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**APPENDIX 3G**

Cultural Resources Correspondence

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State of Utah

SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

## DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.

*Executive Director*

LISA J. WILSON, P.E.

*Deputy Director of Engineering and Operations*

BENJAMIN G. HUOT, P.E.

*Deputy Director of Planning and Investment*

August 2, 2023

Mr. Chris Hansen  
Senior Historic Preservation Specialist  
Utah Division of State History  
3760 Highland Dr.  
Millcreek, UT 84106

RE: Project No. S-0224(50)12, Kimball Junction Environmental Impact Statement, Summit County, Utah (PIN 19477).

### **Area of Potential Effect Request for Concurrence**

Dear Mr. Hansen:

The Utah Department of Transportation (UDOT) is preparing to undertake the subject federally-permitted project. UDOT intends to prepare an environmental impact statement (EIS) and conduct necessary environmental studies to evaluate potential transportation solutions for the proposed project. In accordance with Parts 3.1.1 and 3.2 of the *Memorandum of Understanding Between the Federal Highway Administration and the Utah Department of Transportation Concerning State of Utah's Participation in the Surface Transportation Project Delivery Program Pursuant to 23 USC §327* (renewed May 26, 2022), the UDOT assumes responsibility, assigned by the Federal Highway Administration (FHWA), for ensuring compliance with Section 106 of the NHPA and with Section 4(f) of the DOT Act of 1966, as amended. Also in accordance with the *Third Amended Programmatic Agreement among the FHWA, the Utah State Historic Preservation Officer, the Advisory Council on Historic Preservation, the USACE Sacramento District, and the UDOT Regarding Section 106 Implementation for Federal-Aid Transportation Projects in the State of Utah* (executed August 23, 2017), Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 et seq.), and U.C.A.9-8-404, UDOT has determined the identification level of effort and Area of Potential Effect (APE) and is seeking to consult with the Utah State Historic Preservation Office (SHPO) on this APE.

The proposed project area (see the enclosed study area map). This project proposes improvements to the Interstate 80 (I-80) and State Route 224 (S.R. 224) interchange at Kimball Junction and on S.R. 224 from Kimball Junction through the two at-grade traffic signals on S.R. 224 at Ute Boulevard and Olympic Parkway in Summit County, Utah. Transportation improvements are needed to address existing and future capacity and improve multimodal travel and connectivity through the Kimball Junction Area.

The APE for cultural resources will include the proposed footprint of all active alternatives as well as all adjoining parcels (see attached map). The APE includes approximately 250ac. and extends one parcel deep from the roadway centerlines. Portions of the APE have been previously surveyed for cultural resources and the majority of the APE has been disturbed by modern commercial development. The only previously documented site is 42SM268 which is the re-located graves of 3 individuals who were re-interred at this location by 2013. Few historic buildings remain in the APE but structures associated with the Swaner family and Hi Ute Ranch remain adjacent to the APE.

An intensive-level archaeological inventory and a selective reconnaissance-level survey for historic architecture will be performed for the entire APE. Any cultural resources will be documented according to the *UDOT Guidelines for Identifying, Recording, and Evaluating Archaeological and Paleontological Resources (2018)*, *UDOT Guidelines for Identifying, Recording, and Evaluating Architectural Resources (2019)*, the UPAC Linear Sites Guidelines, and the Reconnaissance-Level Survey Standard Operating Procedures. UDOT will set the threshold for historic

architecture at 1978 to account for buildings that may achieve historic age during the project schedule. All survey reports and associated forms will be submitted to the SHPO with the Determination of Eligibility document.

Please review this document and please respond in writing if you concur with the APE and level of effort described herein. Should you have any questions or need additional information, please feel free to contact me at 801-910-2035 or [lizrobinson@utah.gov](mailto:lizrobinson@utah.gov).

Sincerely,


A handwritten signature in cursive script that reads "Liz Robinson".

Liz Robinson, M.A., RPA  
Cultural Resources Program Manager  
UDOT Central Environmental

Enclosures



**Legend**

 Kimball Junction EIS Needs Assessment Evaluation Area



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Spencer J. Cox  
Governor

Deidre M. Henderson  
Lieutenant Governor



Christopher Merritt  
State Historic Preservation Officer  
Utah State Historic Preservation Office

August 3, 2023

Jill Remington Love  
Executive Director  
Utah Department of Cultural  
and Community Engagement

Liz Robinson  
Cultural Resources Program Manager  
Utah Dept of Transportation (UDOT)  
4501 Constitution Blvd  
Salt Lake City, Utah 84119

RE: PIN 19477\_Kimball Junction EIS

For future correspondence, please reference Case No. 23-1706

Dear Ms. Robinson,

The Utah State Historic Preservation Office received your submission and request for our comment on the above-referenced project on August 2, 2023. Based on the information provided to our office, we agree with your area of potential effect and level of effort as proposed for the undertaking.

This information is provided to assist with Section 106 responsibilities as per §36CFR800 and state law UCA 9-8-404. If you have questions, please contact me at (801) 245-7239 or by email at [clhansen@utah.gov](mailto:clhansen@utah.gov).

Sincerely,

Christopher Hansen  
Preservation Planner/Utah SHPO



State of Utah

SPENCER J. COX  
Governor

DEIDRE M. HENDERSON  
Lieutenant Governor

## DEPARTMENT OF TRANSPORTATION

CARLOS M. BRACERAS, P.E.  
*Executive Director*

LISA J. WILSON, P.E.  
*Deputy Director of Engineering and Operations*

BENJAMIN G. HUOT, P.E.  
*Deputy Director of Planning and Investment*

October 28, 2024

Mr. Chris Hansen  
Deputy State Historic Preservation Officer  
Utah Division of State History  
3760 Highland Dr.  
Millcreek, UT 84106

RE: UDOT Project No. S-0224(50)12, Kimball Junction Environmental Impact Statement, Summit County, Utah (PIN 19477).  
**Determination of Eligibility and Finding of No Historic Properties Affected.**

Dear Mr. Hansen:

The Utah Department of Transportation (UDOT) is preparing to undertake the subject federal-aid project. In accordance with Parts 3.1.1 and 3.2 of the *Memorandum of Understanding Between the Federal Highway Administration and the Utah Department of Transportation Concerning State of Utah's Participation in the Surface Transportation Project Delivery Program Pursuant to 23 USC §327* (renewed May 26, 2022), the UDOT assumes responsibility, assigned by the Federal Highway Administration (FHWA), for ensuring compliance with Section 106 of the NHPA and with Section 4(f) of the DOT Act of 1966, as amended. Also in accordance with the *Third Amended Programmatic Agreement among the FHWA, the Utah State Historic Preservation Officer, the Advisory Council on Historic Preservation, the USACE Sacramento District, and the UDOT Regarding Section 106 Implementation for Federal-Aid Transportation Projects in the State of Utah* (executed August 23, 2017), Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. § 300101 et seq.), and U.C.A.9-8-404, the UDOT has taken into account the effects of this undertaking on historic properties, and is affording the Utah State Historic Preservation Officer (SHPO) an opportunity to comment on the undertaking. Additionally, this submission is in compliance with Section 4(f) of the Department of Transportation Act of 1966, 23 U.S.C. § 138 (as amended) and 49 U.S.C. § 303 (as amended).

### PROJECT DESCRIPTION

This project proposes improvements to the Interstate 80 (I-80) and State Route 224 (S.R. 224) interchange at Kimball Junction and on S.R. 224 from Kimball Junction through the two at-grade traffic signals on S.R. 224 at Ute Boulevard and Olympic Parkway in Summit County, Utah. Transportation improvements are needed to address existing and future capacity and improve multimodal travel and connectivity through the Kimball Junction Area.

The area of potential affects (APE) has been defined as the proposed footprint of all active alternatives as well as all adjoining parcels (see attached map). The APE includes approximately 250ac. and extends one parcel deep from the roadway centerlines. Portions of the APE have been previously surveyed for cultural resources and the majority of the APE has been disturbed by modern commercial development.



The APE has been surveyed for archaeology by Certus Environmental Solutions, under State Antiquities Project Number U23HY0674, and the results are reported in *An Archaeological Resources Assessment in Support of the Kimball Junction Environmental Impact Statement (EIS), Summit County, Utah* (see enclosed report). An intensive level pedestrian survey was conducted using 15 meter transects to identify archaeological resources in any undisturbed areas. A reconnaissance selective level survey was conducted to record architectural properties, and the results are reported in *A Selective Reconnaissance-Level Historic Structures Inventory in Support of the Kimball Junction Environmental Impact Statement (EIS), Summit County, Utah* (see enclosed report).

The surveys have resulted in the identification of 1 archaeological site and 2 architectural properties. Of these, 1 architectural property is eligible to the National Register of Historic Places (NRHP). A culvert on Bitner Road appears to be a reinforced concrete box culvert. However, neither UDOT nor Summit County (the owner of the road) could provide any information about the specific culvert design or type. Concrete box culverts are a common structure type and one of the structure types eligible for the Advisory Council on Historic Preservation’s *Program Comment Issued for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges* (77 Federal Register 68790). For this reason, UDOT will address this culvert through the program comment process, and it is not discussed further in this document. The Determinations of Eligibility and Findings of Effects (for both Section 106 and Section 4(f)) are provided in Table 1 for archaeological resources and in Table 2 for architectural properties. Please see attached notification letter regarding Section 4(f) *de minimis* impacts.

## ARCHAEOLOGICAL RESOURCES

Table 1. Determinations of Eligibility and Findings of Effect for Archaeological Resources.

Site	Name or Description	NRHP Eligibility	Finding of Effect	Section 4(f) Use	Section 4(f) Impact
42SM268	Pioneer-era burials	Not Eligible	No Historic Properties Affected	N/A	N/A

**Description of Effect to Site 42SM268:** This site, 42SM268, is a historic-period burial site that was previously reported and determined ineligible for listing in the NRHP under all criteria (in 1999, 2007, and 2021). Upon their discovery in 1999, the remains at this site were removed and relocated to a nearby parcel that is also within the project APE. UDOT has determined that this site remains not eligible for the NRHP and that it will not be impacted by this project.

## ARCHITECTURAL PROPERTIES

Table 2. Determinations of Eligibility and Findings of Effect for Architectural Properties.

Address	Date	Style	NRHP Eligibility/ SHPO Rating	Finding of Effect	Section 4(f) Use	Section 4(f) Impact
2201N. Kilby Rd.	1906	Barn	Eligible/EC	No Historic Properties Affected	No	None

**Description of Effects to 2201N. Kilby Rd.:** The proposed project will avoid this property and will result in no impacts to the structure and will not require any ROW acquisition. Therefore, the project will result in a finding of No Historic Properties Affected and No Section 4(f) use.

## CONSULTATION EFFORTS

Native American consultation was initiated through letters sent to the Uintah and Ouray Ute Tribes, Shoshone-Bannock Tribes, Eastern Shoshone Tribe of the Wind River Reservation, Skull Valley Band of Goshutes and Northwestern Band of Shoshone Nation (sent December 21, 2022). Letters were also sent to the Summit County Certified Local Government (CLG) representative, Summit County Historical Society, Park City CLG, and the Park City Historic Preservation Board (sent December 21, 2022). No responses or comments were received.

## SUMMARY

To summarize, the project will result in a finding of **No Historic Properties Affected** for all archaeological sites and architectural properties. Therefore, the Finding of Effect for the proposed UDOT Project No. S-0224(50)12, Kimball Junction Environmental Impact Statement, Summit County, Utah, is **No Historic Properties Affected**.

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by UDOT pursuant to 23 *USC* §327 and a Memorandum of Understanding dated May 26, 2022, and executed by FHWA and UDOT.

Please review this document and, providing you agree with the findings contained herein, provide written concurrence. Should you have any questions or need additional information, please feel free to contact Liz Robinson at 801-910-2035 or [lizrobinson@utah.gov](mailto:lizrobinson@utah.gov); or David Amott at 801-971-4808 or [damott@utah.gov](mailto:damott@utah.gov).

Sincerely,



Liz Robinson, M.A., RPA  
Cultural Resources Program Manager  
UDOT Environmental Services



David Amott, AICP  
Architectural Historian  
UDOT Environmental Services

Enclosures

cc: Rebecka Stromness, Project Manager  
Carissa Watanabe, Environmental Manager



Spencer J. Cox  
Governor

Deidre M. Henderson  
Lieutenant Governor

Donna Law  
Interim Executive Director



Christopher Merritt  
State Historic Preservation Officer  
Utah State Historic Preservation Office

October 29, 2024

Liz Robinson  
Cultural Resources Program Manager  
Utah Dept of Transportation (UDOT)  
4501 Constitution Blvd  
Salt Lake City, Utah 84119

RE: PIN 19477\_ Kimball Junction EIS

For future correspondence, please reference Case No. 24-2728

Dear Ms Robinson,

The Utah State Historic Preservation Office received your submission and request for our comment on the above-referenced undertaking on October 28, 2024.

We concur with your determinations of eligibility and effect for this undertaking.

This letter serves as our comment on the determinations you have made within the consultation process specified in §36CFR800.4. If you have questions, please contact me at (801) 535-2502 or by email at [rmcgrath@utah.gov](mailto:rmcgrath@utah.gov).

Sincerely,

Ryan McGrath  
Compliance Archaeologist

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