



**DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION**

Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

EI-26893

February 21, 2020

Reply In Reference To: STB_2019_1125_001

Sally Mordi
Attorney
Sierra Northern Railway
1330 Connecticut Ave., NW
Washington, DC 20036-1795

RE: STB Docket No. AB 874 (Sub-No. 1) Sierra Northern Railway Abandonment
Exemption – Yolo County, California

Dear Ms. Mordi:

OHP is in receipt of your January 23, 2020 letter continuing consultation for the above undertaking. In addition to your letter, a Memo by GEI Consultants dated September 5, 2019 was included.

You are seeking my comments, on behalf of the Surface Transportation Board (STB), that the documents you have provided are sufficient to answer the comments of my December 6, 2019 letter.

Your letter states that in 2015 a Programmatic Agreement (PA) between United States Army Corps of Engineers (USACE), Sacramento Area Flood Control Agency (SAFCA), and myself was signed that accounts for meeting the USACE's responsibilities under Section 106 and for its applicable implementation of the NHPA regulations for all aspects of the undertaking.

According to your letter, SAFCA in 2019 prepared two addenda to the EIR/EIS, which resulted in the aforementioned PA to implement projects that include, among other elements, the necessary widening of the Sacramento Weir.

In your letter, it is stated that SAFCA, in 2019, modified the description of the project of the EIS/EIR to include the proposed railroad line abandonment of the Sierra Northern Railway. You state that SAFCA's consultants inventoried and evaluated the Line for eligibility to be listed in the National Register of Historic Places (NRHP), determining

that the evaluated railroad segment "lacks integrity of design, materials, and workmanship to its period of historic significance", and does not meet the NRHP criteria.

OHP has reviewed the provided information and is offering the following comments.

At this point, I am unable to comment on the information provided for the following reasons.

First, it needs to be clarified, whether the 2019 project modification of the EIR/EIS that is including the railroad abandonment has been addressed in an amendment to the above-described PA.

Second, the GEI consultants appear to have prepared the recordation and evaluation of the railroad segment on behalf of SAFCA.

However, OHP cannot concur with a determination made by a local agency. Hence please clarify whether the recordation and evaluation of the Sierra Northern Railway segment has been conducted by a federal agency within the amended PA, and if indeed it has, please provide me with this information.

Also, in order for the STB to receive concurrence that the evaluated railroad segment does not meet the NRHP criteria, STB would need to agree with SAFCA' determination as presented in the September 5, 2019 Memo, and this must be presented and stated in your letter when asking for my concurrence.

Please note that two web links that were referenced in your letter cannot be opened. In general, OHP expects to receive relevant information that is to be reviewed as part of the hard copy submission. It would be at the discretion of the agency to determine which relevant documentation should be included in a submission.

Please also note that the correct project identification reference is the one above and it is to be used in all future correspondence.

If you have any other questions, please contact Michelle C. Messinger of my staff at (916) 445-7005 or through e-mail at Michelle.Messinger@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer