

# Appendix C

## Cultural Resources

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**Table C-1.** Cultural Resources in the Build Alternative area of potential effects

Site number/Name	Description	National Register of Historic Places Eligibility (Criterion)
AZ AA:2:118 (ASM)/ Casa Grande Highway/ SR 84	Historic road	Determined eligible (D)
AZ AA:12:11 (ASM)	Prehistoric artifact scatter	Determined eligible (D)
AZ AA:12:13 (ASM)	Prehistoric artifact scatter	Eligibility undetermined
AZ AA:12:14 (ASM)	Multicomponent site (prehistoric and historic)	Eligibility undermined
AZ AA:12:20/352 (ASM)/ The Home Depot Site	Prehistoric habitation	Determined eligible (D)
AZ AA:12:91 (ASM)/ Los Pozos	Prehistoric habitation	Determined eligible (D)
AZ AA:12:92 (ASM)/ El Taller	Prehistoric habitation	Determined eligible (D)
AZ AA:12:103 (ASM)	Prehistoric habitation	Determined eligible (D)
AZ AA:12:111/753 (ASM)/ Las Capas	Prehistoric habitation and agricultural site and associated canals	Determined eligible (D)
AZ AA:12:503 (ASM)/ Costello-King Site	Multicomponent site	Determined eligible (D)
AZ AA:12:739 (ASM)	Prehistoric artifact scatter	Determined eligible (D)
AZ AA:12:788 (ASM)/Rillito Fan Site	Multicomponent site	Determined eligible (D)
AZ AA:12:798 (ASM)/Slip-up Site	Multicomponent site	Eligibility undetermined
AZ Z:2:40 (ASM)/Southern Pacific Railroad Main Line– Southern Route, Sunset Route	Historic railroad	Determined eligible (A)

**Table C-2.** Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual National Register of Historic Places eligibility	Contributor to district eligibility	Eligibility remarks/Justification
<i>Casas del Oeste (1-79) Subdivision</i>					
4411 W Placita Rebecca	225370330	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4420 W Ina Road	225370230	1972	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4421 W Placita Rebecca	225370320	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4430 W Ina Road	225370240	1981	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4430 W Placita Rebecca	225370370	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4431 W Placita Rebecca	225370310	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4440 W Placita Rebecca	225370380	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4460 W Ina Road	225370250	1972-73	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4541 W Calle Marco	225370420	1977	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4551 W Calle Marco	225370410	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4561 W Calle Marco	225370400	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4571 W Calle Marco	225370390	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
7211 N Camino de la Cruz	225370260	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
7221 N Camino de la Cruz	225370270	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
7231 N Camino de la Cruz	225370280	1972	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
7241 N Camino de la Cruz	225370290	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant

**Table C-2.** Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual National Register of Historic Places eligibility	Contributor to district eligibility	Eligibility remarks/Justification
7251 N Camino de la Cruz	225370300	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
<b>Gibson Tract Subdivision</b>					
2850 W Diamond Street	101153270	1959-1961	Not eligible	Not eligible	Not eligible under Criteria A, B, C
2838 W Ruthrauff Road	10115040A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2840 W Ruthrauff Road	10115039A	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4842 N Shannon Road	10115036A	1959	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4846 N Davis Avenue	101150310	1946	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4851 N Maryvale Avenue	101150270	1960-61	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4868 N Shannon Road	101150340	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5151 N Davis Avenue	101150004A	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
<b>Palmdale No. 2 Subdivision</b>					
2964 W. Sago Circle	101142490	mobile home 1964, block addition-1968	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3037 W. Emerald Circle	101142750	1986	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
3053 W. Jade Place	101143040	1971	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
<b>Sunrise Addition Subdivision</b>					
4821 N. Kain Avenue	101150440	1959	Not eligible	Not eligible	lack of integrity
4831 N. Valley Park Avenue	101150630	1959	Not eligible	Not eligible	not individually significant, in an ineligible district
4861 N. Valley Park Avenue	101150670	1959	Not eligible	Not eligible	not individually significant, in an ineligible district
<b>Sunrise Addition No. 2 Subdivision</b>					
2550 W Ruthrauff Road	101151010	1989	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
2602 W Ruthrauff Road	101150720	1980	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4826 N. Plane Avenue	101150750	1962	Not eligible	Not eligible	lack of integrity
4833 N. Gold Avenue	101150970	1960	Not eligible	Not eligible	not individually significant, in an ineligible district
4950 N. Plane Avenue	101150850	1974	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant

**Table C-2.** Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual National Register of Historic Places eligibility	Contributor to district eligibility	Eligibility remarks/Justification
<b><i>Sunrise Addition No. 3 Subdivision</i></b>					
2660 W Ruthrauff Road	10115176A	1965	Not eligible	Not eligible	alterations to primary façade have substantially impacted integrity
2680 W Ruthrauff Road	101151180	1980	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4801 N Sunrise Avenue	101151470	1970	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4833 N. Sunrise Avenue	101151430	1964	Not eligible	Not eligible	not individually significant, in an ineligible district
4842 N Maryvale Avenue	101151230	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4949 N. Plane Avenue	101151640	1974	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
<b><i>Tres Nogales Subdivision</i></b>					
3333 W. Tres Nogales Road	101080170	1962	Not eligible	Not eligible	lack of integrity
3342 W. Tres Nogales Road	101080040	1962	Not eligible	Not eligible	lack of integrity
3404 W. Tres Nogales Road	101080060	1954	Not eligible	Not eligible	lack of integrity
<b><i>Tucsonita Subdivision</i></b>					
2565 W Zinnia Avenue	10307048B/ 103070470	1962	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2623 W Violet Avenue	103070200	1957	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2626 W Violet Avenue	103070080	ca. 1945	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2627 W Violet Avenue	103070210	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2629 W Ruthrauff Road	10307002A	1949	Not eligible	Not eligible	1949 original residence substantially altered
2634 W Violet Avenue	103070070	1950	Not eligible	Not eligible	substantial alterations to the exterior have significantly impacted integrity
2639 W Ruthrauff Road	10307003A	1960-1963	Not eligible	Not eligible	Integrity compromised, not eligible under Criteria A, B, and C
2656 W Violet Avenue	103070060	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2713 W Violet Avenue	10307026A	1986	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
2722 W Violet Avenue	103070170	ca. 1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2729 W Ruthrauff Road	103070120	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2755 W Ruthrauff Road	10307015B	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

**Table C-2.** Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual National Register of Historic Places eligibility	Contributor to district eligibility	Eligibility remarks/Justification
2819 W Ruthrauff Road	10307066A	1957	Not eligible	Not eligible	Not significant, replacement of doors and windows has impacted integrity
4410 N Highway Drive	103070650	1973	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
4619 N Highway Drive	10307069B	1963	Not eligible	Not eligible	Integrity compromised, not eligible under Criteria A, B, and C
4684 N. Highway Dr.	10307026C	1968	Not eligible	Not eligible	Not significant, does not meet Criteria Consideration A
<b>Individual properties not in a subdivision</b>					
3100 W Curtis Road	10117023A	1931	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3120 W Curtis Road	10117022F	1955	Not eligible	Not eligible	Compromised integrity
3150 W El Camino del Cerro	10120038C	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4535 West Ina Road	10105009D	ca. 1960	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4715 W Massingale Road	22138008A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4801 W Massingale Road	221380040	1959	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4820 W Massingale Road	221350380	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4901 N Shannon Road	10120009E	1948	Not eligible	Not eligible	Integrity compromised, not eligible under Criteria A, B, and C
4915 N Shannon Road	10120008A	1958	Not eligible	Not eligible	see continuation sheet
4945 N Shannon Road	10120007F	1971	Not eligible	Not eligible	Integrity compromised, not eligible under Criteria A, B, and C
5128 N Casa Grande Highway	10120019F	1951	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5140 N Casa Grande Highway	10120019J	1953-55	Not eligible	Not eligible	substantial alterations, compromised integrity
5141 N Casa Grande Highway	10120025B	1961	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5201 N Casa Grande Highway	10117019J	1946	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5240 N Highway Drive	10117022B	1969	Not eligible	Not eligible	additions and alterations have compromised integrity, not significant
5266 N Highway Drive	101170270	1962	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5280 (5333) N Highway Drive	10117028A	1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5301 W Ina Road	21401015A	1960	Not eligible	Not eligible	Compromised integrity

**Table C-2.** Individually surveyed properties, sorted by subdivision

Address	Tax parcel no.	Construction date	Individual National Register of Historic Places eligibility	Contributor to district eligibility	Eligibility remarks/Justification
5348 N Highway Drive	101170310	1946	Not eligible	Not eligible	Original structure hidden by non-historic additions on SW and SE facades
6913 N Camino Martin	101050170	1941	Not eligible	Not eligible	compromised integrity, not eligible under Criteria A, B, and C
6915 N Camino Martin	101050160	1989	Not eligible	Not eligible	Does not meet age requirements and not exceptionally significant
7031 N Camino Martin	10105012F	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

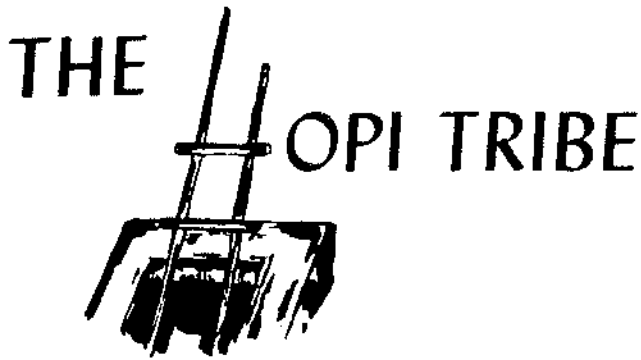


**Table C-3.** Architectural evaluations – list of subdivisions

<b>Subdivision</b>	<b>Plat date</b>	<b>National Register of Historic Places district eligibility</b>	<b>Remarks</b>
Casas del Oeste	1972	Not eligible	Less than 40 years old, high integrity
Gibson Tract	1946	Not eligible	Lack of significance, low integrity
Jeremy	1972	Not eligible	Less than 40 years old, low integrity
Palmdale No. 2	1963	Not eligible	Lack of significance, low integrity
Sunrise Addition	1958	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 2	1959	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 3	1959	Not eligible	Locally significant under Criterion C, low integrity
Tres Nogales	1948	Not eligible	Lack of significance, low integrity
Tucsonita	1946	Not eligible	Lack of significance, low integrity

**Table C-4.** Properties within area of potential effects initially identified but not surveyed

Address	Tax parcel no.	Remarks
2739 W. Ruthrauff Road	10307013B	No historic buildings/structures
2745 W. Ruthrauff Road	10307014B	No buildings/structures
5355 W. Ina Road	21401017C	No buildings/structures
4802 N. Sunrise Avenue	101151480	No buildings/structures
4810 N. Maryvale Avenue	101151190	No buildings/structures
2566 W. Violet Avenue	103070890	No historic buildings/structures
2739 W. Ruthrauff Road	10307013B	No historic buildings/structures
4527 W. Walker Road	10105023C	No historic buildings/structures
5043 W. Ina Road	21401012A	No historic buildings/structures
4202 W. Jeremy Place	101050330	No historic buildings/structures
4261 W. Jeremy Place	101050280	No historic buildings/structures
4818 N. Maryvale Avenue	101151200	No historic buildings/structures
4826 N. Maryvale Avenue	101151210	No historic buildings/structures
4834 N. Maryvale Avenue	101151220	No historic buildings/structures
4866 N. Shannon Road	101150370	No historic buildings/structures visible from right-of-way



H7583  
JMM & Ruthrauff

Leroy Shingoitewa  
CHAIRMAN

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VICE-CHAIRMAN

December 31, 2009

Dr. John M. Lindly, Historic Preservation Specialist  
Arizona Department of Transportation, Environmental Planning Group  
1611 West Jackson St., Mail Drop EM02  
Phoenix, Arizona 85007-3213

Re: I-10, Ina Road to Ruthrauff Road

Dear Dr. Lindly,

Thank you for your correspondence dated December 21, 2009, with an enclosed cultural resources survey report and monitoring plan for geotechnical investigations for the Federal Highway Administration and Arizona Department of Transportation (ADOT) planning of a roadway improvement project along Interstate 10 between Ina and Ruthrauff Roads in Marana and Tucson. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in Arizona, including the Hohokam prehistoric cultural group. The Hopi Cultural Preservation Office supports identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties and we consider the archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the ADOT's continuing solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office understands predesign geotechnical investigations are necessary for the project to proceed. We also understand that previous cultural resources surveys have identified 11 prehistoric National Register eligible sites in the area of potential effect, and that site AZ AA:12:13 of undetermined eligibility has been recommended for testing. We have reviewed the enclosed survey report and monitoring plan and we finally understand that the proposed geotechnical testing will include locations within five sites, AZ AA:12:11, 14, 103, 111, Las Capas, and 788, Rillito Fan Site.

Therefore, we concur that this project will have adverse effects on cultural resources, but that with the monitoring plan for geotechnical investigations, these investigations should result in no adverse effects to cultural resources. Please provide us with copies of the monitoring report and proposed treatment plan for review and comment. Should you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,

Leigh J. Kuwanwisiwma, Director  
Hopi Cultural Preservation Office

xc: Arizona State Historic Preservation Office





**Arizona Department of Transportation**  
**Intermodal Transportation Division**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer  
*Governor*

John S. Halikowski  
*Director*

Floyd Roehrich Jr.  
*State Engineer*

December 21, 2009

Roger Anyon, Cultural Resources Program Manager  
Pima County  
Housing and Community Development Department  
City of Tucson  
P. O. Box 27210  
Tucson, AZ 85726

RE: TRACS No. 010 PM 247 H7583 01C  
Ina Road to Ruthrauff Road  
Continuing State Act Consultation  
Geotechnical Investigations  
"no adverse effect"

Dear Mr. Anyon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project along Interstate 10 (I-10) in the Town of Marana and City of Tucson in Pima County. At this time, pre-design geotechnical investigations are necessary for the project to proceed. The geotechnical aspect of this project would use state funds; therefore, ADOT is consulting with you pursuant to ARS §41-864. The geotechnical investigations would occur on ADOT, City of Tucson (COT), Town of Marana, unincorporated Pima County (PC), and Union Pacific Railroad (UPRR) owned right-of-way (R/W). Consulting parties for the geotechnical aspect of this project include ADOT, the State Historic Preservation Office (SHPO), COT, PC, UPRR, the Hopi Tribe, Pascua Yaqui, San Carlos Apache Nation (SCAN), Tohono O'odham Nation (TON), Tonto Apache Tribe, White Mountain Apache Tribe (WMAT), and Yavapai-Apache Nation (YAN).

The geotechnical component of this project involves excavating bore holes both within and outside the existing ADOT R/W. All geotechnical work will be performed with a drill rig mounted on a double-axle commercial truck with rubber tires. Boring depths will range from 5 to 150 feet; the diameter of the boring holes will be approximately 8 inches. Excess tailings will be re-deposited in and/or immediately adjacent to the boring location. The area of potential effects (APE) for geotechnical investigations consists of the I-10 R/W between milepost (MP) 247.5 and MP 253.4 and adjacent municipal land at I-10 interchanges with Ina, Sunset and Ruthrauff roads. The majority of the APE was previously surveyed for cultural resources in conjunction with numerous undertakings. The following table lists previous surveys performed within the project area.

The remainder of the APE has recently been surveyed by HDR Engineering, Inc. The survey results are reported in “*A Cultural Resources Supplemental Survey for Geotechnical Investigations along Interstate 10 between Mileposts 247.5 and 253.4 in Marana, Tucson, and Pima County, Arizona*” (Touchin et al. 2009), which is enclosed for your review and comment. Artifacts associated with sites, AZ AA:12:11, 14, 103, and 788 (ASM) were identified as a result of HDR’s survey. Site AZ Z:2:40 (ASM), the historic Southern Pacific Railroad, also was observed.

			Existing R/W
Author/Year	References*	Milepost Limits	Concurrence
Bernard-Shaw 1991	<i>Archaeological Survey of the Proposed ADOT I-10 Corridor Improvements from Ruthrauff to Tangerine Roads, Pima County, Arizona (Desert)</i>	247.5 – 252.43	Unavailable
Swartz 1994a	Desert Archaeology Letter Report No. 94-117: An Archaeological Survey along Interstate 10 from Ina Road to Hartman Lane (Desert)	247.5-248.67	Unavailable
Kearns et al. 2001	<i>An Archaeological Survey of Link Three of the AT&amp;T NexGen/Core Project, Arizona and California (WCRM)</i>	247.5 – 253.43	Unavailable
Hill and Garcia 1999	<i>Cultural Resources Inventory Report and Monitoring/Discovery Plan for Phase I of the Tucson Freeway Management System along Portions of Interstates 10, 19, and B-19, Pima County, Arizona (Dames &amp; Moore, Inc.)</i>	248.62 – 248.70 249.44 – 249.74 250.04 250.60 – 250.76 252.18 – 252.48	Unavailable
Swartz 1994b	Desert Archaeology Letter Report No. 94-125: An Archaeological Survey along Interstate 10 at the Cañada del Oro Wash (Desert)	248.67-249	Unavailable
Thiel and Diehl 1999	<i>National Register Assessment of the Casa Grande Highway (AZ AA:12:118 [ASM]) between Ina and Ruthrauff Roads, Tucson, Arizona (Desert)</i>	248.67 – 252.43	7/3/2000
JHK & Associates 1989	<i>A Class III Archaeological Survey, I-10 General Plan, I-10/I-19 Interchange to Ruthrauff [sic] Road (JHK &amp; Associates)</i>	249.4 – 253.43	Unavailable
			Proposed New R/W
Author/Year	References*	Milepost Limits	Concurrence
Adams and Macnider 1992	<i>An Archaeological Assessment for the Rillito Loop, Santa Fe Pacific Pipeline, Tucson to Marana, Pima County, Arizona (ACS)</i>	Ina and Ruthrauff Road R/W east of I-10	Unavailable
Freeman 1994	<i>Archaeological Survey along Interstate 10, South Ina Road. Letter Report No. 94-133. (Desert)</i>	Ina Road R/W, east of I-10	Unavailable
Railey and Yost	<i>Cultural Resources Survey of the 360 Networks</i>	Ina Road R/W,	Unavailable

2000	<i>Fiber Optics Line from Mesa, Arizona to El Paso, Texas, Volumes I and II (TRC)</i>	west of I-10	
Bontrager 1988	<i>A Cultural Resources Evaluation of a Proposed Highway Interchange Improvement Project at the Interstate 10-Ina Road Interchange near Tucson, Pima County, Arizona (ARS)</i>	Ina Road R/W, west of I-10	Unavailable
Fish et al. 1992	<i>The Marana Community in the Hohokam World (ASM)</i>	Ina Road R/W, west of I-10	Unavailable
Fratt 1998	<i>An Archaeological Assessment Survey of Two Parcels Totaling 5 Acres near Ina and Oldfather Roads in the Town of Marana, Pima County, Arizona (Tierra R/W)</i>	north side of Ina Road R/W, west of I-10	Unavailable
Stephen 2001	PAST Report No. 011288: Letter Report for Development Plan Project (PAST)	Sunset Road R/W, west of I-10	Unavailable
Huckell and Brew 1980	No Reference available (CRMS)	Ruthrauff Road R/W, west of I-10	Unavailable
Hesse et al. 2008	<i>Archaeological Survey for the Roger Road WWTP to Ina Road WPCF Plant Interconnect Project, Pima County, Arizona (SWCA)</i>	Ruthrauff Road R/W, west of I-10	Unavailable
Touchin et al. 2009	<i>A Cultural Resources Supplemental Survey for Geotechnical Investigations along Interstate 10 between Mileposts 247.5 and 253.4 in Marana, Tucson, and Pima County, Arizona (HDR)</i>	Portions of Ina Road, east of I-10; portions of Sunset Road, east and west of I-10, and all of Ruthrauff Road (within APE)	N/A

\*ACS=Archaeological Consulting Services, Ltd.; ARS=Archaeological Research Services, Inc.; ASM=Arizona State Museum; CRMS=?; Desert=Desert Archaeology, Inc.; HDR=HDR Engineering, Inc.; PAST=SWCA=SWCA Environmental Consultants; Tierra R/W=Tierra Right-of-Way Services; TRC=TRC Solutions, Inc.; WCRM=Western Cultural Resource Management, Inc.

A total of 14 cultural resources have been documented within the current project APE as a result of previous investigations. Thirteen have been recommended or determined eligible for listing to the National Register of Historic Places (NRHP); testing has been recommended in order to evaluate the eligibility of site AZ AA:12:13 (ASM). The following table presents a list of historic properties within the APE.

Site Number/Name	Description	Eligibility (Criterion)	Reference
AZ AA:2:118 (ASM)/ Casa Grande Highway, State Route 84	Historic road	Segment within APE -- contributing Determined eligible (D)	Thiel and Diehl 1999
AZ AA:12:11 (ASM)	Prehistoric artifact scatter	Determined eligible (D) <sup>a</sup>	Adams and Macnider 1992 Bernard-Shaw 1991 Railey and Yost 2001 Hesse et al. 2008
AZ AA:12:13 (ASM) <sup>a</sup>	Prehistoric artifact scatter	Of undetermined eligibility	Adams and Macnider 1992 Railey and Yost 2001 Hesse et al. 2008
AZ AA:12:14 (ASM)	Multicomponent site (prehistoric and historic)	Determined eligible (D)	JHK & Associates 1989
AZ AA:12:20 (ASM)/ AZ AA:12:352 (ASM)	Prehistoric habitation	Determined eligible (D)	Bernard-Shaw 1991 Hesse et al. 2008
AZ AA:12:91 (ASM)/ Los Pozos	Prehistoric habitation	Determined eligible (D)	Hesse et al. 2008 JHK & Associates 1989
AZ AA:12:92 (ASM)/ El Taller	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Hesse et al. 2008 Railey and Yost 2001
AZ AA:12:103 (ASM)	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Hesse et al. 2008 Railey and Yost 2000
AZ AA:12:111 (ASM)/ AZ AA:12:753 (ASM)/ Las Capas	Prehistoric habitation and agricultural site	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Bontrager 1988 Hesse et al. 2008 Railey and Yost 2000
AZ AA:12:503 (ASM)/ Costello-King Site	Multicomponent site	Determined eligible (D)	Bernard-Shaw 1991
AZ AA:12:739 (ASM)	Prehistoric artifact scatter	Recommended eligible (D)	Hesse et al. 2008
AZ AA:12:788 (ASM)/ Rillito Fan Site	Multicomponent site	Determined eligible (D)	Hesse et al. 2008
AZ AA:12:798 (ASM)/ Slip-up Site	Multicomponent site	Determined eligible (D)	Bernard-Shaw 1991
AZ Z:2:40 (ASM)/ Southern Pacific Railroad Mainline-Southern Route, Sunset Route	Historic railroad	Segment within APE -- contributing Determined eligible (A and D)	Kearns et al. 2001 Railey and Yost 2001

<sup>a</sup> Based on Desert's previous investigations, site AZ AA:12:11 (ASM) was recommended eligible; however, no cultural deposits were encountered during trenching along the westbound frontage road.



Two of the sites—AZ AA:2:118 (ASM)/historic State Route (SR) 84, and AZ Z:2:40 (ASM)/Southern Pacific Railroad—are historic transportation corridors. SR 84 is part of the Historic State Highway System (HSHS). In accordance with the *Interim Procedures for the Treatment of Historic Roads* developed between FHWA, ADOT, and SHPO on November 15, 2002, the road is considered NRHP eligible under Criterion D. Geotechnical boring will not affect the location or function/design of remaining historic road segments. Therefore, there is no adverse impact to the road. Although boring will take place within the railroad R/W, the AZ Z:2:40 (ASM) structure will be avoided.

The existing ADOT R/W was also previously investigated by Desert Archaeology, Inc. through a series of testing and data recovery projects. Following is a list of consultations for those investigations:

I-10; Cortaro to Ina Roads

- No previous consultation available

I-10; Ina to Sunset Roads

- Miller [SHPO] to Lindauer [ADOT] on February 26, 1998 (testing)
- Miller [SHPO] to Rosenberg [ADOT] on August 12, 1999 (data recovery)

I-10; Sunset to Ruthrauff Roads

- Miller [SHPO] to Hollis [FHWA] on June 4, 2001 (testing)
- Jacobs [SHPO] to Hollis [FHWA] on September 17, 2001 (data recovery)

I-10; Ruthrauff to Prince Roads

- Miller [SHPO] to Lindauer [ADOT] on March 4, 1998 (testing)
- ? [SHPO] to Rosenberg [ADOT] on September 5, 1995 (data recovery)
- Miller [SHPO] to Rosenberg [ADOT] on December 23, 1998 (data recovery)

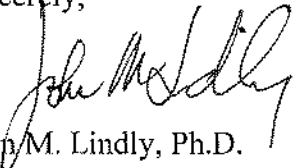
In the event that subsurface cultural deposits are encountered within site boundaries in areas of the APE not previously covered by testing or data recovery, ADOT recommends that an archaeological monitor be present. ADOT also recommends that geotechnical work can proceed without an archaeological monitor in areas that are within portions of sites previously tested or data recovered. To expedite the geotechnical clearance, ADOT requested that HDR prepare a monitoring and discovery plan, *An Archaeological Monitoring and Discovery Plan for Geotechnical Investigations along I-10, Ina Road to Ruthrauff Road (Mileposts 247.5 to 253.43) within the City of Tucson and Town of Marana, Pima County, Arizona* (Lundin and Fackler 2009), a copy of which is enclosed for your review and comment.

Based on the above information, ADOT has determined that a finding of “no adverse effect” is appropriate for the geotechnical investigations, provided that the procedures described in the monitoring and discovery plan are followed. Please review the enclosed geotechnical testing

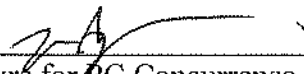
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December 21, 2009  
Page 6 of 6

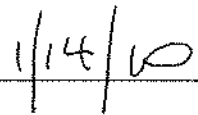
plans, survey report, monitoring and discovery plan, and the information provided in this letter. If you find the report and plan adequate and agree with ADOT's determination of project effect for the geotechnical component of this undertaking, please indicate your concurrence by signing below. If you have any questions or comments, please feel free to contact me at (602) 712-8640 or JLindly@azdot.gov.

Sincerely,



John M. Lindly, Ph.D.  
Environmental Planning Group  
1611 W. Jackson Street, Mail Drop EM02  
Phoenix, AZ 85007

  
\_\_\_\_\_  
Signature for PC Concurrence

  
\_\_\_\_\_  
Date

Enclosures

*[Faint, illegible text or stamp]*

2009-1851(75700)



**Arizona Department of Transportation**  
**Intermodal Transportation Division**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer  
Governor

John S. Halikowski  
Director

December 21, 2009

Floyd Roehrich Jr.  
State Engineer

RECEIVED

DEC 22 2009

STATE PARKS/S.H.P.

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

RE: TRACS No. 010 PM 247 H7583 01C  
Ina Road to Ruthrauff Road  
Continuing State Act Consultation  
Geotechnical Investigations  
"no adverse effect"

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project along Interstate 10 (I-10) in the Town of Marana and City of Tucson in Pima County. At this time, pre-design geotechnical investigations are necessary for the project to proceed. The geotechnical aspect of this project would use state funds; therefore, ADOT is consulting with you pursuant to ARS §41-864. The geotechnical investigations would occur on ADOT, City of Tucson (COT), Town of Marana, unincorporated Pima County (PC), and Union Pacific Railroad (UPRR) owned right-of-way (R/W). Consulting parties for the geotechnical aspect of this project include ADOT, the State Historic Preservation Office (SHPO), COT, PC, UPRR, the Hopi Tribe, Pascua Yaqui, San Carlos Apache Nation (SCAN), Tohono O'odham Nation (TON), Tonto Apache Tribe, White Mountain Apache Tribe (WMAT), and Yavapai-Apache Nation (YAN).

The geotechnical component of this project involves excavating bore holes both within and outside the existing ADOT R/W. All geotechnical work will be performed with a drill rig mounted on a double-axle commercial truck with rubber tires. Boring depths will range from 5 to 150 feet; the diameter of the boring holes will be approximately 8 inches. Excess tailings will be re-deposited in and/or immediately adjacent to the boring location. The area of potential effects (APE) for geotechnical investigations consists of the I-10 R/W between milepost (MP) 247.5 and MP 253.4 and adjacent municipal land at I-10 interchanges with Ina, Sunset and Ruthrauff roads. The majority of the APE was previously surveyed for cultural resources in conjunction with numerous undertakings. The following table lists previous surveys performed within the project area.

kind

✓

			Existing R/W
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Swartz 1994b	Desert Archaeology Letter Report No. 94-125: An Archaeological Survey along Interstate 10 at the Cañada del Oro Wash (Desert)	248.67-249	Unavailable
Thiel and Diehl 1999	<i>National Register Assessment of the Casa Grande Highway (AZ AA:12:118 [ASM]) between Ina and Ruthrauff Roads, Tucson, Arizona (Desert)</i>	248.67 – 252.43	7/3/2000
JHK & Associates 1989	<i>A Class III Archaeological Survey, I-10 General Plan, I-10/I-19 Interchange to Ruthrauff [sic] Road (JHK &amp; Associates)</i>	249.4 – 253.43	Unavailable
			Proposed New R/W
Author/Year	References*	Milepost Limits	Concurrence
Adams and Macnider 1992	<i>An Archaeological Assessment for the Rillito Loop, Santa Fe Pacific Pipeline, Tucson to Marana, Pima County, Arizona (ACS)</i>	Ina and Ruthrauff Road R/W east of I-10	Unavailable
Freeman 1994	<i>Archaeological Survey along Interstate 10, South Ina Road. Letter Report No. 94-133. (Desert)</i>	Ina Road R/W, east of I-10	Unavailable
Railey and Yost 2000	<i>Cultural Resources Survey of the 360 Networks Fiber Optics Line from Mesa, Arizona to El Paso, Texas, Volumes I and II (TRC)</i>	Ina Road R/W, west of I-10	Unavailable
Bontrager 1988	<i>A Cultural Resources Evaluation of a Proposed Highway Interchange Improvement Project at the Interstate 10-Ina Road Interchange near Tucson, Pima County, Arizona (ARS)</i>	Ina Road R/W, west of I-10	Unavailable
Fish et al. 1992	<i>The Marana Community in the Hohokam World (ASM)</i>	Ina Road R/W, west of I-10	Unavailable
Fratt 1998	<i>An Archaeological Assessment Survey of Two Parcels Totaling 5 Acres near Ina and Oldfather Roads in the Town of Marana, Pima County,</i>	north side of Ina Road R/W, west of I-10	Unavailable

	<i>Arizona (Tierra R/W)</i>		
Stephen 2001	PAST Report No. 011288: Letter Report for Development Plan Project (PAST)	Sunset Road R/W, west of I-10	Unavailable
Huckell and Brew 1980	No Reference available (CRMS)	Ruthrauff Road R/W, west of I-10	Unavailable
Hesse et al. 2008	<i>Archaeological Survey for the Roger Road WWTP to Ina Road WPCF Plant Interconnect Project, Pima County, Arizona (SWCA)</i>	Ruthrauff Road R/W, west of I-10	Unavailable
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\*ACS=Archaeological Consulting Services, Ltd.; ARS=Archaeological Research Services, Inc.; ASM=Arizona State Museum; CRMS=?; Desert=Desert Archaeology, Inc.; HDR=HDR Engineering, Inc.; PAST=SWCA=SWCA Environmental Consultants; Tierra R/W=Tierra Right-of-Way Services; TRC=TRC Solutions, Inc.; WCRM=Western Cultural Resource Management, Inc.

The remainder of the APE has recently been surveyed by HDR Engineering, Inc. The survey results are reported in “*A Cultural Resources Supplemental Survey for Geotechnical Investigations along Interstate 10 between Mileposts 247.5 and 253.4 in Marana, Tucson, and Pima County, Arizona*” (Touchin et al. 2009), which is enclosed for your review and comment. Artifacts associated with sites, AZ AA:12:11, 14, 103, and 788 (ASM) were identified as a result of HDR’s survey. Site AZ Z:2:40 (ASM), the historic Southern Pacific Railroad, also was observed.

A total of 14 cultural resources have been documented within the current project APE as a result of previous investigations. Thirteen have been recommended or determined eligible for listing to the National Register of Historic Places (NRHP); testing has been recommended in order to evaluate the eligibility of site AZ AA:12:13 (ASM). The following table presents a list of historic properties within the APE.

Site Number/Name	Description	Eligibility (Criterion)	Reference
AZ AA:2:118 (ASM)/ Casa Grande Highway, State Route 84	Historic road	Segment within APE – contributing Determined eligible (D)	Thiel and Diehl 1999
AZ AA:12:11 (ASM)	Prehistoric artifact scatter	Determined eligible (D) <sup>a</sup>	Adams and Macnider 1992 Bernard-Shaw 1991 Railey and Yost 2001 Hesse et al. 2008
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AZ AA:12:91 (ASM)/ Los Pozos	Prehistoric habitation	Determined eligible (D)	Hesse et al. 2008 JHK & Associates 1989
AZ AA:12:92 (ASM)/ El Taller	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Hesse et al. 2008 Railey and Yost 2001
AZ AA:12:103 (ASM)	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Hesse et al. 2008 Railey and Yost 2000
AZ AA:12:111 (ASM)/ AZ AA:12:753 (ASM)/ Las Capas	Prehistoric habitation and agricultural site	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Bontrager 1988 Hesse et al. 2008 Railey and Yost 2000
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AZ AA:12:788 (ASM)/ Rillito Fan Site	Multicomponent site	Determined eligible (D)	Hesse et al. 2008
AZ AA:12:798 (ASM)/ Slip-up Site	Multicomponent site	Determined eligible (D)	Bernard-Shaw 1991
AZ Z:2:40 (ASM)/ Southern Pacific Railroad Mainline–Southern Route, Sunset Route	Historic railroad	Segment within APE – contributing Determined eligible (A and D)	Kearns et al. 2001 Railey and Yost 2001

<sup>a</sup> Based on Desert's previous investigations, site AZ AA:12:11 (ASM) was recommended eligible; however, no cultural deposits were encountered during trenching along the westbound frontage road.

Jacobs

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December 21, 2009

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Two of the sites—AZ AA:2:118 (ASM)/historic State Route (SR) 84, and AZ Z:2:40 (ASM)/Southern Pacific Railroad—are historic transportation corridors. SR 84 is part of the Historic State Highway System (HSYS). In accordance with the *Interim Procedures for the Treatment of Historic Roads* developed between FHWA, ADOT, and SHPO on November 15, 2002, the road is considered NRHP eligible under Criterion D. Geotechnical boring will not affect the location or function/design of remaining historic road segments. Therefore, there is no adverse impact to the road. Although boring will take place within the railroad R/W, the site AZ Z:2:40 (ASM) structure will be avoided.

The existing ADOT R/W was also previously investigated by Desert Archaeology, Inc. through a series of testing and data recovery projects. Following is a list of consultations for those investigations:

I-10; Cortaro to Ina Roads

- No previous consultation available

I-10; Ina to Sunset Roads

- Miller [SHPO] to Lindauer [ADOT] on February 26, 1998 (testing)
- Miller [SHPO] to Rosenberg [ADOT] on August 12, 1999 (data recovery)

I-10; Sunset to Ruthrauff Roads

- Miller [SHPO] to Hollis [FHWA] on June 4, 2001 (testing)
- Jacobs [SHPO] to Hollis [FHWA] on September 17, 2001 (data recovery)

I-10; Ruthrauff to Prince Roads

- Miller [SHPO] to Lindauer [ADOT] on March 4, 1998 (testing)
- ? [SHPO] to Rosenberg [ADOT] on September 5, 1995 (data recovery)
- Miller [SHPO] to Rosenberg [ADOT] on December 23, 1998 (data recovery)

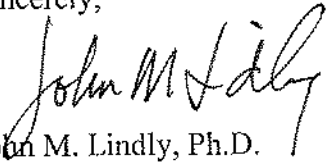
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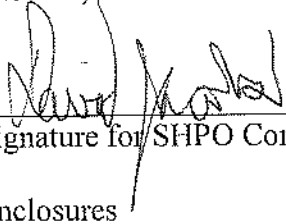
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TRACS No. 010 PM 247 H7583 01C  
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Page 6 of 6

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Sincerely,

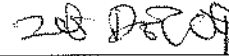


John M. Lindly, Ph.D.  
Environmental Planning Group  
1611 W. Jackson Street, Mail Drop EM02  
Phoenix, AZ 85007



Signature for SHPO Concurrence

Enclosures



Date





**Arizona Department of Transportation**  
**Intermodal Transportation Division**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer  
Governor

John S. Halikowski  
Director

Floyd Roehrich Jr.  
State Engineer

December 21, 2009

Mr. Peter Steere, Tribal Historic Preservation Officer  
Mr. Joe Joaquin  
Cultural Affairs Office  
Tohono O'odham Nation  
P. O. Box 837  
Sells, Arizona 85634

RE: TRACS No. 010 PM 247 H7583 01C  
Ina Road to Ruthrauff Road  
Continuing State Act Consultation  
Geotechnical Investigations  
"no adverse effect"

Dear Messrs. Steere and Joaquin:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project along Interstate 10 (I-10) in the Town of Marana and City of Tucson in Pima County. At this time, pre-design geotechnical investigations are necessary for the project to proceed. The geotechnical aspect of this project would use state funds; therefore, ADOT is consulting with you pursuant to ARS §41-864. The geotechnical investigations would occur on ADOT, City of Tucson (COT), Town of Marana, unincorporated Pima County (PC), and Union Pacific Railroad (UPRR) owned right-of-way (R/W). Consulting parties for the geotechnical aspect of this project include ADOT, the State Historic Preservation Office (SHPO), COT, PC, UPRR, the Hopi Tribe, Pascua Yaqui, San Carlos Apache Nation (SCAN), Tohono O'odham Nation (TON), Tonto Apache Tribe, White Mountain Apache Tribe (WMAT), and Yavapai-Apache Nation (YAN).

The geotechnical component of this project involves excavating bore holes both within and outside the existing ADOT R/W. All geotechnical work will be performed with a drill rig mounted on a double-axle commercial truck with rubber tires. Boring depths will range from 5 to 150 feet; the diameter of the boring holes will be approximately 8 inches. Excess tailings will be re-deposited in and/or immediately adjacent to the boring location. The area of potential effects (APE) for geotechnical investigations consists of the I-10 R/W between milepost (MP) 247.5 and MP 253.4 and adjacent municipal land at I-10 interchanges with Ina, Sunset and Ruthrauff roads. The majority of the APE was previously surveyed for cultural resources in conjunction with numerous undertakings. The following table lists previous surveys performed within the project area.

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<b>Author/Year</b>	<b>References*</b>	<b>Milepost Limits</b>	<b>Concurrence</b>
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Fratt 1998	<i>An Archaeological Assessment Survey of Two</i>	north side of Ina	Unavailable

	<i>Parcels Totaling 5 Acres near Ina and Oldfather Roads in the Town of Marana, Pima County, Arizona (Tierra R/W)</i>	Road R/W, west of I-10	
Stephen 2001	PAST Report No. 011288: Letter Report for Development Plan Project (PAST)	Sunset Road R/W, west of I-10	Unavailable
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The remainder of the APE has recently been surveyed by HDR Engineering, Inc. The survey results are reported in “*A Cultural Resources Supplemental Survey for Geotechnical Investigations along Interstate 10 between Mileposts 247.5 and 253.4 in Marana, Tucson, and Pima County, Arizona*” (Touchin et al. 2009), which is enclosed for your review and comment. Artifacts associated with sites, AZ AA:12:11, 14, 103, and 788 (ASM) were identified as a result of HDR’s survey. Site AZ Z:2:40 (ASM), the historic Southern Pacific Railroad, also was observed.

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- Jacobs [SHPO] to Hollis [FHWA] on September 17, 2001 (data recovery)

I-10; Ruthrauff to Prince Roads

- Miller [SHPO] to Lindauer [ADOT] on March 4, 1998 (testing)
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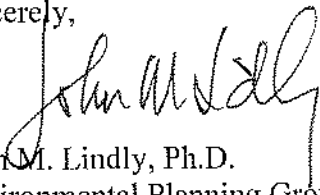
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Based on the above information, ADOT has determined that a finding of “no adverse effect” is appropriate for the geotechnical investigations, provided that the procedures described in the monitoring and discovery plan are followed. Please review the enclosed geotechnical testing

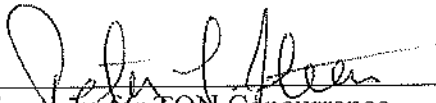
Steere and Joaquin  
TRACS No. 010 PM 247 H7583 01C  
December 21, 2009  
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plans, survey report, monitoring and discovery plan, and the information provided in this letter. If you find the report and plan adequate and agree with ADOT's determination of project effect for the geotechnical component of this undertaking, please indicate your concurrence by signing below. At this time, ADOT is also inquiring as to whether you have any concerns regarding historic properties of religious or cultural importance to your community within the project area. If you have such concerns, any information you might provide within 30 days of receipt of this letter would be considered in the project planning. If your office opts to participate in cultural resource consultation at a later date, ADOT would make a good faith effort to address any of the tribe's concerns. However, such consultation would not necessitate a reconsideration of this determination of project effect. If you have any questions or comments, please feel free to contact me at (602) 712-8640 or JLindly@azdot.gov.

Sincerely,



John M. Lindly, Ph.D.  
Environmental Planning Group  
1611 W. Jackson Street, Mail Drop EM02  
Phoenix, AZ 85007



Signature for TON Concurrence

1-23-10

Date

Enclosures

Rec. 2/17/10



**Arizona Department of Transportation**  
**Intermodal Transportation Division**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer  
Governor

John S. Halikowski  
Director

Floyd Roehrich Jr.  
State Engineer

December 21, 2009

Mr. Ivan Smith, Chair  
Tonto Apache Reservation #30  
Payson, AZ 85541

RE: TRACS No. 010 PM 247 H7583 01C  
Ina Road to Ruthrauff Road  
Continuing State Act Consultation  
Geotechnical Investigations  
“no adverse effect”

Dear Chair Smith:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project along Interstate 10 (I-10) in the Town of Marana and City of Tucson in Pima County. At this time, pre-design geotechnical investigations are necessary for the project to proceed. The geotechnical aspect of this project would use state funds; therefore, ADOT is consulting with you pursuant to ARS §41-864. The geotechnical investigations would occur on ADOT, City of Tucson (COT), Town of Marana, unincorporated Pima County (PC), and Union Pacific Railroad (UPRR) owned right-of-way (R/W). Consulting parties for the geotechnical aspect of this project include ADOT, the State Historic Preservation Office (SHPO), COT, PC, UPRR, the Hopi Tribe, Pascua Yaqui, San Carlos Apache Nation (SCAN), Tohono O’odham Nation (TON), Tonto Apache Tribe, White Mountain Apache Tribe (WMAT), and Yavapai-Apache Nation (YAN).

The geotechnical component of this project involves excavating bore holes both within and outside the existing ADOT R/W. All geotechnical work will be performed with a drill rig mounted on a double-axle commercial truck with rubber tires. Boring depths will range from 5 to 150 feet; the diameter of the boring holes will be approximately 8 inches. Excess tailings will be re-deposited in and/or immediately adjacent to the boring location. The area of potential effects (APE) for geotechnical investigations consists of the I-10 R/W between milepost (MP) 247.5 and MP 253.4 and adjacent municipal land at I-10 interchanges with Ina, Sunset and Ruthrauff roads. The majority of the APE was previously surveyed for cultural resources in conjunction with numerous undertakings. The following table lists previous surveys performed within the project area.

			<b>Existing R/W</b>
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JHK & Associates 1989	<i>A Class III Archaeological Survey, I-10 General Plan, I-10/I-19 Interchange to Ruthrauff [sic] Road (JHK &amp; Associates)</i>	249.4 – 253.43	Unavailable
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<b>Author/Year</b>	<b>References*</b>	<b>Milepost Limits</b>	<b>Concurrence</b>
Adams and Macnider 1992	<i>An Archaeological Assessment for the Rillito Loop, Santa Fe Pacific Pipeline, Tucson to Marana, Pima County, Arizona (ACS)</i>	Ina and Ruthrauff Road R/W east of I-10	Unavailable
Freeman 1994	<i>Archaeological Survey along Interstate 10, South Ina Road. Letter Report No. 94-133. (Desert)</i>	Ina Road R/W, east of I-10	Unavailable
Railey and Yost 2000	<i>Cultural Resources Survey of the 360 Networks Fiber Optics Line from Mesa, Arizona to El Paso, Texas, Volumes I and II (TRC)</i>	Ina Road R/W, west of I-10	Unavailable
Bontrager 1988	<i>A Cultural Resources Evaluation of a Proposed Highway Interchange Improvement Project at the Interstate 10-Ina Road Interchange near Tucson, Pima County, Arizona (ARS)</i>	Ina Road R/W, west of I-10	Unavailable
Fish et al. 1992	<i>The Marana Community in the Hohokam World (ASM)</i>	Ina Road R/W, west of I-10	Unavailable
Fratt 1998	<i>An Archaeological Assessment Survey of Two Parcels Totaling 5 Acres near Ina and Oldfather Roads in the Town of Marana, Pima County,</i>	north side of Ina Road R/W, west of I-10	Unavailable



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	Arizona (Tierra R/W)		
Stephen 2001	PAST Report No. 011288: Letter Report for Development Plan Project (PAST)	Sunset Road R/W, west of I-10	Unavailable
Huckell and Brew 1980	No Reference available (CRMS)	Ruthrauff Road R/W, west of I-10	Unavailable
Hesse et al. 2008	<i>Archaeological Survey for the Roger Road WWTP to Ina Road WPCF Plant Interconnect Project, Pima County, Arizona (SWCA)</i>	Ruthrauff Road R/W, west of I-10	Unavailable
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\*ACS=Archaeological Consulting Services, Ltd.; ARS=Archaeological Research Services, Inc.; ASM=Arizona State Museum; CRMS=?; Desert=Desert Archaeology, Inc.; HDR=HDR Engineering, Inc.; PAST=SWCA=SWCA Environmental Consultants; Tierra R/W=Tierra Right-of-Way Services; TRC=TRC Solutions, Inc.; WCRM=Western Cultural Resource Management, Inc.

The remainder of the APE has recently been surveyed by HDR Engineering, Inc. The survey results are reported in “*A Cultural Resources Supplemental Survey for Geotechnical Investigations along Interstate 10 between Mileposts 247.5 and 253.4 in Marana, Tucson, and Pima County, Arizona*” (Touchin et al. 2009), which is enclosed for your review and comment. Artifacts associated with sites, AZ AA:12:11, 14, 103, and 788 (ASM) were identified as a result of HDR’s survey. Site AZ Z:2:40 (ASM), the historic Southern Pacific Railroad, also was observed.

A total of 14 cultural resources have been documented within the current project APE as a result of previous investigations. Thirteen have been recommended or determined eligible for listing to the National Register of Historic Places (NRHP); testing has been recommended in order to evaluate the eligibility of site AZ AA:12:13 (ASM). The following table presents a list of historic properties within the APE.

Site Number/Name	Description	Eligibility (Criterion)	Reference
AZ AA:2:118 (ASM)/ Casa Grande Highway, State Route 84	Historic road	Segment within APE – contributing Determined eligible (D)	Thiel and Diehl 1999
AZ AA:12:11 (ASM)	Prehistoric artifact scatter	Determined eligible (D) <sup>a</sup>	Adams and Macnider 1992 Bernard-Shaw 1991 Railey and Yost 2001 Hesse et al. 2008
AZ AA:12:13 (ASM) <sup>a</sup>	Prehistoric artifact scatter	Of undetermined eligibility	Adams and Macnider 1992 Railey and Yost 2001 Hesse et al. 2008
AZ AA:12:14 (ASM)	Multicomponent site (prehistoric and historic)	Determined eligible (D)	JHK & Associates 1989
AZ AA:12:20 (ASM)/ AZ AA:12:352 (ASM)	Prehistoric habitation	Determined eligible (D)	Bernard-Shaw 1991 Hesse et al. 2008
AZ AA:12:91 (ASM)/ Los Pozos	Prehistoric habitation	Determined eligible (D)	Hesse et al. 2008 JHK & Associates 1989
AZ AA:12:92 (ASM)/ El Taller	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Hesse et al. 2008 Railey and Yost 2001
AZ AA:12:103 (ASM)	Prehistoric habitation	Determined eligible (D)	Adams and Macnider 1992 Hesse et al. 2008 Railey and Yost 2000
AZ AA:12:111 (ASM)/ AZ AA:12:753 (ASM)/ Las Capas	Prehistoric habitation and agricultural site	Determined eligible (D)	Adams and Macnider 1992 Bernard-Shaw 1991 Bontrager 1988 Hesse et al. 2008 Railey and Yost 2000
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AZ AA:12:798 (ASM)/ Slip-up Site	Multicomponent site	Determined eligible (D)	Bernard-Shaw 1991
AZ Z:2:40 (ASM)/ Southern Pacific Railroad Mainline–Southern Route, Sunset Route	Historic railroad	Segment within APE – contributing Determined eligible (A and D)	Kearns et al. 2001 Railey and Yost 2001

<sup>a</sup> Based on Desert's previous investigations, site AZ AA:12:11 (ASM) was recommended eligible; however, no cultural deposits were encountered during trenching along the westbound frontage road.

Two of the sites—AZ AA:2:118 (ASM)/historic State Route (SR) 84, and AZ Z:2:40 (ASM)/Southern Pacific Railroad—are historic transportation corridors. SR 84 is part of the Historic State Highway System (SHHS). In accordance with the *Interim Procedures for the Treatment of Historic Roads* developed between FHWA, ADOT, and SHPO on November 15, 2002, the road is considered NRHP eligible under Criterion D. Geotechnical boring will not affect the location or function/design of remaining historic road segments. Therefore, there is no adverse impact to the road. Although boring will take place within the railroad R/W, the site AZ Z:2:40 (ASM) structure will be avoided.

The existing ADOT R/W was also previously investigated by Desert Archaeology, Inc. through a series of testing and data recovery projects. Following is a list of consultations for those investigations:

I-10; Cortaro to Ina Roads

- No previous consultation available

I-10; Ina to Sunset Roads

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- Miller [SHPO] to Rosenberg [ADOT] on August 12, 1999 (data recovery)

I-10; Sunset to Ruthrauff Roads

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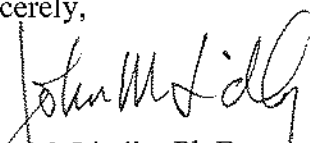
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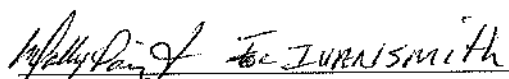
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Smith  
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December 21, 2009  
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plans, survey report, monitoring and discovery plan, and the information provided in this letter. If you find the report and plan adequate and agree with ADOT's determination of project effect for the geotechnical component of this undertaking, please indicate your concurrence by signing below. At this time, ADOT is also inquiring as to whether you have any concerns regarding historic properties of religious or cultural importance to your community within the project area. If you have such concerns, any information you might provide within 30 days of receipt of this letter would be considered in the project planning. If your office opts to participate in cultural resource consultation at a later date, ADOT would make a good faith effort to address any of the tribe's concerns. However, such consultation would not necessitate a reconsideration of this determination of project effect. If you have any questions or comments, please feel free to contact me at (602) 712-8640 or JLindly@azdot.gov.

Sincerely,

  
John M. Lindly, Ph.D.  
Environmental Planning Group  
1611 W. Jackson Street, Mail Drop EM02  
Phoenix, AZ 85007

  
Signature for Tonto Apache Tribe Concurrence

12-28-09  
Date

Enclosures



**Arizona Department of Transportation**  
**Intermodal Transportation Division**

206 South Seventeenth Avenue Phoenix, Arizona 85007-3213

Janice K. Brewer  
Governor

John S. Halikowski  
Director

Floyd Roehrich Jr.  
State Engineer

December 21, 2009

Jonathan Mabry  
Historic Preservation Office  
Housing and Community Development Department  
City of Tucson  
P. O. Box 27210  
Tucson, AZ 85726

RE: TRACS No. 010 PM 247 H7583 01C  
Ina Road to Ruthrauff Road  
Continuing State Act Consultation  
Geotechnical Investigations  
“no adverse effect”

Dear Mr. Mabry:

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- Jacobs [SHPO] to Hollis [FHWA] on September 17, 2001 (data recovery)

I-10; Ruthrauff to Prince Roads

- Miller [SHPO] to Lindauer [ADOT] on March 4, 1998 (testing)
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- Miller [SHPO] to Rosenberg [ADOT] on December 23, 1998 (data recovery)

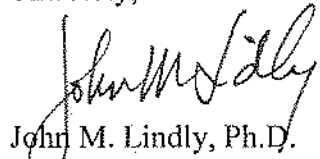
In the event that subsurface cultural deposits are encountered within site boundaries in areas of the APE not previously covered by testing or data recovery, ADOT recommends that an archaeological monitor be present. ADOT also recommends that geotechnical work can proceed without an archaeological monitor in areas that are within portions of sites previously tested or data recovered. To expedite the geotechnical clearance, ADOT requested that HDR prepare a monitoring and discovery plan, *An Archaeological Monitoring and Discovery Plan for Geotechnical Investigations along I-10, Ina Road to Ruthrauff Road (Mileposts 247.5 to 253.43) within the City of Tucson and Town of Marana, Pima County, Arizona* (Lundin 2009), a copy of which is enclosed for your review and comment.

Based on the above information, ADOT has determined that a finding of “no adverse effect” is appropriate for the geotechnical investigations, provided that the procedures described in the monitoring and discovery plan are followed. Please review the enclosed geotechnical testing

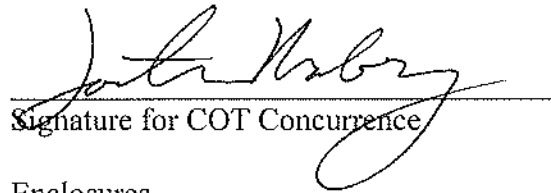
Mabry  
TRACS No. 010 PM 247 H7583 01C  
December 18, 2009  
Page 6 of 6

plans, survey report, monitoring and discovery plan, and the information provided in this letter. If you find the report and plan adequate and agree with ADOT's determination of project effect for the geotechnical component of this undertaking, please indicate your concurrence by signing below. If you have any questions or comments, please feel free to contact me at (602) 712-8640 or JLindly@azdot.gov.

Sincerely,



John M. Lindly, Ph.D.  
Environmental Planning Group  
1611 W. Jackson Street, Mail Drop EM02  
Phoenix, AZ 85007

  
Signature for COT Concurrence

Enclosures

2-9-2010  
Date

Rec. 2/17/10

**White Mountain Apache Tribe Heritage Program**  
**PO Box 507 Fort Apache, AZ 85926**  
**1 (928) 338-3033 Fax: (928) 338-6055**

**To:** John M. Lindly, Ph.D., ADOT Environmental Planning Group  
**Date:** December 29, 2009  
**Project:** TRACS No. 010 PM 247 H7583 01C – Ina Road to Ruthrauff Road

.....

The White Mountain Apache Historic Preservation Office (THPO) appreciates receiving information on the proposed project, dated December 21, 2009. In regards to this, please attend to the 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.*

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 Cultural Resource Director, *Mr. Ramon Riley* would be the contact person at (928) 338-4625 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 the cultural resource survey for the proposed roadway improvement project along Interstate 10 in the Town of Marana and City of Tucson in Pima County, and we've determined the proposed project *will not have an effect* on the White Mountain Apache tribe's Cultural Heritage Resources and/or historic properties, however, any ground disturbance should be monitored *if* there are reasons to believe that human remains and/or funerary objects are present, if such remains and/or objects are encountered all construction activities are to be stopped and the proper authorities and/or affiliated tribe(s) be notified to evaluate the situation.

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

Sincerely,

Mark T. Altaha  
White Mountain Apache Tribe  
Historic Preservation Officer  
Email: [markaltaha@wmat.nsn.us](mailto:markaltaha@wmat.nsn.us)





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

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 14, 2011

In Reply Refer To:  
010-D(211)A  
HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Mr. Leigh Kuwanwisiwma  
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 planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Nation, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The scope of this project would involve reconstruction of I-10 including widening to ten lanes, from Ina Road to Ruthrauff Road, using the median; reconstructing traffic interchanges at Ina Road, Sunset Road, and Ruthrauff Road; adding turn lanes at the frontage road and crossroad intersections along the corridor; replacing the bridges over the Cañada del Oro Wash and the Rillito River; installing a storm drain system with catch basins and pipes; extending and adding capacity to existing drainage structures; and replacing culverts and implementing local access changes at Ina Road and Ruthrauff Road. New right of way (ROW) will be required for the project. The area of potential effects (APE) for the consideration of direct impacts to archaeological resources and the historic built environment is defined as the construction footprint. The APE for the consideration of indirect impacts (visual, audible, and seismic) to historic built environment includes the construction footprint plus adjacent property parcels and subdivisions (see attached map).

HDR Engineering, Inc., prepared a Class I overview, which presents a discussion of (1) historic properties within the APE; (2) regional geomorphology; (3) prior subsurface investigations within and adjacent to the APE; (4) potential research themes and questions; and (5) recommendations for future cultural

resource investigations within the APE. The results of the Class I overview are reported in "Past Occupation of the Middle Santa Cruz Floodplain: A Class I Overview for the Interstate 10, Ina Road to Ruthrauff Road, Project in Marana, Tucson, and Pima County, Arizona" (Lundin 2011), which is enclosed for your review and comment.

The APE encompasses portions of 14 historic properties. Of those historic properties, 12 are prehistoric sites: AZ AA:12:11 (ASM), AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), AZ AA:12:20/352 (ASM), AZ AA:12:91 (ASM)/Los Pozos, AZ AA:12:92 (ASM), AZ AA:12:103 (ASM), AZ AA:12:111/753 (ASM)/Las Capas, AZ AA:12:503 (ASM)/Costello-King Site, AZ AA:12:739 (ASM), AZ AA:12:788 (ASM), and AZ AA:12:798 (ASM); and 2—AZ AA:2:118 (ASM)/State Route 84 and AZ Z:2:40 (ASM)/Southern Pacific Railroad—are historic structures/alignments. Because historic properties cannot be avoided by construction, FHWA has determined that a finding of "adverse effect" is appropriate for this project.

A total of 21 bridges are present within the APE; however, none are eligible for listing in the National Register of Historic Properties (refer to appended bridge table). Ineligibility is based on: (1) insufficient age; (2) Section 106 exemption as part of the interstate system; or (3) recommendation of ineligibility by FRASERdesign.

HDR also is preparing an assessment of National Register of Historic Places eligibility for the project's built environment, which addresses the evaluation of historic buildings, residences, subdivisions, and commercial/industrial properties. Please indicate in your response to this letter if you would like a copy of the architectural report sent to you for Section 106 review.

Please review the enclosed report and the information provided in this letter. If you agree with the adequacy of the report and management recommendations, and FHWA's determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,



for  
Karla S. Petty  
Division Administrator

\_\_\_\_\_  
Signature for Hopi Concurrence  
010-D(211)A

\_\_\_\_\_  
Date

Enclosures

Structure No.	Milepost	Bridge Name	Year Built	National Register Eligibility
5545	247.63	RCB EFR, I-10 & WFR	1953	Ineligible (FD)
6040	247.63	RCBC EFR	1930	Ineligible (FD)
5547	248.01	RCB I-10 & WFR	1953	Ineligible (FD)
6062	248.01	RCBC EFR	1930	Ineligible (FD)
5549	248.63	RCB	1953	Ineligible (E)
0866	248.72	Ina Road TI OP EB	1965	Ineligible (E)
0867	248.72	Ina Road TI OP WB	1965	Ineligible (E)
0390	249.49	Canada del Oro Bridge WB	1953	Ineligible (E)
0853	249.49	Canada del Oro Bridge EB	1965	Ineligible (E)
1431	249.57	Canada del Oro Bridge EB FR	2000	Ineligible (A)
1432	249.57	Canada del Oro Bridge WB FR	1999	Ineligible (A)
0868	250.04	Orange Grove TI OP EB	1965	Ineligible (E)
0869	250.04	Orange Grove TI OP WB	1965	Ineligible (E)
0391	250.66	Rillito Creek Bridge EB	1953	Ineligible (E)
0854	250.66	Rillito Creek Bridge WB	1965	Ineligible (E)
1397	250.66	Rillito Creek Bridge EB FR	2001	Ineligible (A)
1398	250.66	Rillito Creek Bridge WB FR	2000	Ineligible (A)
0870	251.18	Sunset Road TI OP EB	1966	Ineligible (E)
0871	251.18	Sunset Road TI OP WB	1966	Ineligible (E)
0872	252.43	Ruthrauff Road TI OP EB	1965	Ineligible (E)
0873	252.43	Ruthrauff Road TI OP WB	1965	Ineligible (E)

RCB/RCBC – reinforced concrete box culvert

EFR/EB FR – east frontage road/East bound frontage road

WFR/WB FR – west frontage road/Westbound frontage road

EB/WB – eastbound/westbound

(E) – exempt from Section 106 as part of the interstate

TI – traffic Interchange

OP – overpass

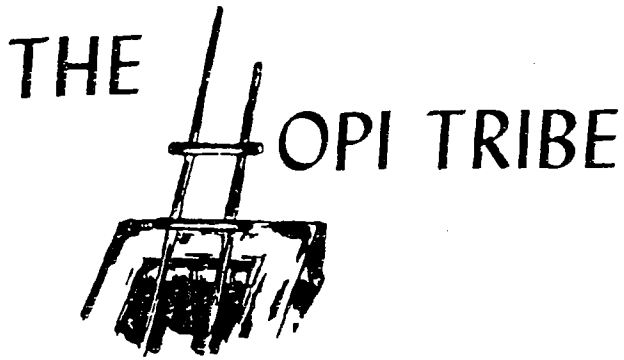
FR – frontage road

(A) – does not meet the age requirement

(FD) – recommended ineligible by FRASERdesign







LeRoy N. Shingoitewa  
CHAIRMAN

Herman G. Honanie  
VICE-CHAIRMAN

September 21, 2011

Karla S. Petty, Division Administrator  
Federal Highway Administration, Arizona Division  
4000 North Central Ave., Suite 1500  
Phoenix, Arizona 85012-3500

Re: I-10, Ina Rd. TI to Ruthrauff Rd. TI

Dear Ms. Petty,

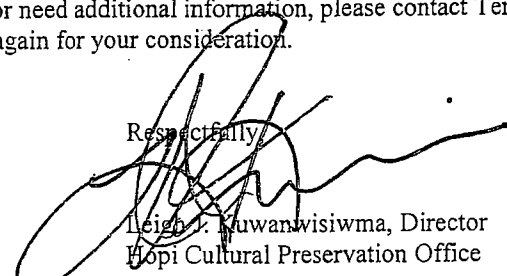
Thank you for your correspondence dated September 14, 2011, with an enclosed Class I Overview, regarding the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) planning improvements to Interstate 10 between the Ina and Ruthrauff Roads traffic interchanges. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in this project area. The Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites and Traditional Cultural Properties, and we consider the archaeological sites of our ancestors to be "footprints" and Traditional Cultural Properties. Therefore, we appreciate the FHWA and ADOT's continuing solicitation of our input and your efforts to address our concerns.

In the enclosed letter dated December 31, 2009, the Hopi Cultural Preservation Office reviewed a cultural resources survey report for predesign geotechnical investigations in this project area. We have now reviewed the enclosed Class I Overview that identifies 12 prehistoric sites, and we understand that "Subsurface investigations along this corridor have identified that beneath the ground surface are nearly continuous deposits of primarily prehistoric cultural material dating from the Middle Archaic Period to the Historic Period."

It is not necessary to provide us with a copy of the architectural report for the project's built environment. However, we are aware of previous project in the Ina and Ruthrauff Roads area that have demonstrated these nearly continuous deposits of primarily prehistoric cultural material, and therefore we concur that this proposal will result in adverse effects to prehistoric cultural resources significant to the Hopi Tribe. We also concur that a data recovery plan be developed for portions of the area of potential effect not previously investigated. Please provide us with a copy of the draft data recovery plan for review and comment.

Should you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office. Thank you again for your consideration.

Respectfully,

  
Leigh J. Nuwanwisiwma, Director  
Hopi Cultural Preservation Office

Enclosure: December 31, 2009 letter to ADOT  
xc: J. Matthew Mallery, Arizona Department of Transportation  
Arizona State Historic Preservation Office





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 14, 2011

In Reply Refer To:  
010-D(211)A  
HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Ms. Jennifer Christelman  
Manager, Environmental Engineering Division  
Town of Marana  
11555 West Civic Center Drive  
Marana, Arizona 85653

Dear Ms. Christelman:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43 (see attached map). As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers, ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Tribe, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The scope of this project would involve reconstruction of I-10 including widening to ten lanes, from Ina Road to Ruthrauff Road, using the median; reconstructing traffic interchanges at Ina Road, Sunset Road, and Ruthrauff Road; adding turn lanes at the frontage road and crossroad intersections along the corridor; replacing the bridges over the Cañada del Oro Wash and the Rillito River; installing a storm drain system with catch basins and pipes; extending and adding capacity to existing drainage structures; and replacing culverts and implementing local access changes at Ina Road and Ruthrauff Road. New right of way (ROW) will be required for the project. The area of potential effects (APE) for the consideration of direct impacts to archaeological resources and the historic built environment is defined as the construction footprint. The APE for the consideration of indirect impacts (visual, audible, and seismic) to historic built environment includes the construction footprint plus adjacent property parcels and subdivisions (see attached map).

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resource investigations within the APE. The results of the Class I overview are reported in "Past Occupation of the Middle Santa Cruz Floodplain: A Class I Overview for the Interstate 10, Ina Road to Ruthrauff Road, Project in Marana, Tucson, and Pima County, Arizona" (Lundin 2011), which is enclosed for your review and comment.

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A total of 21 bridges are present within the APE (refer to appended bridge table). Four bridges, located on the eastbound and westbound frontage roads have been recommended ineligible for listing on the National Register of Historic Places (NRHP) by FRASERdesign because they are typical examples of common structural types. The remaining bridges are not NRHP eligible because of insufficient age or Section 106 exemption as part of the interstate system.

HDR also is preparing an assessment of National Register of Historic Places eligibility for the project's built environment, which addresses the evaluation of historic buildings, residences, subdivisions, and commercial/industrial properties. The resulting report will be forthcoming through continued Section 106 consultation.


Please review the enclosed report and the information provided in this letter. If you agree with the adequacy of the report, and management recommendations, and FHWA's determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,



OCT 7 2011

*for*  
Karla S. Petty  
Division Administrator

  
\_\_\_\_\_  
Signature for Town of Marana Concurrence  
010-D(211)A

\_\_\_\_\_  
Date 10-5-11

Enclosures

Structure No.	Milepost	Bridge Name	Year Built	National Register Eligibility
5545	247.63	RCB EFR, I-10 & WFR	1953	Ineligible (FD)
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U.S. Department  
of Transportation  
**Federal Highway  
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ARIZONA DIVISION

4000 North Central Avenue  
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September 14, 2011

In Reply Refer To:  
010-D(211)A  
HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Mr. Roger Anyon  
Pima County  
Office of Cultural Resources and Historic Preservation  
201 North Stone, 6th floor  
Tucson, Arizona 8570

Dear Mr. Anyon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Tribe, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

The scope of this project would involve reconstruction of I-10 including widening to ten lanes, from Ina Road to Ruthrauff Road, using the median; reconstructing traffic interchanges at Ina Road, Sunset Road, and Ruthrauff Road; adding turn lanes at the frontage road and crossroad intersections along the corridor; replacing the bridges over the Cañada del Oro Wash and the Rillito River; installing a storm drain system with catch basins and pipes; extending and adding capacity to existing drainage structures; and replacing culverts and implementing local access changes at Ina Road and Ruthrauff Road. New right of way (ROW) will be required for the project. The area of potential effects (APE) for the consideration of direct impacts to archaeological resources and the historic built environment is defined as the construction footprint. The APE for the consideration of indirect impacts (visual, audible, and seismic) to historic built environment includes the construction footprint plus adjacent property parcels and subdivisions (see attached map).

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HDR also is preparing an assessment of National Register of Historic Places eligibility for the project's built environment, which addresses the evaluation of historic buildings, residences, subdivisions, and commercial/industrial properties. The resulting report will be forthcoming through continued Section 106 consultation.

Please review the enclosed report and the information provided in this letter. If you agree with the adequacy of the report, and management recommendations, and FHWA's determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

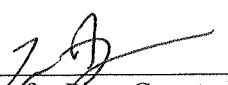
Sincerely yours,

*Melissa Otaw*

*for*

Karla S. Petty  
Division Administrator

SEP 21 2011

  
\_\_\_\_\_  
Signature for Pima County Concurrence  
010-D(211)A

Date

*9/19/11*  
\_\_\_\_\_

Enclosures



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OP – overpass

FR – frontage road

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

~~SHPO~~ 2009-1851 (94512)  
ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
(602) 379-3646  
Fax: (602) 382-8998  
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September 14, 2011

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HOP-AZ

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I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

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

RECEIVED

SEP 16 2011

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Tribe, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe. land

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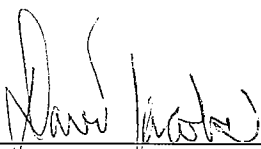
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Sincerely yours,

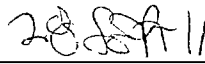


for

Karla S. Petty  
Division Administrator



Signature for SHPO Concurrence  
010-D(211)A



Date

Enclosures





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

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 14, 2011

In Reply Refer To:  
010-D(211)A  
HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Mr. Ivan Smith, Chairman  
Tonto Apache Tribe  
Tonto Apache Reservation #30  
Payson, Arizona 85541

Dear Chairman Smith:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Nation, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

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Sincerely yours,

*Karla S. Petty*

OCT 19 2011

*for*

Karla S. Petty  
Division Administrator

*[Signature]*  
Signature for Tonto Apache Tribe Concurrence  
010-D(211)A

*[Signature]*  
Date

Enclosures



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 14, 2011

In Reply Refer To:  
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HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Mr. Peter Steere, Tribal Historic Preservation Officer  
Mr. Joe Joaquin, Cultural Affairs Office  
Tohono O'odham Nation  
P. O. Box 837  
Sells, Arizona 85634

Dear Messrs. Steere and Joaquin:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on ADOT-owned land and private land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad, Hopi Tribe, Pascua Yaqui Tribe, San Carlos Apache Nation, Tohono O'odham Nation, Tonto Apache Nation, Yavapai-Apache Nation, and the Yavapai-Prescott Indian Tribe.

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Sincerely yours,

*Meeras Otaw*

OCT 11 2011

*for*  
Karla S. Petty  
Division Administrator

*Robert L. Allen*

Signature for Tohono O'odham Nation Concurrence  
010-D(211)A

10-10-11  
Date

Enclosures



**From:** [James M. Mallery](#)  
**To:** [James J. Lemmon](#); [Melissa B. Reuter](#); [Brodbeck, Mark](#); [Lundin, Deil](#)  
**Subject:** H7583, Ina to Ruthraff YAN concurrence  
**Date:** Tuesday, September 27, 2011 2:46:34 PM

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Chris Coder from the Yavapai-Apache Nation called. He said he has no concerns with this project and he defers to the other tribes we are consulting with. We can remove YAN from future consultation.

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U.S. Department  
of Transportation

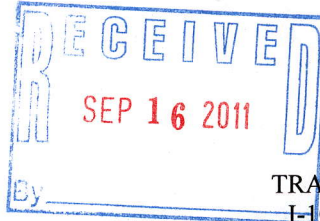
**Federal Highway  
Administration**

**ARIZONA DIVISION**

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September 14, 2011

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010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Mr. Ernest Jones, Sr., President  
Yavapai-Prescott Indian Tribe  
530 East Merritt Street  
Prescott, Arizona 86301-2038

Dear President Jones:

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Sincerely yours,

**Meesa**

Karla S. Petty  
Division Administrator

  
Signature for Yavapai-Prescott Indian Tribe Concurrence  
010-D(211)A

Oct. 19, 2011  
Date

Enclosures

cc:

Linda Ogo, Director of Cultural Research Department (with enclosure)

MOTani

JMallery (F500)

MOTani:cdm



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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December 12, 2011

In Reply Refer To:  
010-D(211)A  
HOP-AZ

010-D(211)A  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"Adverse effect"

Ms. Nancy E. Pearson  
Assistant Permits Administrator  
Arizona State Museum  
P.O. Box 210026  
University of Arizona  
Tucson, Arizona 85721-0026

Dear Ms. Pearson:

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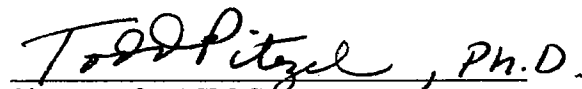
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Sincerely yours,




for  
Karla S. Petty  
Division Administrator



Signature for ASM Concurrence  
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Enclosures



U.S. Department  
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**Federal Highway  
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ARIZONA DIVISION

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February 16, 2012

HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
“adverse effect”

Ms. Jennifer Christelman  
Manager, Environmental Engineering Division  
Town of Marana  
11555 West Civic Center Drive  
Marana, Arizona 85653

Dear Ms. Christelman:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Advisory Council on Historic Preservation, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O’odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe. A small portion of State Trust land has been identified within the project boundary and, therefore, ASLD has been added as a consulting party.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation on the state-funded geotechnical investigations, which identified the consulting parties, scope, and area of potential effects (APE) for the geotechnical phase of the project, resulted in a finding of “no adverse effect.” Concurrence was received from the City of Tucson (Mabry [City of Tucson] to Lindly [ADOT], February 9, 2010), the Hopi Tribe (Kuwanwisiwma [Hopi Tribe] to Lindly [ADOT], December 31, 2009), Pima County (Anyon

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This project will proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south (Project No. IR-10-4[24], TRACS No. 010 PM 255 H2386 01D). A copy of the PA is appended to this letter for your information.

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The purpose of this consultation is to: (1) seek concurrence on the eligibility and treatment of individual historic properties; (2) provide an updated scope of work; and (3) recommend the development of a project specific data recovery plan for the mitigation of adverse effects to NRHP-eligible archaeological sites and historic linear structures within the APE as stipulated in Section II.D of the PA. Consultation regarding historic architectural resources is forthcoming.

### ***Scope Changes***

Since the time of the initial Section 106 consultation, the requirements for the UPRR/SPRR overpasses are now known. The Ina Road TI and Ruthrauff Road TI will include overpasses that span the UPRR/SPRR within the previously defined APE. At Ina Road TI bridge piers would be installed within the UPRR/SPRR right-of-way (ROW). At Ruthrauff Road, bridge abutments will encroach into the subsurface of the UPRR/SPRR ROW. The railroad tracks and alignment



will not be impacted by the project. The effects of the UPRR/SPRR ROW acquisition and overpass construction are addressed below.

### *Archaeological Sites and Historic Linear Structures*

National Register of Historic Places (NRHP) eligibility and recommended treatment to mitigate potential adverse effects to individual historic properties are summarized in the table below. There are 12 prehistoric sites and two historic linear structures within the APE. The prehistoric sites—AZ AA:12:11 (ASM), AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), AZ AA:12:20/352 (ASM), AZ AA:12:91 (ASM)/Los Pozos, AZ AA:12:92 (ASM), AZ AA:12:103 (ASM), AZ AA:12:111/753 (ASM)/Las Capas, AZ AA:12:503 (ASM)/Costello-King Site, AZ AA:12:739 (ASM), and AZ AA:12:788 (ASM)—have been determined or recommended eligible for listing in the NRHP under Criterion D. Site AZ AA:12:798 (ASM) has not been evaluated for NRHP eligibility. Phased data recovery is recommended for seven prehistoric sites which cannot be avoided by the project and therefore will be adversely affected. Two prehistoric sites are located at the edge of the APE where avoidance may be possible (detailed construction plans are not yet available). At this time, avoidance is recommended for these two sites; however, if it is determined that the project will have an adverse effect on one or both of these sites, data recovery is recommended. Eligibility testing is recommended for three of the prehistoric sites that will be adversely affected by the project.

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The UPRR (formerly the historic Southern Pacific Railroad [SPRR], and hereafter referred to as UPRR/SPRR) is considered eligible for listing in the NRHP under Criterion A for its associations with the early development of Arizona's railroad system during the period of significance between 1878 and 1940 (Janus Associates Incorporated 1989). UPRR/SPRR continues to operate and maintain the railroad line as a modern railroad. What remains within the APE—the track and associated infrastructure—is categorized as a system property type. Under Criterion A, integrity of location, setting, materials, and feeling are considered most important for this property type (Janus Associates Incorporated 1989). While the SPRR line follows the

original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse effect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR ROW. The abutments will be placed at the edges of the UPRR/SPRR ROW, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR ROW for the Ina Road TI and 0.09 acres of UPRR/SPRR ROW for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR ROW and to maintain access to the new road facilities. This is a minor acquisition of a railroad ROW that spans across the entire state of Arizona; it will not result in an adverse effect to the historic property.

### ***Treatment Plan and Segment-specific Data Recovery Plan***

Pursuant to the PA, Desert Archaeology, Inc. developed a corridor-wide treatment plan (*Treatment Plan for Archaeological Resources within the Interstate 10 Corridor Improvement Project, Tangerine to Road to the I-19 Interchange* [Mabry 1993]), revised research design (*Revised Research Design for the Archaeological Treatment Plan, Interstate 10 Corridor Improvement Project, Tangerine Road to the I-19 Interchange* [Gregory and Mabry 1998]), and a construction monitoring and discovery plan (*Monitoring and Discovery Plan for Interstate 10 from Tangerine Road to Junction I-10/I-19 Projects, Tucson* [Wöcherl 1999]).

At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.

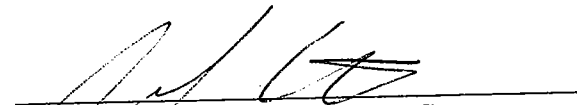
Please review the information provided in this letter. If you agree (1) with the change in scope; (2) with the NRHP eligibility recommendations and determination of effect for the archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the

UPRR/SPRR; and (4) the recommendation to develop a project-specific data recovery plan, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,



*for*  
Karla S. Petty  
Division Administrator

  
Signature for Town of Marana Concurrence  
010-D(211)N

Date 2/23/12

- Enclosures
- APE map
  - Site map
  - Programmatic Agreement





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

**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>

February 16, 2012

In Reply Refer To:  
HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"adverse effect"

Mr. Roger Anyon  
Pima County  
Office of Cultural Resources and Historic Preservation  
201 North Stone, 6th floor  
Tucson, Arizona 8570

Dear Mr. Anyon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Advisory Council on Historic Preservation, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe. A small portion of State Trust land has been identified within the project boundary and, therefore, ASLD has been added as a consulting party.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

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The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse affect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR ROW. The abutments will be placed at the edges of the UPRR/SPRR ROW, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR ROW for the Ina Road TI and 0.09 acres of UPRR/SPRR ROW for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR ROW and to maintain access to the new road facilities. This is a minor

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Sincerely yours,

*Michael D. O'Leary*

*for*  
Karla S. Petty  
Division Administrator

*RA*  
\_\_\_\_\_  
Signature for Pima County Concurrence  
010-D(211)N

*ROGER ANKEN*

Date

*2/27/12*  
\_\_\_\_\_

Enclosures

APE map

Site map

Programmatic Agreement





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

**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>

February 16, 2012

HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"adverse effect"

Mr. Peter Steere, Tribal Historic Preservation Officer  
Mr. Joe Joaquin, Cultural Affairs Office  
Tohono O'odham Nation  
P. O. Box 837  
Sells, Arizona 85634

Dear Messrs. Steere and Joaquin:

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### ***Traditional Cultural Properties***

At this time, FHWA is inquiring whether you have any concerns regarding historic properties of traditional, religious, cultural, or historic importance to your community within the APE. Any information you might 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 would make a good faith effort to address your concerns.

### ***Archaeological Sites and Historic Linear Structures***

National Register of Historic Places (NRHP) eligibility and recommended treatment to mitigate potential adverse effects to individual historic properties are summarized in the table below. There are 12 prehistoric sites and two historic linear structures within the APE. The prehistoric sites—AZ AA:12:11 (ASM), AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), AZ AA:12:20/352 (ASM), AZ AA:12:91 (ASM)/Los Pozos, AZ AA:12:92 (ASM), AZ AA:12:103 (ASM), AZ AA:12:111/753 (ASM)/Las Capas, AZ AA:12:503 (ASM)/Costello-King Site, AZ AA:12:739 (ASM), and AZ AA:12:788 (ASM)—have been determined or recommended eligible for listing in the NRHP under Criterion D. Site AZ AA:12:798 (ASM) has not been evaluated for NRHP eligibility. Phased data recovery is recommended for seven prehistoric sites which cannot be avoided by the project and therefore will be adversely affected. Two prehistoric sites are located at the edge of the APE where avoidance may be possible (detailed construction plans are not yet available). At this time, avoidance is recommended for these two sites; however, if it is determined that the project will have an adverse effect on one or both of these sites, data recovery is recommended. Eligibility testing is recommended for three of the prehistoric sites that will be adversely affected by the project.

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The UPRR (formerly the historic Southern Pacific Railroad [SPRR], and hereafter referred to as UPRR/SPRR) is considered eligible for listing in the NRHP under Criterion A for its associations with the early development of Arizona's railroad system during the period of significance between 1878 and 1940 (Janus Associates Incorporated 1989). UPRR/SPRR

continues to operate and maintain the railroad line as a modern railroad. What remains within the APE—the track and associated infrastructure—is categorized as a system property type. Under Criterion A, integrity of location, setting, materials, and feeling are considered most important for this property type (Janus Associates Incorporated 1989). While the SPRR line follows the original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse effect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR ROW. The abutments will be placed at the edges of the UPRR/SPRR ROW, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR ROW for the Ina Road TI and 0.09 acres of UPRR/SPRR ROW for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR ROW and to maintain access to the new road facilities. This is a minor acquisition of a railroad ROW that spans across the entire state of Arizona; it will not result in an adverse effect to the historic property.

### ***Treatment Plan and Segment-specific Data Recovery Plan***

Pursuant to the PA, Desert Archaeology, Inc. developed a corridor-wide treatment plan (*Treatment Plan for Archaeological Resources within the Interstate 10 Corridor Improvement Project, Tangerine to Road to the I-19 Interchange* [Mabry 1993]), revised research design (*Revised Research Design for the Archaeological Treatment Plan, Interstate 10 Corridor Improvement Project, Tangerine Road to the I-19 Interchange* [Gregory and Mabry 1998]), and a construction monitoring and discovery plan (*Monitoring and Discovery Plan for Interstate 10 from Tangerine Road to Junction I-10/I-19 Projects, Tucson* [Wöcherl 1999]).

At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.

Please review the information provided in this letter. If you agree (1) with the change in scope; (2) with the NRHP eligibility recommendations and determination of effect for the archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the UPRR/SPRR; and (4) the recommendation to develop a project-specific data recovery plan, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

*Meeras Ota*

MAR - 2 2012

*for*  
Karla S. Petty  
Division Administrator

*Peter P. Lees*

*2-27-12*

\_\_\_\_\_  
Signature for Tohono O'odham Nation Concurrence  
010-D(211)A

\_\_\_\_\_  
Date

- Enclosures
- APE map
- Site map
- Programmatic Agreement





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

**ARIZONA DIVISION**

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

February 16, 2012

In Reply Refer To:  
HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"adverse effect"

Ms. Nancy E. Pearson, Assistant Permits Administrator  
Arizona State Museum  
P.O. Box 210026  
University of Arizona  
Tucson, Arizona 85721-0026

Dear Ms. Pearson:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Advisory Council on Historic Preservation, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe. A small portion of State Trust land has been identified within the project boundary and, therefore, ASLD has been added as a consulting party.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation on the state-funded geotechnical investigations, which identified the consulting parties, scope, and area of potential effects (APE) for the geotechnical phase of the project, resulted in a finding of "no adverse effect." Concurrence was received from the City of Tucson (Mabry [City of Tucson] to Lindly [ADOT], February 9, 2010), the Hopi Tribe

(Kuwanwisiwma [Hopi Tribe] to Lindly [ADOT], December 31, 2009), Pima County (Anyon [Pima County] to Lindly, January 14, 2010), SHPO (Jacobs [SHPO] to Lindly [ADOT], December 28, 2009), the Tohono O'odham Nation (Steere [Tohono O'odham Nation] to Lindly [ADOT], January 23, 2010), and the Tonto Apache Tribe (Smith [Tonto Apache Tribe] to Lindly [ADOT], December 28, 2009). The White Mountain Apache Tribe asked that no additional information be sent unless project implementation results in the discovery of sites and/or items having known or suspected Apache cultural affiliation.

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This project will proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south (Project No. IR-10-4[24], TRACS No. 010 PM 255 H2386 01D). A copy of the PA is appended to this letter for your information.

The APE for the consideration of direct impacts to archaeological sites and historic linear structures is defined as the construction footprint, which extends from MP 248.2 to MP 252.93 (refer to enclosed maps).

The purpose of this consultation is to: (1) seek concurrence on the eligibility and treatment of individual historic properties; (2) provide an updated scope of work; and (3) recommend the development of a project specific data recovery plan for the mitigation of adverse effects to NRHP-eligible archaeological sites and historic linear structures within the APE as stipulated in Section II.D of the PA. Consultation regarding historic architectural resources is forthcoming.

### ***Scope Changes***

Since the time of the initial Section 106 consultation, the requirements for the UPRR/SPRR overpasses are now known. The Ina Road TI and Ruthrauff Road TI will include overpasses that span the UPRR/SPRR within the previously defined APE. At Ina Road TI bridge piers would be installed within the UPRR/SPRR right-of-way (ROW). At Ruthrauff Road, bridge abutments will encroach into the subsurface of the UPRR/SPRR ROW. The railroad tracks and alignment



will not be impacted by the project. The effects of the UPRR/SPRR ROW acquisition and overpass construction are addressed below.

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original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

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At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.


Please review the information provided in this letter. If you agree (1) with the change in scope; (2) with the NRHP eligibility recommendations and determination of effect for the archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the

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Sincerely yours,

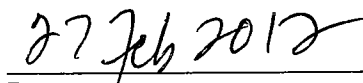


*for*  
Karla S. Petty  
Division Administrator



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Signature for ASM Concurrence  
010-D(211)N



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Date

- Enclosures
- APE map
  - Site map
  - Programmatic Agreement



FILED- 2009-1851 (99397)



U.S. Department of Transportation  
Federal Highway Administration

ARIZONA DIVISION

4000 North Central Avenue  
Suite 1500  
Phoenix, Arizona 85012-3500  
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February 16, 2012

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FEB 22 2012

HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"adverse effect and *de minimis* finding"

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

Dear Dr. Jacobs:

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The purpose of this consultation is to: (1) seek concurrence on the eligibility and treatment of individual historic properties; (2) provide an updated scope of work; (3) make a *de minimis* determination for the project effects on the UPRR (formerly the historic Southern Pacific Railroad [SPRR], and hereafter referred to as UPRR/SPRR); and (4), recommend the development of a project specific data recovery plan for the mitigation of adverse effects to NRHP-eligible archaeological sites and historic linear structures within the APE as stipulated in Section II.D of the PA. Consultation regarding historic architectural resources is forthcoming.

### ***Scope Changes***

Since the time of the initial Section 106 consultation, the requirements for the UPRR/SPRR overpasses are now known. The Ina Road TI and Ruthrauff Road TI will include overpasses that span the UPRR/SPRR within the previously defined APE. At Ina Road TI bridge piers would be installed within the UPRR/SPRR right-of-way (R/W). At Ruthrauff Road, bridge abutments will encroach into the subsurface of the UPRR/SPRR R/W. The railroad tracks and alignment will

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The UPRR/SPRR is considered eligible for listing in the NRHP under Criterion A for its associations with the early development of Arizona's railroad system during the period of significance between 1878 and 1940 (Janus Associates Incorporated 1989). UPRR/SPRR continues to operate and maintain the railroad line as a modern railroad. What remains within the APE—the track and associated infrastructure—is categorized as a system property type. Under Criterion A, integrity of location, setting, materials, and feeling are considered most important for this property type (Janus Associates Incorporated 1989). While the SPRR line follows the original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since

been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse affect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR R/W. The abutments will be placed at the edges of the UPRR/SPRR R/W, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR R/W for the Ina Road TI and 0.09 acres of UPRR/SPRR R/W for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR R/W and to maintain access to the new road facilities. This is a minor acquisition of a railroad R/W that spans across the entire state of Arizona; it will not result in an adverse effect to the historic property.

### ***De minimis Finding***

As discussed above, the proposed undertaking will not adversely affect the qualities that contribute to the NRHP eligibility of the UPRR/SPRR, including the amount of land acquisition required from the railroad R/W which will be minor. Section 6009(a) of the Safe Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) simplifies compliance with Section 4(f) by allowing a determination of *de minimis* impact in situations where certain transportation uses of Section 4(f) properties have no adverse effects on historic properties.

It is FHWA's intention to make a *de minimis* impact determination for this property under Section 4(f) regulations 23 CFR 774.3(b); 23 CFR 774.5(b); and 23 CFR 774.17. Under the regulations, FHWA can only make a *de minimis* impact determination based on your written concurrence that the undertaking would have no adverse effect on this particular historic property under Section 106. It is acknowledged that there will be an adverse effect on other historic properties associated with this undertaking.

Through application of the *de minimis* impact criteria and associated determination requirements set forth in Section 6009(a) of SAFETEA-LU, FHWA has determined that the proposed undertaking will have a *de minimis* impact on the Southern Pacific Railroad (AZ EE:3:53 [ASM]).

### ***Treatment Plan and Segment-specific Data Recovery Plan***



Pursuant to the PA, Desert Archaeology, Inc. developed a corridor-wide treatment plan (*Treatment Plan for Archaeological Resources within the Interstate 10 Corridor Improvement Project, Tangerine to Road to the I-19 Interchange* [Mabry 1993]), revised research design (*Revised Research Design for the Archaeological Treatment Plan, Interstate 10 Corridor Improvement Project, Tangerine Road to the I-19 Interchange* [Gregory and Mabry 1998]), and a construction monitoring and discovery plan (*Monitoring and Discovery Plan for Interstate 10 from Tangerine Road to Junction I-10/I-19 Projects, Tucson* [Wöcherl 1999]).

At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.

Please review the information provided in this letter. If you agree (1) with the change in scope; (2) with the NRHP eligibility recommendations and determination of effect for the archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the UPRR/SPRR; (4) with a determination of a *de minimis* finding for the UPRR/SPRR; and (5) the recommendation to develop a project-specific data recovery plan, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

*Karla S. Petty*

*for*  
Karla S. Petty  
Division Administrator

*[Handwritten Signature]*

Signature for SHPO Concurrence  
010-D(211)N

*2 MAR 12*

Date

Enclosures

APE map  
Site map  
Programmatic Agreement  
*de minimis* figures (2)

cc: *Matt Mallery, ADOT*





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

**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>

February 16, 2012

In Reply Refer To:  
HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"adverse effect"

Mr. Ernest Jones, Sr., President  
Yavapai-Prescott Indian Tribe  
530 East Merritt Street  
Prescott, Arizona 86301-2038

Dear President Jones:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, and Marana, as well as State Trust and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad (UPRR), the Advisory Council on Historic Preservation, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe. A small portion of State Trust land has been identified within the project boundary and, therefore, ASLD has been added as a consulting party.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation on the state-funded geotechnical investigations, which identified the consulting parties, scope, and area of potential effects (APE) for the geotechnical phase of the project, resulted in a finding of "no adverse effect." Concurrence was received from the City of Tucson (Mabry [City of Tucson] to Lindly [ADOT], February 9, 2010), the Hopi Tribe

(Kuwanwisiwma [Hopi Tribe] to Lindly [ADOT], December 31, 2009), Pima County (Anyon [Pima County] to Lindly, January 14, 2010), SHPO (Jacobs [SHPO] to Lindly [ADOT], September 28, 2009), the Tohono O'odham Nation (Steere [Tohono O'odham Nation] to Lindly [ADOT], January 23, 2010), and the Tonto Apache Tribe (Smith [Tonto Apache Tribe] to Lindly [ADOT], December 28, 2009). The White Mountain Apache Tribe declined participation in Section 106 consultation.

Following the geotechnical phase, the project qualified for federal funding. Initial Section 106 consultation outlined the scope, consulting parties, and APE for the overall project, summarized the results of the Class I overview, and resulted in a determination of "adverse effect" for the project. Concurrence was received from the SHPO (Jacobs [SHPO] to Petty [FHWA], September 28, 2011), the Town of Marana (Christelman [Town of Marana] to Petty [FHWA], October 5, 2011), Pima County (Anyon [Pima County] to Petty [FHWA], September 19, 2011), the Hopi Tribe (Kuwanwisiwma [Hopi Tribe] to Petty [FHWA], September 21, 2011), the Tonto Apache Tribe (Smith [Tonto Apache Tribe] to Petty [FHWA], October 17, 2011), the Tohono O'odham Nation (Steere [Tohono O'odham Nation] to Petty [FHWA], October 10, 2011), and the Yavapai-Prescott Indian Tribe (Glassco [Yavapai-Prescott Indian Tribe] to Petty [FHWA], October 19, 2011). The Yavapai-Apache Nation declined participation in Section 106 consultation.

This project will proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south (Project No. IR-10-4[24], TRACS No. 010 PM 255 H2386 01D). A copy of the PA is appended to this letter for your information.

The APE for the consideration of direct impacts to archaeological sites and historic linear structures is defined as the construction footprint, which extends from approximately MP 248.2 to MP 252.93 (refer to enclosed maps).

The purpose of this consultation is to: (1) seek concurrence on the eligibility and treatment of individual historic properties; (2) provide an updated scope of work; and (3) recommend the development of a project specific data recovery plan for the mitigation of adverse effects to NRHP-eligible archaeological sites and historic linear structures within the APE as stipulated in Section II.D of the PA. Consultation regarding historic architectural resources is forthcoming.

### ***Scope Changes***

Since the time of the initial Section 106 consultation, the requirements for the UPRR overpasses are now known. The Ina Road TI and Ruthrauff Road TI will include overpasses that span the UPRR within the previously defined APE. At Ina Road TI bridge piers would be installed within the UPRR right-of-way (ROW). At Ruthrauff Road, bridge abutments will encroach into the subsurface of the UPRR ROW. The railroad tracks and alignment will not be impacted by the project. The effects of the UPRR ROW acquisition and overpass construction are addressed below.

### ***Traditional Cultural Properties***

At this time, FHWA is inquiring whether you have any concerns regarding historic properties of traditional, religious, cultural, or historic importance to your community within the APE. Any information you might 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 would make a good faith effort to address your concerns.

### ***Archaeological Sites and Historic Linear Structures***

National Register of Historic Places (NRHP) eligibility and recommended treatment to mitigate potential adverse effects to individual historic properties are summarized in the table below. There are 12 prehistoric sites and two historic linear structures within the APE. The prehistoric sites—AZ AA:12:11 (ASM), AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), AZ AA:12:20/352 (ASM), AZ AA:12:91 (ASM)/Los Pozos, AZ AA:12:92 (ASM), AZ AA:12:103 (ASM), AZ AA:12:111/753 (ASM)/Las Capas, AZ AA:12:503 (ASM)/Costello-King Site, AZ AA:12:739 (ASM), and AZ AA:12:788 (ASM)—have been determined or recommended eligible for listing in the NRHP under Criterion D. Site AZ AA:12:798 (ASM) has not been evaluated for NRHP eligibility. Phased data recovery is recommended for seven prehistoric sites which cannot be avoided by the project and therefore will be adversely affected. Two prehistoric sites are located at the edge of the APE where avoidance may be possible (detailed construction plans are not yet available). At this time, avoidance is recommended for these two sites; however, if it is determined that the project will have an adverse effect on one or both of these sites, data recovery is recommended. Eligibility testing is recommended for three of the prehistoric sites that will be adversely affected by the project.

Four segments of the historic alignment of SR 84 are within the APE—one segment is north of Ina Road; two segments are between Ina and Ruthrauff roads; and one segment is south of Ruthrauff Road. Per the *Interim Procedures for the Treatment of Historic Roads* developed between FHWA, ADOT, and SHPO (November 15, 2002), SR 84 is a component of the Historic State Highway System (HSHS) and, therefore, considered eligible for listing in the NRHP under Criterion D for its potential to yield important information about the development of Arizona's roadways. The two segments between Ina and Ruthrauff roads have been determined "noncontributing" through previous consultation (Collins [SHPO] to Hollis [FHWA], July 3, 2000); The segment between Ruthrauff and Prince roads, has been determined "contributing" (Jacobs [SHPO] to Hollis [FHWA], May 9, 2006) and was subsequently documented by EcoPlan Associates, Inc., the results of which will be submitted for consultation under an adjacent project (I-10; Prince – Ruthrauff, NH-010-D[008], 010 PM 252 H6241 01D). Accordingly, no further treatment is recommended for those segments. The SR 84 alignment north of Ina Road has not been replaced and is currently used as the westbound frontage road for I-10. FHWA recommends that this segment of the historic SR 84 alignment is "contributing" to the HSHS. Because it cannot be avoided, documentation is recommended to mitigate adverse effects to this historic property.

The UPRR (formerly the historic Southern Pacific Railroad [SPRR], and hereafter referred to as UPRR/SPRR) is considered eligible for listing in the NRHP under Criterion A for its associations with the early development of Arizona's railroad system during the period of significance between 1878 and 1940 (Janus Associates Incorporated 1989). UPRR/SPRR continues to operate and maintain the railroad line as a modern railroad. What remains within the APE—the track and associated infrastructure—is categorized as a system property type. Under

Criterion A, integrity of location, setting, materials, and feeling are considered most important for this property type (Janus Associates Incorporated 1989). While the SPRR line follows the original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse affect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR ROW. The abutments will be placed at the edges of the UPRR/SPRR ROW, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR ROW for the Ina Road TI and 0.09 acres of UPRR/SPRR ROW for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR ROW and to maintain access to the new road facilities. This is a minor acquisition of a railroad ROW that spans across the entire state of Arizona; it will not result in an adverse effect to the historic property.

#### ***Treatment Plan and Segment-specific Data Recovery Plan***

Pursuant to the PA, Desert Archaeology, Inc. developed a corridor-wide treatment plan (*Treatment Plan for Archaeological Resources within the Interstate 10 Corridor Improvement Project, Tangerine to Road to the I-19 Interchange* [Mabry 1993]), revised research design (*Revised Research Design for the Archaeological Treatment Plan, Interstate 10 Corridor Improvement Project, Tangerine Road to the I-19 Interchange* [Gregory and Mabry 1998]), and a construction monitoring and discovery plan (*Monitoring and Discovery Plan for Interstate 10 from Tangerine Road to Junction I-10/I-19 Projects, Tucson* [Wöcherl 1999]).

At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.

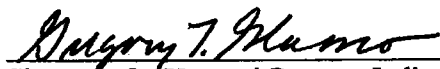
Please review the information provided in this letter. If you agree (1) with the change in scope; (2) with the NRHP eligibility recommendations and determination of effect for the

archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the UPRR/SPRR; and (4) the recommendation to develop a project-specific data recovery plan, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

**Meesa Otani**

Karla S. Petty  
Division Administrator



March 2, 2012

Signature for Yavapai-Prescott Indian Tribe Concurrence Date  
010-D(BCL)A

Enclosures

APE map

Site map

Programmatic Agreement

cc:

Linda Ogo, Director of Cultural Research Department, Yavapai-Prescott Indian Tribe (with enclosure)

MOfani

JMallery (F500)

MOfani:cdm







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

**ARIZONA DIVISION**

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In Reply Refer To:  
HOP-AZ  
010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Initial Section 106 Consultation  
"adverse effect and *de minimis* finding"

Ms. Carol Legard  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue, NW  
Washington, D.C. 20004

Dear Ms. Legard:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, and Marana, as well as State Trust and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, Union Pacific Railroad (UPRR), the Advisory Council on Historic Preservation (ACHP), the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe. A small portion of State Trust land has been identified within the project boundary and, therefore, ASLD has been added as a consulting party.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

The scope of this project would involve reconstruction of I-10 including widening to ten lanes, from Ina Road to Ruthrauff Road, using the median; reconstructing traffic interchanges at Ina Road, Sunset Road, and Ruthrauff Road; adding turn lanes at the frontage road and crossroad intersections along the corridor; replacing the bridges over the Cañada del Oro Wash and the Rillito River; installing a storm drain system with catch basins and pipes; extending and adding capacity to existing drainage structures; and replacing culverts and implementing local access changes at Ina Road and Ruthrauff Road. Also, the Ina Road TI and Ruthrauff Road TI will

include overpasses that span the UPRR. At Ina Road, TI bridge piers would be installed within the UPRR right-of-way (ROW). At Ruthrauff Road, bridge abutments will encroach into the UPRR ROW. The railroad tracks and alignment will not be impacted by the project. New ROW will be required for the project.

Previous consultation on the state-funded geotechnical investigations, which identified the consulting parties, scope, and area of potential effects (APE) for the geotechnical phase of the project, resulted in a finding of "no adverse effect." Concurrence was received from the City of Tucson (Mabry [City of Tucson] to Lindly [ADOT], February 9, 2010), the Hopi Tribe (Kuwanwisiwma [Hopi Tribe] to Lindly [ADOT], December 31, 2009), Pima County (Anyon [Pima County] to Lindly, January 14, 2010), SHPO (Jacobs [SHPO] to Lindly [ADOT], September 28, 2009), the Tohono O'odham Nation (Steere [Tohono O'odham Nation] to Lindly [ADOT], January 23, 2010), and the Tonto Apache Tribe (Smith [Tonto Apache Tribe] to Lindly [ADOT], December 28, 2009). The White Mountain Apache Tribe declined participation in Section 106 consultation.

Following the geotechnical phase, the project qualified for federal funding. Initial Section 106 consultation outlined the scope, consulting parties, and APE for the overall project, summarized the results of the Class I overview, and resulted in a determination of "adverse effect" for the project. Concurrence was received from the SHPO (Jacobs [SHPO] to Petty [FHWA], September 28, 2011), the Town of Marana (Christelman [Town of Marana] to Petty [FHWA], October 5, 2011), Pima County (Anyon [Pima County] to Petty [FHWA], September 19, 2011), the Hopi Tribe (Kuwanwisiwma [Hopi Tribe] to Petty [FHWA], September 21, 2011), the Tonto Apache Tribe (Smith [Tonto Apache Tribe] to Petty [FHWA], October 17, 2011), the Tohono O'odham Nation (Steere [Tohono O'odham Nation] to Petty [FHWA], October 10, 2011), and the Yavapai-Prescott Indian Tribe (Glassco [Yavapai-Prescott Indian Tribe] to Petty [FHWA], October 19, 2011). The Yavapai-Apache Nation declined participation in Section 106 consultation. The results of the Class I overview are reported in "*Past Occupation of the Middle Santa Cruz Floodplain: A Class I Overview for the Interstate 10, Ina Road to Ruthrauff Road, Project in Marana, Tucson, and Pima County, Arizona*" (Lundin 2011), which is enclosed for your review and comment.

This project will proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south (Project No. IR-10-4[24], TRACS No. 010 PM 255 H2386 01D). A copy of the PA is appended to this letter for your information.

The APE for the consideration of direct impacts to archaeological resources, historic linear structures, and the historic built environment is defined as the construction footprint, which extends from approximately MP 248.2 to MP 252.93 (refer to enclosed maps). The APE for the consideration of indirect impacts (visual, audible, and seismic) to the historic built environment includes the construction footprint plus adjacent property parcels and subdivisions. The purpose of this consultation is to: (1) seek concurrence on the adequacy of the Class I report and the determination of "adverse effect" for this project; (2) seek concurrence on the eligibility and treatment of individual historic properties; (3) make a *de minimis* determination for the

project effects on the Southern Pacific Railroad; and (4), recommend the development of a project specific data recovery plan for the mitigation of adverse effects to NRHP-eligible archaeological sites and historic linear structures within the APE as stipulated in Section II.D of the PA. Consultation regarding historic architectural resources is forthcoming.

### ***Archaeological Sites and Historic Linear Structures***

National Register of Historic Places (NRHP) eligibility and recommended treatment to mitigate potential adverse effects to individual historic properties are summarized in the table below. There are 12 prehistoric sites and two historic linear structures within the APE. The prehistoric sites—AZ AA:12:11 (ASM), AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), AZ AA:12:20/352 (ASM), AZ AA:12:91 (ASM)/Los Pozos, AZ AA:12:92 (ASM), AZ AA:12:103 (ASM), AZ AA:12:111/753 (ASM)/Las Capas, AZ AA:12:503 (ASM)/Costello-King Site, AZ AA:12:739 (ASM), and AZ AA:12:788 (ASM)—have been determined or recommended eligible for listing in the NRHP under Criterion D. Site AZ AA:12:798 (ASM) has not been evaluated for NRHP eligibility. Phased data recovery is recommended for seven prehistoric sites which cannot be avoided by the project and therefore will be adversely affected. Two prehistoric sites are located at the edge of the APE where avoidance may be possible (detailed construction plans are not yet available). At this time, avoidance is recommended for these two sites; however, if it is determined that the project will have an adverse effect on one or both of these sites, data recovery is recommended. Eligibility testing is recommended for three of the prehistoric sites that will be adversely affected by the project.

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Criterion A, integrity of location, setting, materials, and feeling are considered most important for this property type (Janus Associates Incorporated 1989). While the SPRR line follows the original 1880 alignment through the APE, the original buildings and structures associated with Jaynes Station/AZ AA:2:14 [ASM], a former siding at Ruthrauff Road built in 1890, have since been destroyed. Historically, the setting of the APE was primarily agricultural and open desert with sparse development that increased towards the later part of the period of significance. The surrounding setting has likewise changed since the period of significance as a modern divided, four-lane interstate (I-10) has replaced SR 84 and building density has greatly increased. The materials—track, ties, bed, etc.—have been replaced and upgraded, albeit in-kind, over the years. As a result, the segment of the SPRR located within the APE retains a high degree of integrity of location and a low degree of integrity of setting, feeling, and materials. FHWA holds that the SPRR remains eligible under Criterion A so long as the alignment itself is preserved in its original location.

The Ina Road TI and Ruthrauff Road TI will require bridging over the railroad. By spanning the SPRR alignment, the alignment would be preserved in its current and original location. Furthermore, given the current visual setting of the modern I-10 transportation corridor, the modification of the railroad's setting by the placement of the overpasses will not have an indirect adverse affect on qualities that contribute to the alignment's NRHP eligibility, mainly the alignment and tracks. The project also would require pier installation at Ina Road, and bridge abutment footing at Ruthrauff Road to be placed within the UPRR/SPRR ROW. The abutments will be placed at the edges of the UPRR/SPRR ROW, therefore the railroad's alignment and tracks will not be affected. Similarly, the piers would be placed beyond the UPRR/SPRR's existing and planned tracks. The project will require 0.85 acres of UPRR/SPRR ROW for the Ina Road TI and 0.09 acres of UPRR/SPRR ROW for the Ruthrauff Road TI for pier and abutment placement inside the UPRR/SPRR ROW and to maintain access to the new road facilities. This is a minor acquisition of a railroad ROW that spans across the entire state of Arizona; it will not result in an adverse effect to the historic property.

### ***De minimis Finding***

As discussed above, the proposed undertaking will not adversely affect the qualities that contribute to the NRHP eligibility of the UPRR/SPRR, including the amount of land acquisition required from the railroad ROW which will be minor. Section 6009(a) of the Safe Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) simplifies compliance with Section 4(f) by allowing a determination of *de minimis* impact in situations where certain transportation uses of Section 4(f) properties have no adverse effects on historic properties.

It is FHWA's intention to make a *de minimis* impact determination for this property under Section 4(f) regulations 23 CFR 774.3(b); 23 CFR 774.5(b); and 23 CFR 774.17. Under the regulations, FHWA can only make a *de minimis* impact determination based on your written concurrence that the undertaking would have no adverse effect on this particular historic property under Section 106. It is acknowledged that there will be an adverse effect on other historic properties associated with this undertaking.

Through application of the *de minimis* impact criteria and associated determination requirements set forth in Section 6009(a) of SAFETEA-LU, FHWA has determined that the proposed undertaking will have a *de minimis* impact on the Southern Pacific Railroad (AZ EE:3:53 [ASM]).

***Treatment Plan and Segment-specific Data Recovery Plan***

Pursuant to the PA, Desert Archaeology, Inc. developed a corridor-wide treatment plan (*Treatment Plan for Archaeological Resources within the Interstate 10 Corridor Improvement Project, Tangerine to Road to the I-19 Interchange* [Mabry 1993]), revised research design (*Revised Research Design for the Archaeological Treatment Plan, Interstate 10 Corridor Improvement Project, Tangerine Road to the I-19 Interchange* [Gregory and Mabry 1998]), and a construction monitoring and discovery plan (*Monitoring and Discovery Plan for Interstate 10 from Tangerine Road to Junction I-10/I-19 Projects, Tucson* [Wöcherl 1999]).

At this time, FHWA recommends that a segment-specific data recovery plan (plan) be prepared and implemented to mitigate adverse effects to historic properties within the APE, pursuant to Stipulation II.D of the PA. The plan will include avoidance measures, archaeological testing in areas not previously investigated for subsurface deposits, eligibility testing at sites AZ AA:12:13 (ASM), AZ AA:12:14 (ASM), and AZ AA:12:798 (ASM), data recovery at all NRHP-eligible sites that cannot be avoided, and monitoring and discovery during construction.

Please review the enclosures and the information provided in this letter. If you agree with (1) the adequacy of the Class I report; (2) the NRHP eligibility recommendations and determination of effect for the archaeological sites and SR 84; (3) that the undertaking would have no adverse effect on the UPRR/SPRR; (4) with a determination of a *de minimis* finding for the UPRR/SPRR; and (5) the recommendation to develop a project-specific data recovery plan, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,



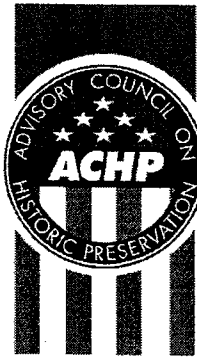
for  
Karla S. Petty  
Division Administrator

\_\_\_\_\_  
Signature for ACHP Concurrence  
010-D(211)A

\_\_\_\_\_  
Date

Enclosures: Class I report, APE map, Site map, Programmatic Agreement, List of bridges *de minimis* figures(2)





Preserving America's Heritage

April 11, 2012

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

Ref: *I-10, Ina Rd. to Ruthrauff Road, Adverse Effect and De Minimus Finding  
City of Tucson, Pima County, Arizona*

Dear Ms. Petty:

The Advisory Council on Historic Preservation (ACHP) received your letter of February 16, 2012, requesting our concurrence regarding (1) the adequacy of the Class I report enclosed with the letter; (2) the National Register of Historic Preservation eligibility recommendations and adverse effect finding for the archeological sites and SR 84, (3) the no adverse effect finding for the UPRR/SPRR; (4) the *de minimus* finding for the UPRR/SPRR; and (5) the recommendation to develop a project-specific data recovery plan for the referenced undertaking. We understand that this request for concurrence is pursuant to the Programmatic Agreement (PA) executed on April 26, 1993, for the Interstate 10 Tangerine Road to Junction I-10/I-19 Projects, in which the ACHP was a Signatory.

The Class I report was comprehensive and we concur with its overall findings. We also concur with the determinations and recommendations of the report as set forth in the February 16th letter since other signatories have not raised any concerns. As such, FHWA has fulfilled the requirement of the PA.

Thank you for the opportunity to review the report and findings. If we can be of further assistance in this matter, please contact Najah Duvall-Gabriel at (202) 606-8585, or via email at [ngabriel@achp.gov](mailto:ngabriel@achp.gov).

Sincerely,

Charlene Dwin Vaughn, AICP  
Assistant Director  
Federal Permitting, Licensing, and Assistance Section  
Office of Federal Agency Programs

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 803 • Washington, DC 20004  
Phone: 202-606-8503 • Fax: 202-606-8647 • [achp@achp.gov](mailto:achp@achp.gov) • [www.achp.gov](http://www.achp.gov)







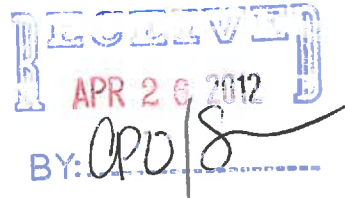
U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**ARIZONA DIVISION**

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April 23, 2012

In Reply Refer To:  
010-D(211)N  
HOP-AZ



010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"Architectural Resources"

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 planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

At this time, FHWA is inquiring whether you have any concerns regarding historic properties of traditional, religious, cultural, or historic importance to your community within the APE. Any information you might 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 would make a good faith effort to address your concerns.

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of “adverse effect” for the project because of impacts to archaeological resources eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in *“Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona”* (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).

The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area’s proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant; do not conform with the Secretary’s Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson’s postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas

del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method of construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

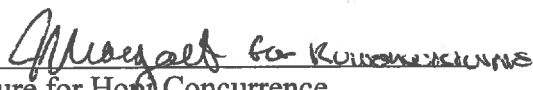
FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

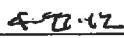
Sincerely yours,

APR 30 2012



for  
Karla S. Petty  
Division Administrator

  
Signature for Home Concurrence  
010-D(211)N

  
Date

Enclosures





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

**ARIZONA DIVISION**

4000 North Central Avenue  
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April 23, 2012

In Reply Refer To:  
010-D(211)N  
HOP-AZ

010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"Architectural Resources"

Mr. Ernest Jones, Sr., President  
Yavapai-Prescott Indian Tribe  
530 East Merritt Street  
Prescott, Arizona 86301-2038

Dear President Jones:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

At this time, FHWA is inquiring whether you have any concerns regarding historic properties of traditional, religious, cultural, or historic importance to your community within the APE. Any information you might 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 would make a good faith effort to address your concerns.

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in "*Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*" (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).

The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant, do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas

del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method of construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

Meesa Otani

Karla S. Petty  
Division Administrator

  
Signature for Yavapai-Prescott Concurrence  
010-D(211)N

April 27, 2012  
Date

Enclosures

cc:

Greg Glassco, Compliance Officer (with enclosures)

MOfani

JMallery (F500)

MOfani:cdm







ARIZONA DIVISION

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April 23, 2012

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HOP-AZ

APR 26 2012

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ARIZONA STATE PARKS/S.H.P.

010-D(211)N

TRACS No. 010 PM 247 H7583 01L

I-10, Ina Rd. TI to Ruthrauff Rd. TI

Continuing Section 106 Consultation

"Architectural Resources"

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

Dear Dr. Jacobs:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

< land >

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National

Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

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The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant, do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method or construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

ZERO

FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

*Melisa J. Otaw*

for  
Karla S. Petty  
Division Administrator

MAY 2 2012

*[Handwritten signature]*

Signature for SHPO Concurrence  
010-D(211)N

*30 APR 12*

Date

Enclosures

*cc: Matt Mallery, ADOT*

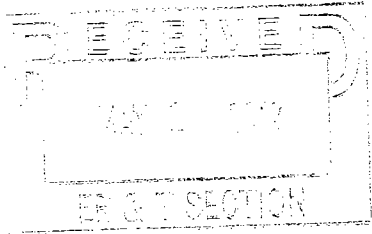


U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**ARIZONA DIVISION**

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April 23, 2012



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HOP-AZ

010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"Architectural Resources"

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

Dear Mr. Ross:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

The project is located in portions of Section 31 of Township 12 South and Range 13 East and Sections 6, 7, 8, 16, 17, 18, 20, and 21 of Township 13 South and Range 13 East (Jaynes, AZ United States Geological Survey [USGS] 7.5' Quadrangle Map; Gila and Salt River Base Line and Meridian).

Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National Register of Historic Places (NRHP) under Criterion D. This project would proceed under the

terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in *"Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona"* (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).


The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant; do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method or construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.

FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,

  
for  
Karla S. Petty  
Division Administrator



\_\_\_\_\_  
Signature for ASLD Concurrence  
010-D(211)N

  
\_\_\_\_\_  
Date

Enclosures

cc:  
Rubin Ojeda, ASLD



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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<http://www.fhwa.dot.gov/azdiv/index.htm>

April 23, 2012

In Reply Refer To:  
010-D(211)N  
HOP-AZ

010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"Architectural Resources"

Mr. Roger Anyon  
Pima County  
Office of Cultural Resources and Historic Preservation  
201 North Stone, 6th floor  
Tucson, Arizona 8570

Dear Mr. Anyon:

The Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) are planning a roadway improvement project on Interstate 10 (I-10) between the Ina Road Traffic Interchange (TI) and the Ruthrauff Road TI within the jurisdictions of the Town of Marana, the City of Tucson, and Pima County. The project is approximately 6 miles long, beginning at I-10 milepost (MP) 247.50 and ending at MP 253.43. As this project qualifies for federal aid funds, it is an undertaking subject to Section 106 review. This project occurs on land owned by ADOT, Pima County, City of Tucson, Town of Marana, Arizona State Land Department (ASLD), Union Pacific Railroad (UPRR) and privately-owned land. Consulting parties for this project include FHWA, U.S. Army Corps of Engineers (USACE), ADOT, the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP), Arizona State Land Department (ASLD), Arizona State Museum (ASM), Pima County, Town of Marana, City of Tucson, UPRR, the Hopi Tribe, the Pascua Yaqui Tribe, the San Carlos Apache Nation, the Tohono O'odham Nation, the Tonto Apache Tribe, and the Yavapai-Prescott Indian Tribe.

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Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National

Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

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Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method of construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.



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Sincerely yours,

*meera10tao*

for  
Karla S. Petty  
Division Administrator

\_\_\_\_\_  
Signature for Pima County Concurrence  
010-D(211)N

\_\_\_\_\_  
Date *5/10/12*

Enclosures

*Please see attached letter with comments. [Signature]*

**Table 1. Individually surveyed properties, sorted by subdivision**

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Casas del Oeste (1-79) Subdivision</i>					
4411 W Placita Rebecca	225370330	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4420 W Ina Road	225370230	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4421 W Placita Rebecca	225370320	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Ina Road	225370240	1981	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4430 W Placita Rebecca	225370370	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4431 W Placita Rebecca	225370310	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4440 W Placita Rebecca	225370380	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4460 W Ina Road	225370250	1972-73	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4541 W Calle Marco	225370420	1977	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4551 W Calle Marco	225370410	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4561 W Calle Marco	225370400	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4571 W Calle Marco	225370390	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7211 N Camino de la Cruz	225370260	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7221 N Camino de la Cruz	225370270	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7231 N Camino de la Cruz	225370280	1972	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7241 N Camino de la Cruz	225370290	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7251 N Camino de la Cruz	225370300	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Gibson Tract Subdivision</i>					
2850 W Diamond Street	101153270	1959-61	Not eligible	Not eligible	Not eligible under Criteria A, B, C
2838 W Ruthrauff Road	10115040A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2840 W Ruthrauff Road	10115039A	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4842 N Shannon Road	10115036A	1959	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4846 N Davis Avenue	101150310	1946	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4851 N Maryvale Avenue	101150270	1960-61	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4868 N Shannon Road	101150340	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5151 N Davis Avenue	101150004A	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

(continued next page)

**Table 1. Individually surveyed properties, sorted by subdivision (continued)**

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Palmdale No. 2 Subdivision</i>					
2964 W. Sago Circle	101142490	mobile home 1964, block addition- 1968	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3037 W. Emerald Circle	101142750	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
3053 W. Jade Place	101143040	1971	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
<i>Sunrise Addition Subdivision</i>					
4821 N. Kain Avenue	101150440	1959	Not eligible	Not eligible	Lacks integrity
4831 N. Valley Park Avenue	101150630	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
4861 N. Valley Park Avenue	101150670	1959	Not eligible	Not eligible	Not individually significant, in an ineligible district
<i>Sunrise Addition No. 2 Subdivision</i>					
2550 W Ruthrauff Road	101151010	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2602 W Ruthrauff Road	101150720	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4826 N. Plane Avenue	101150750	1962	Not eligible	Not eligible	Lacks integrity
4833 N. Gold Avenue	101150970	1960	Not eligible	Not eligible	Not individually significant, in an ineligible district
4950 N. Plane Avenue	101150850	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Sunrise Addition No. 3 Subdivision</i>					
2660 W Ruthrauff Road	10115176A	1965	Not eligible	Not eligible	Alterations to primary façade have substantially compromised integrity
2680 W Ruthrauff Road	101151180	1980	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4801 N Sunrise Avenue	101151470	1970	Not eligible	Not eligible	Compromised Integrity, not eligible under Criteria A, B, and C
4833 N. Sunrise Avenue	101151430	1964	Not eligible	Not eligible	Not individually significant, in an ineligible district
4842 N Maryvale Avenue	101151230	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4949 N. Plane Avenue	101151640	1974	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
<i>Tres Nogales Subdivision</i>					
3333 W. Tres Nogales Road	101080170	1962	Not eligible	Not eligible	Lacks integrity
3342 W. Tres Nogales Road	101080040	1962	Not eligible	Not eligible	Lacks integrity
3404 W. Tres Nogales Road	101080060	1954	Not eligible	Not eligible	Lacks integrity

(continued next page)

**Table 1. Individually surveyed properties, sorted by subdivision**

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Tucsonita Subdivision</i>					
2565 W Zinnia Avenue	10307048B/ 103070470	1962	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2623 W Violet Avenue	103070200	1957	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2626 W Violet Avenue	103070080	ca. 1945	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2627 W Violet Avenue	103070210	1956	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2629 W Ruthrauff Road	10307002A	1949	Not eligible	Not eligible	Original 1949 residence is substantially altered
2634 W Violet Avenue	103070070	1950	Not eligible	Not eligible	Substantial alterations to the exterior have significantly compromised integrity
2639 W Ruthrauff Road	10307003A	1960-63	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
2656 W Violet Avenue	103070060	1954	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2713 W Violet Avenue	10307026A	1986	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
2722 W Violet Avenue	103070170	ca. 1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2729 W Ruthrauff Road	103070120	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2755 W Ruthrauff Road	10307015B	1960	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
2819 W Ruthrauff Road	10307066A	1957	Not eligible	Not eligible	Not significant, replacement of doors and windows has compromised integrity
4410 N Highway Drive	103070650	1973	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
4619 N Highway Drive	10307069B	1963	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4684 N. Highway Dr.	10307026C	1968	Not eligible	Not eligible	Not significant, does not meet Criteria Consideration A
<i>Individual properties not in a subdivision</i>					
3100 W Curtis Road	10117023A	1931	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
3120 W Curtis Road	10117022F	1955	Not eligible	Not eligible	Compromised integrity
3150 W El Camino del Cerro	10120038C	1964	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4535 West Ina Road	10105009D	ca. 1960	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4715 W Massingale Road	22138008A	1963	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4801 W Massingale Road	221380040	1959	Not eligible	Not eligible	Not eligible under criteria A, B, and C
4820 W Massingale Road	221350380	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
4901 N Shannon Road	10120009E	1948	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
4915 N Shannon Road	10120008A	1958	Not eligible	Not eligible	See continuation sheet
4945 N Shannon Road	10120007F	1971	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5128 N Casa Grande Highway	10120019F	1951	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5140 N Casa Grande Highway	10120019J	1953-55	Not eligible	Not eligible	Substantial alterations, compromised integrity

(continued next page)

**Table 1. Individually surveyed properties, sorted by subdivision (continued)**

Address	Tax parcel no.	Construction date	Individual NRHP eligibility	Contributor to district eligibility	Eligibility remarks/ Justification
<i>Individual properties not in a subdivision (continued)</i>					
5141 N Casa Grande Highway	10120025B	1961	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5201 N Casa Grande Highway	10117019J	1946	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5240 N Highway Drive	10117022B	1969	Not eligible	Not eligible	Additions and alterations have compromised integrity, property is not significant
5266 N Highway Drive	101170270	1962	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
5280 (5333) N Highway Drive	10117028A	1950	Not eligible	Not eligible	Not eligible under Criteria A, B, and C
5301 W Ina Road	21401015A	1960	Not eligible	Not eligible	Compromised Integrity
5348 N Highway Drive	101170310	1946	Not eligible	Not eligible	Original structure hidden by non-historic additions on SW and SE facades
6913 N Camino Martin	101050170	1941	Not eligible	Not eligible	Compromised integrity, not eligible under Criteria A, B, and C
6915 N Camino Martin	101050160	1989	Not eligible	Not eligible	Does not meet age requirements and is not exceptionally significant
7031 N Camino Martin	10105012F	1969	Not eligible	Not eligible	Not eligible under Criteria A, B, and C

**Table 2. National Register of Historic Places Evaluation of Subdivisions**

<b>Subdivision</b>	<b>Plat date</b>	<b>NRHP district eligibility</b>	<b>Remarks</b>
Casas del Oeste	1972	Not eligible	Less than 40 years old, high integrity
Gibson Tract	1946	Not eligible	Lack of significance, low integrity
Jeremy	1972	Not eligible	Less than 40 years old, low integrity
Palmdale No. 2	1963	Not eligible	Lack of significance, low integrity
Sunrise Addition	1958	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 2	1959	Not eligible	Locally significant under Criterion C, low integrity
Sunrise Addition 3	1959	Not eligible	Locally significant under Criterion C, low integrity
Tres Nogales	1948	Not eligible	Lack of significance, low integrity
Tucsonla	1946	Not eligible	Lack of significance, low integrity



**Pima County Office of Sustainability and Conservation**  
**Cultural Resources & Historic Preservation Division**  
201 N. Stone Ave, 6<sup>th</sup> floor  
Tucson, AZ 85701

Phone: (520)740-6416

Fax: (520) 243-1610

May 10, 2012

Karla S. Petty  
Division Administrator  
Federal Highway Administration  
4000 N. Central Ave., Suite 1500  
Phoenix, AZ 85012-3500

Re: 010-D(211)N  
HOP-AZ  
Section 106 Consultation, Architectural Resources

Dear Ms. Petty:

I have reviewed your letter of April 23, 2012 and the attached report entitled *Historic Built Environment National Register of Historic Place Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*, dated March 2012.

Both the report and the letter place major emphasis on residential subdivisions. Much less emphasis is placed on mixed-use, and commercial and industrial uses within the Area of Potential Effect (APE). It is suggested that the mixed-use zoning and the interspersed residential, commercial, and industrial uses of the area muddles the clearly defined boundaries of subdivisions. In fact, mixed-use along this major historic transportation corridor is an integral and essential part of the history of land use within the APE. In this light, the history of mixed use (residential, commercial, and industrial) is an essential part of the historic context for the built environment. One problem with the report is that the evaluation of mixed use, commercial, and industrial properties lacks adequate context: the context is not nearly as well developed as it is for the residential subdivisions. This weakness is reflected in the less than adequate consideration given to the mixed-use,

commercial, and industrial aspects of historic development and how this then is translated in the evaluation of these properties' eligibility to the National Register of Historic Places (NRHP).

Thank you for the opportunity to review and comment.

Sincerely,

A handwritten signature in black ink, appearing to be 'R. Anyon', followed by a period.

Roger Anyon  
Program Manager





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

**ARIZONA DIVISION**

4000 North Central Avenue  
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Phoenix, Arizona 85012-3500  
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Fax: (602) 382-8998  
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April 23, 2012

In Reply Refer To:  
010-D(211)N  
HOP-AZ

010-D(211)N  
TRACS No. 010 PM 247 H7583 01L  
I-10, Ina Rd. TI to Ruthrauff Rd. TI  
Continuing Section 106 Consultation  
"Architectural Resources"

Ms. Jennifer Christelman, Manager  
Environmental Engineering Division  
Town of Marana  
11555 West Civic Center Drive  
Marana, Arizona 85653

Dear Ms. Christelman:

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Previous consultation for the project has addressed the geotechnical investigations, scope, consulting parties, the area of potential effect (APE), and a determination of "adverse effect" for the project because of impacts to archaeological resources eligible for inclusion in the National

Register of Historic Places (NRHP) under Criterion D. This project would proceed under the terms of a 1993 programmatic agreement (PA) among FHWA, ADOT, SHPO, and the Advisory Council on Historic Preservation for improvements to portions of I-10 between Tangerine Road to the north and I-10/I-19 interchange to the south. The purpose of this consultation is to address architectural resources within the APE. The APE for the consideration of architectural resources was defined as the project footprint plus adjacent property parcels and subdivisions so that both direct and indirect effects could be evaluated.

HDR Engineering, Inc., prepared an inventory and NRHP eligibility assessment of architectural resources within the APE. The results are reported in "*Historic Built Environment and National Register of Historic Places Eligibility Assessment for the Interstate 10, Ina Road Traffic Interchange (TI) to Ruthrauff Road TI, Project in Pima County, Arizona*" (Blackwell and Barnes 2012), which is enclosed for your review and comment. The APE for the consideration of direct and indirect effects of the project on architectural resources is defined as the project footprint plus adjacent property parcels and subdivisions. Because the project would be constructed in phases over several years, a 40 year cut-off date was used for the evaluation; therefore, properties built in 1971 or prior were investigated. A total of 83 individual properties and 9 subdivisions were identified within the APE that met the 40 year age criterion for consideration under Section 106 (Tables 1 and 2).

The properties surveyed within the APE originally developed in unincorporated Pima County in the post-World War II period, with the majority of improvements occurring between the early 1960s into the late 1970s. The gradual, piecemeal development pattern that occurred in the survey area is reflective of slow, continual suburbanization of the Tucson area and in Pima County, where planning and zoning were not as regulated as within the city. The later incursion of commercial, industrial, and manufacturing properties into planned residential subdivisions muddled the clearly defined boundaries, property setbacks, and lot size and layout of platted residential subdivisions and is reflective of the project area's proximity to major transportation routes such as I-10 and the railroad. The modest size of the houses in the survey area has resulted in a large number of additions and enclosures of carports in response to a desire of modern families for more livable space. Following the SHPO revised policy statement regarding Recommendation of Eligibility of Buildings (March 25, 2011), these additions and enclosures typically are not significant; do not conform with the Secretary's Standards, or both. As a result, none of the individual properties evaluated were determined eligible for inclusion in the NRHP.

Taken as a collective group, the subdivisions within the APE are reflective of the general suburbanization and growth of post-World War II Tucson, indicative of Criterion A. However, at an individual level, none of the subdivisions is distinguished by significant contributions to Tucson's postwar suburban development. None of the subdivisions in the APE is associated with a person or groups of persons of outstanding importance, rendering them ineligible under Criterion B. Similarly, with the exceptions of the three Sunrise Addition subdivisions and Casas del Oeste (not yet 40 years of age), the subdivisions were not significant under Criterion C because they do not possess distinctive characteristics of a type, period, style, or method of construction or landscape architecture, nor are they representative of a master architect, landscape architect, or community planner. Rather, these subdivisions in the project area are typical examples of twentieth-century architectural styles and forms of the larger Tucson area.

Many of the houses within the subdivisions have been changed by alterations that do not conform to the *Secretary of Interior's Standards*, alterations that occurred outside of the period of significance, and alterations that have compromised the historic integrity of the resources, rendering them unable to convey their historic significance. The three Sunrise subdivisions could be locally significant under Criterion C for their cohesive and retained residential suburban design and representative post-World War II architectural styles common to Tucson. However, construction outside the respective periods of significance and insensitive alterations and additions impact the overall integrity and leave each unable to convey that significance. None of the subdivisions in the survey are recommended eligible for inclusion in the NRHP as historic districts.


FHWA recommends that none of the properties within the APE that were evaluated in the architectural inventory qualify for inclusion in the NRHP. However, because the project will result in impacts to NRHP-eligible archaeological sites, a finding of "adverse effect" for the overall project still applies. Please review the information provided in this letter and enclosed materials. If you agree with FHWA's eligibility recommendations and determination of project effect, please indicate your concurrence by signing below. If you have any questions or concerns, please feel free to contact J. Matthew Mallery at 928-779-7595 or email [JMallery@azdot.gov](mailto:JMallery@azdot.gov).

Sincerely yours,



MAY 18 2012

*pr*  
Karla S. Petty  
Division Administrator

  
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Signature for Town of Marana Concurrence  
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Date

Enclosures

