

SECTION 106 PROGRAMMATIC AGREEMENT ANNUAL REPORT

JULY 1, 2024 - JUNE 30, 2025



**CULTURAL STUDIES OFFICE
DIVISION OF ENVIRONMENTAL ANALYSIS
CALIFORNIA DEPARTMENT OF TRANSPORTATION
SACRAMENTO, CALIFORNIA**

September 2025

EXECUTIVE SUMMARY

This report documents the effectiveness of and summarizes actions carried out under the January 1, 2014, *First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal Aid Highway Program In California* (2014 Section 106 PA) *Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the United States Army Corps' of Engineers' Sacramento District, San Francisco District, and Los Angeles District, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as It Pertains to the Administration of the Federal-Aid Highway Program in California* (Section 106 PA). The 2014 Section 106 PA was executed on January 1, 2014, and was set to expire on December 31, 2024. The Section 106 PA became effective on December 6, 2024. This reporting period is from July 1, 2024, through June 30, 2025, and is provided in accordance with Stipulations XXVI.A and XXVI.B of the Section 106 PA. The California Department of Transportation (Caltrans) has employed the use of a Programmatic Agreement as an alternative measure to comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA) since 2004.

The Section 106 PA incorporates Caltrans' role as National Environmental Policy Act (NEPA) Lead Agency. The Federal Highway Administration (FHWA) first assigned this responsibility to Caltrans in 2007 as a pilot program under the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users, (SAFETEA-LU) (Public Law 109-59). In July 2012, SAFETEA-LU legislation was replaced with the Moving Ahead for Progress in the 21st Century Act (MAP-21) (P.L. 112-141). Section 1313 of MAP-21 23 amended U.S.C. 327 to establish a permanent Surface Transportation Project Delivery Program, which allows any state to participate and allows states to renew their participation in the program. Caltrans was the first state to participate in this program. Through the Project Delivery Program Memorandum of Understanding (327 MOU), Caltrans maintains its assignment of FHWA's (hereafter NEPA Assignment) responsibilities under NEPA and Section 106 of the National Historic Preservation Act (Section 106). Permanent assignment as NEPA Lead Agency became effective October

1, 2012. Due to its continued success in managing its NEPA responsibilities, Caltrans renewed the 327 MOU with FHWA in 2022, the model for which has been used by many other states contemplating an enhanced role in the federal process in accordance with the provisions of MAP-21 and the successor legislation, the Fixing America's Surface Transportation (FAST) Act (Pub. L. No. 114-94). The Caltrans Division of Environmental Analysis and Cultural Studies Office (CSO) continue to perform FHWA's role and take on its responsibilities for compliance with the steps of the Section 106 process.

The results of this Annual Report reveal that Caltrans processed 1087 federal-aid highway projects under the Section 106 PA during the reporting period. Of these, 996 required no SHPO review and were treated in accordance with various stipulations governing internal review of identification, evaluation, and assessment of effects. A total of 91 completed projects required external review by the State Historic Preservation Officer (SHPO). Of these, 61 resulted in completed findings of effect. Fifty-four (54) of the 61 completed projects resulted in findings of No Adverse Effect. Two (2) of the No Adverse Effect Finding included Minor Phasing. Four (4) of the 61 SHPO-reviewed projects resulted in a finding of Adverse Effect (FAE). The 4 FAE projects required or will require preparation of memorandum of agreement (MOA) documents to address mitigation strategies for effects to historic properties. Three (3) SHPO-reviewed projects were conducted under emergency procedures. The remaining 30 SHPO-reviewed projects included only concurrence on Determinations of Eligibility. A summary of results of the actions completed in accordance with the Section 106 PA begins on page 2.

Caltrans districts reported two (2) violations of an established Environmentally Sensitive Area (ESA) or Archaeological Monitoring Area (AMA) and three (3) instances of Post-Review Discoveries during the current reporting period. A discussion of these incidents begins on page 17.

Quality assurance measures for this reporting period included on-going PQS review of Caltrans District reports by CSO staff, delivery of one PA training for statewide PQS in February 2025, the delivery of 3 PA Renewal trainings between October and November online to all District PQS statewide, and the delivery of a training on working with Caltrans as an external partner under the Section 106 PA and 5024 MOU at the Society for California Archaeology 2025 Annual Meeting in March. Other training presented by CSO and the District PQS was tailored to the needs of the individual districts and regions to improve the

knowledge, skills, and abilities of internal Caltrans staff as well as external agency partners, consultants, and Native American Tribes. These and other quality assurance measures are presented on page 24.

During this reporting period, Caltrans also continued consultation with the SHPO and other parties to the PA to amend and renew the Section 106 PA, in accordance with Stipulation XX.G of the 2014 Section 106 PA.

Through its mission, vision, and goals, Caltrans strives for innovation, quality, and commitment to its stewardship of important public resources. The Section 106 PA is a valuable tool, and its use is directly related to several of the Department's goals: Cultivate Excellence; Strengthen stewardship and drive efficiency; and Advance equity and livability in all communities. Caltrans PQS meet these goals by promoting stewardship, partnering, and efficiency to meet the challenges of the current fiscal climate and provide balance with the project delivery process. Working with internal and external partners, Caltrans Section 106 practitioners take their role within Caltrans seriously, and through the Section 106 PA they continue to seek innovative measures to comply with cultural resources laws and regulations while maintaining federal standards and ensuring that effects to cultural resources are taken into account during project planning. It is Caltrans' judgment that the use of the alternative measures to comply with Section 106 provided by the Section 106 PA exceed the standards set by the Caltrans Mission, Vision, and Goals and continues to be an effective program alternative to standard compliance within the NHPA and its implementing regulations.

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INTRODUCTION

The First Amended Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as It Pertains to the Administration of the Federal-Aid Highway Program in California (2014 Section 106 PA) became effective on January 1, 2014, and the Programmatic Agreement among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, the United States Army Corps' of Engineers' Sacramento District, San Francisco District, and Los Angeles District, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as It Pertains to the Administration of the Federal-Aid Highway Program in California (Section 106 PA) became effective on December 6, 2024. The Section 106 PA streamlines compliance with Section 106 of the National Historic Preservation Act by assigning Federal Highway Administration's (FHWA) responsibility for carrying out the routine aspects of the Section 106 process to the California Department of Transportation (Caltrans). The Section 106 PA applies to Federal-Aid Highway projects on or off the State Highway System (SHS), funded all or in part by FHWA. All cultural resource studies completed under the auspices of the Section 106 PA are carried out by or under the direct supervision of individuals who meet the Secretary of the Interior's (SOI) Professional Qualifications Standards for the relevant field of study. Use of the SOI standards ensure program quality and satisfies federal mandates associated with Section 106 compliance. Caltrans meets these standards by certifying its cultural resources staff as Professionally Qualified Staff (PQS). The Chief of the Cultural Studies Office in the Division of Environmental Analysis (DEA) is responsible for certifying the qualifications of all PQS. Caltrans PQS are responsible for ensuring that the effects of Caltrans' undertakings to cultural resources are accounted for.

In accordance with Stipulations XXVI.A and XVI.B, this report documents the effectiveness of, and summarizes activities carried out under, the Section 106 PA. It covers actions for which Section 106 consultation concluded between July 1, 2024, and June 30, 2025. In addition to annual reporting and in accordance with Stipulation XXVI.C, Caltrans is required to provide the SHPO quarterly reports on findings made relevant to Stipulation X.B.1 for the first year of the execution

of the PA. A summary of those findings is included herein as well.

In addition to streamlining the Section 106 process for Caltrans, the Section 106 PA reduces the workload for the State Historic Preservation Officer through internal PQS review of routine projects. This includes district-processed Screened Undertakings, or those projects that do not involve any cultural resources, and CSO approved Findings of No Adverse Effects with Standard Conditions (NAE-SC), as well as assumptions of eligibility for the purposes of an undertaking when special circumstances preclude their complete evaluation. Approximately 8.4% of projects done under the Section 106 PA required SHPO review this reporting period. Caltrans staff ensures that all project documentation for undertakings that are not subject to SHPO review remain on file in the appropriate Caltrans District. In addition, when appropriate, Caltrans PQS provide documentation to consulting parties and the public in accordance with applicable confidentiality requirements. Delegation to PQS of the authority to perform many of the functions of the SHPO has enabled SHPO staff to concentrate efforts on the more complex projects that involve the formal evaluation of cultural resources and/or have potential for adverse effects to historic properties, as defined by 36 CFR 800.

In accordance with Stipulation XXVI.D, Caltrans is providing notice to the public that this report is available for inspection and will ensure that potentially interested members of the public are made aware of its availability. Additionally, the public may provide comment to signatory parties on the report. This report is being submitted to the FHWA, SHPO, the Advisory Council on Historic Preservation (ACHP), the U.S. Army Corps of Engineers (Corps) Sacramento District, San Francisco District, and Los Angeles District, and the Caltrans Director and District Directors. It is posted on the Caltrans website and is available upon request.

SUMMARY OF SECTION 106 PA ACTIONS

According to data provided by the District PQS, enumerated in Table 1, Caltrans processed 1087 Federal-Aid Highway projects during the state fiscal year 2024-2025 (FY 24-25). Of those, 851 (78.3 percent), were exempted from further

Section 106 review after appropriate review, or “screened,” by PQS.¹ An additional 121 projects (11.1 percent) that did not qualify as screened undertakings were completed with no outside review as findings of No Historic Properties Affected (NHPA), since no consultation with the SHPO or CSO was required under the terms of the Section 106 PA.² The Cultural Studies Office reviewed 24 projects that included a Finding of No Adverse Effect with Standard Conditions (NAE-SC) (2.2 percent), requiring no consultation with SHPO.

In total, Caltrans consulted with the SHPO on 91 total projects in FY 24-25 (61 completed projects and 30 standalone DOEs). Fifty-four (54) submittals (5.0 percent) of the 61 completed projects resulted in Findings of No Adverse Effect (NAE). Four (4) were determined to have a Finding of Adverse Effect (AE) and required or will require additional consultation to resolve effects. Caltrans districts also initiated and completed emergency procedures with the SHPO on three (3) emergency projects during the current reporting period. Caltrans submitted and received the SHPOs concurrence on 52 determinations of eligibility (DOE). Of the 52 DOEs, 30 were associated with a project that did not include SHPO consultation on a finding of effect. Fiscal year activities are depicted in Table 1. Project Findings Completed by District are portrayed in Figure 1. Project-screening activities are delineated by Caltrans District in Figure 2.

Compared to previous four reporting periods, the total number of Federal-Aid Highway projects completed under the Section 106 PA increased. However, the general trend since the implementation of a Section 106 PA has been a general decrease in the total number of Federal-Aid Highway projects completed under the Section 106 PA. Caltrans staff workload is commensurate with previous years. The number and complexity of projects requiring determinations of eligibility, CSO and SHPO consultation, and the preparation of agreement documents has

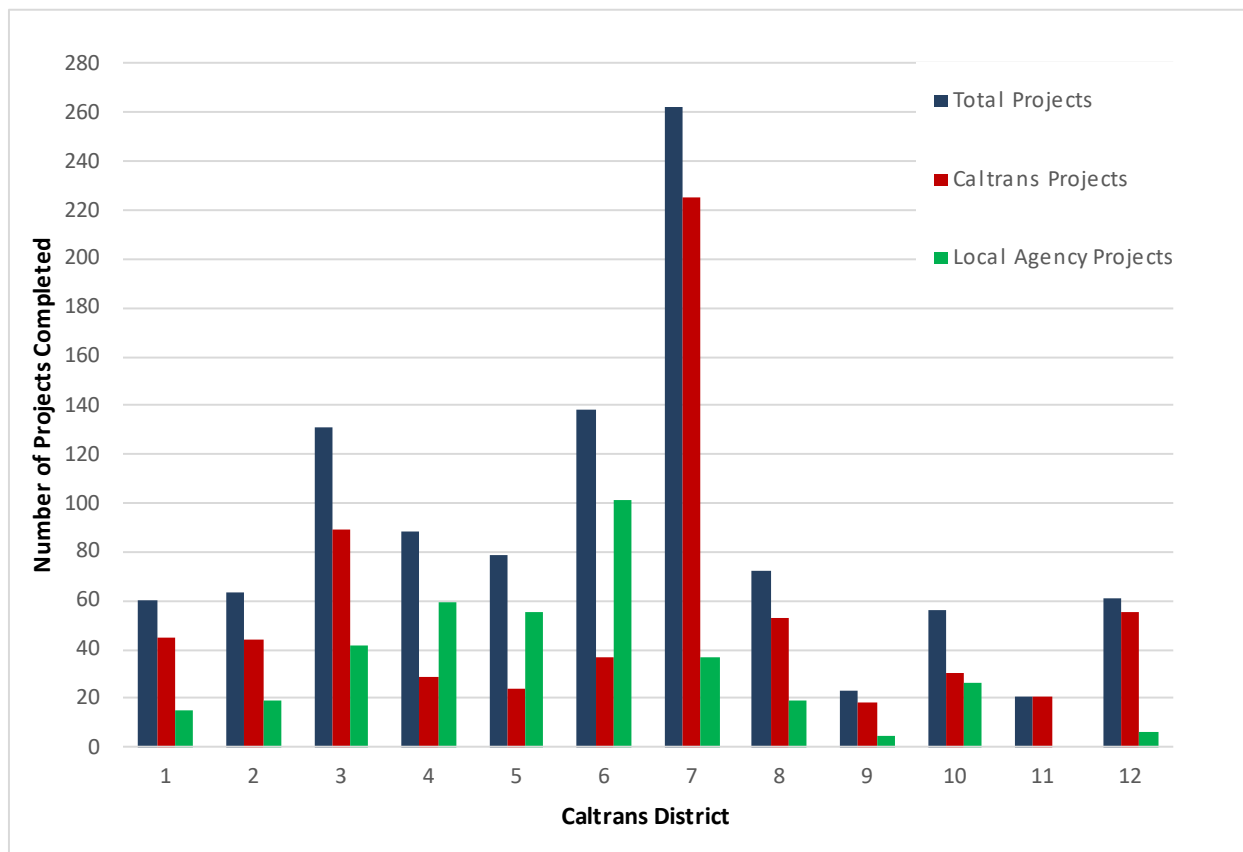
¹Under the Section 106 PA, Stipulation VII specifies classes of undertakings identified in PA Attachment 2 as “screened undertakings” that will require no further review under the PA when the steps set forth in Attachment 2 are satisfactorily completed. Caltrans PQS are responsible for “screening” individual actions that are included within the classes of screened undertakings to determine whether the undertakings require further consideration or may be exempt from further review.

²These are projects for which the proposed activities do not fall under any of the classes of screened undertakings listed in PA Attachment 2, but for which no cultural resources were identified, or properties determined eligible but will not be affected are located within the project limits.

Table 1: Total Activities Processed - Fiscal Year 2024-2025

Total Projects Processed	1087
State Highway System Projects	676
Local Streets and Roads Projects	384
Number of Projects Screened	851 (78.3%)
State Highway System Projects	533
Local Streets and Roads Projects	318
Number of Findings of NHPA	121 (11.1%)
State Highway System Projects	71
Local Streets and Roads Projects	50
Number of Findings of NAE-SC	24 (2.2%)
State Highway System Projects	22
Local Streets and Roads Projects	2
Number of Findings of NAE	54 (5.0%)
State Highway System Projects	40
Local Streets and Roads Projects	14
Number of Findings of AE	4 (0.4%)
State Highway System Projects	5
Local Streets and Roads Projects	0
Number of Completed Emergency Procedures	3 (0.3%)
State Highway System Projects	3
Local Streets and Roads Projects	0
Number of Processed Projects to SHPO	91 (8.4%)
State Highway System Projects	66
Local Streets and Roads Projects	16
Number of Completed Projects to SHPO	61 (5.6%)
State Highway System Projects	50
Local Streets and Roads Projects	14
Number of Completed DOE	52
State Highway System Projects	28
Local Streets and Roads Projects	26
Number of Completed DOE with DOE Concurrence Only	30 (2.8%)
State Highway System Projects	15
Local Streets and Roads Projects	15

Figure 1: Federal-Aid Highway Project Findings Completed – FY 24-25



remained relatively consistent. The primary driver of change in projects completed has been an increased volume of projects Screened or with Findings of NHPA. The 2024-2025 fiscal year saw the continued delivery of broadband infrastructure projects, many of which were screened or determined not to effect historic properties due to changes in project approach and design, which added to the increase in screened undertakings and NHPA findings. Finally, Caltrans completed agreement documents for several projects whose findings were reported in the previous fiscal year's reporting. The Section 106 PA will prove to be an invaluable tool for continuing to complete the increasingly complex projects that are planned for the next several years. Figure 1 is a graphical representation of the projects completed by each District and differentiated between Caltrans and Local Assistance projects. As with the preceding fiscal year, the current report findings show that Caltrans' PQS processed more State Highway projects than local agency projects (with the

exception of Districts 4, 5, and 6); likewise, SHPO reviewed more State Highway System projects than Local Assistance projects.

2024-2025 PROJECT COMPLIANCE ACTIVITIES

Projects Exempt from SHPO Review

The primary streamlining tool provided by the Section 106 PA is the application of Stipulation VII - Screened Undertakings. Screened Undertakings, defined in Attachment 2 of the Section 106 PA, are projects that have no potential to affect properties listed on or eligible for inclusion in the National Register of Historic Places (NRHP). If PQS make this finding through the “screened undertaking” process, no further review by CSO or SHPO is required. The findings typically are documented in a memo along with any supporting documentation, such as project plans, records search results, or correspondence with consulting parties including Native American governments and representatives when necessary.

For the reporting period, 851 projects (78.3 percent) qualified as “screened undertakings” and were exempt from further review. The projects that were screened moved through the Section 106 compliance process promptly without the need for review by outside staff. Without the Section 106 PA, all the projects would have required review by SHPO and FHWA staff, causing a costly and time-consuming backlog of projects for the same period.

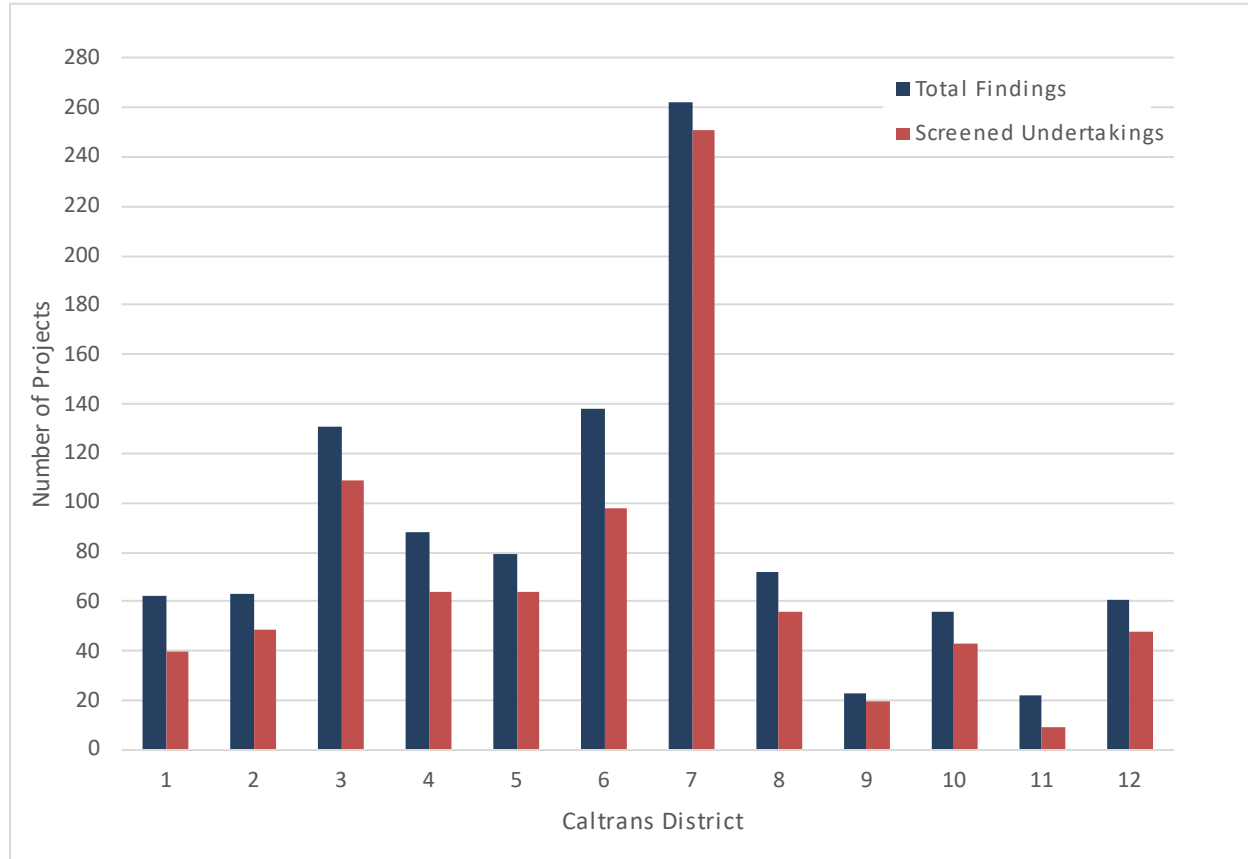
Figure 2, below, is a graphical representation by Caltrans District regarding the compliance of Section 106 completed through use of Stipulation VII - Screened Undertakings. As with previous reporting periods, the majority of federal-aid highway projects qualified as Screened Undertakings.

Projects Requiring SHPO Review

Identification and Evaluation Activities – Fiscal Year 2024-2025

In accordance with Stipulation VIII.C.6, District PQS consult directly with the SHPO when a property is formally evaluated for its potential eligibility for inclusion in the NRHP. The SHPO reviewed and concurred on a total of 52 DOEs during the current reporting period, which were sent directly to the SHPO by District PQS for concurrence. Thirty (30) of the 52 DOEs were for projects that are not yet complete. Of the 1087 Federal-Aid Highway projects processed during FY 24-25,

Figure 2: Screened Undertakings – FY 24-25



22 (2.0 percent) required eligibility evaluations. Eleven (11) of these projects required only SHPO concurrence with DOEs, which were accompanied by a notification of No Historic Properties Affected. Three (3) DOEs required only SHPO concurrence with DOEs, which then had Findings of NAE-SC that were sent to CSO for review. Eight (8) were then submitted to the SHPO and not objected to as Findings of NAE. No completed projects with findings of AE included consultation on DOEs this fiscal year.

Stipulation VIII.C.4 allows for the assumption of eligibility, subject to CSO approval, for the purposes of an undertaking when special circumstances preclude their complete evaluation, such as restricted access, large property size, or limited potential to effect. The use of this stipulation allows District PQS to move on to analysis of effects when evaluation is not possible or feasible. Caltrans CSO approved eligibility assumptions under the 2014 Section 106 PA and eligibility considerations under the Section 106 PA for a total of 54

undertakings during the current reporting period. These findings are represented in Table 2.

Table 2: Property Evaluation Activities

Type of Evaluations	FY Total*
Total Determinations of Eligibility	52
DOEs with incomplete projects	30
DOEs with Finding of No Historic Properties Affected	11
DOEs with Finding of NAE-SC	3
DOEs with Finding of NAE	8
DOEs with a Finding of AE	0
Assumptions/Considerations of Eligibility (Stip. VIII.C.4)	54

*Number of projects, not number of individual properties.

Effect Findings – FY 24-25

Of the 1087 projects processed within the reporting period, 206 resulted in findings of effect. A total of 121 of these resulted in a Finding of NHPA. Documentation of a Finding of NHPA does not require SHPO consultation under the Section 106 PA. However, 11 of the 129 projects with a Finding of NHPA required SHPO consultation on DOEs within this fiscal year.

In accordance with the Section 106 PA, CSO reviews and approves Findings of NAE-SC, which may include establishment of Environmentally Sensitive Areas (ESA), Vegetation Management Environmentally Sensitive Areas (VMESA) or use of the Secretary of Interior Standard for Rehabilitation (SOIS). This finding requires that District PQS provide adequate documentation for CSO review. If CSO does not object to the finding within 15 days, the District may proceed with the undertaking. Caltrans is not required to seek the SHPO's concurrence on an NAE-SC; however, CSO approval of the NAE-SC is contingent upon any comments received by SHPO on project documents reviewed in accordance with Stipulation VIII.C.6 or in compliance with California Public Resources Code Section 5024. CSO approved 24 NAE-SC findings (2.2 percent) in the current reporting period.

Under the Section 106 PA, Caltrans consults with the SHPO on NAE and AE findings. These findings require that the Districts submit all supporting documentation to CSO for quality control reviews. Caltrans CSO then consults directly with the SHPO on behalf of the Districts. Caltrans CSO consulted on a total of 61 project findings with the SHPO during the current reporting period.

Fifty-four (54) projects resulted in NAE findings and four (4) resulted in AE findings. Two (2) of the No Adverse Effect Finding included Minor Phasing. Table 3 includes a summary of the projects with findings of effect for the FY 24-25 reporting period.

Caltrans CSO consulted with the Districts on a total of 85 projects (8.0 percent) during the current reporting period. Twenty-four (24) of these projects included NAE-SC findings, which required no SHPO consultation. The remaining 61 projects included consultation with the SHPO on findings of NAE and AE or on the development of project-specific PAs.

Table 3: Effect Findings

Type of Effect Findings	FY Total
No Historic Properties Affected	121
No Adverse Effect with Standard Conditions (NAE-SC)	24
No Adverse Effect	54
Adverse Effect	4

EFFECTIVENESS OF THE PA

Without an executed Section 106 PA, all Federal-Aid Highway projects would be subject to a greater level of consultation between the Districts, CSO, FHWA and/or the SHPO. As discussed previously, the Section 106 PA delegates many of the steps involved in the Section 106 process directly to Caltrans PQS.

FHWA Reviews and Approvals

Prior to Caltrans' NEPA Assignment, documentation of AE and NAE findings were subject to FHWA review in addition to SHPO review. With delegation to CSO provided by the Section 106 PA, Caltrans has realized a savings of up to 60 days per project. In addition, the previous delegation of approval of APE maps and determinations of eligibility from FHWA to Caltrans PQS saves an additional 30 to 90 days. Caltrans continues to realize these time savings on the FHWA projects that are exempt because of NEPA Assignment, as well.

Pursuant to the 327 MOU for NEPA Assignment, FHWA and Caltrans may agree that a project would be retained by FHWA. In these limited cases, FHWA relies on Caltrans staff to continue working on projects on their behalf due to the

staffing and limited resources of FHWA. The Section 106 PA remains applicable for projects where FHWA is NEPA Lead Agency.

No new projects were retained by FHWA in this Fiscal Year, and Caltrans returned no projects to FHWA.

Estimated Time Savings

Table 4, below, provides comparison of consultation timeframes in accordance with the standard Section 106 process and those under the Section 106 PA. These statutory review timelines provide a baseline for the projection of savings Caltrans realizes in the Section 106 program.

Table 4: Section 106 Review Timeframes

Action	36 CFR Part 800 Process	PA Process
Screened Undertaking	N/A	No Review by SHPO
Setting Area of Potential Effects (APE)	30-day review by SHPO	No Review by SHPO
Adequacy of Identification/Survey effort	30-day review by SHPO	No Review by SHPO
Evaluation of cultural resources (if present)	30-day review by SHPO	30-day review by SHPO

Projects Not Requiring SHPO Review

CSO and District PQS measure the time saved per project by estimating the amount of time that would otherwise have been spent conducting Section 106 studies and preparing consultation documents for SHPO review. Based on input from District PQS, CSO estimates the time saved per project processed as a Screened Undertaking is approximately 43 hours of staff time for preparation and up to 90 days in external agency reviews. This represents a considerable savings of labor hours among Caltrans, FHWA, and SHPO staff. Time savings are best viewed as a measure of more efficient project delivery, in that the screening process has allowed Caltrans to move projects to completion more quickly than could be accomplished without the Section 106 PA. In addition, the ability to screen projects saves an unknown amount of limited taxpayer

resources and provides predictability in the estimation of costs and time related to project scheduling.

Evaluations Not Requiring SHPO Review

Stipulation VIII.C.1 and Attachment 4 - Properties Exempt from Evaluation

Stipulation VIII.C.1 and Attachment 4 of the Section 106 PA require a reasonable level of effort to identify and evaluate historic properties. However, the Section 106 PA recognizes that not all properties possess potential for historical significance. PQS and qualified consultants are entrusted with the responsibility of determining whether cultural resources property types meet the terms of PA Attachment 4 and may, therefore, be exempt from Section 106 evaluation. It is difficult to measure the time savings of this Section 106 PA provision, but by roughly estimating the amount of time PQS or qualified consultants would have had to spend evaluating the properties, Caltrans saves from 20 to 60 hours per resource. CSO review is not required for exemptions of properties under this stipulation. CSO does provide guidance and review when requested. CSO and SHPO reserve the right to provide feedback to District PQS on the application of this Stipulation.

Stipulation VIII.C.3 - Special Consideration for Certain Archaeological Properties.

Stipulation VIII.C.3 of the Section 106 PA allows archaeological sites to be considered eligible for the NRHP without conducting subsurface test excavations to determine their historic significance when qualified PQS determine that the site can be protected from all project effects by designating it an environmentally sensitive area (ESA). Prior to the original 2004 PA, FHWA and Caltrans required evaluation of *all* sites within an APE for historic significance through testing. The time saved is approximately 3-12 months per site by not having to conduct test excavations.

In addition to the time savings benefit, this provision of the Section 106 PA advances Caltrans' environmental stewardship of archaeological sites by providing PQS the ability to avoid or reduce the need for destructive excavations whenever possible. Foregoing archaeological excavations, where possible, has saved time and needless expenditures of public funds, or unwarranted damage to heritage resources. CSO and SHPO reserve the right to provide feedback to District PQS on the application of this Stipulation.

Stipulation VIII.C.4: Assumption of Eligibility

Stipulation VIII.C.4 of the Section 106 PA allows PQS to assume properties eligible for inclusion in the NRHP when special circumstances preclude their complete evaluation. Such special circumstances include restricted access, large property size, or limited potential for effects. PQS are required to receive written approval from CSO prior to completing a project Historic Property Survey Report (HPSR). Properties treated under this stipulation may require consultation with the SHPO at a later date regarding the assessment of effects. CSO and SHPO reserve the right to provide feedback to district PQS on the application of this Stipulation. CSO does not track the actual time saved related to this stipulation because of the varied durations required when evaluating an individual property.

Projects Requiring SHPO Review

Pursuant to 36 CFR Part 800, a typical undertaking includes separate consultation with the SHPO regarding the establishment of the area of potential effects, identification efforts, and evaluation of cultural resources, which could take up to 90 days. With the alternative streamlining measures provided by the Section 106 PA, this review time has been reduced to 30 days, resulting in a potential time savings of at least 60 days per project. For the reporting period, of the 1087 federal-aid highway projects Caltrans processed, only 91 were submitted to the SHPO.

Time Savings for Effect Findings

Table 5 compares the timeframes for review of effect findings under the Section 106 PA to those of 36 CFR Part 800.

Table 5: Review Timeframes for Effect Findings

Action	36 CFR Part 800 Process	PA Process
Finding of No Historic Properties Affected	30-day review by SHPO	0
Finding of No Adverse Effect with Standard Conditions (NAE-SC)	NA – unique to Section 106 PA	15-day review by CSO*
Finding of No Adverse Effect without Standard Conditions	NA – no time limit	30-day review by SHPO
Adverse Effect	30-day review by SHPO	30-day review by SHPO

*CSO responsibility and review period per Stipulation X.B.1

Under the Section 106 PA, projects that Caltrans PQS determine result in a Finding of No Historic Properties Affected are documented to Caltrans files (if no historic properties requiring evaluation are present and/or no historic properties will be affected) or are sent to the SHPO for notification purposes only as part of the Determination of Eligibility submittal, resulting in a time savings of 30 days per project.

Pursuant to 36 CFR 800, an NAE finding requires a 30-day review by the SHPO. In accordance with the Section 106 PA, there are two levels of NAE findings: findings of NAE-SC (those with “Standard Conditions³”), and those without. Prior to the Section 106 PA, NAE-SC findings were provided to the SHPO for notification only with no direct review by CSO. The SHPO did not concur in the finding; thus, there was no “review” period. However, the SHPO does reserve its right to comment on any aspect of a consultation if it chooses to do so. These provisions of the Section 106 PA continue to result in an additional time savings of 30 days per project.

In accordance with the Section 106 PA, CSO reviews for approval all NAE-SC findings. District PQS will notify SHPO regarding Findings of NAE-SC if there is consultation under Stipulation VII.C.6 or for state requirements. The CSO review time is not more than 15 days. If CSO does not respond within 15 days, the district can move forward. During the reporting period, PQS submitted 24 projects with findings of NAE-SC to CSO for review.

While an exact figure regarding times savings cannot be fully ascertained, the signatory parties agree the alternative measures provided by the Section 106 PA are invaluable to the delivery of the federal-aid highway program in California.

POST-REVIEW DISCOVERIES, UNANTICIPATED EFFECTS, ESA/AMA VIOLATIONS, AND EMERGENCIES

The following is a summary of post-review discoveries, unanticipated effects, ESA and AMA violations, and emergencies that occurred during the reporting period. Caltrans has always emphasized thorough identification efforts be employed during the Section 106 process to avoid post-review discoveries to the extent feasible. Caltrans actively works to avoid such events through ongoing training of PQS and working with our partners in the Section 106 process.

³ Standard Conditions includes establishment of an Environmentally Sensitive Areas to protect a site in its entirety or the use of the Secretary of Interior Standards for Rehabilitation.

The 2024-2025 reporting period included adverse weather events that prompted director's orders in several districts and emergency declarations from the Governor in several counties. The emergency procedures as outlined in PA Stipulation XVI allowed Caltrans staff to respond quickly and efficiently assess potential effects to historic properties while prioritizing safety and recovery of life and property. Note that some emergency situations arose during the current reporting period, but consultation remains ongoing; such projects will be reported in the next Annual Report following conclusion of consultation.

Emergency Procedures

District 3. Omega Curves Slide Emergency (FHWA_2024_0514_002; CATRA_2024_0514_002)

On May 6, 2024, Caltrans District 3 notified the SHPO, the United States Forest Service, Native American tribes, and potentially interested local historical societies of the district's intent to use emergency procedures for a failed slope that resulted from severe storms in the winter and spring of 2024. The damage consisted of a large diagonal crack in a cut slope on State Route 20 in Nevada county. The failed slope was eroding into the highway, was very steep, and was highly susceptible to catastrophic failure. A slip plane developed at the bottom of the slope and represented an immediate danger to the travelling public. The District director signed the director's order for the Omega Slide Emergency repairs, triggering the emergency protocols. There were two known resources within the slide disposal area: an approximately 40 ft segment of the Blue tent Company Ditch System (CA-NEV-2159; P-29-000032) and an approximately 141 ft segment of the Towle Brothers Railroad (CA-NEV-2215H; P-29-001651). The anticipated effects to the Blue Tent Company ditch system was to partially destroy about 40 feet of the property through cutting into the hillside in order to stabilize the slope. About 140 feet of the Towle Brothers Railroad was expected to be covered by the excess material from the slope stabilization.

The 6-month narrative report was provided to the SHPO on March 4, 2025. The emergency repair work was continuing, cutting the slope back 5% with a 2:1 slope angle. Material removal was ongoing to ensure the safety of the travelling public while rock slope protection is being used to shore up and stabilize the slope. Construction at the slope was close to complete. The effects to the properties had not changed from what had been anticipated at the start of the emergency. The SHPO responded acknowledging the notification with no comments on March 27, 2025.

District 5. Bethany Culvert Emergency (FHWA_2024_0722_001)

On July 19, 2024 Caltrans District 5 notified the SHPO of the district's intent to use emergency procedures as outlined in PA Stipulation XVI for a project by the City of Santa Cruz to replace the Bethany Culvert in Santa Cruz County. The winter storm events that occurred in late December 2023/2024 produced heavy rains and large swells along the coastline near the City of Santa Cruz. This caused damage at 1004 West Cliff Drive resulting in the closure of the road. A large culvert underneath the bridge was damaged by the storms. The "Bethany" culvert separated from the outlet headwall, and both arched headwalls were damaged. In addition, a segment of the bike path and roadway collapsed, the seaward concrete retaining wall was damaged, and approximately 5,000 tons of rock slope protection was displaced. The Governor declared a state of emergency for the winter storms and extended to include Santa Cruz County on February 2, 2024. On March 21, 2024, the City provided Caltrans with a Damage Assessment Form. When Caltrans became aware that this scope of work had the potential to impact historic properties, the Governor's declared State of Emergency had passed. The Caltrans District 5 District Director declared a state of emergency for emergency work for the Bethany Culvert on July 19, 2024. As of that date, West Cliff Drive still remained closed and the culvert was necessary to be repaired to reopen the road. The SHPO acknowledged receipt of the proposed emergency project on July 22, 2024, with no additional comments.

The scope of work for the emergency included removing all the existing damaged culvert and headwalls and replacing them with new construction. The size of the culvert remained unchanged. The construction of the new headwalls left much of the old structure in place to minimize excavation. All of the existing backfill and utilities were also replaced with new materials. The headwalls and roadway were raised to reduce wave overtopping and increase resiliency. The roadway was graded and repaved, and sidewalks and storm drain infrastructure were restored.

District 5 provided the 6-month narrative on December 19, 2024, and included with the narrative a DOE that evaluated the Bethany Culvert and West Cliff Drive as ineligible for the NRHP. Additionally, archaeological and tribal monitors were present during the implementation of project work based on concerns expressed with the work. The SHPO concurred with the determinations of eligibility on January 15, 2025. The emergency affected no historic properties.

District 5. Regent's Slide Emergency (CATRA_2024_0820_001)

On August 19, 2024 Caltrans District 5 notified the SHPO of the district's intent to use emergency procedures as outlined in PA Stipulation XVI for a project related to the district director declared emergency for the landslide at Regent's slide on August 19, 2024. This landslide was initiated during the winter storms that the governor declared emergencies for on February 2 and March 22, 2024. Caltrans was notified of an increased/revised scope of work that had the potential to effect historic properties on August 1, 2024. The area of Highway 1 at Regents slide still remained closed to the traveling public due to the safety hazard of the ongoing landslide onto the highway. The potential historic property under threat was CA-MNT-479 (P-27-000566), a shell midden site containing California mussel, chiton, and abalone remains. The site was located on a terrace above the highway and directly over the slide. The scope of work was changed to cut into the site as part of the repair work necessary to stabilize the sliding hillslope. The SHPO responded acknowledging the emergency on August 21, 2024.

District 5, in consultation with the Esselen Tribe of Monterey County and the Salinan Tribe of San Luis Obispo and Monterey Counties, coordinated a full data recovery of CA-MNT-479 since the proposed scope of work would require the complete removal of the landform that the site resided on in order to stabilize the landslide. The District consulted in August to coordinate the data recovery and tribal monitoring by both consulting tribes. Data recovery excavations occurred between September 4 and September 26, 2024. Due to the complete destruction of the landform and site, the district continued consultation regarding analyses and the studies for the data recovery report, in addition to potential additional treatments for the slide. As of January 22, the District agreed to develop the following items in consultation with the tribes: a Data Recovery and Monitoring Technical Report; a regional synthesis monograph; additional outreach including potentially travelling museum exhibits and development of materials and tools for cultural resources and monitoring training for tribes; repatriation and reburial of the collection at the University of California Santa Cruz's (UCSC) Big Creek Reserve; and a Cultural Resources Management Plan for UCSC to assist with the management of cultural resources on the Big Creek Reserve.

Laboratory analyses of the collection was ongoing as of the 6-month narrative report, provided February 13, 2025. Additionally, on June 4 Caltrans, in partial addressment of the SHPO's May 8th comments on the Narrative Report,

provided an update regarding tribal consultation on the proposed treatments and welcomed any additional comments regarding them from the SHPO. Caltrans intends to consult with the SHPO on the draft Data Recovery Report when the studies are completed and anticipates that the site will not be eligible, due to the fact it will retain no physical integrity from this emergency.

Unused Emergency Procedures Time Extensions for Applicability

The following emergencies are where Emergency Procedures were initiated in case of emergency projects being received by the districts after the 30-day notification requirement, due to the large-scale and/or the nature of the emergencies precluding full identification and start of repairs within the initial 30-day period. However, Caltrans Districts either received no projects under these emergencies within the allotted time extensions and/or did not need to use emergency procedures due to the projects being possible to screen per Stipulation VII. The table below describes the name of the emergencies, the District, the emergency declaration date, who declared the emergency, the date Caltrans notified the SHPO of the intent to use emergency procedures, and the date of the SHPO's response.

Table 6: Unused Emergency Procedures Time Extensions for Applicability

District	Emergency	FHWA/CATRA Number	Emergency Declaration	Notification to SHPO	SHPO Response Date
2, 3	Gold Complex and Park Fires	FHWA-CATRA_2024_0729_001	Governor	7/29/2024	8/13/2024
7	Palisades Fire	FHWA-CATRA_2025_0128_001	Governor	1/28/2025	1/29/2025
7	Eaton Fire	FHWA-CATRA_2025_0128_002	Governor	1/28/2025	1/29/2025
8	Line Fire	CATRA_2024_0913_001	Governor	9/13/2024	9/16/2024
8, 12	Bridge and Airport Fires	FHWA-CATRA_2024_0912_001	Governor	9/12/2024	9/16/2024

Post-Review Discoveries and Inadvertent Effects

District 1. Inadvertent Discovery. Eel River Bridge Replacement Project, State Route 162, Mendocino County, EA 01-0A131 (FHWA_2024_0712_001)

The post-review discovery occurred during construction on the Eel River Bridge on State Route 162 near the community of Covelo in Mendocino County, California. Caltrans originally made a finding of *No Adverse Effect with Standard Conditions – Environmentally Sensitive Areas (ESAs)* for this undertaking in 2020. The project had federal funding and was therefore processed under the Section 106 PA.

On July 3, 2024, Caltrans D1 PQS archaeologist Stacey Zolnoski, received notification via telephone from the Round Valley Indian Tribe Cultural Monitor that a partial mortar bowl had been observed during construction and that the monitor had not deemed a stop-work appropriate after the find. Ms. Zolnoski performed a site visit to assess the area of the find on July 5, 2024 and observed a single chert flake in disturbed soil context (fill) and made a determination based upon the site visit, the information provided by the monitor, and conversation via telephone with the Tribal Historic Preservation Officer (THPO) for the Round Valley Indian Tribe, Patricia Rabano, to treat the find as an isolate, exempt from evaluation, in accordance with Appendix 4 of the Section 106 PA.

On July 9, 2024, District 2 Cultural Resources Staff PQS and Management, received an email notification from the THPO Patricia Rabano of the Round Valley Indian Reservation that additional cultural artifacts had been located by the tribal monitor. A request for a temporary stop-work order was also included. D3 staff immediately began post review discovery protocols per Stipulation XV of the Section 106 PA and halted all work at the construction site until the discovery could be accessed.

On July 10, 2024, Lisa Bright (District 3 Cultural Senior), Kristina Crawford (North Region Broadband Archaeologist), and Jacqueline Farrington (D1 Archaeologist) met the project staff and Round Valley Indian Tribe Monitors on site to access the discovery. In addition to the artifacts pictured in the July 9, 2024 email from THPO Rabano additional lithics, pestles, charcoal, and cultural materials were noted in the cut slope and spoils pile from work to create an access road. Dr. Lisa Bright also made the identification of human remains within the disturbed area. Upon identification of the human remains, in following Public Health and Safety Code § 7050.5, the Mendocino Coroner's office was notified of the human remains at 12:19 PM. The Coroner's office called Dr. Bright back

within the hour stating that pursuant to code § 5097.98, the Mendocino coroner's office contacted the Native American Heritage Commission (NAHC) to begin the most likely descendent process. The Coroner also noted that they would not be coming to site to collect the remains. This information was shared with the two Round Valley tribal monitors on site. Dr. Bright asked that they contact THPO Rabano to discuss the safe handling and keeping of the human remains. It was determined that Dr. Bright would secure the remains safely off site, pending Most Likely Descendant (MLD) designation. The Round Valley Indian Tribe was ultimately designated the MLD.

The ethnographic village of *Sipimul* (affiliated with the Huchnom) is reported to exist at the confluence of the South Eel River and Outlet Creek. During the prior environmental and cultural clearance of the project it was determined that the ethnographic village of *Sipimul* was not in the APE based upon pedestrian survey, archival research, and tribal consultation. It is likely that this buried resource (located approximately 5-10 feet below ground surface) may be associated with this village.

Based on this ethnographic knowledge, tribal input, the nature of cultural artifacts encountered thus far, and pursuant to Stipulation XV of the Section 106 PA, Caltrans determined that the site may be potentially eligible for listing in the NRHP and is treating it as such for purposes of the project.

Caltrans halted work at the site pending the necessary archaeological investigations to determine the boundary and extent of the deposit. Consultation with Tribes was ongoing through this process.

Caltrans proposed to conduct archaeological testing including but not limited to test units, auguring, and column samples to determine the site boundary. Once the physical boundary of the site can be determined, Caltrans proposed to develop minimization and/or avoidance of further construction impacts to the site.

D3 notified CSO and the SHPO of the discovery on July 11, 2024. The SHPO responded with comments on July 12, 2024, requesting to be kept involved in the resolution of the post-review discovery. The SHPO agreed with Caltrans' proposal to conduct archaeological testing to determine the site boundary before developing minimization and/or avoidance of further impacts to the site. The SHPO also requested location maps, photographs, and the DPR 523 site record of the assumed eligible historic property when available and that Caltrans provide notification in the event additional treatment measures are

determined necessary or an objection from the Round Valley Indian Tribe occurs regarding the proposed archaeological testing.

D3 held meetings with the Round Valley Indian Tribe Tribal Council on July 31, 2024 (in-person), September 13, 2024 (in-person), October 15, 2024 (virtual), April 21, 2025 (in-person), and May 8, 2025 (in-person on-site at the bridge). Per consultation with the Round Valley Indian Tribe, Caltrans put protection measures put in place and determined the extent of the site. Construction resumed on July 1, 2025.

District 4. SR 1 Culvert Replacement Project (EA 04-1K730; FHWA_2024_0722_002)

On July 22, 2024, the District provided SHPO notice of a post-review discovery during monitoring on the Culvert Replacement Project on State Route 1 (EA 04-1K730) pursuant to Stipulation XV.B of the PA. On July 17, 2024, an exposed portion of a previously unknown archaeological site was discovered during a culvert replacement in construction within the Caltrans Right of Way. The discovery was a shell midden deposit located within the vicinity of two known shell midden sites adjacent to the local creek actively eroding down the cliff into the ocean. The section of the highway that the discovery was identified in is a narrow corridor with little to no shoulder and has limited access in the past for survey work and subsurface archaeological testing. Archaeological and tribal monitoring were in place during construction when the shell midden was unearthed. Upon discovery, all work stopped within 60 feet of the discovery area and the monitors notified District 4, who then contacted the Kashia Band of Pomo Indians of the Stewarts Point Rancheria (Kashia Pomo) to discuss the find and the tribe's preferred treatment. Work continued and was completed on July 19th, with the Tribe's conditions that all shell midden soils be temporarily stockpiled at an agreed-upon location 100 feet away from the find as safely as possible. Caltrans confirmed no further work was proposed within the resource boundary. The tribe requested only minimal details necessary to document the discovery be included in the Department of Parks and Recreation (DPR) forms, due to the sensitivity of the area and the Tribe's preference for it to not be documented further outside of the Tribe's database.

On July 23, 2024, the SHPO responded with the following comments: why Caltrans District 4 did not adhere to notifying the SHPO within 48 hours of discovery as specified in Stipulation XV.B.2 of the 2014 Section 106 PA; information on how District 4 will ensure all future discoveries that occur will follow the process stipulated in the 2014 Section 106 PA; whether District 4

completed an evaluation of the newly discovered resource for the NRHP, and if Caltrans proposes to conduct the assessment as part of future site recordation efforts; requesting District 4 to provide the description of the discovery, a map depicting the discovery location, a description of all project activities and disturbances that occurred between July 17-19, and photographs; and requesting to be kept informed of ongoing consultation efforts with the tribe. The SHPO requested to be kept apprised should the consulting tribes provide Caltrans any pertinent information for Caltrans' future site record updates or impacts assessment.

After additional consultation with the SHPO and a meeting between District 4, CSO, and the SHPO's office, the issues regarding the late notification were addressed by ensuring construction personnel and cultural monitors are aware of the chain of command they must follow should late discoveries be encountered, and District 4 confirmed its commitment to send an email notification within 48 hours of a find with a note that further information will be forthcoming in the following days.

The district provided the DPR records for the find and additional information regarding the nature of the find, including the requested photographs, on September 13, 2024. Based on a visual assessment by District 4 and the tribal monitor, the shell midden likely originates from an upslope terrace and is bisected by the road. No cultural soils or materials were observed within the filled soils above the culvert. The project footprint disturbed 1 approximate cubic yard of shell midden soils mixed in with culturally sterile soils from the culvert work location. Due to the small footprint in relation to the larger extent of the shell midden, Caltrans determined the effects to the discovery were not adverse. Caltrans, through consultation with the Kashia Pomo, returned the midden soils to the site as part of the backfill and was spread along the shoulder to preserve the exposed site. The district also, through consultation, established an ESA to protect the shell midden and committed to continued monitoring.

District 8. Construction of 8-foot shoulders Post-Review Discovery Project (FHWA_2020_0117_001)

The post-review discovery occurred during construction of 8-Foot Shoulders project on State Route 79 near the community of Temecula in Riverside County, California. Caltrans originally made a finding of *No Adverse Effect* for this project in 2020. The project had federal funding and was therefore processed under the Section 106 PA.

On April 29, 2025, construction on the project resulted in the discovery of previously unidentified cultural resources in the APE consisting of one feature, a single milling slick on a boulder. Caltrans District 8 (D8) Cultural Studies stopped work in the immediate area in accordance with the Post Review Discovery Plan for the project and consulted the Pechanga Band of Indians' Cultural Studies office (Tribe). The Tribe expressed their primary objective for the feature was avoidance. However, in coordination with the Contractor, Resident Engineer, and Caltrans Design team, Caltrans concluded on April 30, 2025, that it was not possible to avoid the boulder housing the feature, and that an alternative option was warranted. The Tribe indicated their second preference is to remove the feature from its current location and move to another location within the site. Caltrans endeavored to adhere to the Tribe's requests to the extent possible. D8 cultural resources staff concluded the original finding of no adverse effect for the project remained unchanged.

Consultation with the Tribe is ongoing for the life of the project. On May 2, 2024, D8 notified CSO and the SHPO of the discovery. The SHPO responded on June 20, 2025 and did not have any objection. The feature was relocated to another portion of the site on June 26, 2025.

ESA and AMA Violations

District 5. ESA Violation. Salinas to Castroville CAPM Project, State Route 183, Monterey County PM R2.1/R8.8, EA: 05-1K430/05-1800-0207

This ESA violation occurred during construction of the Salinas to Castroville CAPM project on State Route 183 in Monterey County, California between postmiles R2.1 and R8.8.

On October 21, 2024 the project Resident Engineer (RE) contacted the Caltrans PQS project archaeologist, Kaya Wiggins, letting her know that construction would wrap up soon and asked if she wanted to be present during weed whacking in the ESA. Kaya let him know that no weed whacking is permitted in the ESA and no people are allowed to enter the ESA. Kaya asked when construction would finish so she could be present to remove the ESA fencing. On November 4, 2024 the RE texted Kaya that the contractor had taken the fence down on the previous Friday. The following day, Kaya visited the project site where construction had finished. Kaya confirmed that the fence had been removed and a portion of the ESA had been mowed. The RE said that construction was not responsible for the mowing. It did not appear that there

had been any subsurface disturbance within the ESA. The incident was reported in a memo and sent to CSO on November 6, 2024.

District 10. Archaeological Monitoring Area Violation for the State Route 140 Merced Seismic Restoration Project, Merced County (FHWA_2018_0716_001)

This Archaeological Monitoring Area violation occurred during construction of the State Route 140 Merced Seismic Restoration Project in Merced County, California. This project had federal funding and was therefore processed under the Section 106 PA.

On Thursday, November 21, 2024, the Caltrans District 10 (D10) Cultural Resources staff, were informed that construction activity for the undertaking at Location 2 was in progress. D10 Cultural staff met with the Project Manager and Resident Engineer, along with construction contractor representatives on November 22, 2024, and determined that construction at this location had been ongoing since April of 2024. Since D10 Cultural staff were not aware of work occurring in the project's Archaeological Monitoring Area (AMA), no tribal or cultural monitors had been present for any of the work at Location 2 as required to comply with the Section 106 commitments in the project's environmental documents.

Caltrans conducted a site visit on November 25, 2024 to assess any effects to the cultural site, CA-MER-0006, at Location 2 and determined that the ESA for Location 2 was intact and there were no adverse effects to the cultural resources at the site.

Caltrans sent notices of the incident to Katherine Perez, Chairperson, and Timothy Perez from Northern Valley Yokuts/Ohlone Tribe and Chairperson Neil Peyron, Chairperson and Kerri Vera of the Tule River Indian Tribe on November 26, 2024 and to Chris Harper and Jeremy Foin from the San Luis National Wildlife Refuge on November 27, 2024.

Caltrans halted all work in the project area; work resumed once archaeological and tribal monitoring within the previously delineated AMA was secured for ground disturbing activities. In response to this event, Caltrans D10 Cultural Resources staff are also implementing communication-process improvements with the Environmental Construction Liaison and Resident Engineer to ensure that all environmental commitments are met and incidents like this do not occur in future projects.

Caltrans notified the SHPO that no post-review discoveries or unanticipated effects have occurred at CA-MER-0006.

STATUS OF AGREEMENT DOCUMENTS AND ONGOING CONSULTATION

During FY 24-25, Caltrans and its partners executed, amended, or terminated the following 18 agreement documents. Consultation between Caltrans, acting as FHWA, and SHPO regarding the development of the agreement documents was completed in an average of 52 days without objection.

Table 7: Agreement Documents Executed, Amended, or Terminated

District	Agreement Document	Date of Execution or Termination
3	Binney Junction Roadway Rehab Revised APE Attachment B	10/14/2024
3	Yankee Jims Road Replacement MOA Execution	10/17/2024
3	Acid Flats Bridge Replacement MOA Termination	12/18/2024
3	Camino Safety Project PA Termination	12/23/2024
3	Waldo Road over Dry Creek Bridge Replacement MOA Execution	2/21/2025
4	Oakland Alameda Access MOA Revised APE Attachment B	8/20/2024
4	Huichica Creek Bridge Replacement and Fish Passage Repair MOA Fulfillment/Termination	1/14/2025
4	Soscol Junction Improvement MOA Fulfillment/Termination	2/12/2025
4	Caldecott Tunnel Bores 1, 2, and 3 Rehabilitation Project MOA Execution	5/12/2025
5	Highway 46 Widening – Cholame Segment MOA Amendment 1	8/15/2024
5	Limekiln Creek Bridge Replacement MOA Execution	8/19/2024
5	Refugio Bridges Replacement MOA Amendment 1	3/12/2025
5	Alamo Pintado Creek Pedestrian Bridge Replacement MOA Fulfillment/Termination	6/20/2025
6	Madera 41 Roadway Rehabilitation MOA Revised APE	9/16/2025
6	Madera 41 Roadway Rehabilitation MOA Amendment 1	4/1/2025
9	Olancho-Cartago Four-Lane Project PA Amendment 1	7/23/2025
10	Seventh Street Bridge Replacement MOA	8/28/2024
10	Pitt Street Bridge Replacement MOA	12/23/2024
10	State Route 4/ Wagon Trail Realignment MOA Amendment 3	3/7/2025

QUALITY ASSURANCE MEASURES

Under the 2014 Section 106 PA and the Section 106 PA, Caltrans PQS have taken on much of the responsibility for ensuring that effects to cultural resources are taken into account and that there is no loss in quality of work. CSO's commitment to ensure that PQS are trained to work within the terms of the PA is embodied in Stipulation XIX. The stipulation was developed to ensure that Caltrans makes training a priority and that Caltrans Districts and PQS work with their partners to identify training needs accordingly. As the results of this report indicate, this responsibility is being handled competently, with the recognition that ongoing communication and training are keys to continued success. To ensure that this level of quality continues, the following quality assurance measures occurred:

- CSO developed training for PQS and supervisory staff for the Section 106 PA/PRC 5024 MOU renewal to familiarize staff with changes and new provisions of the 2024 agreements. Three virtual deliveries of this training were held: October 22, 2024, October 29, 2024, and November 5, 2024.
- CSO delivered one in-person PA training session for PQS in Sacramento. From February 11 to February 14, 2025. This is an annual presentation primarily aimed at new staff; other Caltrans PQS often attend this class as a refresher course. The course is also open to staff from the Federal Highway Administration and the Office of Historic Preservation. In addition, the class is offered to non-PQS Caltrans staff from various divisions as space allows.
- CSO staff held a workshop for external partners on use of the Section 106 PA and PRC 5024 MOU at the Society for California Archaeology annual meeting on March 13, 2025. Attendees included Cultural Resource Management Consultants, Members and Representatives of Native American Tribes, and other agency employees.
- CSO maintains and updates the Caltrans Cultural Resources Manual in Volume II of the Caltrans Standard Environmental Reference (SER), and revised Chapters and Exhibits were posted between December 16, 2024 and June 30, 2025 in order to reflect changes from the newly executed Section 106 PA and provide updated guidance on various topics. The SER is located online at <http://www.dot.ca.gov/ser/vol2/vol2.htm>.

- CSO provides peer reviews of cultural resource studies as requested by the districts. CSO PQS staff assist districts that lack expertise in Historical Archaeology and Architectural History.
- CSO routinely reviews documents submitted directly to SHPO in accordance with Stipulation VIII.C.6. CSO works with OHP, District PQS and managers as needed to correct deficiencies when encountered.
- CSO reviews and approves request for Assumption of Eligibility pursuant to Stipulation VIII.C.4.
- CSO, pursuant to Stipulation X, reviews and approves all No Adverse Effects, Adverse Effect reports, Memoranda of Agreements, and MOA attachments prior to transmittal to SHPO.
- CSO maintains the Caltrans Cultural Resources Database, which includes storage of cultural compliance documents to assist District staff in recordation and recordkeeping.
- CSO developed a new tracking module of Caltrans Collections in the Caltrans Cultural Resources Database, which includes data categories to meet tracking requirements introduced in Stipulation XIV of the newly executed Section 106 PA this fiscal year.
- CSO and OHP Project Review staff meet monthly to discuss district submittals and issues that may arise relating to Caltrans compliance with Section 106.
- CSO developed an internal tracking system of executed Agreement Documents that provides early notification to responsible District Staff and Supervisors regarding upcoming Annual Report Deadlines and Expiration dates of agreement documents. This helps ensure the long-term meeting of deadlines in accordance with the individual Agreement documents, no matter District staff turnover. The system went fully into effect in June 2025.
- CSO and OHP Project Review staff hold quarterly statewide video teleconferences to discuss policy, procedures, and workload issues with District Staff, as well as provide “mini-training” sessions on a variety of pertinent topics.

- CSO started the implementation of Section 106/PRC 5024 open office hours 8 months of the year during months with no quarterly statewide video teleconferences, where District staff statewide are free to attend and discuss with CSO any topics, questions, or issues related to Section 106 or PRC 5024 they may have.
- CSO maintains the bi-monthly Cultural Call Bulletin, a newsletter to discuss implementation and interpretation of policy and disseminate the information to PQS and other Caltrans staff statewide.
- Staff from the Advisory Council on Historic Preservation and the Office of Historic Preservation are invited to attend District site visits when appropriate, and other meetings to provide early coordination regarding issues that occur during survey and document preparation.

Pursuant to the Stipulation XX.C (Exclusionary Provision) of the Section 106 PA on the advice of and in consultation with CSO Chief and the OHP Review and Compliance Unit Supervisor, the Caltrans Division of Environmental Analysis Chief can place individual Caltrans Districts, Divisions, Offices, or Branches on Probation, Suspension, or Removal. Each level of exclusion includes a process to return to full status under the terms of the PA. All districts are currently in good standing.

CONCLUSION

The information contained in this report demonstrates a steady and consistent program of compliance with the terms of the PA. During fiscal year 2024-2025, Caltrans processed 1087 Federal-Aid Highway projects. Of the 1087 total projects, 851 qualified as Screened Undertakings and were exempted from further Section 106 review. There were 121 projects that resulted in findings of No Historic Properties Affected. CSO approved 24 projects with findings of NAE-SC in accordance with Stipulation X.B.1, which needed no review by the SHPO. A total of 91 projects were submitted to SHPO, 61 of which resulted in findings of effect or completed emergency procedures. Fifty-four (54) projects required consultation on NAE findings. Four (4) projects resulted in AE findings, which require additional consultation to resolve effects. Caltrans consulted on a total of three (3) emergency projects during the current reporting period. Caltrans also consulted on a total of 52 DOEs, 30 of which were for projects where findings have not been determined yet, during the current reporting period.

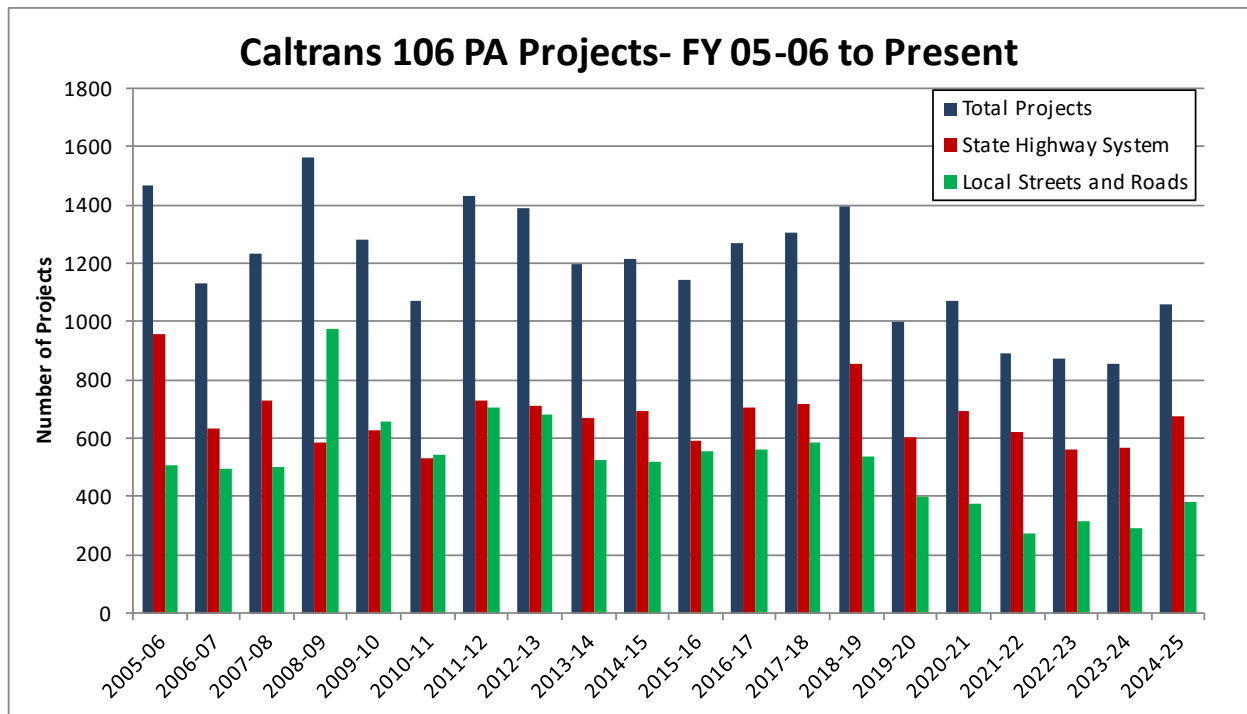
CSO, with its many internal and external partners, continues to work cooperatively to develop policy procedures that adequately address concerns that occur during project development.

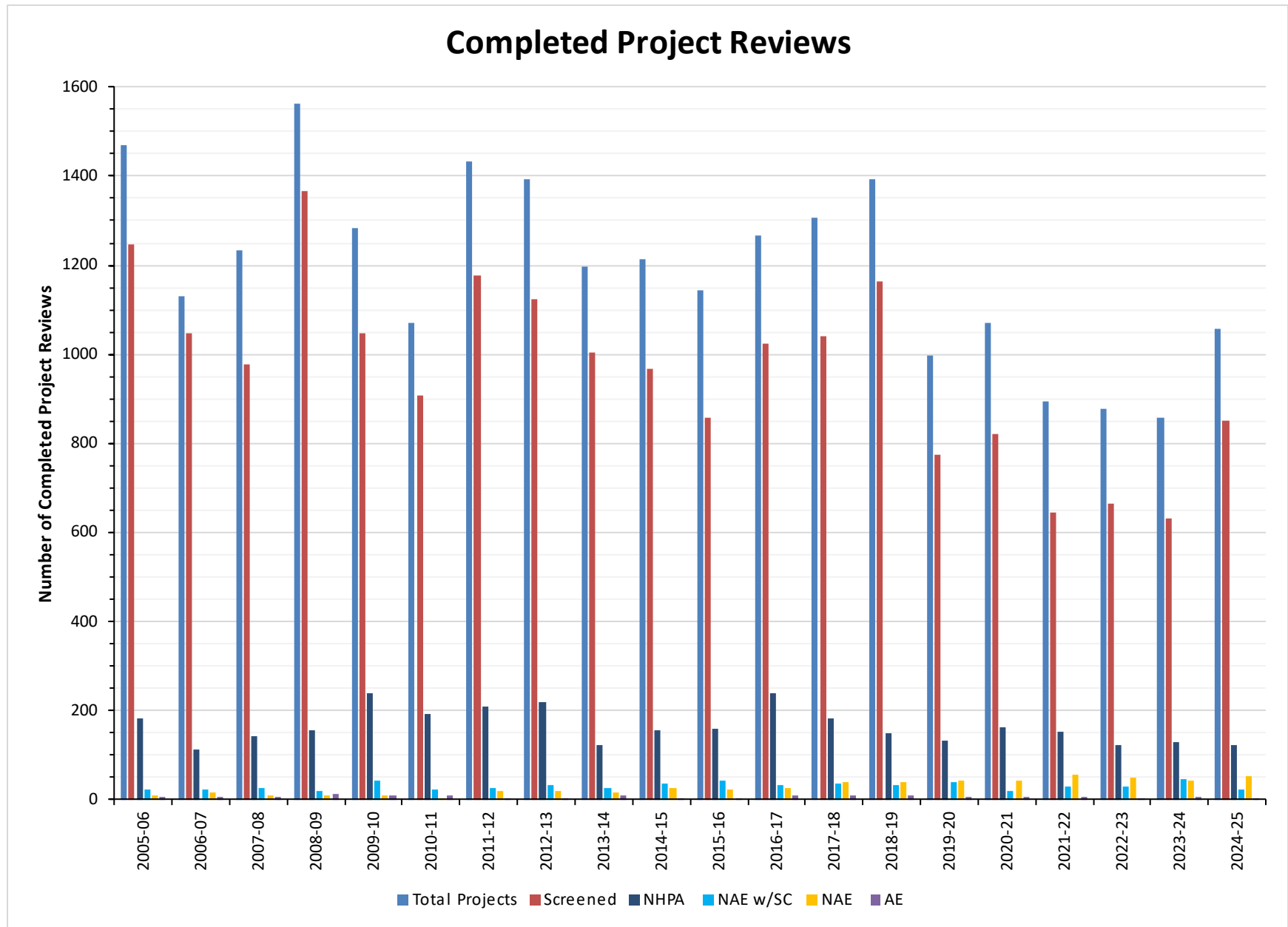
Caltrans' mission is "Improving lives and communities through transportation." The Caltrans Mission, Vision, and Goals are defined in the 2024-2028 Caltrans Strategic Plan. The Section 106 PA meets or exceeds the standards provided in the Strategic Plan by providing timesaving and streamlining measures, while at the same time meeting state and federal laws and regulations regarding cultural resources. Since 2004, Caltrans' use of alternative measures to comply with Section 106 through a programmatic approach has been widely recognized as a model for other agencies nationwide. Through its innovative features, the Section 106 PA continues to save Caltrans and its partners limited valuable taxpayer resources. Caltrans believes the Section 106 PA keeps pace with the changing perceptions of resource values and maintains consultation standards, while streamlining processes for undertakings with little or no potential for affecting historic properties. Caltrans is committed to maintaining its high standards of compliance, resource consideration, and stewardship through retention and continued training of highly qualified staff, clear communication with our partners, quality documentation of compliance with the terms of the Section 106 PA, and the best practices in the field of historic preservation.

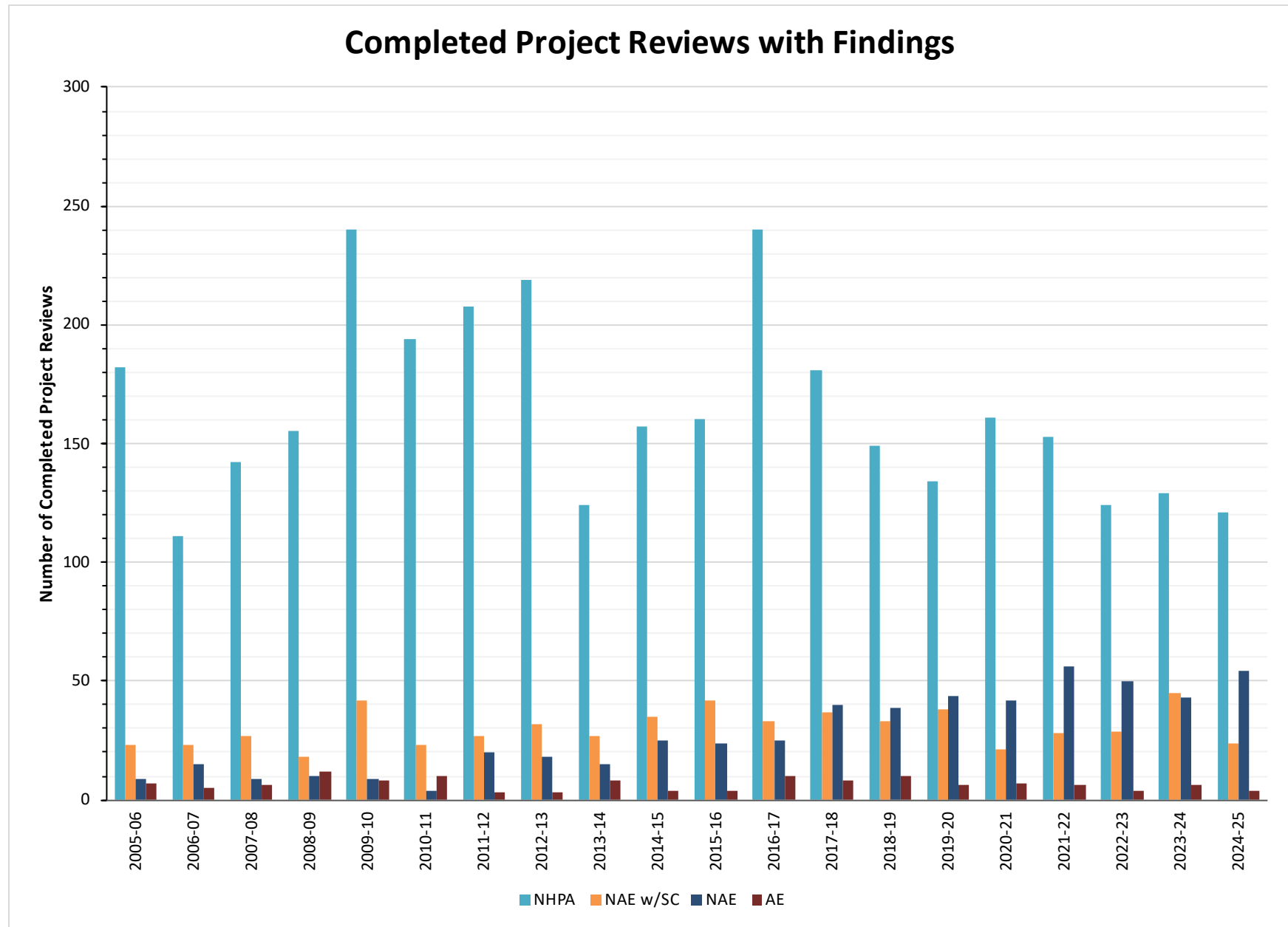
ATTACHMENT 1 – PA ACTIVITIES FISCAL YEARS 2005-2006 TO 2024-2025

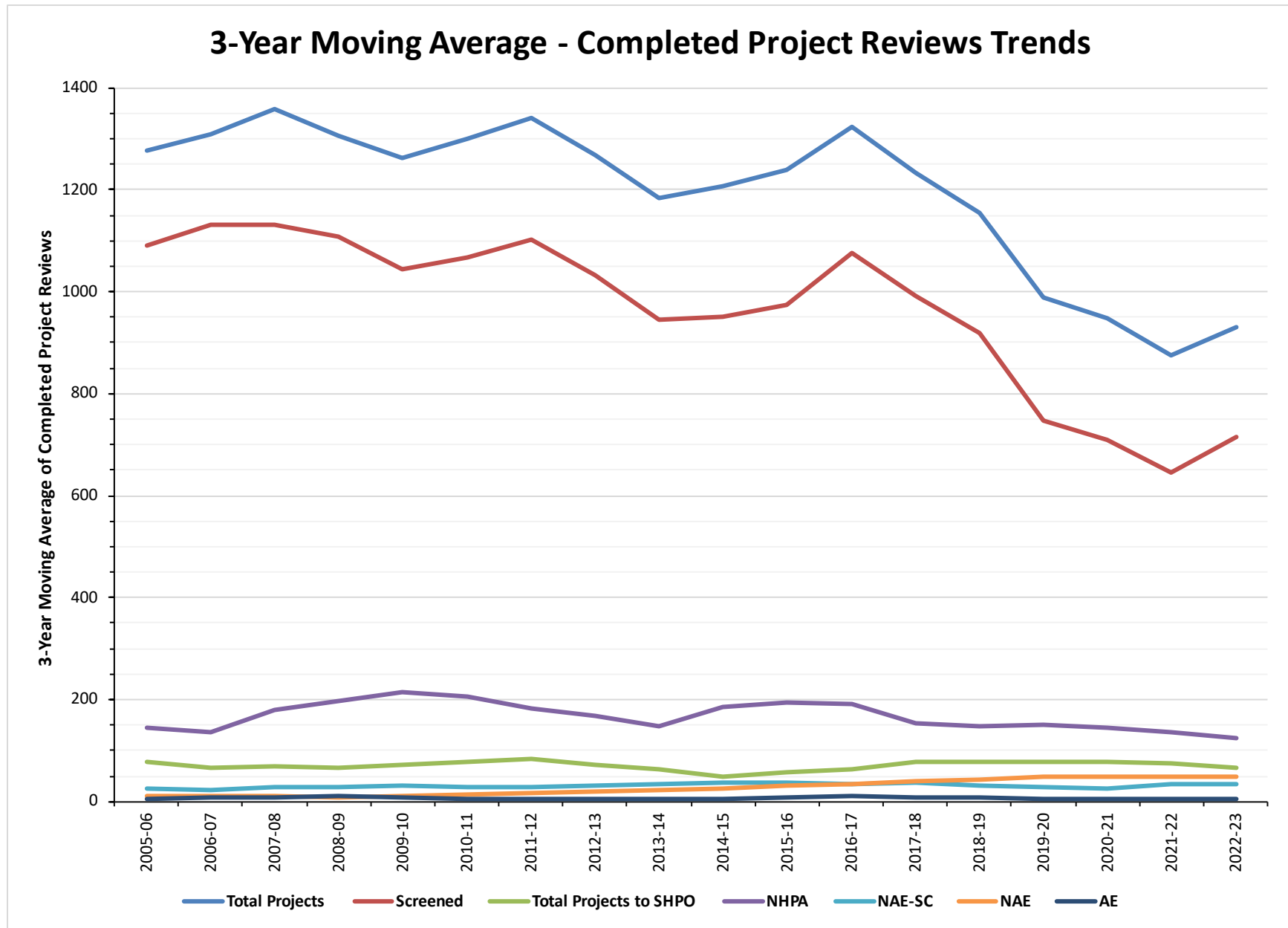
Since fiscal year 2005-2006, the first year that statistics for Caltrans use of a Section 106 PA were fully tabulated, Caltrans Professionally Qualified Staff have processed 23,849 projects Section 106 applied to. Of those, 13,455 projects were on the State Highway System (Caltrans), and the remaining 10,384 projects were on local streets and roads (Local Assistance) throughout the state.

The majority of projects, 19,331 of 23,849 (80.5 percent), completed between fiscal years 2005-2006 and 2024-2025 were classed as Screened Undertakings. Only 1,428 of the projects (5.9 percent) were submitted to SHPO for review. The remaining 3,284 projects were kept in Caltrans files because they were projects not classed as Screened Undertakings but found to have no effect on historic properties. The use of the Screened Undertaking process continues to be a primary and important time saving tool. Though trends in the total projects and Screened Undertakings vary through time, the low trend in the number of Caltrans projects requiring CSO and/or SHPO review remains steady thanks to the Section 106 PA. The tables below illustrate these totals and trends.









ATTACHMENT 2 – DATA FOR FIGURES

**Table 8. Data for Figure 1:
Federal-Aid Highway Project Findings Completed – FY 24-25**

District	Total Completed Projects	Total Completed Caltrans Projects	Total Completed Local Agency Projects
1	60	45	15
2	63	44	19
3	131	89	42
4	88	29	59
5	79	24	55
6	138	37	101
7	262	225	37
8	72	53	19
9	23	18	5
10	56	30	26
11	21	21	0
12	61	55	6

Table 9. Data for Figure 2: Screened Undertakings – FY 24-25

District	Total Findings	Screened Undertakings
1	60	40
2	63	49
3	131	109
4	88	64
5	79	64
6	138	98
7	262	251
8	72	56
9	23	20
10	56	43
11	21	9
12	61	48

**Table 10. Data for Attachment 1 Figure 1:
Caltrans 106 PA Projects FY 05-06 to Present**

FY	Total Projects	State Highway System	Local Streets and Roads
2005-06	1468	959	509
2006-07	1131	633	498
2007-08	1232	730	502
2008-09	1562	586	976
2009-10	1284	629	655
2010-11	1071	530	541
2011-12	1434	731	703
2012-13	1392	711	681
2013-14	1196	671	525
2014-15	1213	696	517
2015-16	1144	589	555
2016-17	1267	706	561
2017-18	1305	718	587
2018-19	1394	856	538
2019-20	998	601	397
2020-21	1071	693	378
2021-22	893	620	273
2022-23	876	562	314
2023-24	857	567	290
2024-25	1057	673	384

**Table 11. Data for Attachment 1 Figure 2:
Completed Project Reviews FY 05-06 to Present**

FY	Total Projects	Screened	NHPA	NAE w/SC	NAE	AE
2005-06	1468	1246	182	23	9	7
2006-07	1131	1047	111	23	15	5
2007-08	1232	977	142	27	9	6
2008-09	1562	1367	155	18	10	12
2009-10	1284	1047	240	42	9	8
2010-11	1071	906	194	23	4	10
2011-12	1434	1176	208	27	20	3
2012-13	1392	1123	219	32	18	3
2013-14	1196	1004	124	27	15	8
2014-15	1213	969	157	35	25	4
2015-16	1144	858	160	42	24	4
2016-17	1267	1023	240	33	25	10
2017-18	1305	1039	181	37	40	8

2018-19	1394	1163	149	33	39	10
2019-20	998	776	134	38	44	6
2020-21	1071	820	161	21	42	7
2021-22	893	645	153	28	56	6
2022-23	876	664	124	29	50	4
2023-24	857	630	129	45	43	6
2024-25	1057	851	121	24	54	4

**Table 12. Data for Attachment 1 Figure 3:
Completed Project Reviews with Findings FY 05-06 to Present**

FY	NHPA	NAE-SC	NAE	AE
2005-06	182	23	9	7
2006-07	111	23	15	5
2007-08	142	27	9	6
2008-09	155	18	10	12
2009-10	240	42	9	8
2010-11	194	23	4	10
2011-12	208	27	20	3
2012-13	219	32	18	3
2013-14	124	27	15	8
2014-15	157	35	25	4
2015-16	160	42	24	4
2016-17	240	33	25	10
2017-18	181	37	40	8
2018-19	149	33	39	10
2019-20	134	38	44	6
2020-21	161	21	42	7
2021-22	153	28	56	6
2022-23	124	29	50	4
2023-24	129	45	43	6
2024-25	121	24	54	4

Table 13: Data for Attachment 1 Figure 4: 3-Year Moving Average – Completed Project Reviews Trends

FY	Total Projects 3-Year Moving Average	Screened 3-Year Moving Average	NHPA 3-Year Moving Average	NAE-SC 3-Year Moving Average	NAE 3-Year Moving Average	AE 3-Year Moving Average
2005-06	N/A	N/A	N/A	N/A	N/A	N/A
2006-07	1277.0	1090.0	145.0	24.3	11.0	6.0
2007-08	1308.3	1130.3	136.0	22.7	11.3	7.7
2008-09	1359.3	1130.3	179.0	29.0	9.3	8.7
2009-10	1305.7	1106.7	196.3	27.7	7.7	10.0
2010-11	1263.0	1043.0	214.0	30.7	11.0	7.0
2011-12	1299.0	1068.3	207.0	27.3	14.0	5.3
2012-13	1340.7	1101.0	183.7	28.7	17.7	4.7
2013-14	1267.0	1032.0	166.7	31.3	19.3	5.0
2014-15	1184.3	943.7	147.0	34.7	21.3	5.3
2015-16	1208.0	950.0	185.7	36.7	24.7	6.0
2016-17	1238.7	973.3	193.7	37.3	29.7	7.3
2017-18	1322.0	1075.0	190.0	34.3	34.7	9.3
2018-19	1232.3	992.7	154.7	36.0	41.0	8.0
2019-20	1154.3	919.7	148.0	30.7	41.7	7.7
2020-21	987.3	747.0	149.3	29.0	47.3	6.3
2021-22	946.7	709.7	146.0	26.0	49.3	5.7
2022-23	875.3	646.3	135.3	34.0	49.7	5.3
2023-24	940.0	715.0	124.7	32.7	49.0	4.7
2024-25	N/A	N/A	N/A	N/A	N/A	N/A