

**Six Counties Rail Project**

**Jeffrey Irwin** to: Pectol, Michael A SPK

Cc: "Urbanic, John E SPK"

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Mike,

Thank you for arranging a review of the preliminary draft PA for the Six Counties Rail Project. After consulting with a number of folks to invite participation, we are ready to move forward with the development of a Programmatic Agreement.

I've attached a Draft PA with attachments. This document addresses a full range of consultation, inventory, evaluation and mitigation issues. I addressed the comments from your archeologist, hopefully to their satisfaction. See below for a list of PA highlights.

I am sending this to all signatories and concurring parties and hope to develop an agreement satisfactory to all involved.

Would you please forward the Draft PA for the necessary technical and legal review? I'd be happy to answer any questions you have and I'd be happy to talk directly to folks in the Sacramento office if that would be helpful.

Please feel free to contact me via email or phone.

Thanks for your help!

*PA Stipulations Highlights*

- Establishes STB as primary coordinator of consultation
- Identifies Signatories and Concurring Parties
- Ensures applicant will support survey and evaluations and mitigation planning prior to construction
- Establishes existing inventory and provides process for additional inventory, as required
- Provides for a records search to update the existing inventory with any recently identified historic properties in the APE
- Provides for evaluation of properties not in the existing inventory
- Ensures process for review and comment on survey, testing, mitigation plans by all signatories and concurring parties
- Provides for consideration of archaeological connection to the Old Spanish Trail at a particular site within the right-of-way (42SV2738)
- Calls for effect determinations as construction plans are refined and finalized
- Establishes avoidance as a preferred approach to historic properties but allows for mitigation
- Ensures a public component of any mitigation
- Identifies standards for professionals executing stipulation requirements and documentation standards for mitigation
- Calls for protective measures during construction and notes potential monitoring opportunities
- Notes permits required for archaeological work on federal and state land
- Establishes curation standards for archaeological collections
- Includes confidentiality provision for archaeological data and information sensitive to tribes
- Includes procedures for inadvertent discovery of archaeological materials and human remains or cultural items



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Best,

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