



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

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October 17, 2013

In Reply Refer To:
STP-087-C(200)A
HOP-AZ

STP-087-C(200)A
TRACS 087 GI 270 H6832 01C
SR 87; MP 267.0 to MP 277.2
Continuing Section 106 Consultation
"no adverse effect"

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

Re: 2009-0207 (39067)

Dear Dr. Jacobs:

In 2010, the Federal Highway Administration (FHWA) and the Arizona Department of Transportation (ADOT) completed improvements to State Route 87 (SR 87) between milepost (MP) 267.0 and MP 277.2, in Gila and Coconino Counties, Arizona. The project was federally funded and, as such, constitutes an undertaking subject to Section 106 review. This project occurs on right-of-way within the Towns of Pine and Strawberry, easement across Tonto National Forest (TNF) land, and on Coconino National Forest (CNF) lands. Consulting parties for this project include FHWA, ADOT, the Arizona State Historic Preservation Office (SHPO), TNF, CNF, Hopi Tribe, Navajo Nation, Salt River Pima-Maricopa Indian Community, Tonto Apache Tribe, Yavapai-Apache Nation, Yavapai Prescott Indian Tribe, and the White Mountain Apache Tribe.

Previous consultation in February 2009 presented the scope of improvements, defined the area of potential effects (APE), discussed prior cultural resource surveys, and described cultural resources within the APE. FHWA acknowledged that a portion of the APE, between MP 276.7 and MP 277.2, had not previously been surveyed for cultural resources. FHWA also acknowledged CNF's request for historic road surveys on CNF lands adjacent to the APE. At the time of consultation, the APE was beneath 2-4 feet of snow and could not be surveyed. FHWA determined that a finding of "no adverse effect" was appropriate for this undertaking with the stipulation that surveys be completed prior to construction. SHPO, CNF, and TNF concurred with this determination (Hollis [FHWA] to Jacobs [SHPO], February 12, 2009, concurrence on February 18, 2009; CNF Inventory Standards & Accounting Form (IS&A) No. 1996-04-105-M, July 10, 2009; TNF IS&A 2009-12-019, March 4, 2009).

The field surveys were completed by EcoPlan Associates in June 2009. Results of the surveys are reported in *Pioneer Trails of the Mogollon Rim: An Archaeological and Historic Road Survey along State Route 87, Coconino County, Arizona* (Ruter and Garcia 2012), a copy of which is enclosed for your review and comment. No archaeological sites were identified, but three historic roads are present in the vicinity of the APE.

Intact portions of the 1915-1939 Pine to Flagstaff Road (AR-03-04-04-156, AZ O:11:71 [ASM]) and the 1883-1939 Strawberry Grade/Mormon Cutoff Road (AR-03-04-04-121, AZ O:11:70 [ASM]) were observed on CNF lands beyond the APE. Both roads retain integrity of location, design, setting, materials, workmanship, feeling, and association and both are recommended eligible for National Register inclusion under Criterion A for their associations with transportation at the local level. Similarly, segments of the 1878-1900 Mormon Pioneer Road (AR-03-04-04-109, AZ O:11:69 [ASM]), also beyond the APE, retain integrity and are recommended eligible for National Register inclusion under Criterion A for their association with Mormon heritage and transportation at the state level.

The scope of work included improvements to forest road crossings that correspond to segments of the Strawberry Grade/Mormon Cutoff (FR 609 and FR 9367R), the Pine to Flagstaff Road (FR 608), and the Mormon Pioneer Road (FR 9365R) within the APE. As was discussed in prior consultation, these segments retain integrity of location, workmanship and materials, but their setting, design, feeling, and association were substantially altered by the construction of modern SR 87. Thus, the portions of these roads within the APE do not contribute to the eligibility of the structures. The project activities did not result in alteration to contributing segments of the historic roads; therefore the finding of "no adverse effect" remains appropriate.

Please review the enclosed report and, if you agree with its adequacy, FHWA's eligibility recommendations, and the determination of effect, please indicate your concurrence by signing on the line provided. If you have questions or concerns, please contact ADOT Historic Preservation Specialist Linda Davis at 602-712-8636 or at LDavis2@azdot.gov.

Sincerely yours,



Karla S. Petty
Division Administrator

Signature for SHPO Concurrence
STP-087-C(200)A

Date

Enclosure