacent landowners have recently had their property reclassified for either commercial or residential property use. Therefore, it is highly likely that future development by the private landowners would also lead to the destruction of the agricultural properties and the historical setting of rural Laveen.

The construction of a freeway through the South Mountain Corridor would accelerate urbanization and likely encourage more commercial and industrial development rather than the predominantly residential construction that has occurred to date. However, since ADOT, the City of Phoenix, landowners, and developers are all planning for future development in the area, it is difficult to determine what the specific agent of change is. Cumulatively, the future development and construction of the freeway has the potential to contribute to an adverse cumulative affect the **Hudson Farm and silos**, **Hackin barn**, and **Tyson/Barnes barn**.

Continuing Cultural Resource Management

In order to proactively address the potential indirect and cumulative adverse effects described above, FHWA and ADOT would document the Hudson Farm Historic District and silos, the Hackin barn, and the Tyson/Barnes barn in a Historic Landscape report. The report would be consistent with the SHPO Standards for Documentation of Historic Properties. For each of the properties this documentation would at a minimum include a descriptive narrative of the property, maps showing geographic location and contextual relationships with other structures and the surrounding landscape, reproductions of original plans/engineering drawings or prepared drawings (or creation of plans/drawings if the originals cannot be found), and photo documentation.

Please review the information provided in this letter, the attached project location maps, and enclosed report. If you agree with the adequacy of the report and agree with FHWA’s revised determination of project effect for each alignment and proposed documentation of the historic properties please indicate your concurrence by signing below and return to FHWA. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [LDavis2@azdot.gov](mailto:LDavis2@azdot.gov).

Sincerely yours,



Karla S. Petty  
Division Administrator

Signature for SHPO Concurrence  
NH-202-D(ADY)

Date

Enclosures





**SHPO-2003-1890 (107733)**  
**ARIZONA DIVISION**  
 4000 North Central Avenue  
 Suite 1500  
 Phoenix, Arizona 85012-3500  
 (602) 379-3646  
 Fax: (602) 382-8998  
<http://www.fhwa.dot.gov/azdiv/index.htm>

September 6, 2012

In Reply Refer To:  
 NH-202-D(ADY)  
 HOP-AZ

NH-202-D(ADY)  
 TRACS No.: 202L MA 54 H5764 01L  
 202L South Mountain Freeway DCR and EIS  
 Continuing Section 106 Consultation  
 Project Effect on the Dobbins Road Historic Properties

Dr. David Jacobs, Compliance Specialist  
 State Historic Preservation Office  
 Arizona State Parks  
 1300 West Washington  
 Phoenix, Arizona 85007

Re: SHPO 2003-1890 (106135)

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Most recently FHWA consulted on a reassessment of historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen. SHPO concurred to the reassessment (Jacobs [SHPO] to Petty [FHWA], July 16, 2012).

Consulting parties for this reevaluation of project effect on the Dobbins Road historic properties include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The purpose of this consultation is to address the project effects of four alternative alignments near these historic properties. AZTEC Engineering Group, Inc. recently prepared a report that assesses the direct and indirect effects from the four alignments on the historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue entitled *South Mountain Transportation Corridor Study: Assessment of Project Effects on Three Historic Buildings and a District, Maricopa County, Arizona* (Solliday 2012). A copy of the report is enclosed for your review and comments.

RECEIVED  
 SEP 10 2012  
 ARIZONA STATE PARKS/SHPO

2

## Historic Properties

Four historic properties have been identified near the Dobbins Road/59<sup>th</sup> Avenue intersection. These include:

- 1) Hudson Farm Historic District, ca. 1926, Criterion A
- 2) Hudson Farm - Cement Stave Silos, 1949, Criterion C
- 3) Hackin Farmstead/Dairy - Dairy Flat Barn, 1952, Criterion C
- 4) Tyson Farmstead/Barnes Dairy - Dairy Head-to-Toe Barn, 1951, Criterion C

## Alternatives

The four alternatives near these historic properties are:

- 1) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Elevated Freeway
- 2) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Semi-Depressed Freeway
- 3) 62<sup>nd</sup> Avenue Alignment Half Diamond - Elevated Freeway
- 4) 62<sup>nd</sup> Avenue Alignment Half Diamond - Semi-Depressed Freeway

## Project Effect

### Direct Impact

All four of the alignment alternatives currently under consideration adequately avoid the Hudson Farm, the Dairy Flat Barn on the Hackin Farmstead/Dairy, and the Dairy Head-to-Toe Barn on the Tyson Farmstead/Barnes Dairy; none of the properties is located within the proposed ADOT right-of-way (ROW). However, the two semi-depressed freeway alternatives would require a realignment of access to the Tyson/Barnes barn. There would be a no adverse effect on the Tyson/Barnes barn as a result of the access modification.

*finding of effect*

### Indirect Impact

Each of the four alignment alternatives would have a similar impact on the **Hudson Farm Historic District**. The freeway would be at least 200 feet west of the Hudson Farm property and 1,500 feet west of 59<sup>th</sup> Avenue, and the setting of the farmstead (farmhouse and associated structures) from the primary public view (from 59<sup>th</sup> Avenue) or from within the farmstead would be buffered by the dense windbreak of trees located on the north and west sides of the farmstead. The freeway would be more visibly intrusive from the secondary public view (from Dobbins Road) and from some places in the fields associated with the property, but these vantage points do not provide a view of the district's significant features, i.e., the farmstead buildings and structures seen within the context of the whole farm. A drainage basin adjacent to the southern boundary of the Hudson Farm would not be visible from the primary public view or from within the farmstead. Thus, any visual intrusion created by the project would be negligible and would not impact the National Register eligibility of the Hudson Farm or any of its contributing elements.

- There would be no adverse effect on the Hudson Farm due to general visual intrusion.
- There would be no adverse effect on the Hudson Farm due to increased traffic noise.
- There would be no adverse effect on the Hudson Farm due to nighttime lighting.



\*

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The freeway would pass approximately 1,500 feet west of the **Hackin barn**, 1,000 feet west of the **Hudson Farm silos**, and 10 feet east of the **Tyson/Barnes Dairy barn**. Since integrity of design, materials, workmanship, and association are most important for these property types, their National Register eligibility would not be impacted by a change in setting. Likewise, the placement of a drainage basin to the south and west of the **Hackin barn** would not impact its integrity of design, materials, workmanship, and association.

- There would be no adverse effect on the individually eligible properties due to general visual intrusion.
- There would be no adverse effect on the individually eligible properties due to increased traffic noise.
- There would be no adverse effect on the individually eligible properties due to nighttime lighting.

Summary of Indirect Impacts to the Dobbins Road Historic Properties

Property Name and Address	Primary Criterion	Collapsed Diamond – Elevated Freeway	Collapsed Diamond – Semi-Depressed Freeway	Half Diamond – Elevated Freeway	Half Diamond – Semi-Depressed Freeway
<b>Eligible Historic Districts</b>					
Hudson Farm 9300 S. 59 <sup>th</sup> Avenue	A	No adverse	No adverse	No adverse	No adverse
<b>Individually Eligible Historic Buildings</b>					
Hudson Farm - Cement Stave Silos 9300 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Hackin Farmstead/Dairy – Dairy Flat Barn 10048 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Tyson Farmstead/Barnes Dairy – Dairy Head-to-Toe Barn 6159 W. Dobbins Road	C	No adverse	No adverse	No adverse	No adverse

Cumulative Impacts

The City of Phoenix has designated this area as the core area of “downtown” Laveen. Local landowners have expressed a desire to develop their properties for commercial and/or residential uses. Housing developments and some associated commercial centers have been constructed nearby; the advancement of this urbanization was slowed only by the economic collapse. Some adjacent landowners have recently had their property reclassified for either commercial or residential property use. Therefore, it is highly likely that future development by the private landowners would also lead to the destruction of the agricultural properties and the historical setting of rural Laveen.

The construction of a freeway through the South Mountain Corridor would accelerate urbanization and likely encourage more commercial and industrial development rather than the predominantly residential construction that has occurred to date. However, since ADOT, the City of Phoenix, landowners, and developers are all planning for future development in the area, it is difficult to determine what the specific agent of change is. Cumulatively, the future development and construction of the freeway has the potential to contribute to an adverse cumulative affect the **Hudson Farm and silos**, **Hackin barn**, and **Tyson/Barnes barn**.

Continuing Cultural Resource Management

In order to proactively address the potential indirect and cumulative adverse effects described above, FHWA and ADOT would document the Hudson Farm Historic District and silos, the Hackin barn, and the Tyson/Barnes barn in a Historic Landscape report. The report would be consistent with the SHPO Standards for Documentation of Historic Properties. For each of the properties this documentation would at a minimum include a descriptive narrative of the property, maps showing geographic location and contextual relationships with other structures and the surrounding landscape, reproductions of original plans/engineering drawings or prepared drawings (or creation of plans/drawings if the originals cannot be found), and photo documentation.

Please review the information provided in this letter, the attached project location maps, and enclosed report. If you agree with the adequacy of the report and agree with FHWA’s revised determination of project effect for each alignment and proposed documentation of the historic properties please indicate your concurrence by signing below and return to FHWA. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [LDavis2@azdot.gov](mailto:LDavis2@azdot.gov).

Sincerely yours,

*Karla S. Petty*  
for  
Karla S. Petty  
Division Administrator

SEP 18 2012

*Linda Davis*  
Signature for SHPO Concurrence  
NH-202-D(ADY)

*14 SEPT 12*  
Date

Enclosures

CC: Linda Davis, ADOT





U.S. Department  
of Transportation  
Federal Highway  
Administration

# ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
(602) 379-3646  
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September 6, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L, South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Project Effect on the Dobbins Road Historic Properties

Mr. Steve Ross, Cultural Resources Manager  
Arizona State Land Department  
1616 West Adams  
Phoenix, Arizona 85007

Dear Mr. Ross:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Most recently FHWA consulted on a reassessment of historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen. SHPO concurred to the reassessment (Jacobs [SHPO] to Petty [FHWA], July 16, 2012).

Consulting parties for this reevaluation of project effect on the Dobbins Road historic properties include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The purpose of this consultation is to address the project effects of four alternative alignments near these historic properties. AZTEC Engineering Group, Inc. recently prepared a report that assesses the direct and indirect effects from the four alignments on the historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue entitled *South Mountain Transportation Corridor Study: Assessment of Project Effects on Three Historic Buildings and a District, Maricopa County, Arizona* (Soliliday 2012). A copy of the report is enclosed for your review and comments.

4

## Continuing Cultural Resource Management

In order to proactively address the potential indirect and cumulative adverse effects described above, FHWA and ADOT would document the Hudson Farm Historic District and silos, the Hackin barn, and the Tyson/Barnes barn in a Historic Landscape report. The report would be consistent with the SHPO Standards for Documentation of Historic Properties. For each of the properties this documentation would at a minimum include a descriptive narrative of the property, maps showing geographic location and contextual relationships with other structures and the surrounding landscape, reproductions of original plans/engineering drawings or prepared drawings (or creation of plans/drawings if the originals cannot be found), and photo documentation.

Please review the information provided in this letter, the attached project location maps, and enclosed report. If you agree with the adequacy of the report and agree with FHWA's revised determination of project effect for each alignment and proposed documentation of the historic properties please indicate your concurrence by signing below and return to FHWA. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [L.Davis2@azdot.gov](mailto:L.Davis2@azdot.gov).

Sincerely yours,

*Karla S. Petty*  
for Karla S. Petty  
Division Administrator

*NAA*  
Signature for ASLD Concurrence  
NH-202-D(ADY)

*9/20/2012*  
Date

Enclosures

cc:  
Rueben Ojeda, Manager, Right-of-way Section





## ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
Phone: (602) 379-3646  
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<http://www.fhwa.dot.gov/azdiv/index.htm>

August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Mr. Garry Cantley, Western Regional Archaeologist  
Bureau of Indian Affairs  
2600 North Central Avenue, Suite 400  
MS-620EQS  
Phoenix, Arizona 85004-3008

Dear Mr. Cantley:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs (BIA), the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern



2

Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

The proposed Chandler Boulevard Extension is located in Section 36 of Township 1 South and Range 2 East. The land in Section 36 north of the existing City of Phoenix water line is owned by the City of Phoenix. The land in Section 36 south of the water line is administered by ASLD.

The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

In 1989, Archaeological Consulting Service, Ltd. (ACS), surveyed the APE in its entirety (Adams 1989). The results were reported in *An Archaeological Assessment of the Proposed South Mountain State Planning Permit Project for Burns International, Inc.* (Adams 1989). No sites were identified.

In 2000, Logan Simpson Design (LSD) performed an archaeological survey for a City of Phoenix water line which covered a 20-m-wide corridor along the centerline of the Chandler Boulevard Extension. The results are reported in *A Class I Inventory and A Class III Cultural Resources Survey for the City of Phoenix Waterline Route Around the Western and Southern Edges of South Mountain Park, Maricopa County, Arizona* (Shaw 2000). LSD recorded one site in the APE. Site AZ T:12:111 (ASM) is a historic mining site that include four features: a collapsed rock ring, a prospecting pit, a tailings pile, and a cleared area. The site was recommended as not eligible for inclusion in the National Register of Historic Places (NRHP).

In 2008, Desert Archaeology, Inc. (Desert) performed a Class III survey that covered the portion of the APE north of the centerline. The results are reported in *Cultural Resources Survey of 237 Acres Within the 620 Property, South of South Mountain Park, Phoenix, Arizona* (Darby and Bagwell 2008). Desert identified two sites near the proposed construction footprint for the Chandler Extension, AZ T:12:236 (ASM) and AZ T:12:287 (ASM). Because of their proximity to the construction footprint, the sites were included in the APE for the consideration of indirect effects, such as alterations to visual setting and the potential for vandalism as a result of increased access provided by the new roadway.



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Site AZ T:12:286 (ASM) is a possible prehistoric agricultural site consisting of a set of rock clusters/piles. Desert recommended that the site was eligible for inclusion in the NRHP under Criterion D for its potential to yield information about prehistoric land use practices at the margins of the middle Gila River Valley.

Site AZ T:12:287 (ASM) consists of two rock features, one with a petroglyph on a portable stone at the center. The petroglyph is etched on to the stone, not pecked. The site lacks diagnostic artifacts and the age of the features is uncertain; the possibility exists that they are of modern origin. Given that the temporal context of AZ T:12:287 (ASM) was unknown, and that additional investigations of the features was unlikely to uncover this information, Desert could not establish a relevant historic context for the site, and therefore recommended that it was not eligible for inclusion in the NRHP. Desert also recommended that this type of site could represent a contemporary O'odham shrine. As discussed in the report, a meeting took place on August 28, 2008 between representatives from GRIC's Cultural Resources Management Program (CRMP) and the City of Phoenix archaeologist to discuss the site. The CRMP representatives agreed it was probably a historic O'odham shrine.

Because the initial survey of the Chandler Boulevard Extension had been performed in 1989, and previously undocumented sites had been recorded in the area by more recent surveys, ADOT requested that HDR Engineering, Inc. (HDR) perform a new Class III survey of the APE. The results are reported in *A Class III Cultural Resources Survey for the Chandler Boulevard Extension, 2021, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). No new sites were identified. The survey confirmed that AZ T:12:111 (ASM) had been obliterated by the City of Phoenix water line project. The survey also documented the condition of sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM).

Site AZ T:12:286 (ASM) was found as described by Desert in 2008, in good condition, and with no new disturbances. FHWA recommends that the site is eligible for inclusion in the NRHP under Criterion D for its potential to contribute information on prehistoric agricultural practices.

The condition of site AZ T:12:287 (ASM) has changed since its 2008 recording. The petroglyph rock has been turned upside down so that the glyph is face down and the top is painted with graffiti. Also, some of the rocks in the outer circle had been shifted. The surrounding area has also been disturbed by off-road vehicles. Because the site could not be placed within a definable temporal context, FHWA recommends that AZ T:12:287 (ASM) is not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommends continuing consultation with the GRIC's Tribal Historic Preservation Office to confirm its status as a potential traditional cultural property and regarding its management. Because sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM) are not located within the construction footprint of the Chandler Boulevard Extension and therefore can be avoided, neither site would be directly impacted. Furthermore, the construction of the Chandler Boulevard Extension would not increase the potential for significant indirect effects because they are already easily accessible given their location near existing roads, hiking trails, and residential development.

Based on the above, FHWA has determined that a finding of "no adverse effect" is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If

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you agree with the adequacy of the report and FHWA's recommendations of NRHP eligibility and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

*Karla S. Petty*

Karla S. Petty  
Division Administrator

SEP 27 2012

AUG 28 2012

*Matthew W. Hain*  
Signature for BIA Concurrence  
NH-202-D(ADY)

Date *9/21/12*

Enclosures





ARIZONA DIVISION

4000 North Central Avenue  
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Phoenix, Arizona 85012-3500  
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September 6, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Project Effect on the Dobbins Road Historic Properties

Mr. Richard Anduze, Archaeologist  
Salt River Project  
P.O. Box 52025, Mail Sta PAB3552  
Phoenix, Arizona 85072-2025

Dear Mr. Anduze:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Most recently FHWA consulted on a reassessment of historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen. SHPO concurred to the reassessment (Jacobs [SHPO] to Petty [FHWA], July 16, 2012).

Consulting parties for this reevaluation of project effect on the Dobbins Road historic properties include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The purpose of this consultation is to address the project effects of four alternative alignments near these historic properties. AZTEC Engineering Group, Inc. recently prepared a report that assesses the direct and indirect effects from the four alignments on the historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue entitled *South Mountain Transportation Corridor Study: Assessment of Project Effects on Three Historic Buildings and a District, Maricopa County, Arizona* (Solliday 2012). A copy of the report is enclosed for your review and comments.

Historic Properties

Four historic properties have been identified near the Dobbins Road/59<sup>th</sup> Avenue intersection. These include:

- 1) Hudson Farm Historic District, ca. 1926, Criterion A
- 2) Hudson Farm - Cement Stave Silos, 1949, Criterion C
- 3) Hackin Farmstead/Dairy – Dairy Flat Barn , 1952, Criterion C
- 4) Tyson Farmstead/Barnes Dairy – Dairy Head-to-Toe Barn, 1951, Criterion C

Alternatives

The four alternatives near these historic properties are:

- 1) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond – Elevated Freeway
- 2) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond – Semi-Depressed Freeway
- 3) 62<sup>nd</sup> Avenue Alignment Half Diamond – Elevated Freeway
- 4) 62<sup>nd</sup> Avenue Alignment Half Diamond – Semi-Depressed Freeway

Project Effect

Direct Impact

All four of the alignment alternatives currently under consideration adequately avoid the Hudson Farm, the Dairy Flat Barn on the Hackin Farmstead/Dairy, and the Dairy Head-to-Toe Barn on the Tyson Farmstead/Barnes Dairy; none of the properties is located within the proposed ADOT right-of-way (ROW). However, the two semi-depressed freeway alternatives would require a realignment of access to the Tyson/Barnes barn. There would be a no adverse effect on the Tyson/Barnes barn as a result of the access modification.

Indirect Impact

Each of the four alignment alternatives would have a similar impact on the **Hudson Farm Historic District**. The freeway would be at least 200 feet west of the Hudson Farm property and 1,500 feet west of 59<sup>th</sup> Avenue, and the setting of the farmstead (farmhouse and associated structures) from the primary public view (from 59<sup>th</sup> Avenue) or from within the farmstead would be buffered by the dense windbreak of trees located on the north and west sides of the farmstead. The freeway would be more visibly intrusive from the secondary public view (from Dobbins Road) and from some places in the fields associated with the property, but these vantage points do not provide a view of the district's significant features, i.e., the farmstead buildings and structures seen within the context of the whole farm. A drainage basin adjacent to the southern boundary of the Hudson Farm would not be visible from the primary public view or from within the farmstead. Thus, any visual intrusion created by the project would be negligible and would not impact the National Register eligibility of the Hudson Farm or any of its contributing elements.

- There would be no adverse effect on the Hudson Farm due to general visual intrusion.
- There would be no adverse effect on the Hudson Farm due to increased traffic noise.
- There would be no adverse effect on the Hudson Farm due to nighttime lighting.



The freeway would pass approximately 1,500 feet west of the **Hackin barn**, 1,000 feet west of the **Hudson Farm silos**, and 10 feet east of the **Tyson/Barnes Dairy barn**. Since integrity of design, materials, workmanship, and association are most important for these property types, their National Register eligibility would not be impacted by a change in setting. Likewise, the placement of a drainage basin to the south and west of the **Hackin barn** would not impact its integrity of design, materials, workmanship, and association.

- There would be no adverse effect on the individually eligible properties due to general visual intrusion.
- There would be no adverse effect on the individually eligible properties due to increased traffic noise.
- There would be no adverse effect on the individually eligible properties due to nighttime lighting.

**Summary of Indirect Impacts to the Dobbins Road Historic Properties**

Property Name and Address	Primary Criterion	Collapsed Diamond – Elevated Freeway	Collapsed Diamond – Semi-Depressed Freeway	Half Diamond – Elevated Freeway	Half Diamond – Semi-Depressed Freeway
<b>Eligible Historic Districts</b>					
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<b>Individually Eligible Historic Buildings</b>					
Hudson Farm - Cement Stave Silos 9300 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
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**Cumulative Impacts**

The City of Phoenix has designated this area as the core area of “downtown” Laveen. Local landowners have expressed a desire to develop their properties for commercial and/or residential uses. Housing developments and some associated commercial centers have been constructed nearby; the advancement of this urbanization was slowed only by the economic collapse. Some adjacent landowners have recently had their property reclassified for either commercial or residential property use. Therefore, it is highly likely that future development by the private landowners would also lead to the destruction of the agricultural properties and the historical setting of rural Laveen.

The construction of a freeway through the South Mountain Corridor would accelerate urbanization and likely encourage more commercial and industrial development rather than the predominantly residential construction that has occurred to date. However, since ADOT, the City of Phoenix, landowners, and developers are all planning for future development in the area, it is difficult to determine what the specific agent of change is. Cumulatively, the future development and construction of the freeway has the potential to contribute to an adverse cumulative affect the **Hudson Farm and silos**, **Hackin barn**, and **Tyson/Barnes barn**.

**Continuing Cultural Resource Management**

In order to proactively address the potential indirect and cumulative adverse effects described above, FHWA and ADOT would document the Hudson Farm Historic District and silos, the Hackin barn, and the Tyson/Barnes barn in a Historic Landscape report. The report would be consistent with the SHPO Standards for Documentation of Historic Properties. For each of the properties this documentation would at a minimum include a descriptive narrative of the property, maps showing geographic location and contextual relationships with other structures and the surrounding landscape, reproductions of original plans/engineering drawings or prepared drawings (or creation of plans/drawings if the originals cannot be found), and photo documentation.

Please review the information provided in this letter, the attached project location maps, and enclosed report. If you agree with the adequacy of the report and agree with FHWA’s revised determination of project effect for each alignment and proposed documentation of the historic properties please indicate your concurrence by signing below and return to FHWA. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [LDavis2@azdot.gov](mailto:LDavis2@azdot.gov).

Sincerely yours,



Karla S. Petty  
Division Administrator

SEP 26 2012

  
Signature for SRP Concurrence  
NH-202-D(ADY)

24 September 2012  
Date

Enclosures





U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**ARIZONA DIVISION**

4000 North Central Avenue  
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August 8, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Ms. Laurene Montero, City Archaeologist  
City of Phoenix  
4619 East Washington  
Phoenix, Arizona 85034

Dear Ms. Montero:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department (ASLD), the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the

2

Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue. The alignment for the proposed Chandler Boulevard Extension follows an existing City of Phoenix water line. The surrounding area is undeveloped.

The proposed Chandler Boulevard Extension is located in Section 36 of Township 1 South and Range 2 East. The land in Section 36 north of the existing City of Phoenix water line is owned by the City of Phoenix. The land in Section 36 south of the water line is administered by ASLD.

The area of potential effects (APE) for the Chandler Boulevard Extension is defined primarily by the proposed construction footprint which includes a 200-foot-wide east-west corridor that extends for 6,230 feet between 19th Avenue and 27th Avenue and short segments at the east and west end where the corridor is 400 feet wide. The footprint also includes a 120-foot-wide north-south corridor that extends for 1,180 feet from the western end of the Chandler Boulevard alignment to the current alignment of Pecos Road. A map of the APE is enclosed to assist you in your review.

In 1989, Archaeological Consulting Service, Ltd. (ACS), surveyed the APE in its entirety (Adams 1989). The results were reported in *An Archaeological Assessment of the Proposed South Mountain State Planning Permit Project for Burns International, Inc.* (Adams 1989). No sites were identified.

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In 2008, Desert Archaeology, Inc. (Desert) performed a Class III survey that covered the portion of the APE north of the centerline. The results are reported in *Cultural Resources Survey of 237 Acres Within the 620 Property, South of South Mountain Park, Phoenix, Arizona* (Darby and Bagwell 2008). Desert identified two sites near the proposed construction footprint for the Chandler Extension, AZ T:12:286 (ASM) and AZ T:12:287 (ASM). Because of their proximity to the construction footprint, the sites were included in the APE for the consideration of indirect effects, such as alterations to visual setting and the potential for vandalism as a result of increased access provided by the new roadway.



Site AZ T:12:286 (ASM) is a possible prehistoric agricultural site consisting of a set of rock clusters/piles. Desert recommended that the site was eligible for inclusion in the NRHP under Criterion D for its potential to yield information about prehistoric land use practices at the margins of the middle Gila River Valley.

Site AZ T:12:287 (ASM) consists of two rock features, one with a petroglyph on a portable stone at the center. The petroglyph is etched on to the stone, not pecked. The site lacks diagnostic artifacts and the age of the features is uncertain; the possibility exists that they are of modern origin. Given that the temporal context of AZ T:12:287 (ASM) was unknown, and that additional investigations of the features was unlikely to uncover this information, Desert could not establish a relevant historic context for the site, and therefore recommended that it was not eligible for inclusion in the NRHP. Desert also recommended that this type of site could represent a contemporary O'odham shrine. As discussed in the report, a meeting took place on August 28, 2008 between representatives from GRIC's Cultural Resources Management Program (CRMP) and the City of Phoenix archaeologist to discuss the site. The CRMP representatives agreed it was probably a historic O'odham shrine.

Because the initial survey of the Chandler Boulevard Extension had been performed in 1989, and previously undocumented sites had been recorded in the area by more recent surveys, ADOT requested that HDR Engineering, Inc. (HDR) perform a new Class III survey of the APE. The results are reported in *A Class III Cultural Resources Survey for the Chandler Boulevard Extension, 202L, South Mountain Freeway EIS & L/DCR Project, Maricopa County, Arizona* (Brodbeck 2012). No new sites were identified. The survey confirmed that AZ T:12:111 (ASM) had been obliterated by the City of Phoenix water line project. The survey also documented the condition of sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM).

Site AZ T:12:286 (ASM) was found as described by Desert in 2008, in good condition, and with no new disturbances. FHWA recommends that the site is eligible for inclusion in the NRHP under Criterion D for its potential to contribute information on prehistoric agricultural practices.


The condition of site AZ T:12:287 (ASM) has changed since its 2008 recording. The petroglyph rock has been turned upside down so that the glyph is face down and the top is painted with graffiti. Also, some of the rocks in the outer circle had been shifted. The surrounding area has also been disturbed by off-road vehicles. Because the site could not be placed within a definable temporal context, FHWA recommends that AZ T:12:287 (ASM) is not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommends continuing consultation with the GRIC's Tribal Historic Preservation Office to confirm its status as a potential traditional cultural property and regarding its management. Because sites AZ T:12:286 (ASM) and AZ T:12:287 (ASM) are not located within the construction footprint of the Chandler Boulevard Extension and therefore can be avoided, neither site would be directly impacted. Furthermore, the construction of the Chandler Boulevard Extension would not increase the potential for significant indirect effects because they are already easily accessible given their location near existing roads, hiking trails, and residential development.

Based on the above, FHWA has determined that a finding of "no adverse effect" is appropriate for this undertaking. Please review the enclosed report and information provided in this letter. If

you agree with the adequacy of the report and FHWA's recommendations of NRHP eligibility and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

  
for Karla S. Petty  
Division Administrator

  
Signature for City of Phoenix Concurrence  
City Archaeologist  
NH-202-D(ADY)

9/26/2012  
Date

Enclosures





ARIZONA DIVISION

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September 6, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Project Effect on the Dobbins Road Historic Properties

Ms. Laurene Montero  
City of Phoenix Archaeologist  
Pueblo Grande Museum  
4619 East Washington  
Phoenix, Arizona 85034

Dear Ms. Montero:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are conducting technical studies in support of the environmental impact statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler and to I-10 in west Phoenix. As this project would employ federal funds, it is considered a federal undertaking subject to Section 106 review.

This project has been the subject of extensive prior consultation (SHPO-2003-1890). Most recently FHWA consulted on a reassessment of historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue in Laveen. SHPO concurred to the reassessment (Jacobs [SHPO] to Petty [FHWA], July 16, 2012).

Consulting parties for this reevaluation of project effect on the Dobbins Road historic properties include FHWA, ADOT, the State Historic Preservation Office (SHPO), the Bureau of Reclamation (Reclamation), the Bureau of Land Management (BLM), the Arizona State Land Department (ASLD), the City of Phoenix-Historic Preservation Office (COP-HPO), the City of Phoenix-Pueblo Grande Museum (COP-PGM), and Salt River Project (SRP).

The purpose of this consultation is to address the project effects of four alternative alignments near these historic properties. AZTEC Engineering Group, Inc. recently prepared a report that assesses the direct and indirect effects from the four alignments on the historic rural properties along Dobbins Road and 59<sup>th</sup> Avenue entitled *South Mountain Transportation Corridor Study: Assessment of Project Effects on Three Historic Buildings and a District, Maricopa County, Arizona* (Solliday 2012). A copy of the report is enclosed for your review and comments.

Historic Properties

Four historic properties have been identified near the Dobbins Road/59<sup>th</sup> Avenue intersection. These include:

- 1) Hudson Farm Historic District, ca. 1926, Criterion A
- 2) Hudson Farm - Cement Stave Silos, 1949, Criterion C
- 3) Hackin Farmstead/Dairy - Dairy Flat Barn, 1952, Criterion C
- 4) Tyson Farmstead/Barnes Dairy - Dairy Head-to-Toe Barn, 1951, Criterion C

Alternatives

The four alternatives near these historic properties are:

- 1) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Elevated Freeway
- 2) 62<sup>nd</sup> Avenue Alignment Collapsed Diamond - Semi-Depressed Freeway
- 3) 62<sup>nd</sup> Avenue Alignment Half Diamond - Elevated Freeway
- 4) 62<sup>nd</sup> Avenue Alignment Half Diamond - Semi-Depressed Freeway

Project Effect

Direct Impact

All four of the alignment alternatives currently under consideration adequately avoid the Hudson Farm, the Dairy Flat Barn on the Hackin Farmstead/Dairy, and the Dairy Head-to-Toe Barn on the Tyson Farmstead/Barnes Dairy; none of the properties is located within the proposed ADOT right-of-way (ROW). However, the two semi-depressed freeway alternatives would require a realignment of access to the Tyson/Barnes barn. There would be a no adverse effect on the Tyson/Barnes barn as a result of the access modification.

Indirect Impact

Each of the four alignment alternatives would have a similar impact on the **Hudson Farm Historic District**. The freeway would be at least 200 feet west of the Hudson Farm property and 1,500 feet west of 59<sup>th</sup> Avenue, and the setting of the farmstead (farmhouse and associated structures) from the primary public view (from 59<sup>th</sup> Avenue) or from within the farmstead would be buffered by the dense windbreak of trees located on the north and west sides of the farmstead. The freeway would be more visibly intrusive from the secondary public view (from Dobbins Road) and from some places in the fields associated with the property, but these vantage points do not provide a view of the district's significant features, i.e., the farmstead buildings and structures seen within the context of the whole farm. A drainage basin adjacent to the southern boundary of the Hudson Farm would not be visible from the primary public view or from within the farmstead. Thus, any visual intrusion created by the project would be negligible and would not impact the National Register eligibility of the Hudson Farm or any of its contributing elements.

- There would be no adverse effect on the Hudson Farm due to general visual intrusion.
- There would be no adverse effect on the Hudson Farm due to increased traffic noise.
- There would be no adverse effect on the Hudson Farm due to nighttime lighting.

The freeway would pass approximately 1,500 feet west of the **Hackin barn**, 1,000 feet west of the **Hudson Farm silos**, and 10 feet east of the **Tyson/Barnes Dairy barn**. Since integrity of design,



materials, workmanship, and association are most important for these property types, their National Register eligibility would not be impacted by a change in setting. Likewise, the placement of a drainage basin to the south and west of the **Hackin barn** would not impact its integrity of design, materials, workmanship, and association.

- There would be no adverse effect on the individually eligible properties due to general visual intrusion.
- There would be no adverse effect on the individually eligible properties due to increased traffic noise.
- There would be no adverse effect on the individually eligible properties due to nighttime lighting.

Summary of Indirect Impacts to the Dobbins Road Historic Properties

Property Name and Address	Primary Criterion	Collapsed Diamond – Elevated Freeway	Collapsed Diamond – Semi-Depressed Freeway	Half Diamond – Elevated Freeway	Half Diamond – Semi-Depressed Freeway
<b>Eligible Historic Districts</b>					
Hudson Farm 9300 S. 59 <sup>th</sup> Avenue	A	No adverse	No adverse	No adverse	No adverse
<b>Individually Eligible Historic Buildings</b>					
Hudson Farm - Cement Stave Silos 9300 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Hackin Farmstead/Dairy – Dairy Flat Barn 10048 S. 59 <sup>th</sup> Avenue	C	No adverse	No adverse	No adverse	No adverse
Tyson Farmstead/Barnes Dairy – Dairy Head-to-Toe Barn 6159 W. Dobbins Road	C	No adverse	No adverse	No adverse	No adverse

Cumulative Impacts

The City of Phoenix has designated this area as the core area of “downtown” Laveen. Local landowners have expressed a desire to develop their properties for commercial and/or residential uses. Housing developments and some associated commercial centers have been constructed nearby; the advancement of this urbanization was slowed only by the economic collapse. Some adjacent landowners have recently had their property reclassified for either commercial or residential property use. Therefore, it is highly likely that future development by the private landowners would also lead to the destruction of the agricultural properties and the historical setting of rural Laveen.

The construction of a freeway through the South Mountain Corridor would accelerate urbanization and likely encourage more commercial and industrial development rather than the predominantly residential construction that has occurred to date. However, since ADOT, the City of Phoenix, landowners, and developers are all planning for future development in the area, it is difficult to determine what the specific agent of change is. Cumulatively, the future development and construction of the freeway has the potential to contribute to an adverse cumulative affect the **Hudson Farm and silos, Hackin barn, and Tyson/Barnes barn.**

Continuing Cultural Resource Management

In order to proactively address the potential indirect and cumulative adverse effects described above, FHWA and ADOT would document the Hudson Farm Historic District and silos, the Hackin barn, and the Tyson/Barnes barn in a Historic Landscape report. The report would be consistent with the SHPO Standards for Documentation of Historic Properties. For each of the properties this documentation would at a minimum include a descriptive narrative of the property, maps showing geographic location and contextual relationships with other structures and the surrounding landscape, reproductions of original plans/engineering drawings or prepared drawings (or creation of plans/drawings if the originals cannot be found), and photo documentation.

Please review the information provided in this letter, the attached project location maps, and enclosed report. If you agree with the adequacy of the report and agree with FHWA’s revised determination of project effect for each alignment and proposed documentation of the historic properties please indicate your concurrence by signing below and return to FHWA. If you have any questions or comments, please feel free to contact Linda Davis at (602) 712-8636 or e-mail [LDavis2@azdot.gov](mailto:LDavis2@azdot.gov).

Sincerely yours,

  
for Karla S. Petty  
Division Administrator

  
Signature for COP-PGM Concurrence  
NH-202-D(ADY)

9/27/2012  
Date

Enclosures





## ARIZONA DIVISION

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October 11, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Dr. David Jacobs, Compliance Specialist  
State Historic Preservation Office  
Arizona State Parks  
1300 West Washington  
Phoenix, Arizona 85007

Re: SHPO-2003-1890 (106850)

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have undertaken cultural resource studies. The E1 Alternative for the proposed freeway would be built along and replace Pecos Road, effectively cutting off access to residential subdivisions west of 27th Avenue. The proposed Chandler Boulevard Extension would provide a new access route by extending Chandler Boulevard between 19th Avenue and 27th Avenue.

FHWA and ADOT initiated consultation regarding the Chandler Boulevard Extension identifying the consulting parties, scope, area of potential effects (APE), and a finding of "no adverse effect" (Petty [FHWA] to Jacobs [SHPO] August 8, 2012). Concurrence was received from ASLD (Ross [ASLD] to Petty [FHWA] August 14, 2012), ASM (Pitezal [ASM] to Petty [FHWA] September 11, 2012), BIA (Crain [BIA] to Petty [FHWA] September 21, 2012),

2

FCDMC (Stevens [FCDMC] to Petty [FHWA] August 20, 2012), the City of Chandler (Dlugas [City of Chandler] to Petty [FHWA] September 10, 2012), the City of Glendale (Ritz [City of Glendale] to Petty [FHWA] August 13, 2012), the City of Phoenix Historic Preservation Office (Dodds [City of Phoenix] to Petty [FHWA] August 29, 2012), the City of Phoenix Pueblo Grande Museum (Montero [City of Phoenix] to Petty [FHWA] September 26, 2012), SRP (Anduze [SRP] to Petty [FHWA] August 24, 2012), the Cocopah Tribe (McCormick [Cocopah Tribe] to Petty [FHWA] August 27, 2012), the Fort McDowell Yavapai Nation (Pattea [Fort McDowell Yavapai Nation] to Petty [FHWA] August 21, 2012), the Gila River Indian Community (Lewis [THPO] to Petty [FHWA] September 10, 2012), the Hopi Tribe (Morgart [Hopi Tribe] to Petty [FHWA] August 14, 2012), the Tonto Apache Tribe (Leubner [Tonto Apache Tribe] to Petty [FHWA] August 14, 2012), the White Mountain Apache Tribe (Altaha [White Mountain Apache Tribe] to Petty [FHWA] August 17, 2012). The Salt River Pima-Maricopa Indian Community (SRP-MIC) responded stating that the Four Southern Tribes in consensus agreed that the Gila River Indian Community will take the lead in providing comments for this project (Butler [SRP-MIC] to Petty [FHWA] August 14, 2012).

Consultation for the Chandler Boulevard Extension identified three sites near and within the proposed APE, Site AZ T:12:287 (ASM), Site AZ T:12:286 (ASM), and Site AZ T:12:111 (ASM). Site AZ T:12:286 (ASM) is a possible prehistoric agricultural site consisting of a set of rock clusters/piles located near the APE. The site is in good condition with no new disturbances. FHWA recommended that the site is eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion D for its potential to contribute information on prehistoric agricultural practices. Site AZ T:12:111 (ASM) is a historic mining site that has been obliterated by a City of Phoenix water line project and FHWA recommended the site as not eligible for inclusion in the NRHP.

Site AZ T:12:287 (ASM) is identified as a possible O'odham shrine located near the APE. The site consists of two rock features, one with an etched petroglyph on a portable stone at the center. Because the site could not be placed within a definable temporal context, FHWA recommended that it was not eligible for inclusion in the NRHP as an archaeological site. Furthermore, FHWA recommended continuing consultation with Gila River Indian Community's Tribal Historic Preservation Office (THPO) to confirm the site's status as a potential traditional cultural property and regarding its management. The Arizona State Historic Preservation Office (SHPO) responded stating that "when that tribal consultation process is completed, and the status of the eligibility of site AZ T:12:287 (ASM) is determined, our office will then be prepared to comment upon the eligibility of the sites and an appropriate finding of effect" (Jacobs [SHPO] to Petty [FHWA] August 13, 2012).

In response to the Chandler Boulevard Extension consultation, the Gila River Indian Community's THPO concurred with FHWA's eligibility recommendations and a finding of "no adverse effect". Additionally, the THPO noted that in 2008 Barnaby V. Lewis and Andrew Darling were consulted in regards to Site AZ T:12:287 (ASM); at this time they both confirmed that the site is a historic O'odham Shrine and that it is still not considered a NRHP eligible property (Lewis [THPO] to Petty [FHWA] September 10, 2012). The THPO also recommended that a site visit to AZ T:12:287 (ASM) be conducted to assess damage to the site, and ascertain if the petroglyph boulder should be collected before it is lost through accumulated disturbance.



Coordination of the site visit is currently underway. A copy of Gila River Indian Community's THPO response is enclosed for your reference.

Based on Gila River Indian Community's THPO concurrence, FHWA recommends Site AZ T:12:286 (ASM) as eligible for the NRHP, Site AZ T:12:287 (ASM) and Site AZ T:12:111 (ASM) as not eligible for the NRHP, and has determined that a finding of "no adverse effect" is still appropriate for this undertaking. Please review the enclosed THPO response and the information provided in this letter. If you agree with the NRHP eligibility recommendation and finding of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,

*Karla S. Petty*  
for  
Karla S. Petty  
Division Administrator

Signature for SHPO Concurrence  
NH-202-D(ADY)

Date

Enclosure



SHPO-2003-1890 (108411)

ARIZONA DIVISION

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October 11, 2012

RECEIVED  
In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ  
OCT 12 2012

ARIZONA STATE PARKS  
NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Chandler Boulevard Extension

Dr. David Jacobs, Compliance Specialist  
State Historic Preservation Office  
Arizona State Parks  
1300 West Washington  
Phoenix, Arizona 85007

Re: SHPO-2003-1890 (106850)

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Sincerely yours,

*Karla S. Petty*  
for  
Karla S. Petty  
Division Administrator

OCT 22 2012

*[Signature]*  
Signature for SHPO Concurrence  
NH-202-D(ADY)

17 OCT 12  
Date

Enclosure

CC: Linda Davis, ADST



This letter was also sent to:

Mr. Steve Ross, Cultural Resources Manager, Arizona State Land Department

Ms. Chery Blanchard, Archaeologist, Bureau of Land Management

Mr. Dave Gifford, Archaeologist, Bureau of Reclamation

Ms. Michelle Dodds, Historic Preservation Office, City of Phoenix

Ms. Laurene Montero, Archaeologist, City of Phoenix

Mr. Richad A. Anduze, Archaeologist, Salt River Project



# GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2140, SACATON, AZ 85147

TRIBAL HISTORIC PRESERVATION OFFICE

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October 22, 2012

Karla S. Petty, Division Administrator  
U. S. Department of Transportation  
Federal Highway Administration, Arizona Division  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012-3500

RE: NH-202-D(ADY) TRACS No. 202L MA 054 H5764 01C 202L, South Mountain  
Freeway, DCR and EIS Continuing 106 Traditional Cultural Properties (TCP)  
Enhancement Plan, No Adverse Effect

Dear Ms. Petty,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received report *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Traditional Cultural Properties and Mitigation of Transportation Corridor Development Adverse Effects Addendum Planning for TCP Mitigation Villa Buena (AZT:12:9[ASM]), Pueblo Del Alamo (AZ T:12:53[ASM]) (Darling and Loendorf 2012)* dated September 26, 2012. The report evaluates the National Register eligibility status of sites Villa Buena (AZ T:12:9[ASM]) and Pueblo del Alamo (AZ T:12:52[ASM]) and plans for mitigation of adverse effects to the sites.

For the extent of the consultation process, the GRIC-THPO has maintained that Villa Buena and Pueblo del Alamo are Akimel O'Odham and Pee Posh Traditional Cultural Properties (TCPs) and Register eligible properties under Criterion A and Criterion D as stipulated in 36 CFR 60: National Register of Historic Places. The FHWA and the Arizona Department of Transportation (ADOT) have both agreed that the sites are Register eligible properties under Criterion A and that there would be adverse effects to the sites if construction of the Loop 202 South Mountain Freeway were to proceed. The finding of site significance under Criterion A presented a situation where mitigative actions would require an alternative strategy to prevent potential adverse effects to the sites. The Darling and Loendorf document proposes that a TCP Enhancement Plan be developed and implemented upon completion of the Environmental Impact Statement (EIS) process. The TCP Enhancement Plan would insure that: 1) The sites and the people are physically and spiritually prepared for anticipated ground disturbance through conducting traditional religious activities, developing and sponsoring exhibits and outreach, through continued tribal consultation, sponsoring of cultural sensitivity training sessions, and through the protection of equivalent sites and sacred landscapes; and 2) The development of



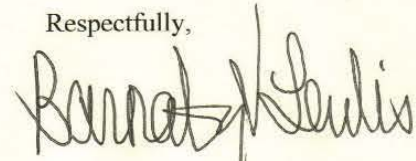
programmatic solutions focused on preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in GRIC culture and history. Through the implementation of the TCP Enhancement Plan, adverse effects to the two sites under Criterion A will be eliminated. Implementation of the TCP Enhancement Plan would allow the FHWA to make a determination of no adverse effect for Villa Buena and Pueblo del Alamo under Criterion A. The FHWA acknowledges that if the plan is not implemented, that the GRIC and the GRIC-THPO would be able to revise their position and not concur with FHWA and ADOT recommendations. In addition, the GRIC-THPO and the FHWA want to make it clearly understood that mitigation of adverse effects for Criterion D is still required. Data recovery efforts must still be undertaken at the two sites.

The GRIC-THPO concurs with a determination of no adverse effect to Villa Buena and Pueblo del Alamo as it pertains to Section 106 of the National Historic Preservation Act and to Criterion A which is defined under 36 CFR 60: National Register of Historic Places. The GRIC-THPO also accepts the TCP Enhancement Plan and all recommendations put forth in the document. The TCP Enhancement Plan is a thoughtful, unique way to avoid potential adverse effects of this undertaking. It is well written. The GRIC-THPO would like to reiterate our appreciation to the FHWA and ADOT for acknowledging and accepting the GRIC worldview.

The GRIC maintains and reinforces the cultural significance of South Mountain to the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'odham Nation) together with the Pee Posh (Maricopa). O'odham oral history and religion defines our life and relationship to the natural world and the cultural landscape. Akimel O'odham and Pee Posh oral histories, religion, creation stories, ceremonial activities and practices, and the concepts of power and sacred places are inseparably tied to every part of the natural environment. Sacred places and Traditional Cultural Places (TCPs) must be treated with reverence and respect.

The GRIC-THPO looks forward to continuing consultation regarding the proposed 202 Loop. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,



Barnaby V. Lewis  
Tribal Historic Preservation Officer  
Gila River Indian Community



# ARIZONA DIVISION

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October 23, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No.: 202L MA 54 H5764 01L  
202L South Mountain Freeway DCR and EIS  
Continuing Section 106 Consultation  
Section 4(f)  
No Adverse Effect

Dr. David Jacobs, Compliance Specialist  
State Historic Preservation Office  
Arizona State Parks  
130 West Washington  
Phoenix, Arizona 85007

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the south side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project would employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department, the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration, the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800, NHPA), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been carrying out cultural resource studies and engaging in an ongoing open dialog with GRIC's Tribal Historic Preservation Office (THPO) and



Cultural Resource Management Program (CRMP) regarding the identification and evaluation of places of religious and cultural significance to the tribe, often referred to as traditional cultural properties (TCPs) as they may be affected by the proposed South Mountain Freeway project. As a result of these discussions, the GRIC has identified TCPs that are eligible for the National Register of Historic Places (NRHP), and could be affected by the construction of the South Mountain Freeway. These include, among others, the prehistoric Hohokam villages of Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM]) (Petty [FHWA] to Jacobs [SHPO], April 24 2012).

Previous correspondence has summarized the specific qualities of Villa Buena and Pueblo del Alamo as TCPs under Criteria A and D of the NRHP, as well as proposed mitigation to address any potential adverse effects to all TCPs identified within the South Mountain freeway project area (Petty [FHWA] to Mendoza [GRIC], April 24, 2012). The mitigation strategies presented thus far include Treatment Plans entitled *South Mountain Freeway (SR 102L) Traditional Uses and Cultural Significance of Muhadagi Doag (South Mountain) Evaluation of Traditional Property and Adverse Effects of Transportation Corridor Development Summary Scope of Work (Draft)* (Darling 2008), and an addendum to the aforementioned document entitled *Addendum Planning for TCP Mitigation Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM]) (Draft)* (Darling 2012), both of which the SHPO previously approved (Petty [FHWA] to Jacobs [SHPO], April 24 2012 [SHPO concurrence 18 May 2012]).

However, based on comments received from SHPO as part of previous consultation dated April 24, 2012 (Petty [FHWA] to Jacobs [SHPO]), and in further consideration of the GRIC's specific concerns for the spiritual welfare and cultural loss to their members and those of other affiliated Tribes due to potential impacts to Villa Buena and Pueblo del Alamo, this letter proposes that in the event of freeway construction an alternative strategy be adopted to prevent potential adverse effects to these two sites as they pertain to Criterion A of the NRHP. The *South Mountain Freeway (SR 202L) Traditional Cultural Property Enhancement and Management Planning for Villa Buena (AZ T:12:9 [ASM]) and Pueblo del Alamo (AZ T:12:52 [ASM])*, replaces the previously identified "Addendum Plan" for Villa Buena and Pueblo del Alamo. This document proposes that upon completion of the EIS review process, a *TCP Enhancement Plan* will be developed and implemented, which would insure the following:

- 1) Preparation of the site(s) and Tribal members for anticipated ground disturbance including Traditional Religious Activities, Exhibits and Outreach, Tribal Consultation, Cultural Sensitivity Training, and the Protection of Equivalent Sites and Sacred Landscapes; and
- 2) Development of Programmatic Solutions for preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in GRIC culture and history.

As noted in previous correspondence with the SHPO (Petty [FHWA] to Jacobs [SHPO], April 24, 2012), the present surface condition of both sites within the area of potential effects (APE) of the proposed western alignments of the 202L freeway is highly disturbed by recent activities such as farming and other development. However, FHWA also recognizes and respects the GRIC's position that these disturbances in no way diminish the qualities of these sites as TCPs. This includes those aspects of site presence, both physical and spiritual; that the GRIC believes will be negatively impacted by freeway construction. These impacts could arguably be considered potential adverse effects under Criterion A of the NRHP. The FHWA also recognizes the GRIC's concerns in regard to site desecration due to intrusion and ground disturbance, which may affect the spiritual welfare of its members and other affiliated Tribes.

In order to address these concerns and in consultation with the GRIC, the FHWA position is that the proposal to develop and implement a *TCP Enhancement Plan* for Villa Buena and Pueblo del Alamo will serve to prevent or eliminate the potential for these adverse effects to Villa Buena and Pueblo del Alamo under Section 106 of the NHPA as it pertains to Criterion A of the NRHP. This plan will not address

other TCPs in the APE or adverse effects under Criterion D of the NRHP as they pertain to these two sites. However, FHWA believes that this revised strategy addresses the SHPO's concerns over the presence or absence of adverse effect under Criterion A and allows the GRIC to take the lead in developing a plan for eliminating the potential for adverse effects, which they feel remain in spite of the present surface condition of these two sites. The attached consultation dated October 22, 2012 indicates the GRIC's concurrence that the development and implementation of a *TCP Enhancement Plan* will prevent potential adverse effects under Criterion A to Villa Buena and Pueblo del Alamo in the event of freeway construction. Furthermore, the GRIC concurred that the *TCP Enhancement Plan* is an adequate precondition for their concurrence with FHWA's recommendation for a finding of "no adverse effect" under Criterion A.

In conclusion, since the proposed strategy for TCP enhancement is to prevent the potential for adverse effects, it is the position of the FHWA that the adoption of the attached proposal is a sufficient and reasonable condition for recommending a finding of "no adverse effect" for Villa Buena and Pueblo del Alamo under Section 106 of the NHPA as it pertains to Criterion A of the NRHP. SHPO concurrence with this finding is requested with the full understanding that FHWA and ADOT are committed to the development and implementation of the *TCP Enhancement Plan* as presented in the attached proposal. Furthermore, FHWA acknowledges that failure to develop and implement such a plan could result in adverse effects under Criterion A, if freeway construction proceeds, and in that event, the SHPO may find it necessary to revise its position.

The TCPs that are the topic of this letter are also subject to regulations set forth in Section 4(f) of the Department of Transportation (DOT) Act of 1966, 49 U.S.C. 303, as amended. Section 4(f) stipulates that FHWA and other DOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historic sites unless there is no feasible and prudent alternative to the use of that land, and that the proposed action includes all possible planning to minimize harm to the property resulting from such use.

Section 4(f) generally applies to the use of TCPs that are determined to be eligible for listing in the NRHP. FHWA believes that Section 4(f) does not apply to the proposed use of portions of the Villa Buena and Pueblo del Alamo TCPs for the proposed South Mountain Freeway project alternatives because the impacted area is primarily archeological in nature and preservation in place is not warranted. The exception is detailed in 23 CFR 774.13 as follows: "The Administration has identified various exceptions to the requirement for Section 4(f) approval. These exceptions include, but are not limited to: (b) Archeological sites that are on or eligible for the National Register when: (1) The Administration concludes that the archeological resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place. This exception applies both to situations where data recovery is undertaken and where the Administration decides, with agreement of the official(s) with jurisdiction, not to recover the resource; and (2) The official(s) with jurisdiction over the Section 4(f) resource have been consulted and have not objected to the Administration finding in paragraph (b)(1) of this section."

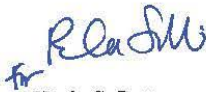
As mentioned above, a number of meetings have taken place between FHWA, ADOT, GRIC CRMP, and GRIC THPO in which the nature of and the impacts to the Villa Buena and Pueblo del Alamo TCPs were discussed. Through these discussions the parties have come to the conclusion that modern development has already significantly altered the portions of these sites that would be impacted by the highway project. While the modern surface development does not diminish the association with traditional cultural practices of the GRIC for purposes of the consultation required by NHPA, for purposes of Section 4(f), the FHWA believes that the impacted area is important chiefly for what could be learned by data recovery of any subsurface features that may still be present. In addition, future archaeological investigations may contribute to their TCP status.



If you have no objection to FHWA's determination under Section 4(f) that the portions of the Villa Buena and Pueblo de Los Alamos TCPs that would be used by the proposed project alternatives under consideration are chiefly important because of what can be learned by data recovery and have minimal value for preservation in place, then FHWA will apply the Section 4(f) exception described above to the use of these properties. This determination is for purposes of Section 4(f) only and would not have any impact on the Section 106 consultation that is underway and will continue.

Please review the information provided in this letter and the enclosed consultation. If you agree with FHWA's finding of "no adverse effect" and do not object to the Section 4(f) determinations described above, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact Linda Davis at 602-712-8636 or at [ldavis2@azdot.gov](mailto:ldavis2@azdot.gov).

Sincerely yours,



Karla S. Petty  
Division Administrator

\_\_\_\_\_  
Signature for SHPO Concurrence  
NH-202-D(ADY)

\_\_\_\_\_  
Date

Enclosure



GILA RIVER INDIAN COMMUNITY

POST OFFICE BOX 2140, SACATON, AZ 85147

TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162  
Fax: (520) 562-5083

October 22, 2012

Karla S. Petty, Division Administrator  
U. S. Department of Transportation  
Federal Highway Administration, Arizona Division  
4000 North Central Avenue, Suite 1500  
Phoenix, Arizona 85012-3500

RE: NH-202-D(ADY) TRACS No. 202L MA 054 H5764 01C 202L, South Mountain Freeway, DCR and EIS Continuing 106 Traditional Cultural Properties (TCP) Enhancement Plan, No Adverse Effect

Dear Ms. Petty,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received report *South Mountain Freeway (SR 202L) Traditional Uses and Cultural Significance of Traditional Cultural Properties and Mitigation of Transportation Corridor Development Adverse Effects Addendum Planning for TCP Mitigation Villa Buena (AZT:12:9[ASM]), Pueblo Del Alamo (AZ T:12:53[ASM]) (Darling and Loendorf 2012)* dated September 26, 2012. The report evaluates the National Register eligibility status of sites Villa Buena (AZ T:12:9[ASM]) and Pueblo del Alamo (AZ T:12:52[ASM]) and plans for mitigation of adverse effects to the sites.

For the extent of the consultation process, the GRIC-THPO has maintained that Villa Buena and Pueblo del Alamo are Akimel O'Odham and Pee Posh Traditional Cultural Properties (TCPs) and Register eligible properties under Criterion A and Criterion D as stipulated in 36 CFR 60: National Register of Historic Places. The FHWA and the Arizona Department of Transportation (ADOT) have both agreed that the sites are Register eligible properties under Criterion A and that there would be adverse effects to the sites if construction of the Loop 202 South Mountain Freeway were to proceed. The finding of site significance under Criterion A presented a situation where mitigative actions would require an alternative strategy to prevent potential adverse effects to the sites. The Darling and Loendorf document proposes that a TCP Enhancement Plan be developed and implemented upon completion of the Environmental Impact Statement (EIS) process. The TCP Enhancement Plan would insure that: 1) The sites and the people are physically and spiritually prepared for anticipated ground disturbance through conducting traditional religious activities, developing and sponsoring exhibits and outreach, through continued tribal consultation, sponsoring of cultural sensitivity training sessions, and through the protection of equivalent sites and sacred landscapes; and 2) The development of



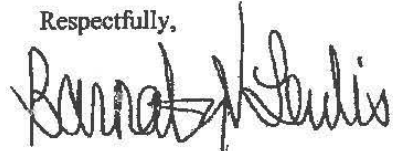
programmatic solutions focused on preservation, restoration, and perpetuation of the roles of Villa Buena and Pueblo del Alamo in GRIC culture and history. Through the implementation of the TCP Enhancement Plan, adverse effects to the two sites under Criterion A will be eliminated. Implementation of the TCP Enhancement Plan would allow the FHWA to make a determination of no adverse effect for Villa Buena and Pueblo del Alamo under Criterion A. The FHWA acknowledges that if the plan is not implemented, that the GRIC and the GRIC-THPO would be able to revise their position and not concur with FHWA and ADOT recommendations. In addition, the GRIC-THPO and the FHWA want to make it clearly understood that mitigation of adverse effects for Criterion D is still required. Data recovery efforts must still be undertaken at the two sites.

The GRIC-THPO concurs with a determination of no adverse effect to Villa Buena and Pueblo del Alamo as it pertains to Section 106 of the National Historic Preservation Act and to Criterion A which is defined under 36 CFR 60: National Register of Historic Places. The GRIC-THPO also accepts the TCP Enhancement Plan and all recommendations put forth in the document. The TCP Enhancement Plan is a thoughtful, unique way to avoid potential adverse effects of this undertaking. It is well written. The GRIC-THPO would like to reiterate our appreciation to the FHWA and ADOT for acknowledging and accepting the GRIC worldview.

The GRIC maintains and reinforces the cultural significance of South Mountain to the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'odham Nation) together with the Pee Posh (Maricopa). O'odham oral history and religion defines our life and relationship to the natural world and the cultural landscape. Akimel O'odham and Pee Posh oral histories, religion, creation stories, ceremonial activities and practices, and the concepts of power and sacred places are inseparably tied to every part of the natural environment. Sacred places and Traditional Cultural Places (TCPs) must be treated with reverence and respect.

The GRIC-THPO looks forward to continuing consultation regarding the proposed 202 Loop. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,



Barnaby V. Lewis  
Tribal Historic Preservation Officer  
Gila River Indian Community



U.S. Department  
of Transportation  
Federal Highway  
Administration

# ARIZONA DIVISION

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October 31, 2012

In Reply Refer To:  
NH-202-D(ADY)  
HOP-AZ

NH-202-D(ADY)  
TRACS No. 202L MA 054 H5764 01C  
202L, South Mountain Freeway, DCR and EIS  
Continuing Section 106 Consultation  
Western Transmission Line Realignment

Mr. Gregory Mendoza, Governor  
Gila River Indian Community  
P.O. Box 97  
Sacaton, Arizona 85147

Dear Governor Mendoza:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are continuing technical studies in support of the Environmental Impact Statement (EIS) for the 202L, South Mountain Freeway, EIS & Location/Design Concept Report project. The EIS addresses alternative alignments for the proposed South Mountain Freeway, which would extend around the southern side of South Mountain from Interstate 10 (I-10) in west Chandler to I-10 in west Phoenix. The project would be built entirely on new right-of-way (ROW). As this project is scheduled to employ federal funds, it is considered an undertaking subject to Section 106 review. Because alternatives are still under development, land ownership of the project area is varied.

Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), the Arizona State Land Department, the Arizona State Museum, the U.S. Army Corps of Engineers, the Bureau of Land Management, the Bureau of Indian Affairs, the Bureau of Reclamation, the Western Area Power Administration (Western), the Salt River Project, the Maricopa County Department of Transportation, the Flood Control District of Maricopa County, the Roosevelt Irrigation District, the City of Avondale, the City of Chandler, the City of Glendale, the City of Phoenix, the City of Tolleson, the Ak-Chin Indian Community, the Chemehuevi Tribe, the Cocopah Tribe, the Colorado River Indian Tribe, the Fort McDowell Yavapai Nation, the Fort Mojave Tribe, the Fort Yuma-Quechan Tribe, the Gila River Indian Community (GRIC), the Havasupai Tribe, the Hopi Tribe, the Hualapai Tribe, the Kaibab-Paiute Tribe, the Navajo Nation, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the San Carlos Apache Nation, the San Juan Southern Paiute, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, the Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

In accordance with the regulations implementing Section 106 of the National Historic Preservation Act (36 CFR 800), which requires federal agencies to take into account the effects of their undertakings on historic properties, FHWA and ADOT have been carrying out cultural resource studies. The proposed South Mountain Freeway would require realignment of the Liberty-Coolidge 230-kV Transmission Line, which is administered by Western. At the request of ADOT, GRIC's Cultural Resource Management