

APPENDIX 10

CARIBBEAN REGIONAL RESPONSE TEAM GUIDANCE ON NATIONAL HISTORIC PRESERVATION ACT (NHPA) SECTION 106 COMPLIANCE DURING EMERGENCY RESPONSE

The purpose of this guide is to facilitate implementation by the Federal On-Scene Coordinator (FOSC) of the *National Programmatic Agreement (PA) on the Protection of Historic Properties during Emergency Response (ER) Under the National Oil and Hazardous Substances Pollution Contingency Plan (NCP)*.

Compliance with the PA constitutes compliance with Section 106 of the National Historic Preservation Act.

NHPA Section 106 Steps FOSCs Must Take During an ER

1. See *Attachment 1* to determine if the ER is categorically excluded from Section 106.
 - If yes, email/fax Attachment 6 to the appropriate contacts identified on the form. No further action is necessary.
2. Notify each state's State Historic Preservation Office (SHPO), landowners and managers/trustees for consultation purposes because of Overriding Factors to the Exclusions in Step 1.

Additionally, if a response to Attachment 1 is received, proceed to the next step.
3. In accordance with the PA (see Section VI.B. et seq.), develop protective measures for historic properties or cultural resources as determined through consultation with the notified parties.

Attachment 2 contains a checklist of parties that may need to be notified and consulted, and actions that may be taken for the purposes of historic property protection in the event of an incident in a non-excluded area. These actions may need to be undertaken prior to the activation of an Historic Properties Specialist (HPS), based on the information received through preparedness activities (e.g., Geographic Response Plans) and the consultations with the notified parties.

Activation of a qualified HPS.¹ The FOSC should activate a qualified HPS in response incidents where:

- Identified historic properties and/or cultural resources are likely to be impacted by response actions;
- Previously unknown cultural resources are discovered; and,
- The incident has grown in scale and complexity necessitating HPS expertise.

The FOSC must activate a qualified HPS when:

¹ See *Attachment 4: HPS Personnel Standards*, and PA Section IV.C. Emergency Response Support/Coordination.

- One or more of the notified/consulting parties expresses concern and requests special consideration for historic properties and cultural resources.

For documentation of response actions, see:

- Attachment 6 for response actions that *did not affect* historic properties;
- Attachment 7 for response actions that *did not adversely affect*² historic properties;
- Attachment 8 for response actions that *did adversely affect* historic properties. For additional detail, see the *Provide Documentation of Actions Taken/Adverse Effects* section beginning on page 4.

If possible, the consultation process should be completed within the operational period that a response strategy is developed (e.g., shoreline treatment recommendation), or prior to the operational period that a strategy will need to be implemented.

4. Notify the SHPO Representative when the emergency response has formally concluded.

Important Concepts about Section 106 for the FOSC

- Information on Historic Properties and cultural resources should be included in the applicable section of each Area Contingency Plan (ACP). The ACPs should also identify, prioritize, and develop strategies for Historic/Cultural sites. See PA *Section V. Pre-Incident Planning*, for additional preparedness needs.
- NHPA Section 106 obligations apply to FOSC response actions, and not to impacts caused by the spill or release.
- Historic properties and cultural resources can be adversely impacted by all facets of cleanup and monitoring, such as access, staging, excavation, waste removal and decontamination, deployment and demobilization of equipment.
- The FOSC may have to make an ER decision that adversely affects historic properties and cultural resources. However, the ER decision must be an informed decision and the determination documented in Attachment 8.
- An informed decision is one in which the FOSC has:
 - Consulted (notified and taken into account professional comments) with SHPO, Federal land-managing agencies, and/or other interested parties;
 - Determined if the exclusions apply;
 - If activated, consulted with an Historic Properties Specialist;
 - Consulted the GRPs or other similar sensitive environments sources;
 - If established within the ICS structure, consulted with the Environmental Unit.
- Attachment 8 is utilized to provide the required documentation of actions taken that resulted in unavoidable injury to historic properties or cultural resources. Once

² Adverse effects can include destruction, damage, or alteration of the property; or isolation from, alteration of, or introduction of conditions out of character with its setting. See the PA at Section VI.D.1, or 36 CFR 800.5(a)(1).

completed, the FOSC will submit Attachment 8 to the SHPO Representative and other potentially affected resource trustees.

- The FOSC must also consult with SHPO Representative and other appropriate parties on newly discovered or unanticipated potential historic properties or cultural resources encountered, and on adverse impacts due to the response on those properties or resources (see 36 CFR 800.1(a) and 800.2(a)(4). This is an inherently governmental responsibility that must be conducted by the FOSC or his/her representative, which may include the HPS.

Determination of factors that may call for the presence of HPS:

- If a spill or release does not meet the characteristics of an excluded spill or release (Attachment 1);
- Uncertainty on applicability of the spill categories in Attachment 1 excluded from additional Section 106 NHPA compliance;
- SHPO Representative or resource manager/trustee responds to determination (Attachment 1) that a Historic Property or Cultural Resource is at risk.

Integrating Section 106 Obligations into ICS

Not all ERs will require a formal ICS structure. However, the need to recognize the protection of historic properties and cultural resources as a response objective, the development and communication of instructions for operational elements that may impact historic and cultural resources, and documentation outlined in the points below, remain.

- The HPS may serve in the Environmental Unit, if established, as the Historic/Cultural Resources Technical Specialist (see Attachment 2).
- In a unified command ICS situation, it should be clear among the Incident Commanders (ICs) that the relationship of the HPS to the FOSC is unique among the command staff. The HPS is responsible for advising the FOSC to help ensure that he/she meets Section 106 legal obligations, which do not apply to the other ICs.
- Include in the Incident Objectives (ICS-202) a statement on protection of historic properties or cultural resources, as appropriate.
- Provide to workers any special instructions to ensure protection of historic properties and cultural resources via the Assignment List (ICS -204) for each Branch involved in actions potentially disturbing ground or structures (e.g., On Water Removal, Shore Line Removal, DECON).
- Ensure that information on historic properties/cultural resources are included in the Resources at Risk Summary (ICS 232) prepared by the Environmental Unit. Also ensure that sensitive information about resource locations is kept secure.
- Document in Unit Logs (ICS-214) completion of any of the following forms:

- Attachment 6 for actions taken that “did not affect” historic properties and/or cultural resources
- Attachment 7 for actions taken that “did not result in an adverse effect” to historic properties and/or cultural resources
- Attachment 8 for actions taken that “did adversely affect” historic properties or cultural resources.

Provide Documentation of Actions Taken/Adverse Effects

1. Did Not Affect. In accordance with the PA, the FOOSC should use Attachment 6 to document actions taken that did not affect Historic Properties or Cultural Resources. No further action is needed unless a response from either the listed SHPO Representative and/or potentially affected resource managers and trustees is received indicating that the response to a spill or release may have the potential to affect a historic property. If a response to Attachment 6 is received indicating that a historic property is at risk, initiate the consultation process (Step 2 of the Guidelines) and activate an HPS. See also Attachment 5 for suggested information to be provided to the HPS upon activation.
2. Did Not Adversely Affect. Use Attachment 7 to document situations where historic properties and cultural resources may be present or the exclusions in Attachment 1 did not apply, and the response actions undertaken did not result in an Adverse Effect.
3. Adverse Effect. If there are adverse effects to historic/cultural resources, the determination shall be documented in writing in Attachment 8 and provided to the SHPO Representative and potentially affected resource managers and trustees.

Other Relevant Authorities

As with the PA (see Section II.B.), these guidelines do not specifically address the Archaeological Resources Protection Act (ARPA), the Antiquities Act, or the National Marine Sanctuaries Act.

The Native American Graves Protection and Repatriation Act (NAGPRA) (Public Law 101-601; 25 U.S.C. 3001 et seq.; see Subpart A, Sec. 10.1, Purpose and Applicability) does *not* apply to U.S. Territories. If human remains are encountered, consultations should be undertaken with the appropriate SHPO personnel in accordance with applicable commonwealth/territorial laws.

In addition, Section II.C. of the PA recognizes the relevance of State policies.

Attachments:

Attachment 1 - Spills or Releases Excluded from Additional NHPA Section 106 Compliance

Attachment 2 - HPS Checklist to Assess and Address Potential Effects on Historic Properties/
Cultural Resources

Attachment 3 - Notice to Response Personnel: Required Actions After Discovery of Cultural
Resources

Attachment 4 - Historic Property Specialists Personnel Standards

Attachment 5 – Suggested Information to Be Provided to the HPS Upon Activation

Attachment 6 - Documentation of Actions Taken that Did Not Affect Historic Properties/Cultural
Resources

Attachment 7 - Documentation of Actions Taken that Did Not Result in an Adverse Effect on
Historic Properties/Cultural Resources

Attachment 8 - Documentation of Actions Taken that Adversely Affected Historic Properties or
Cultural Resources

Attachment 9 - Preparedness

ATTACHMENT 1
SPILLS OR RELEASES EXCLUDED
FROM ADDITIONAL NHPA SECTION 106 COMPLIANCE

Overriding Factors: (1) If you are not sure whether a spill or release fits into one of the categories listed above; (2) if at any time, the specifics of a spill or release change so it no longer fits into one of the categories listed above; (3) if the spill is greater than 100,000 gallons; and/or (4) if the State Historic Preservation Officer, the National Park Service, landowners and managers/trustees, other interested party notifies you that a categorically-excluded spill or release may have the potential to affect a historic property, then an Historic Properties Specialist needs to be activated in accordance with the Nationwide Programmatic Agreement.³

Threatened spills/releases:

Response activities related to threatened spills or releases that include the removal of fuel, and which will not include land/submerged land-disturbing activities.

Spills/releases onto (which stay on):

- Gravel pads
- Roads (gravel or paved, not including the undeveloped right-of-way).
- Parking areas (graded or paved)
- Dock staging areas less than 50 years old
- Gravel causeways
- Artificial gravel islands
- Drilling mats, pads, and/or berms
- Airport runways (improved gravel strips and/or paved runways)

Spills/releases into (that stay in):

- Water bodies where the spill or release: (1) will not reach land/submerged land; and (2) Will not include emergency response activities with land/submerged land-disturbing components
- Water bodies where the spill or release: (1) will reach land/submerged land; and (2) will not include emergency response activities with land/submerged land-disturbing components.
- Lined pits (e.g., drilling mud pits and reserve pits).
- Borrow pits
- Concrete containment areas.
- Tidal shorelines exposed to aggressive wave action resulting in erosion and sediment reworking
- Existing paths, roads, and public use areas that are improved, marked and mapped, or worn bare and have no proscription against walking, providing no soil is disturbed. Excludes concrete containment areas

Spills/releases of:

Gases (e.g., chlorine gas)

³ Refer to PA Sections VI.A.1 and VI.A.2.

ATTACHMENT 2
HISTORIC PROPERTIES SPECIALIST CHECKLIST TO
ASSESS AND ADDRESS POTENTIAL EFFECTS ON
HISTORIC PROPERTIES/CULTURAL RESOURCES*

THE FOLLOWING STEPS NEED TO BE TAKEN AS APPROPRIATE BY THE FEDERAL ON-SCENE COORDINATOR'S HISTORIC PROPERTIES SPECIALIST FOLLOWING ACTIVATION:	
<input type="checkbox"/>	Understand and implement the Area Contingency Plan. If the spill/release occurs in an area where Geographic Response Strategies or Plans (GRS or GRP) have been developed, check the historic properties note on the GRS/GRP and discuss appropriate actions with the FOSC.
<input type="checkbox"/>	Identify the (1) location(s) of known historic properties affected or potentially affected by the spill or release; and/or, (2) potential for undocumented historic properties to be affected or potentially affected by the spill or release.
<input type="checkbox"/>	<i>Notify and consult with the _____ State Historic Preservation Office.</i>
<input type="checkbox"/>	<i>Notify and consult with all appropriate Federal, State, local, and/or private landowner(s)</i>
<input type="checkbox"/>	<i>Consult with archaeologists/historians/local residents knowledgeable about the area.</i>
<input type="checkbox"/>	<i>Consult with Responsible Party's Historic Properties Specialist (if identified).</i>
<input type="checkbox"/>	<i>Review (if available) aerial photos or other documentation of the area affected or potentially-affected by the spill or release (this could include digital photographs/videos).</i>
<input type="checkbox"/>	<i>If necessary, conduct on-site inspection to determine presence of historic properties and prioritize.</i>
<input type="checkbox"/>	Document effect of spill or release on historic properties or cultural resources.
<input type="checkbox"/>	Assess whether emergency response strategies have the potential to affect historic properties.
<input type="checkbox"/>	Establish an historic properties policy for all spill-related field personnel.
<input type="checkbox"/>	If ICS is in place, implement policy through the Unified Command (e.g., FOSC, Safety Officer, or other appropriate individuals). Provide specific instructions on the ICS -204 to ensure protection of historic properties and cultural resources. Additionally, provide input to the ICS-232 Resources at risk summary on Historic Properties/cultural resources.
<input type="checkbox"/>	Help identify, prioritize, and develop strategies to protect historic properties.
<input type="checkbox"/>	Provide information on response activities that have the potential to negatively affect historic properties.

**ATTACHMENT 2, HISTORIC PROPERTIES SPECIALIST
CHECKLIST, CONT.**

ONE OR MORE OF THE FOLLOWING STEPS NEED TO BE TAKEN, AS APPROPRIATE, AT THE RECOMMENDATION OF THE HPS FOLLOWING APPROVAL BY THE FOSC:	
<input type="checkbox"/>	Travel to the spill or release site to inspect or monitor on-site activities to minimize or eliminate potential historic properties impacts resulting from response-related activities.
<input type="checkbox"/>	Provide information on response activities that have the potential to negatively affect historic properties.
<input type="checkbox"/>	Conduct field survey(s) to provide recommendations to the FOSC on areas that need protection.
<input type="checkbox"/>	Participate in assessment teams that survey oiled shorelines and adjacent lands.
<input type="checkbox"/>	Create a Historic Properties Technical Advisory Group to review proposed cleanup strategies for shorelines and adjacent lands.
<input type="checkbox"/>	Provide on-site monitoring of cleanup crews.
<input type="checkbox"/>	Conduct archeological and/or historic recovery at an oiled site.
<input type="checkbox"/>	Arrange for appropriate permits.
<input type="checkbox"/>	Arrange for disposition of records and collected materials.
<input type="checkbox"/>	Ensure the confidentiality of site location information for all activities identified above. ⁴
<input type="checkbox"/>	Report any actual or suspected artifact theft to the Federal OSC, State Historic Preservation Officer, appropriate law enforcement officials and the landowner and/or land manager.
<input type="checkbox"/>	Ensure compliance with applicable Federal/state regulations.

*Additional steps may be required in a more complex incident.

⁴ See PA Section VI.E.4., and the Section 106 regulations at 36 CFR 800.11(c)(1)

ATTACHMENT 3

NOTICE TO RESPONSE PERSONNEL: REQUIRED ACTIONS AFTER DISCOVERY OF CULTURAL RESOURCES

The Unified Command is required to comply with State and Federal laws that protect cultural resources from injury. Response personnel including contractors, sub-contractors, emergency responders, cleanup workers, and field crews play a crucial role in this process since they, by the nature of their work, are the people most likely to encounter cultural resources while in the field.

During an incident response it is possible that you, as a person involved in the response, may discover cultural resources. In the course of your work, if you find an item that you believe or suspect is cultural or historic, you must:

1. Stop work immediately at, near, and surrounding the area where you discovered the object, item, or artifact.
2. Leave the suspected cultural item in place, undisturbed, exactly where it was discovered. Do not pick the item up, touch it, or work around it.
3. If possible, mark the location where you discovered the item but do not disturb or penetrate the soil with any object or tool. There may be other artifacts under the soil that could be damaged by your actions.
4. Inform your field supervisor of the discovery as soon as possible.

After these initial actions, your field supervisor will immediately notify the Planning Section's Environmental Unit and the HPS, which assist the Unified Command and FOSC to ensure that cultural resources are appropriately considered during emergency response activities, and initiate or reinstate consultation with parties identified on page 1, bullet 2, and Attachment 2, checkbox 2. Further direction on how to proceed will be provided by the Unified Command, consistent with Attachments 7⁵ and 8⁶. If you are unsure of something discovered being culturally sensitive, consider it to be sensitive and follow the steps listed above so that the Unified Command can be notified and, ultimately, make a determination on the item's historic significance and the actions needed to protect it.

Compliance with these procedures is mandatory. They must be followed by all response personnel. Failure to comply with these procedures by excavating, removing, damaging, altering, or defacing any archaeological resource is a violation of multiple State and Federal laws and may result in fines/penalties, criminal prosecution, and imprisonment. For more information on actions related to the discovery of cultural resources, consult with your supervisor or contact the Historic/Cultural Resource Specialist.

For the purpose of this guidance, the term "cultural resource" includes but is not limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Non-fossilized and fossilized paleontological specimens may also be considered cultural resources, depending greatly on the context in which they were discovered.

⁵ Documentation of Actions Taken That Did Not Result in an Adverse Affect on Historic/Cultural Resources.

⁶ Documentation of Emergency Response Decisions That Adversely Affect Historic Properties or Cultural Resources.

ATTACHMENT 4

HISTORIC PROPERTIES SPECIALISTS PERSONNEL STANDARDS

These standards apply to individuals contracted to provide technical services to Federal On-Scene Coordinators as Historic Properties Specialists. Standards for individuals performing field Historic Properties duties in a spill response (such as Shoreline Cleanup Assessment Team [SCAT] Archaeologists), either for the responsible party or for the government, may be different.⁷

1. The individual must meet the Secretary of Interior's Historic Preservation Professional Qualification Standards for either Prehistoric or Historic Archeology. In general, these require a graduate degree in Anthropology (or a closely related field), with a specialization in Archeology, and two and one-half years of professional experience. These standards can be found on-line at: https://www.nps.gov/history/local-law/arch_stnds_9.htm
2. The individual should have demonstrated familiarity with the history, archaeology and environment of the area in question.
3. The individual must be fully familiar with Federal and State laws and regulations governing historic preservation, and with the operation of the State Historic Preservation Officer/Office (SHPO).
4. The individual must have, or must acquire, training in compliance with the standards found in 29 CFR 1910, and should be familiar with the basic principles of the Incident Command System. Additionally, the individual should have familiarity with the *National Oil and Hazardous Substances Pollution Contingency Plan (NCP)*; the applicable Area Contingency Plan (ACP); the *Programmatic Agreement on the Protection of Historic Properties during Emergency Response under the NCP (Programmatic Agreement)*; and specific procedures such as the SCAT process.

⁷ Refer to PA Sections IV.C.2.a. and Appendix II

ATTACHMENT 5

SUGGESTED INFORMATION TO BE PROVIDED TO THE HISTORIC PROPERTIES SPECIALISTS UPON ACTIVATION

STEP 3: Activation of the Federal On-Scene Coordinator’s Historic Properties Specialist (HPS) in Accordance with the National Programmatic Agreement

NOTE: Activation of the HPS must be accomplished in a “reasonable and timely” manner.

Suggested information to be provided to HPS upon activation.

Name of incident: _____
Date/time of incident: _____
Spill/release location: land __; water __; land/water __ If on land, estimate number of acres contaminated: _____
Spill/release coordinates: _____ latitude; _____ longitude If on land, _____ township; _____ range; _____ section
Distance to nearest water body, if on land: _____ km/mi
Distance to nearest land, if in water: _____ km/mi
Product released: Gasoline __; Diesel #2 __; Light or Heavy Crude __; #6 Oil/Bunkers __; JP4 __; Other _____
Estimated volume of product released: _____ gals/bbls
Release status: Stopped __; Continuing __; Unknown __
Is spill/release: Contained __; Spreading __; Unknown __
Estimated volume of product potentially released: _____ gals/bbls/other measure
Have Geographic Response Strategies been approved for the area affected or potentially affected by the spill/release? Yes _____; No _____
Describe any response actions proposed or taken that include ground- or structure-disturbing activities:

ATTACHMENT 6

DOCUMENTATION OF ACTIONS TAKEN THAT DID NOT AFFECT HISTORIC PROPERTIES/CULTURAL RESOURCES

This form should be completed and submitted, along with any additional supporting documentation, in a reasonable and timely manner to the appropriate entities listed below:

Name of incident:
Date/time of incident:
Location of incident:
Brief description of response action approved (including the date) by the FOSC: <input type="checkbox"/> The Exclusions listed in Attachment 1 apply to this spill or release, and there are no known "OverridingFactors" ⁸
FOSC Name and Title:
FOSC Signature:
Date of Signature:
Email or fax this form to the consulting parties/individuals listed below, consistent with the Checklist in Attachment 2. No further action is needed unless a response from one of the listed individuals/agencies is received indicating that the spill or release may have the potential to affect a historicproperty.
If a response to this statement is received indicating <u>that a historic property is at risk</u> , initiate the consultation process (Step 2 of the Guidelines) and activate an HPS. Note: <i>Activation of the HPS must be accomplished in a "reasonable and timely" manner.</i>
Emailed or Faxed to: <input type="checkbox"/> _____, State Historic Preservation Officer: <input type="checkbox"/> (Name, email and fax number of potentially affected resource managers/trustees): <input type="checkbox"/> (Name, email and fax number of potentially affected resource managers/trustees):

⁸ Refer to PA Sections VI.A.1 and VI.A.2.

ATTACHMENT 7

DOCUMENTATION OF ACTIONS TAKEN THAT DID NOT RESULT IN AN ADVERSE AFFECT ON HISTORIC PROPERTIES/CULTURAL RESOURCES

This form, or other record format with similar information, can be used when the Exclusions listed in Attachment 1.B.do not apply, where there are "Overriding Factors," or when, through consultation with appropriate parties, historic properties/cultural resources may be present in the area subject to Federal response actions.⁹

Name of incident:	Date/time of incident:
Location of incident:	
<u>Brief description of response action approved (including the date) by the FOSC:</u>	
Describe how Adverse Effects were avoided, reduced, or mitigated:	
_____ FOSC Signature and Date	_____ Printed Name and Title:
_____ Commonwealth/Territorial Rep Signature and Date	_____ Printed Name and Title:
_____ SHPO Signature and Date	_____ Printed Name and Title:
_____ Resource Manager/Trustee Signature and Date	_____ Printed Name and Title:
_____ Resource Manager/Trustee Signature and Date	_____ Printed Name and Title:

⁹ This may include any facet of the response actions, from access and staging, to deployment of equipment, demobilization, decontamination, or monitoring, where the action may impact historic properties/cultural resources.

ATTACHMENT 8

**DOCUMENTATION OF EMERGENCY RESPONSE DECISION
THAT ADVERSELY AFFECTED HISTORIC PROPERTIES OR
CULTURAL RESOURCES¹⁰**

This form should be completed and submitted, along with any additional supporting documentation, in a reasonable and timely manner to the appropriate entities listed below:

Name of incident:	
Date/time of incident:	
Location of incident:	
Response Action, Impact, and Decision	
Describe the response action and adverse impacts to historic properties or cultural resources. Explain why protecting historic properties/cultural resources and public health/safety could not all be met concurrently. Include information that would support this as an informed decision and the date of the decision. Describe any mitigative actions taken.	
_____ FOSC Signature and Date	_____ Printed Name and Title:
_____ Commonwealth/Territorial Representative, Signature and Date	_____ Printed Name and Title :
_____ SHPO Signature and Date	_____ Printed Name and Title:
_____ Resource Manager/Trustee Signature and Date	_____ Printed Name and Title:

¹⁰ Reference the National Programmatic Agreement Section IV.F.

ATTACHMENT 9

PREPAREDNESS¹¹

The PA states that the FOSC is responsible for ensuring that historic properties are appropriately considered in planning and during emergency response. During *pre-spill planning* activities, the PA calls for the development of an "agreed-upon mechanism" or response process that includes the following elements:

- identification of historic properties listed in or determined eligible for listing in the National Register of Historic Properties that might be affected by the *response* to a release or spill **and** areas not yet surveyed where there is a high potential for the presence of historic properties;
- identification of geographic areas or types of areas where historic properties are unlikely to be affected;
- identification of parties that are to be notified and consulted in the event of a spill in a non-excluded area;
- development of emergency response strategies to help protect historic properties;
- assessment of potential effects of the emergency response on the historic property;
- documentation, if applicable, of actions resulting in unavoidable injury to historic properties when the FOSC has determined that the requirements of the PA cannot be satisfied concurrently with the paramount requirement of protecting public health and the environment; and,
- identification of the Historic Properties Specialist responsible for providing expertise on historic properties to the FOSC during emergency response; e.g., through agreements between the involved Federal response agency and State or other Federal agencies having historic properties specialists on staff; contracts between the Federal response agency and expert(s) identified in the ACP; or historic properties specialist(s) on the Federal response agencies' staff. The PA specifies the professional qualifications and standards that the Historic Properties Specialist must meet.

¹¹ Refer to PA Section V.