



Memorandum

Office of Sustainability & Conservation

Cultural Resources & Historic Preservation Division

DATE: November 9, 2012

TO: Jing Luo, Regional Wastewater Reclamation District

FROM: Loy Neff, Office of Sustainability & Conservation

Subject: Ina Road Biogas Site Location #13 – Cultural Resources Status

At your request, I am providing a cultural resources summary of the current status of the preferred location #13 for the Biogas cleaning facility proposed at or near the Ina Road WRF and recommendations for possible compliance actions for the facility construction.

Cultural Resources Summary: In the original review of Location #13, dated October 4, 2012, I incorrectly placed the proposed location within an area of cultural sensitivity, based on Phase I data recovery excavations conducted in 2008 for the Ina Road WRF ROMP Expansion. Subsequent review in a project meeting on October 25, 2012, benefitted from additional maps, which allowed the correct placement of the Biogas facility in the current location of the construction trailers at the northwestern edge of the Ina Road facility. The cultural resources status of this area differs, as follows:

During the archaeological fieldwork for the Ina Road ROMP Expansion, an expedited cultural resources consultation process was established with the State Historic Preservation Office (SHPO) that allowed expedited compliance work in certain project areas where construction of various facilities required a compressed schedule. One such area was identified at the time as the MWH Construction Trailers Area in the northwestern project area. The expedited compliance process resulted in issuance of a cultural resources clearance in October, 2008. The clearance was based on exploratory archaeological trenching that identified a large area in the northwest and west portions of the project area to consist of relict Santa Cruz River channel deposits resulting from prehistoric shifts in the river channel that were subsequently filled by overbank flood deposits as the river changed course through time. These events resulted in the removal, or "scouring out" of any buried cultural resources that might have been present.

The remaining cultural resources concern was the possibility that more recent prehistoric (Hohokam) or historic remains might be present in shallow buried contexts. The 2008 clearance was based on County and SHPO approval of the archaeological documentation of the relict channel deposits and it included a condition that construction in this area might require archaeological monitoring, at the discretion of the archaeological consultant. It should be noted that although there is no clearly defined border to the zone of disturbed river fill deposits and the adjacent zone with intact buried cultural deposits, the location and extent of the disturbed fill deposits encompass the construction trailer area. The construction trailers

and associated support, parking, and infrastructure were installed with an archaeological monitor present, but no additional archaeological discoveries were made during the work.

Recommendations for Compliance Actions for the Biogas Facility in Location #13:

Planning discussions for construction of the Biogas cleaning facility in the preferred location #13 have resulted in the following recommended compliance actions related to alternate construction methods proposed by RWRD. Internal labor costs for either construction method outlined below can be charged to a Task Order Number determined by RWRD.

1. Construction can proceed under the County and SHPO-approved 2008 clearance. If construction proceeds with excavations below current grade, this represents ground disturbance, which will invoke Condition #2 of the 2008 cultural resources clearance, requiring construction monitoring at the discretion of the archaeological consultant.

Desert Archaeology, Inc. (Desert), is the archaeological consultant currently under contract for the Ina Road WRF ROMP Expansion. Recent discussions with Desert confirmed their ability to conduct the monitoring with available staff. They estimate the work will require additional funds, not to exceed \$5,000, for a project area of approximately .4-acre requiring five working days for construction monitoring (only initial ground-disturbing construction requires monitoring), and writing a suitable monitoring report written to Arizona State Museum and SHPO standards. The project also includes monitoring of any required below-ground support structures or infrastructure, such as electrical conduit or other utility lines.

Using Desert under their existing contract removes the requirements, and time, for establishing a new contract and to prepare a separate monitoring plan for submittal to County and SHPO for review and approval. Instead, the existing County and SHPO-approved treatment plan can be invoked to reduce costs and save time. Follow-up consultation with SHPO will be done to provide notification of the work under the 2008 clearance and to provide documentation of the Biogas project in the form of the monitoring report.

2. If construction proceeds by bringing in fill to elevate the grade of the construction site above current grade (two-feet above current grade has been suggested in previous discussions), then there will be no below-grade ground disturbance, which removes the potential for disturbing buried cultural deposits, and construction can begin under the 2008 clearance without requiring any archaeological compliance work before construction.

However, if below-ground support structures or infrastructure are required, such as electrical conduit or other utility lines, then archaeological monitoring of initial ground disturbances related to installation will be required as a condition of the clearance. In this case, costs for the monitoring services and report will be reduced. Follow up SHPO consultation will be as described in Recommendation No. 1.

I look forward to assisting this project in moving ahead. Please contact me with any questions.