January 25, 2022

In Reply Refer To:

PPM-0(268)D
TRACS No. 0000 PM PPM T0327 01C
Sunset Road: I-10 – River Road
Continued Section 106 Consultation
Comprehensive APE and SOW
“No Adverse Effect”

Ms. Kathryn Leonard, State Historic Preservation Officer
State Historic Preservation Office
1110 W Washington, Suite 100
Phoenix, Arizona 85007

Dear Ms. Leonard:

Pima County and the Arizona Department of Transportation (ADOT) are planning a roadway construction project in Tucson, Pima County, Arizona (see Figure 1, at the bottom of this letter). This project would facilitate the extension of Sunset Road to the northeast, above Interstate 10 (I-10) and the Union Pacific Railroad (UPRR), where it would connect with River Road. The project is situated within ADOT-owned right-of-way (ROW), UPRR-owned ROW, and lands owned by Pima County and private parties. Project construction may affect Waters of the United States and thus requires issuance of a Regional General Permit from the U.S. Army Corps of Engineers (USACE), pursuant to Section 404 (33 USC § 1344) of the Federal Water Pollution Control Act (33 USC §§ 1251—1387), and the submission of a Pre-Construction Notice. While temporary construction easements may be necessary, and new Pima County ROW would be obtained, new ADOT ROW is not anticipated.

The project area is located in Sections 8, 17, and 18 of Township 13 South, Range 13 East, relative to the Gila and Salt River Baseline and Meridian, as shown in U.S. Geographic Survey topographic maps (7.5-minute series) of the Jaynes (AZ) quadrangle.

Because this project would employ federal funds and requires federal permitting, it is considered an undertaking subject to review under Section 106 (54 USC § 306108) of the National Historic Preservation Act of 1966, as amended (54 USC § 300101 et seq.) and its implementing regulations (36 CFR Part 800). The environmental review, consultation, and other actions required by applicable federal environmental laws for this project are being, or have been, carried out by ADOT pursuant to 23 USC § 327 and a memorandum of understanding executed by the Federal Highway Administration and ADOT on April 16, 2019.

Consulting parties for this project are ADOT, the Ak-Chin Indian Community, Arizona State Historic Preservation Office (SHPO), Arizona State Museum (ASM), Gila River Indian...
ADOT contacted the consulting parties on December 13, 2021, introducing the undertaking’s full scope of work, comprehensive APE, provided a continued finding of “no adverse effect,” and requested concurrence. After receiving a preliminary response from SHPO, ADOT coordinated a meeting between ADOT, SHPO, and Pima County. This meeting took place on January 25, 2022, and led to the following resolutions:

1. The 1990 survey report by Ciolek-Torrello and Homburg does not satisfy current reporting standards.
2. The 2012 survey report by Milliken and Boley is adequate.
3. Additional archaeological survey within the APE’s eastern segment is unwarranted.
4. A finding of “no adverse effect” remains appropriate for the undertaking, contingent upon archaeological monitoring in accordance with an approved historic properties treatment plan or monitoring and discovery plan.
5. ADOT and Pima County will provide additional maps to SHPO, identifying previous archaeological investigations that intersect with the current APE.

Please consider the information in this and previous letters. If you agree with ADOT’s determination of effect, please indicate your concurrence by signing below. If you have any questions or concerns, please contact me at (480) 536-4747 or at by email at WRussell3@AZDOT.gov.

Sincerely,

Will G. Russell, PhD, RPA
Senior Archaeologist, Major Projects

Signature for SHPO Concurrence
T0327, 1/25/2022

26 JAN 2022

Date

ccc:
Ms. Mary-Ellen Walsh, Cultural Resources Compliance Manager, SHPO
Ms. Kasey Miller, Compliance Specialist / Archaeologist, SHPO