

APPENDIX D
INTERAGENCY/INTERGOVERNMENTAL
COORDINATION AND CONSULTATIONS

N/A

Janice K. Brewer
Governor

Bryan Martyn
Executive Director



Board Members

Walter D. Armer, Jr., Vail, Chair
Mark Brnovich, Phoenix
R. J. Cardin, Phoenix
Kay Daggett, Sierra Vista
Alan Everett, Sedona
Larry Landry, Phoenix
Vanessa Hickman, State Land Commissioner

April 19, 2013

Ms. Angela R. Flores
Chief, Asset Management Flight
Department of the Air Force
355th Civil Engineer Squadron (ACC)
5285 E. Madera Street
Davis-Monthan Air Force Base, AZ 85707-4927

RE: Operation Snowbird Project; Davis-Monthan AFB; DOD; SHPO-2011-1239 (111513)

Dear Ms. Flores:

Thank you for continuing to consult with our office regarding the above referenced project. Pursuant to the 36 CFR Part 800, the implementing regulation for Section 106 of the National Historic Preservation Act, we have reviewed the documentation submitted and have the following comments:

1. Thank you for providing us with the cultural resource report as requested in our consultation letter dated November 15, 2012.
2. Projects that deviate from the standard procedures used to evaluation potential impacts to historic properties can be complex and difficult. It is because of this difficulty that we especially want to commend you for providing us with a well-organized report that adequately addresses the potential for indirect effects (i.e. visual and auditory) on historic properties. It is refreshing to see documented case studies that support the statements provided in the report.
3. We concur with your finding of No Adverse Effect for this project.

We look forward to your continued consultation regarding this undertaking. As always, we appreciate your continued cooperation with this office in complying with the historic preservation requirements for state undertakings. If you have any questions or concerns, then please do not hesitate to contact me via e-mail, kdobschuetz@azstateparks.gov, or by phone, 602-542-7141.

Sincerely,

Kris Dobschuetz, RPA
Compliance Specialist/ Archaeologist
Arizona State Historic Preservation Office

MIR

Janice K. Brewer
Governor

Bryan Martyn
Executive Director



Board Members

Walter D. Armer, Jr., Vail, *Chair*
 Maria Baier, State Land Commissioner, *Vice Chair*
 Kay Daggett, Sierra Vista
 Alan Everett, Sedona
 Larry Landry, Phoenix
 William C. Scalzo, Phoenix
 Tracey Westerhausen, Phoenix

November 15, 2012

Mr. Kevin Wakefield
 Natural/Cultural Resource Manager
 Department of the Air Force
 355th Civil Engineer Squadron
 5285 E. Madera Street
 Davis-Monthan AFB, AZ 85707-4927

RE: ANG Training Plan 60-1 Operation Snowbird Project; Tucson – Davis Monthan AFB;
 DOD; SHPO-2011-1239 (108813)

Dear Mr. Wakefield:

Thank you for consulting with our office regarding the above referenced project. Pursuant to 36 C.F.R. Part 800, the implementing regulation for Section 106 of the National Historic Preservation Act, we have reviewed the documentation submitted and have the following comments:

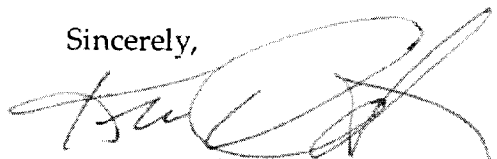
1. It is our understanding that the United States Air Force (Air Force) proposes to increase the number of Air National Guard (ANG) annual training flights flown at Davis-Monthan AFB from 1,190 to 2,256. Also, the Air Force is preparing an Environmental Assessment to evaluate the potential environmental consequences of the proposed undertaking.
2. Thank you for providing a draft copy of the EA for our review. It is the responsibility of the agency to complete cultural resources identification for both NEPA and for Section 106. A brief review of the enclosed NEPA document has indicated that cultural resources were not evaluated because no ground disturbance and/or no construction is anticipated for this project. While we agree that there probably would not be any direct impact to historic properties; we cannot yet know whether the project would have an indirect impact on historic properties. Indirect impacts to historic properties must also be considered when evaluating the potential effects that the federal undertaking may have on historic properties [36 CFR 800.16(d)]. Examples of indirect impacts may include visual impacts, auditory impacts, and vibratory impacts.
3. In general, our offices do not comment on EAs, unless the federal agency has elected to conduct their Section 106 consultation requirements as part of NEPA as per (36 CFR Part 800.8) and notified our offices in writing of their intent to do so. Therefore,

we are requesting that the Agency initiate Section 106 consultation on this undertaking with our office.

4. In order to facilitate historic preservation compliance reviews, the SHPO has established documentation standards for survey reports, report abstracts, and cover letters. These documentation standards are based in part on guidance provided within the Secretary of the Interior's Standards, the Advisory Council on Historic Preservation publications and policies, 36 C.F.R. §800.11, National Register Bulletins, SHPO guidance on implementing the SHPA, and Arizona State Museum (ASM) rules for implementing the Arizona Antiquities Act A.R.S. §41-841 *et seq.*
5. The SHPO documentation that is required includes a detailed cover letter and an associated cultural resource report. A well-drafted cover letter should state the project undertaking, describe the efforts taken to evaluate whether the proposed project will impact historic properties, provide the eligibility determinations for all cultural resources identified, discuss the efforts taken to consult with Native Americans and other interested groups, provide a project finding of effect (No Historic Properties Affected, Adverse Effect, No Adverse Effect), and provide a request for review and concurrence from the SHPO. A cultural resource report is prepared by a professional, permitted archaeologist and documents that the project area has investigated for cultural resources (either through a records review if the area has already been surveyed, or through a combination of records review and pedestrian survey by a professional, qualified archaeologist).
6. In your letter, you indicate that copies of the draft EA were provided to several Native American Tribes. We recommend that you continue your consultation efforts with the tribes under Section 106 also. Please inform us on the results of your tribal consultation efforts this for undertaking.
7. At this time, we cannot concur with your finding of No Historic Properties Affected; until the potential for indirect impacts to historic properties has been evaluated.

We are requesting that indirect impacts to cultural resources be evaluated as part of this project and that the EA be revised to include an evaluation of cultural resources. We also request that the appropriate documentation needed for Section 106 consultation with our office be provided (see numbers 4 and 5 above). We look forward to your continued consultation regarding this undertaking. As always, we appreciate your continued cooperation with this office in complying with the historic preservation requirements for federal undertakings. If you have any questions or concerns, then please do not hesitate to contact me via e-mail, kdotschuetz@azstateparks.gov, or by phone, 602-542-7141.

Sincerely,



Kris Dobschuetz, RPA
Compliance Specialist/Archaeologist
Arizona State Historic Preservation Office