



## Arizona Department of Transportation

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# E1-16155  
B7W  
FD-34836

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Victor M. Mendez  
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11-18-2008

Floyd Roehrich Jr.  
State Engineer

Victoria Rutson, Chief  
Section of Environmental Analysis  
Surface Transportation Board  
395 E Street, SW  
Washington, DC 20423

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

Dear Ms. Rutson:

Thank you for submitting the above referenced draft eligibility evaluation and draft treatment plan. On behalf of the Arizona Department of Transportation (ADOT) Utility & Railroad Engineering Section and Environmental Planning Section, I would like to offer the following comments on the above-mentioned reports.

I note that the area of potential effects (APE) for the proposed Arizona Eastern Railway (AZER) rail line extension crosses U.S. Highway 70 (US 70)/ US 191 at milepost (MP) 343.3 on the west side of the channelized San Simon River. None of the checkdam sites addressed in the eligibility evaluation fall within the ADOT-owned right-of-way (R/W); therefore ADOT has no comment on the draft eligibility evaluation. Among the 11 properties addressed in the treatment plan, one, the San Simon River Diversion (AZ CC:2:360 [ASM]) extends within the ADOT R/W and is spanned by the existing highway bridge. Site AZ CC:2:361 (ASM), a historic hog-raising facility, is located immediately west of the San Simon Diversion Channel and immediately north of the highway, but does not extend within the ADOT R/W. Therefore, ADOT's comments regarding the treatment plan are confined to a consideration of proposed treatment of the diversion channel.

I note that in the Surface Transportation Board's (STB) earlier consultation with the State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act, it was determined that the San Simon River Diversion *may* have significance under Criterion A for its association with the history of agriculture, irrigation, flood control and settlement, especially historic Mormon settlement, of the Gila River Valley. The history of the structure and why it was constructed have yet to be determined, however; therefore, the property's significance and eligibility for listing on the National Register of Historic Places (National Register) are currently undetermined. WestLand proposes a program of archival research to document the structure's construction history coupled with detailed field recording for use in a comparison of the property's current condition relative to its historic aspect if that information can be obtained. If the property should prove to be significant and to retain sufficient integrity to be determined eligible for National Register listing, WestLand proposes that the documentation they will already have collected be combined with additional archival research and field

Ms. Victoria Rutson

DATE

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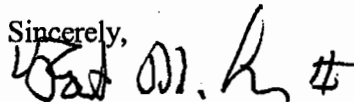
work to document construction methods as mitigation of adverse effects associated with installation of the AZER rail line extension. ADOT agrees that these are reasonable eligibility assessment and mitigation strategies.

In closing, there are two items I would like to bring to your attention. In the first paragraph on page 1 of the treatment plan, the authors state that, "All lands within the APE are privately owned. This is not the case; as noted above, within the APE the US 70/US 191 Highway R/W is owned by ADOT, a state agency. The second item concerns a cultural resource within the ADOT R/W that appears not to have been included in the AZER rail line extension corridor inventory. The resource that appears to have been overlooked is the historic San Simon River Bridge (Structure No. 00310).

The San Simon River Bridge at MP 343.37 was constructed in 1947 by the ADOT, but was substantially altered in 1984. Therefore, ADOT has determined that the structure is not eligible for National Register listing following recommendations in *Vehicular Bridges in Arizona 1880-1964* National Register Multiple Property Documentation Form [FRASERdesign 2008]). ADOT has accepted these recommendations and is currently concluding consultation with the State Historic Preservation Office regarding the FRASERdesign study. Therefore, treatment considerations likely will not be necessary for the San Simon River Bridge, but I thought you should be aware of its presence within your APE.

If you have questions or comments, please contact me at 602.712.6193.

Sincerely,



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Arizona Department of Transportation  
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cc: Joe Warren, ADOT Roadway Predesign