

In reply refer to: **SHPO-2006-1264** (38789)
HPTP revisions needed

#E1-16442
DAW
PD-34836

February 6, 2009

Virginia Rutson, Chief, Section of Environmental Analysis
Environmental Services
Surface Transportation Board
Washington, DC 20423

Attention: Diana Wood, SEA Project Manager

RE: Request to Revise Plan of Work for Mitigation of Adverse Effects to Checkdams;
Arizona Eastern Railway (STB Finance Docket No. 34836)
SHPO-2006-1264 (38789)

Dear Ms. Rutson:

Thank you for continuing to consult with our office pursuant to 36 CFR 800 about the above referenced federal undertaking. William Collins, SHPO Historian and I have reviewed the materials submitted and have the following comments:

Conservation Service and Civilian Conservation Corps Checkdam Sites in the Proposed Arizona Eastern Railroad Construction Corridor (Revised January 6, 2009).

The revised document is acceptable.

Historic Properties Treatment Plan for Historic Properties Affected by the Proposed Arizona Eastern Railroad Extension (Revised January 6, 2009)

Soil Erosion Service & Civilian Conservation Corps Checkdam Site Work Plan

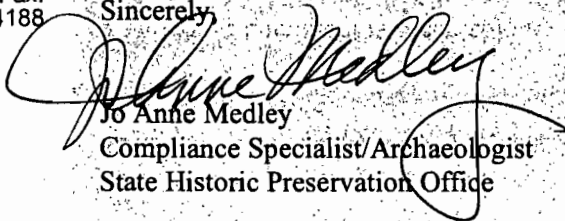
In the Research Context section, WestLand identifies a few research issues, mainly related to Criterion A eligibility, none specific to Criterion C, and only one related to Criterion D eligibility. Their description of Phase I data recovery makes no mention of the research questions listed in our November 25, 2008 letter [comment 1.b)]. They anticipate no Phase II data recovery. When exactly were they planning to actually evaluate the checkdams to gather useful information rather than just map them?

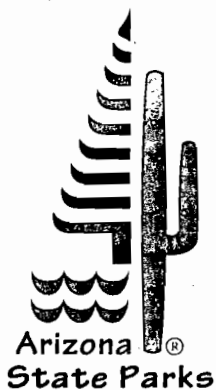
The data recovery plan should include a soils expert who can design fieldwork, including sampling methods and analytical techniques sufficient to evaluate the checkdam system according to research questions.

The remainder of the Treatment Plan is acceptable.

Please provide us and other consulting parties with pages 23-38 that have been revised to address the above comments. Please feel free to call me at 602/542-7142 if you have questions or concerns.

Sincerely,


Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Office



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