SECTION 106
PROGRAMMATIC AGREEMENT
ANNUAL REPORT

JULY 1, 2025 - JUNE 30, 2026



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

September 2026

EXECUTIVE SUMMARY

This report documents the effectiveness of and summarizes actions carried out under 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). This reporting period is from July 1, 2025, through June 30, 2026, 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 1757 federal-aid highway projects under the Section 106 PA during the reporting period. Of these, 1674 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 95 completed projects required external review by the State Historic Preservation Officer (SHPO). Of these, 58 resulted in completed findings of effect. Fifty-three (53) of these resulted in findings of No Adverse Effect. Four (4) of the No Adverse Effect Findings included Minor Phasing. Five (5) of the 58 SHPO-reviewed projects resulted in a finding of Adverse Effect (FAE). The 5 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. One project the finding could not be completed, and thus a project specific Programmatic Agreement (PA) was executed with the SHPO. The remaining 33 SHPO-reviewed projects included only concurrence on Determinations of Eligibility (DOE). A summary of results of the actions completed in accordance with the Section 106 PA begins on page 2.

Caltrans districts reported one (1) violation of an established Environmentally Sensitive Area (ESA) or Archaeological Monitoring Area (AMA) and four (4) 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 January 2026. 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 26.

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.

TABLE OF CONTENTS

SECTION 106 PROGRAMMATIC AGREEMENT ANNUAL REPORT..... 1
EXECUTIVE SUMMARY ii
TABLE OF CONTENTS v
INTRODUCTION..... 1
SUMMARY OF SECTION 106 PA ACTIONS..... 2
2025-2026 PROJECT COMPLIANCE ACTIVITIES 6
Projects Exempt from SHPO Review..... 6
Projects Requiring SHPO Review 6
EFFECTIVENESS OF THE PA 9
FHWA Reviews and Approvals 9
Estimated Time Savings 10
Projects Requiring SHPO Review 12
POST-REVIEW DISCOVERIES, UNANTICIPATED EFFECTS, AND EMERGENCIES 13
Emergency Procedures..... 14
Unused Emergency Procedures Time Extensions for Applicability..... 16
Post-Review Discoveries and Unanticipated Effects..... 17
STATUS OF AGREEMENT DOCUMENTS AND ONGOING CONSULTATION 25
QUALITY ASSURANCE MEASURES 26
CONCLUSION 28
ATTACHMENT 1 – PA ACTIVITIES FISCAL YEARS 2005-2006 TO 2025-2026 30
ATTACHMENT 2 – DATA FOR FIGURES..... 34

TABLES

Table 1: Total Activities Processed - Fiscal Year 2025-2026 4
Table 2: Property Evaluation Activities..... 8
Table 3: Effect Findings..... 9
Table 4: Section 106 Review Timeframes..... 10
Table 5: Review Timeframes for Effect Findings 12

Table 6: Unused Emergency Procedures Time Extensions for Applicability 17
Table 7: Agreement Documents Executed, Amended, or Terminated 25
Table 8: Data for Figure 1: Federal-Aid Highway Project Findings Completed – FY 25-26 34
Table 9: Data for Figure 2: Screened Undertakings – FY 25-26 34
Table 10: Data for Attachment 1 Figure 1: Caltrans 106 PA Projects FY 05-06 to Present 35
Table 11: Data for Attachment 1 Figure 2: Completed Project Reviews FY 05-06 to Present 36
Table 12: Data for Attachment 1 Figure 3: Completed Project Reviews with Findings FY 05-06 to Present 37
Table 13: Data for Attachment 1 Figure 4: 3-Year Moving Average – Completed Project Reviews Trends 38

FIGURES

Figure 1: Federal-Aid Highway Project Findings Completed – FY 25-26 5
Figure 2: Screened Undertakings – FY 25-26 7
Attachment 1 Figure 1: Caltrans 106 PA Projects FY 05-06 to Present 30
Attachment 1 Figure 2: Completed Project Reviews FY 05-06 to Present 31
Attachment 1 Figure 3: Completed Project Reviews with Findings FY 05-06 to Present 32
Attachment 1 Figure 4: 3-Year Moving Average – Completed Project Reviews Trends 33

INTRODUCTION

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, 2025, and June 30, 2026. 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 though 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 5.4% 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 1757 Federal-Aid Highway projects during the state fiscal year 2025-2026 (FY 25-26). Of those, 1362 (77.5 percent), were exempted from further Section 106 review after appropriate review, or "screened," by PQS.[1] An additional 247 projects (14.1 percent) that did not qualify as screened undertakings were completed with no outside review as findings of No Historic

[1]Under 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.

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 65 projects that included a Finding of No Adverse Effect with Standard Conditions (NAE-SC) (3.7 percent), requiring no consultation with SHPO.

In total, Caltrans consulted with the SHPO on 95 total projects in FY 25-26 (58 completed projects and 33 standalone DOEs). Fifty-three (53) submittals of the 95 resulted in Findings of No Adverse Effect (NAE), four (4) of which were Minor Phasing with a likely Finding of No Adverse Effect. Five (5) were determined to have a Finding of Adverse Effect (AE) and required or will require additional consultation to resolve effects. One project's finding could not be completed, and a project-specific PA was executed. 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 45 determinations of eligibility (DOE). Of the 45 DOEs, 33 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.

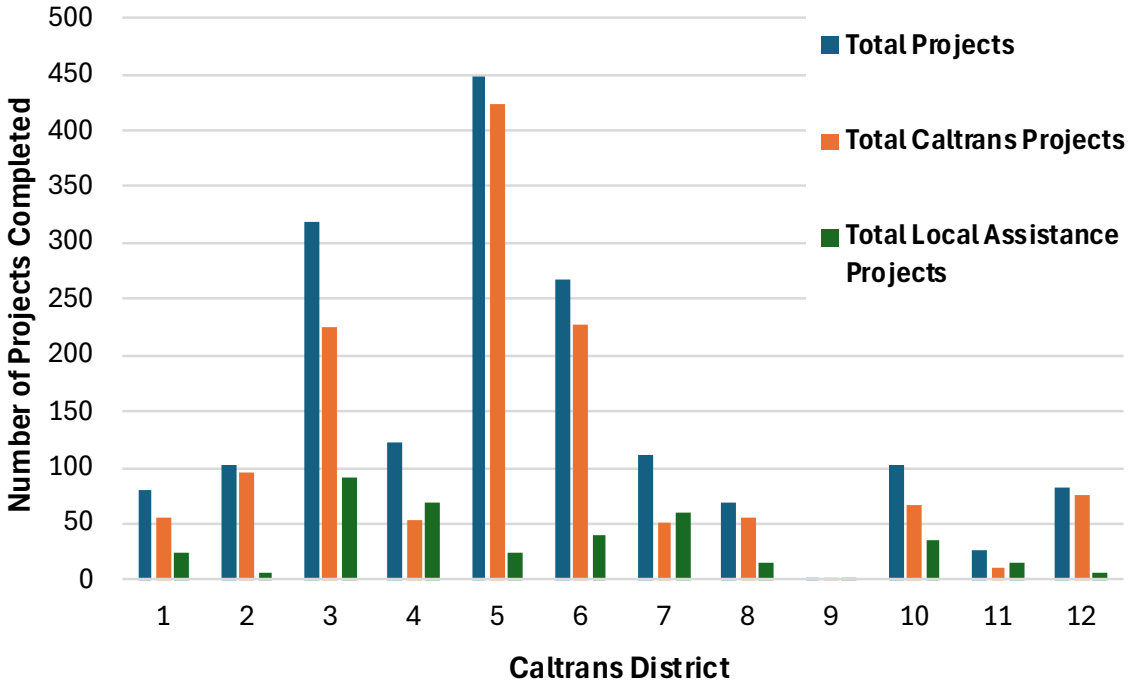
The total number of Federal-Aid Highway projects completed under the Section 106 PA increased to it's largest number since Caltrans started implementing programmatic Section 106 PAs. However, the general trend since the implementation of a Section 106 PA has been a general decrease in the total number of Federal-Aid Highway projects completed under the Section 106 PA. Caltrans staff workload was higher than with previous years. The number and complexity of projects requiring determinations of eligibility, CSO and SHPO consultation, and the preparation of agreement documents has remained relatively consistent. The primary driver of change in projects completed has been an increased volume of projects Screened or with Findings of NHPA. Additionally, there has been a larger number of encroachment permits this year for which the Section 106 PA applied to. The 2025-2026 fiscal year saw the continued delivery of broadband infrastructure projects, many of which were

[2]These 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 2025-2026

Total Projects Processed	**1757**
State Highway System Projects	1354
Local Streets and Roads Projects	403
Number of Projects Screened	**1362 (77.5%)**
State Highway System Projects	1081
Local Streets and Roads Projects	281
Number of Findings of NHPA	**247 (14.1%)**
State Highway System Projects	160
Local Streets and Roads Projects	87
Number of Findings of NAE-SC	**65 (3.7%)**
State Highway System Projects	58
Local Streets and Roads Projects	7
Number of Findings of NAE	**53 (3.0%)**
State Highway System Projects	38
Local Streets and Roads Projects	15
Number of Findings of AE	**5 (0.3%)**
State Highway System Projects	2
Local Streets and Roads Projects	3
Number of Completed Emergency Procedures	**3 (0.2%)**
State Highway System Projects	3
Local Streets and Roads Projects	0
Number of Processed Projects to SHPO	**95 (5.4%)**
State Highway System Projects	64
Local Streets and Roads Projects	31
Number of Completed Projects to SHPO	**58 (3.3%)**
State Highway System Projects	40
Local Streets and Roads Projects	18
Number of Completed DOE	**45**
State Highway System Projects	27
Local Streets and Roads Projects	18
Number of Completed DOE with DOE Concurrence Only	**33 (1.9%)**
State Highway System Projects	20
Local Streets and Roads Projects	13

Figure 1: Federal-Aid Highway Project Findings Completed – FY 25-26



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. This also increased the number of Findings of NAE-SC; 31 of the Findings of NAE-SC this reporting period were Encroachment Permits, most of which were for middle-mile broadband network projects.

Finally, Caltrans completed four agreement documents, two of which were for projects whose findings were reported in previous fiscal years. The Section 106 PA proves 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 and 7); likewise, SHPO reviewed more State Highway System projects (64) than Local Assistance projects (30). For more analysis of trends since Fiscal Year 2005-2006, please see Attachment 1.

2025-2026 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, 1362 projects (77.5 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.

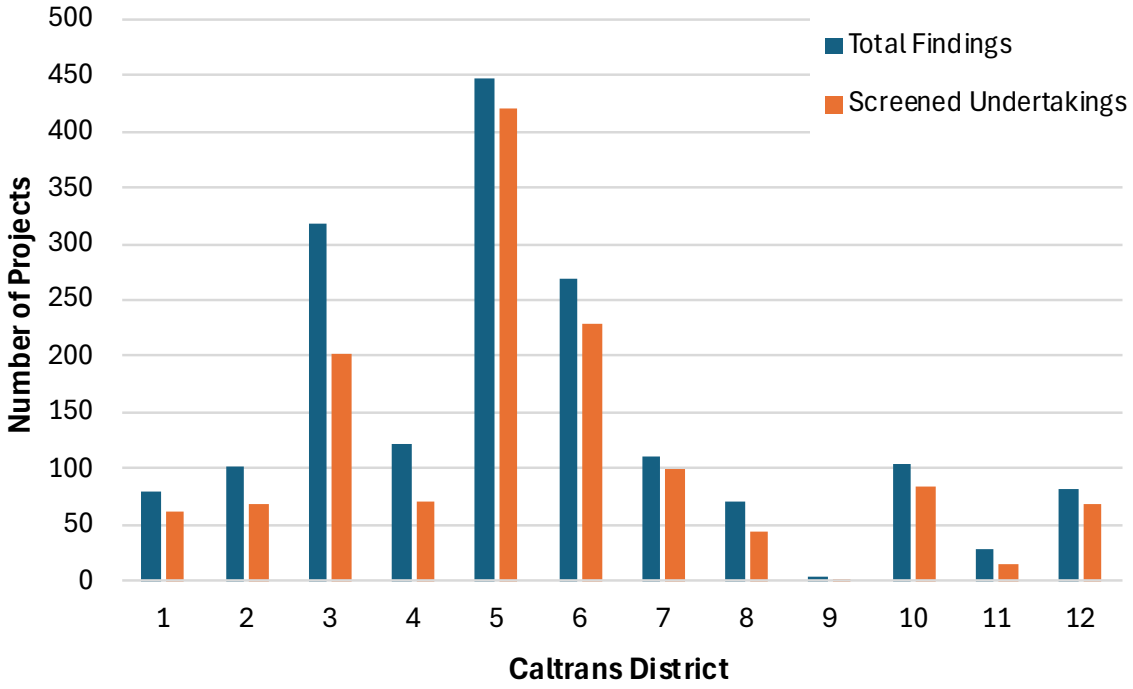
Figure 2, below, is a graphical representation by Caltrans District regarding the compliance of Section 106 completed through use of Stipulation VII - Screened Undertakings. As with previous reporting periods, the majority of federal-aid highway projects qualified as Screened Undertakings.

Projects Requiring SHPO Review

Identification and Evaluation Activities – Fiscal Year 2025-2026

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 45 DOEs during the current reporting period, which were sent directly to the SHPO by District PQS for concurrence. Twenty-one (21) of the 45 DOEs were for projects that are not yet complete. Of the 1732 Federal-Aid Highway projects completed during FY 25-26,

Figure 2: Screened Undertakings – FY 25-26



24 (1.4 percent) required eligibility evaluations. Twelve (12) of these projects required only SHPO concurrence with DOEs, which were accompanied by a notification of No Historic Properties Affected. Three (3) DOEs required resulted in Findings of NAE-SC that were sent to CSO for review. Finally, nine (9) resulted in Findings of NAE that required subsequent SHPO review. No completed projects with findings of AE included consultation on DOEs this fiscal year.

Stipulation VIII.C.4 allows for the consideration 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 considerations for a total of 65 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	45
DOEs with incomplete projects	21
DOEs with Finding of No Historic Properties Affected	12
DOEs with Finding of NAE-SC	3
DOEs with Finding of NAE	9
DOEs with a Finding of AE	0
Considerations of Eligibility (Stip. VIII.C.4)	65

*Number of projects, not number of individual properties.

Effect Findings – FY 25-26

Of the 1757 projects processed within the reporting period, 368 resulted in findings of effect. A total of 247 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, 12 of the 247 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 65 NAE-SC findings (3.7 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 62 project findings with the SHPO during the current reporting period. Fifty-three (53) projects resulted in NAE findings and five (5) resulted in AE findings. Four (4) of the No Adverse Effect Finding included Minor Phasing. For

one project, the identification and effects analysis could not be completed and a project-specific PA was developed. Table 3 includes a summary of the projects with findings of effect for the FY 25-26 reporting period.

Caltrans CSO consulted with the Districts on a total of 127 projects (7.2 percent) during the current reporting period. Sixty-five (65) of these projects included NAE-SC findings, which required no SHPO consultation. The remaining 62 projects included consultation with the SHPO on findings of NAE (n= 53), AE (n= 5), the development of a project-specific PA (n= 1), and emergency procedures (n= 3).

Table 3: Effect Findings

Type of Effect Findings	**FY Total**
No Historic Properties Affected	247
No Adverse Effect with Standard Conditions (NAE-SC)	65
No Adverse Effect	53
Adverse Effect	5
Programmatic Agreement (Phasing)	1

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 1757 federal-aid highway projects Caltrans processed, only 95 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	30-day review by SHPO	30-day review by SHPO
Adverse Effect	NA – no review limit	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 Conditions[3]"), 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 65 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, AND EMERGENCIES

The following is a summary of post-review discoveries, unanticipated effects (including 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

[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.

ongoing training of PQS and working with our partners in the Section 106 process.

The 2025-2026 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.

Emergency Procedures

District 3. Camino Emergency Tree Project, U.S. Route 50, El Dorado County (CATRA_2026_0408_001)

On March 20, 2026 the Caltrans District 3 Director declared an emergency on US Route (US) 50, in El Dorado County, east of Blakeley Reservoir and west of the town of Camino, though just east of Riverton and west of White Hall. A series of severe winter storms that occurred during winter of 2025 through 2026 damaged trees along US 50 resulting in an unexpected number of trees falling into the roadway and along the Caltrans Right-Of-Way (ROW). The ROW also contained trees damaged during the storms that are still standing and posed a serious risk to the traveling public and needed immediate removal.

There were five known resources within the project area:

- P-09-001251: An abandoned historic railroad grade for the Camino, Placerville, and Lake Tahoe Railroad that was used for lumber transportation.
- P-09-000233: A large Prehistoric Native American habitation site including BRM's, midden, cupules, and petroglyphs.
- P-09-01512: A large historical refuse scatter including historical housing materials.
- P-09-000599: The historic El Dorado canal.
- P-09-003778: A historic site recorded by the forest service (FS 05 03 55 182) as a section of reinforced roadway with fencing, ditch segment, fenceline, and a possible water tank.

Caltrans District 3 notified CSO and the SHPO of the emergency on April 8, 2026 in accordance with Stipulation XVI of the Section 106 PA. The SHPO responded

on April 15, 2026, requesting that Caltrans provide a summary of consultation efforts with other consulting parties regarding the proposed emergency project and to clarify whether the Eldorado National Forest included in consultation. The SHPO recommend that Caltrans collaborate with the Eldorado National Forest to identify best management practices to minimize effects and consult with other parties on their use.

The work consisting of the removal of approximately 2,000 damaged and fallen trees, stump grinding, tree disposal, the replacement of a damaged service cabinet, traffic control box, and other incidental work was completed between April 19, 2026, to June 18, 2026.

No impact occurred to the sites or sensitive locations due to careful monitoring from both archaeological and tribal monitors. An archaeological monitor was present every day during tree felling and all other work monitoring and documenting impacts, which were none. Consultation with the USFS and Caltrans' tribal partners is complete.

District 5. Gifford Fire Emergency Project, State Route 166, San Luis Obispo and Santa Barbara Counties (FHWA-CATRA_2025_0819_001)

The Gifford Fire began on August 1, 2025, and caused damage to Highway 166 in San Louis Obispo and Santa Barabara counties. On August 3, 2025, the Caltrans District 5 Director declared a state of emergency for the Gifford Fire and an emergency project was implemented to repair damage to the highway, which was closed due to safety concerns. Crews began work on August 9, 2025 to repair damaged guardrail, replace burned high-density polyethylene culverts, and replace signage to reopen the damaged roadway. The highway reopened on August 13, 2025.

Two locations where emergency culvert replacements were required were near cultural resources: one culvert was near the precontact rock shelter site known as CA-SLO-84 and the second was within a newly recorded precontact site known as CA-SLO-3046. Culvert work in the vicinity of CA-SLO-84 was determined to require only archaeological and Native American monitoring and there were no project-related impacts to SLO-84. A second culvert was located within the boundaries of CA-SLO-3046, a newly recorded archaeological resource that had not been subject to previous archaeological testing. District 5 notified CSO and the SHPO on August 19, 2025. The SHPO responded on August 25, 2025, recommending that Caltrans update the DPR

523 form for CA-SLO-84 as part of this project and requesting the opportunity to review the Archaeological Treatment Plan for CA-SLO-3046 and provide comments before it was finalized.

Archaeological excavations were carried out at CA-SLO-3046 and it was determined to be redeposited cultural materials, likely washed into the ROW from past storm events. All work was monitored by two Native American tribes: Santa Ynez Band of Chumash Indians and the Northern Chumash Tribe-YTT. District 5 submitted the narrative report documenting the emergency work within the 6-month window.

District 5. Granite Canyon Bridge Railing Repair Emergency, State Route 1, San Luis Obispo County (FHWA-CATRA_2026_0424_001).

On April 10, 2026, a vehicle struck and severely damaged an approximately 10-foot-long section of the bridge railing on the Granite Cayon Bridge (44 0012) on State Route 1 in San Luis Obispo County. Built in 1932, Granite Canyon Bridge is a state-owned historical resource on the Master List. It is individually eligible for the National Register the National Register of Historic Places and is a contributing element of the Carmel to San Simeon Highway Historic District. On April 20, 2026 the Caltrans District 5 Director declared an emergency for the damage to the Granite Canyon Bridge railing. On April 23, 2026, District 5 notified CSO and the SHPO in accordance with Stipulation XVI of the 106 PA of its intention to use emergency procedures for the proposed repair. District 5 cultural staff proposed that repairs to the railing be completed in a manner that matched the existing railing as closely as possible, as detailed in the bridge's construction records/As-Builts. The SHPO responded on April 27, 2026 that District 5's recommendations were a reasonable approach to remedying the damaged property. In the event the work completed under the emergency repair did not match the existing railing aesthetic, the SHPO requested the opportunity to comment on any proposed measures taken to correct the work. The repair work was successfully completed in a manner consistent with the recommendations District 5 PQS provided. The District documented the completion of the railing repair work in a narrative report submitted to CSO and the SHPO on June 23, 2026.

<u>Unused Emergency Procedures Time Extensions for Applicability</u>

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 and ACHP of the intent to use emergency procedures, and the date of the SHPO's and ACHP's response.

Table 6: Unused Emergency Procedures Time Extensions for Applicability

District	Emergency	FHWA/CATRA Number	Emergency Declaration	Notification to SHPO and ACHP	SHPO Response Date	ACHP Response Date
2, 7, 8, 11, 12	2025 Late Winter Storms Large-Scale Emergency	FHWA-CATRA_2026_0115_001	Governor	1/15/2026	1/22/2026	1/16/2026

Post-Review Discoveries and Unanticipated Effects

District 3. Post Review Discovery. Chico Rehab Project, State Route 32, Butte County, EA 03-4F760 (FHWA_2021_0722_001)

The post-review discovery occurred during electrical trenching for the Chico Rehab Project on State Route 32 within the City of Chico in Butte County, California. Caltrans originally made a finding of a likely No Adverse Effect, but with Minor Phasing to confirm the finding, for this undertaking in 2021. During implementation of the Project's Post Review Discovery and Monitoring Plan (PRDMP) and Phased Identification Plan (PIP), Caltrans was informed that the archaeological monitor had identified a subsurface refuse scatter during construction on September 2, 2025. All work was stopped within 20 meters (60 feet) of the find. Caltrans PQS investigated the discovery on September 3, 2025, confirmed the find meets the threshold of a Post-Review Discovery, and notified the SHPO, CSO, and the Mechoopda Indian Tribe of the find on the same day. The Mechoopda Indian Tribe's Tribal Historic Preservation Officer responded acknowledging the find and requested updates as scheduling occurred. The SHPO responded September 4th with requests that Caltrans addressed on September 5th. The SHPO acknowledged this response and had no further comments at the time on September 8th.

Due to public safety and for protection of the find, the trench was backfilled temporarily until implementation of the PRDMP field methods could occur. The location was tied historically with the Kempf property that served at times as a city dump for Chico. While the find was substantial enough to not meet the thresholds of an exempt property, research into the property for the PRDMP found that the property was not likely to be eligible for the National Register of Historic Places (NRHP). The find could potentially meet data thresholds under Criterion D based on the project research design in the PRDMP, however, despite this established context. As the location was unavoidable for the project, Caltrans consulted with the SHPO and the Mechoopda Indian Tribe and committed to proceeding to the next step of the procedures established in the PRDMP. Caltrans is completing the identification and evaluation effort within the unavoidable location using the data recovery methods established in the PRDMP. Caltrans will continue consulting with the SHPO and Mechoopda Indian Tribe on the final monitoring report, that shall include a summary of the results of construction monitoring, all DPR forms, excavation records, and analyses of the data recovered property within 12 months following the completion of construction, per the PIP and the PRDMP.

District 4. Post Review Discovery. Arcadian Middle Mile Broadband Network Project, State Route 680, Alameda County, Encroachment Permit #04-25-6-BB-0387 (CATRA_2026_0511_001)

The post-review discovery occurred May 7, 2026, outside of any Environmentally Sensitive Areas (ESAs) during nighttime conduit installation for the Arcadian Middle Mile Broadband Network Encroachment Permit # 04-25-6-BB-0387 on May 7, 2026. Caltrans originally made a finding of *No Adverse Effect with Standard Conditions – Environmentally Sensitive Areas (ESAs)* for this undertaking in July 2025. The find consisted of shell midden located approximately 300 feet southwest of a known shell midden and habitation site, P-01-002162 (CA-ALA-576). Due to the proximity of the ESA and through ongoing consultation with the Muwekma Ohlone Indian Tribe of the SF Bay Area (Muwekma) and the Confederated Villages of Lisjan Nation (Lisjan), archaeological and tribal monitors were present and observed the find. The monitors and Caltrans PQS did a preliminary inspection to assess the discovery and secure the site until an assessment of the potential eligibility could be made per Stipulation XV.B.1 of the Section 106 PA. The monitors informed their supervisors, who informed Caltrans District 4 Office of Cultural Resource Studies (OCRS) immediately. OCRS immediately consulted with the Muwekma and the Lisjan to discuss the find and

the preferred treatment from the tribal perspectives. Construction was stopped within 100 feet of the discovery and the area was secured. All stockpiled soils were covered and secured, and the bore pits were secured with steel plates. OCRS also notified the SHPO of the discovery on May 8, 2026.

Lisjan requested no evaluation or assessment of the significance of the discovery occur until a meeting with the tribal archaeologists and leadership could occur. An on-site meeting was scheduled for Monday, May 11, 2026, with all parties involved to discuss the significance of the discovery and next steps.

OCRS reiterated discovery protocols, lines of communication, and chain-of-command procedures with construction staff and cultural monitors should any additional finds occur. Additionally, OCRS coordinated with project staff to ensure that the location remains protected, and additional tribal monitor were brought in to provide increased oversight. Remaining conduit tie-in and backfilling work will proceed only under continued consultation with the tribes and with full archaeological and tribal monitoring on site. Consultation with Muwekma and Lisjan have continued and will continue for the project. As of August 2026 no additional cultural finds have been identified within the vicinity of CA-ALA-576 or the ESA. OCRS also provided a Department of Parks and Recreation (DPR) 523 site record for the find and provided this to the SHPO and CSO on August 24, 2026, as requested. The post-review discovery is considered to be resolved by all parties.

District 4. Unanticipated Effect, Capital Maintenance Project, State Route 131, Marin County (FHWA_2023_1016_002)

On August 22, 2025, District 4 notified CSO and the SHPO of a breach in an Environmentally Sensitive and Archaeological Monitoring Area (ESA/AMA) established for the Capital Maintenance (CAPM) Project, State Route 131 in Marin County.

On Wednesday, July 2, 2025, the Caltrans Utility Engineering Office conducted potholing for utilities at the intersection of San Rafael Avenue and SR 131, within an ESA and AMA established for archaeological site CA-MRN-35. The ESA and AMA were established during the Project Approval & Environmental Document (PAED) phase of project delivery. The ESA/AMA is included in the Plans and Specifications and the Environmental Commitment Record. On August 20, 2025, the District 4 Office of Cultural Resource Studies (OCRS) was notified by the Town of Tiburon that the potholing had occurred to support the completion of the

CAPM Project's design plans. No archaeological or Native American monitor was present at the time of the potholing. The excavations took place over existing utilities to relocate them for planning/design purposes. Nine holes were excavated between 7 inches and 5 feet 10 inches deep.

Immediately after notification of the violation, OCRS contacted the Project Manager and the Caltrans Utility Engineering Office and received a copy of the report documenting the potholing work, which occurred on July 2, 2025. Caltrans staff discussed the potholing discussed in a call with Buffy McQuillen, Tribal Historic Preservation Officer (THPO) for the Federated Indians of Graton Rancheria (FIGR) on August 21, 2025. Caltrans followed up with an email to THPO McQuillen with the potholing report and summary of the known information. Caltrans and FIGR Representative Hector Garcia visited the location of the potholing on August 22, 2025. Pothole locations were still visible within the paved roadway, indicated by spray paint and asphalt patches. No cultural deposits were noted on the visible ground surfaces.

Extended Phase II testing at this location had been completed in Fall 2023. Extended Phase I/II Investigations for the SR 131 Rehabilitation Project, Marin County, CA (XPI/II) included two augers on the north side of the intersection of San Rafael Avenue, where potholing occurred to 4 feet 2 inches below ground surface (bgs). One auger was completed to a depth of 0.6 meters (approx. 2 feet) bgs and the second to 1.25 meters (approx. 4 feet) bgs. Fill was identified to a depth of 4 feet when there was a refusal due to a dense rocky layer. Project work at this location was anticipated to go to 2.5 feet bgs.

On the south side of the intersection with San Rafael Avenue, a total of 5 potholes were opened to depths between 2 feet 7 inches and 5 feet 10 inches. The deepest pothole did not identify the utility as it encountered refusal at 5 feet 10 inches due to rock. The XPI/II tested to 1 meter (approx. 3 feet) and 0.75 meters (approx. 2.5 feet). Both augers identified artificial fill, and one also identified a small lens of redeposited shell midden at 0.6 meters (approx. 2 feet). The pothole that occurred nearest the auger that identified the redeposited midden went to a depth of 2 feet 7 inches.

Based on the XPI/II testing, the location of the potholing over existing utility lines, the field visit with a FIGR representative and a review of the potholing report, Caltrans determined that the ESA and AMA breach likely did not extend beyond the fill or encounter intact midden deposits and therefore, did not result in an adverse effect to CA-MRN-35.

OCRS confirmed with Utility Engineering that the soils disturbed during potholing were removed using a vacuum truck and were deposited at the Potrero Hills Landfill. Because of this, the soils could not be retrieved or inspected by an archaeologist or Tribal representative.

The SHPO responded on August 25, 2025, acknowledging receipt of the notification and requested to be included in consultation regarding this matter as additional information becomes available.

On September 5, 2025, OCRS sent a memo to the Project Manager documenting the ESA/AMA violation and the importance of adhering to these requirements. Through several email chains and project meetings, OCRS conveyed to the project development team the sensitivity of the area and the need to adhere to the ESA/AMA plan in all phases of the project. To prevent violations such as this from occurring in the future, potholing dates, location, and depths are to be discussed in Project Development Team (PDT) meetings by the Office of Utility Engineering (OUE). OCRS will work closely with the PDT and OUE to ensure that no work occurs within established ESA and AMAs in the future.

Several actions were agreed upon to address the challenges of communicating utility planning needs during PS&E and to ensure that Tribal and archaeological monitors have accurate information when crews are working within ESAs and AMAs. These actions include:

- PDT members will be informed that utility relocations are needed, and OCRS and OUE will work together to schedule monitors.

- PQS will be invited and attend all PS&E meetings when ESAs and/or AMAs are present. PQS will be informed of any ground disturbing work needed before 100% plans are finalized to ensure the ESA and/or AMA measures are in place.

District 4 concluded that the ESA/AMA violation did not result in an adverse effect to historic properties and provided updated information to CSO and the SHPO on October 2, 2025. The SHPO responded on November 3, 2025 with no objection to the finding and acknowledged that Caltrans had taken steps to prevent such breaches from occurring in the future. There were no further comments.

District 7. Post Review Discovery. State Route 1 Drainage Restoration and Culvert Modification/Fish Passage Repair Project, State Route 1, Los Angeles and Ventura Counties, EA 07-31350 (FHWA_2018_1206_001)

The post-review discovery occurred during the excavation of Cast-in drilled hole (CIDH) piles for Stage 3 of construction for the project. Caltrans originally made a finding of a likely No Adverse Effect, but with Minor Phasing to confirm the finding, for this undertaking in 2019. The CIDH piles involves large drills going to specified depths. Monitors for the undertaking were sample screening the drilling spoils from the soil lenses including native soils and mixed context excavated within the site boundaries of CA-LAN-210. This was to identify any potential cultural materials following the Monitoring Plan for the project. Multiple bone fragments, lithic shards, and shell fragments were identified by the archaeological and tribal monitors. During the field visit on October 23, 2025 by Caltrans qualified human osteologists, however, 5 fragmented disarticulated human remains were identified after examining the osteological material identified during the sampling.

Upon identification of the human remains, Caltrans stopped all work in the immediate area and contacted the coroner per the process outlined in the monitoring plan and in compliance with Section 7050.5 of the California Health and Safety Code and California Public Resources Code Section 5097.98. Caltrans notified the Fernandeño Tataviam Band of Mission Indians and the Coastal Band of Mission Indians on October 23, 2025, and the SHPO on October 24, 2025. Representatives from both tribes were present on the site that day and were informed of the positive identification immediately. Caltrans PQS, CSO, the tribal representatives, and the coroner discussed the process to follow and agreed to temporarily house and protect the identified cultural material and human remains at Caltrans until the Most Likely Descendant (MLD) was determined by the Native American Heritage Commission (NAHC). For safety reasons, the drill hole was filled with concrete to ensure the stabilization of the slope, and construction was otherwise stopped until consultation with MLD, the consulting parties, and the SHPO could be completed.

The NAHC identified the Barbareno/Ventureno Band of Mission Indians (BVBMI) as the MLD on October 27, 2025. Caltrans District 7 met with the MLD on November 5, 2025 and discussed and resolved the following items.

1. The MLD identified all cultural materials and artifacts recovered from the project site at CA-LAN-210 as either human remains or associated grave

goods, as defined in PRC 5097.98. Caltrans agreed and is facilitating the MLD's recommendation that all human remains and associated grave goods are reburied following the analysis provided in the PRDMP.
2. A supplemental PRDMP was produced to capture Caltrans' commitments based on the outcome of discussions with the MLD, as well as to address the issues that resulted in the misidentification of the remains initially.
3. Additional conversations are ongoing with the MLD regarding the location for the eventual reburial.
4. Caltrans authorized minor work in the area consisting of work that does not enter the depth range where the midden was identified, with an archaeological and tribal monitor present. This was authorized while the supplemental PRDMP was being developed due to its lack of potential to affect the midden.

To address the issues that resulted in the initial misidentification of the remains, Caltrans included the following updates to monitoring procedures in the supplemental monitoring plan:

1. Updated the protocols to follow should additional human remains be found;
2. Requires the presence of an on-call osteologist who will determine if bones are human within 24 hours of a discovery;
3. Requires 100% of the spoils extracted during CDIH pile excavations to be sifted until the archaeological and tribal monitors determine it can be discontinued based on what is being found and depth/soils profile.

Caltrans also provided information on the work that remains for the project that will include going into depths the midden was discovered at. Additionally, the remainder of the work contract was modified through a contract change order to provide additional protocol additions that will help ensure ground disturbance will not occur in archaeological monitoring areas without monitor presence while helping avoid construction and communication conflicts.

Caltrans followed up its initial consultation with the SHPO on November 25, 2025, welcoming comments on the proposed treatments and the supplemental PRDMP done to address the PRD. The SHPO responded acknowledging receipt of the letter and Supplemental PRDMP; stated understanding that the assessment of effects to CA-LAN-210 is ongoing and a formal finding of effect is yet to be made; and that the SHPO looked forward to receiving and consulting on this and any proposed treatment measures when available. The SHPO also

stated the Supplemental PRDMP was still under review and requested additional consultation among all consulting parties regarding the treatment of cultural materials and artifacts identified during a PRD should they be determined to contribute to National Register Significance. Caltrans responded December 18th with clarifications and requested additional information. Caltrans clarified that it will propose a Finding based on the results of ongoing work in accordance with the project's PIP, and will consult with the SHPO regarding these efforts. Additionally, Caltrans clarified the nature of the find under PRC 5097.98 and that the state law does not prescribe landowner or MLD consultation with the SHPO concerning the treatment of human remains or associated grave goods. Caltrans requested additional information on the goal or purpose of the requested additional consultation to better take the request into account and ensure concerns are adequately addressed. Caltrans has not received further response from the SHPO. The other consulting parties and the MLD had no comments regarding the proposed treatments, processual modifications, and supplemental PRDMP. As such, the undertaking construction has continued.

As the project is still in construction and is minor phased, Caltrans is still in the process of determining the finding of effect. Caltrans intends to further continue proceeding under the PIP, PRDMP, and Supplemental PRDMP processes, and shall consult regarding the finding at the end of this work with the final reporting.

District 10. Post Review Discovery. State Route 12 Calaveras County Bridge Project, State Route 12, Calaveras County (FHWA_2021_1022_002)

The post-review discovery is a previously unidentified historic-era mining adit located immediately adjacent to the existing Highway 12 alignment. The adit was reported to Caltrans PQS on May 20, 2026, and a Caltrans PQS conducted a site visit for confirmation of the resource on May 21, 2026. The property owner stated that him and the previous landowner had no prior knowledge of the mine feature. The feature is isolated with limited associating to the broader historical landscape and had no identified relationship to other known cultural resources within the vicinity. The presence of the mine posed broader potential geotechnical and public safety concerns as it may extend an unknown amount, and as such it was determined that additional geotechnical work would be done to fully identify the extent and depth. No construction on the project had started yet in the vicinity of the area when the mine was found, and work schedule was shifted to allow for a full analysis of the mine.

Caltrans notified the SHPO and the Calaveras Band of Miwok Indians of the discovery on May 26, 2026. The SHPO responded on May 27, 2026 with comments, requesting information regarding why there had been a delay in notification, requesting a map, DPR 523 forms, and additional information on the resource, and requesting to be kept up to date on consultation outcomes.

Caltrans PQS conducted a field visit with geophysics personnel following the SHPO's comments. Standing water within the adit limited the effectiveness of geophysical survey. Caltrans PQS evaluated the adit and found it ineligible for the National Register. Caltrans consulted with the SHPO regarding the determination of eligibility on July 15, 2026. The SHPO concurred with the determination on July 30, 2026. With this determination, the PRD is considered completed. The adit shall be permanently closed to address public safety concerns.

STATUS OF AGREEMENT DOCUMENTS AND ONGOING CONSULTATION

During FY 25-26, Caltrans and its partners executed, amended, or terminated the following 15 agreement documents for projects under the 106 PA. Consultation between Caltrans, acting as FHWA, and SHPO regarding the development, amendment, or termination of the agreement documents was completed in an average of 72 days without objection. This is a notable increase from FY 24-25, which averaged 52 days without objection.

Table 7: Agreement Documents Executed, Amended, or Terminated

District	Agreement Document	Date of Execution or Termination
1	Albion Bridge Replacement Project PA	7/30/2025
1	Calpella Two Bridges Replacement PA Termination	7/25/2025
2	Whiskey Creek Bridge Emergency Repair Project MOA	3/6/2026
3	Binney Junction Roadway Rehabilitation Project PA Amendment 1	9/4/2025
4	Silverado Trail/Coombsville Rd 5-Way Intersection Project MOA	6/26/2026
4	Marin Sonoma Narrows Project MOA Amendment 3	8/26/2025
4	Better Market Street Project PA Amendment 1	8/11/2025
4	Ritchie Creek Bridge Replacement for Storm Water Mitigation Project MOA Termination	1/8/2026
4	Watmaugh Road Bridge Replacement Project MOA supplemental APE	8/28/2026
5	San Lorenzo Bridge Replacement MOA	3/25/2026
5	Garrapata Creek BridgeRail Replacement Project MOA Amendment 1	11/4/2025

7	Interstate-5 ExpressLanes Project PA Amendment 1	4/6/2026
7	Interstate-710 South Corridor PA Termination	3/25/2026
8	State Route 79 Realignment Project MOA Amendment 2	1/26/2026
10	Seventh Street Bridge Replacement Project MOA Amendment 1	1/13/2026
10	State Route 4/ Wagon Trail Realignment Project PA Amendment 4	3/19/2026

QUALITY ASSURANCE MEASURES

Under 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 delivered one PA training session for PQS in Sacramento, with the virtual portion on January 14, 2026, and the in-person portion from January 26 to January 30, 2026. This is an annual training primarily aimed at new staff; other Caltrans PQS 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 maintains and updates the Caltrans Cultural Resources Manual in Volume II of the Caltrans Standard Environmental Reference (SER). 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 uses the 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 Section 106 PA last 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 uses 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.
- 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 provided 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 2025-2026, Caltrans processed 1,757 Federal-Aid Highway projects. Of the 1,757 total projects, 1,362 qualified as Screened Undertakings and were exempted from further Section 106 review. There were 247 projects that resulted in findings of No Historic Properties Affected. CSO approved 65 projects with findings of NAE-SC in accordance with Stipulation X.B.1, which needed no review by the SHPO. A total of 95 projects were submitted to SHPO, 61 of which resulted in findings of effect or completed emergency procedures. Fifty-three (53) projects required consultation on NAE findings, 4 of which were Minor Phased. Five (5) 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 executed one (1) PA with the SHPO for a project whose finding could not be completed until after access is gained to restricted locations. Caltrans consulted on a total of 45 DOEs, 21 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.

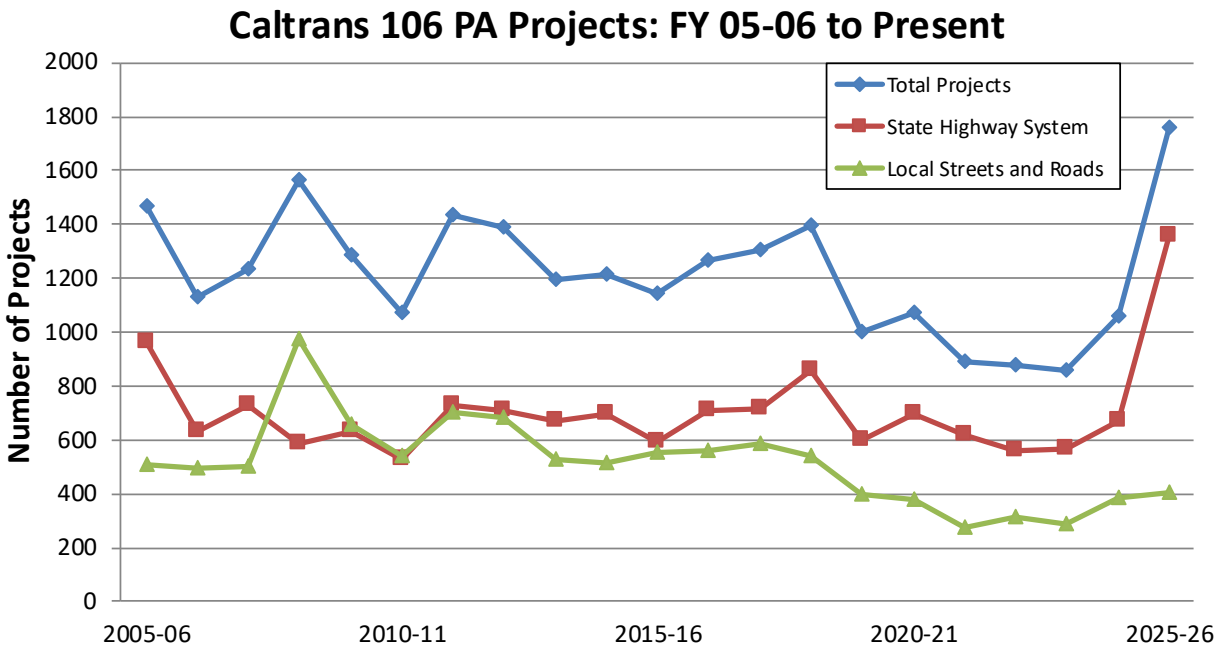
Caltrans' mission is "Improving lives and communities through transportation." The Caltrans Mission, Vision, and Goals are defined in the 2024-2028 Caltrans Strategic Plan. The Section 106 PA meets or exceeds the standards provided in the Strategic Plan by providing timesaving and streamlining measures, 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

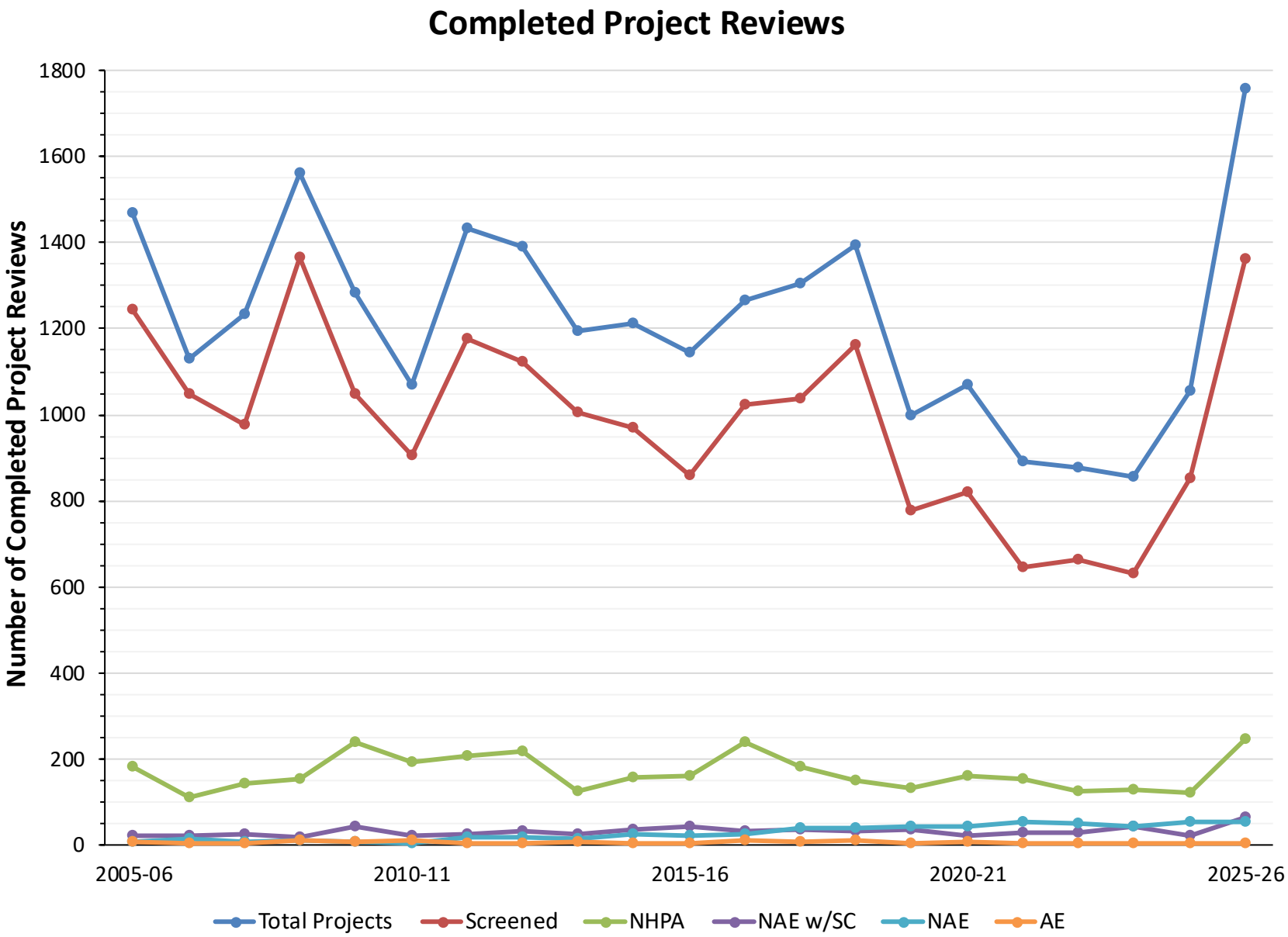
with the changing perceptions of resource values and maintains consultation standards, while streamlining processes for undertakings with little or no potential for affecting historic properties. Caltrans is committed to maintaining its high standards of compliance, resource consideration, and stewardship 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.

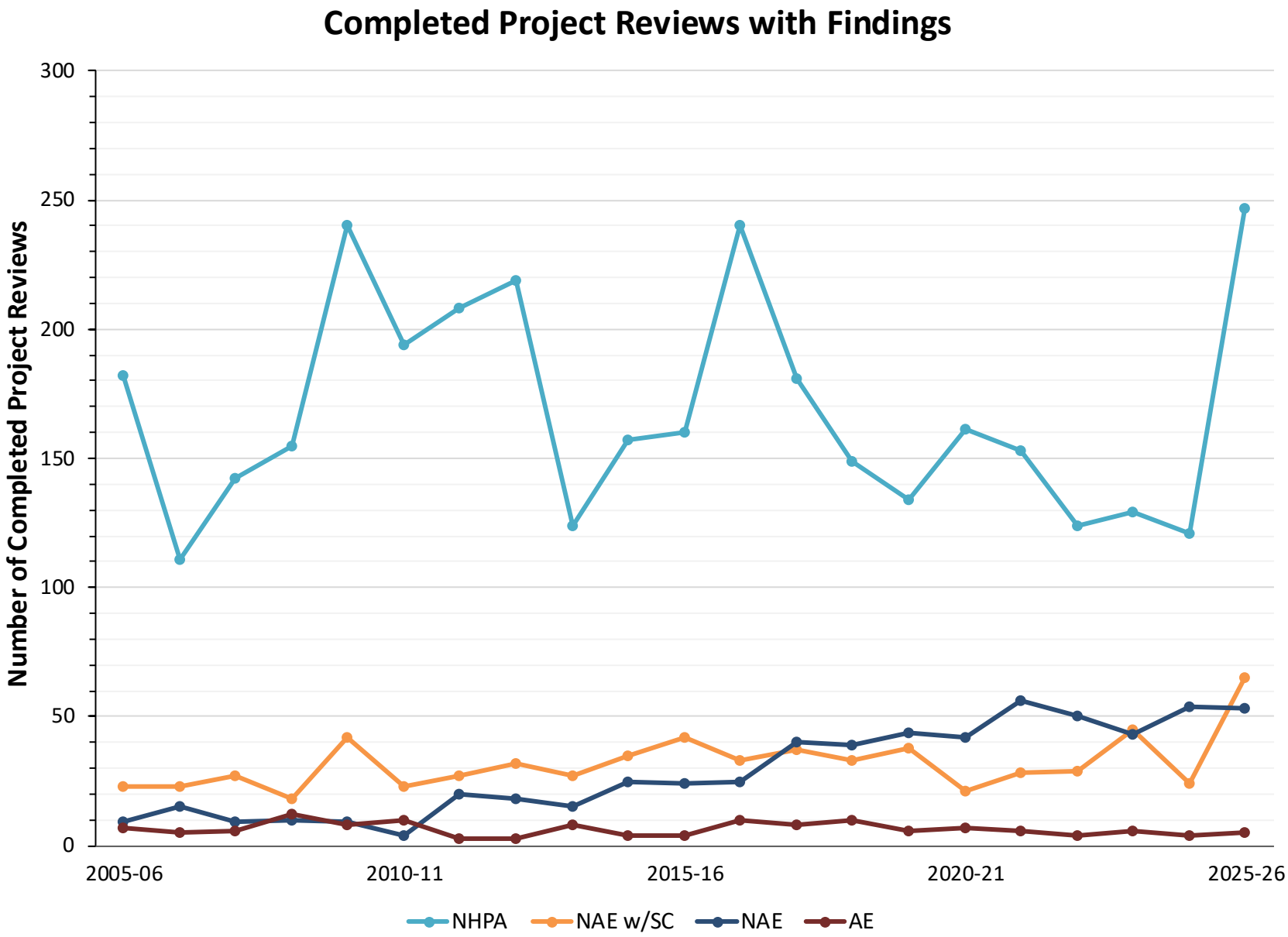
ATTACHMENT 1 – PA ACTIVITIES FISCAL YEARS 2005-2006 TO 2025-2026

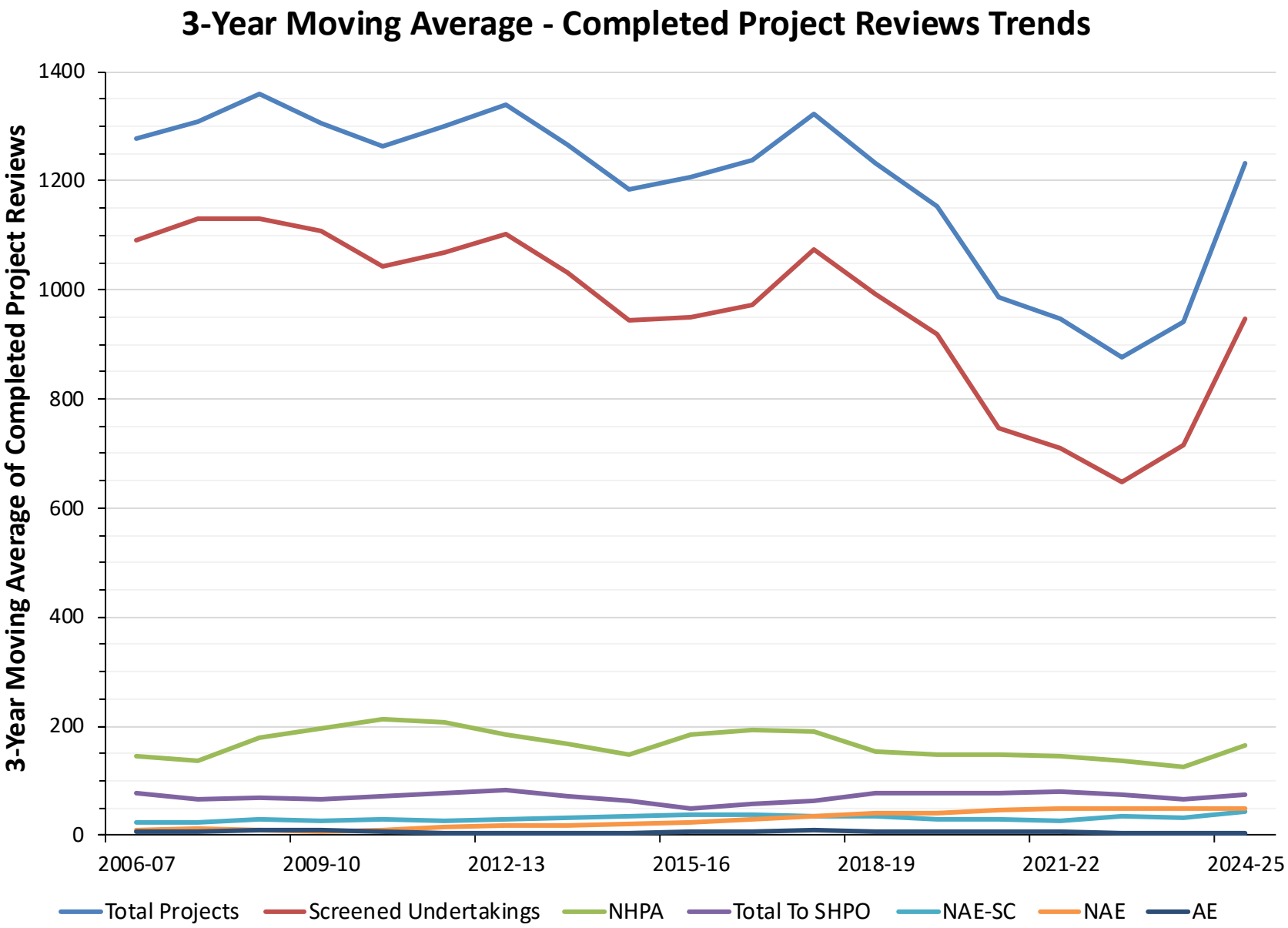
Since fiscal year 2005-2006, the first year that statistics for Caltrans use of a Section 106 PA were fully tabulated, Caltrans Professionally Qualified Staff have processed 25,602 projects Section 106 applied to. Of those, 14,815 projects were on the State Highway System (Caltrans), and the remaining 10,787 projects were on local streets and roads (Local Assistance) throughout the state.

The majority of projects, 20,693 of 25,602 (80.8 percent), completed between fiscal years 2005-2006 and 2025-2026 were classed as Screened Undertakings. Only 1,519 of the projects (5.9 percent) were submitted to SHPO for review. The remaining 3,531 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.




Completed Project Reviews
Number of Completed Project Reviews
1800
1600
1400
1200
1000
800
600
400
200
0
2005-06
2010-11
2015-16
2020-21
2025-26
Total Projects
Screened
NHPA
NAE w/SC
NAE
AE


Completed Project Reviews with Findings
Number of Completed Project Reviews
300
250
200
150
100
50
0
2005-06
2010-11
2015-16
2020-21
2025-26
NHPA
NAE w/SC
NAE
AE


3-Year Moving Average - Completed Project Reviews Trends
3-Year Moving Average of Completed Project Reviews
1400
1200
1000
800
600
400
200
0
2006-07
2009-10
2012-13
2015-16
2018-19
2021-22
2024-25
Total Projects
Screened Undertakings
NHPA
Total To SHPO
NAE-SC
NAE
AE

ATTACHMENT 2 – DATA FOR FIGURES

Table 8. Data for Figure 1: Federal-Aid Highway Project Findings Completed – FY 25-26

District	Total Completed Projects	Total Completed Caltrans Projects	Total Completed Local Agency Projects
1	80	55	25
2	102	95	7
3	317	225	92
4	121	52	69
5	447	423	24
6	268	227	41
7	111	51	60
8	70	55	15
9	3	1	2
10	103	67	36
11	27	12	15
12	82	75	7

Table 9. Data for Figure 2: Screened Undertakings – FY 25-26

District	Total Findings	Screened Undertakings
1	80	61
2	102	68
3	317	203
4	121	70
5	447	420
6	268	229
7	111	99
8	70	43
9	3	2
10	103	84
11	27	15
12	82	68

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
2025-26	1757	1354	403

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
2025-26	1757	1362	247	65	53	5

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
2025-26	247	65	53	5

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	Total to SHPO 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	N/A
2006-07	1277.0	1090.0	145.0	77.7	24.3	11.0	6.0
2007-08	1308.3	1130.3	136.0	67.0	22.7	11.3	7.7
2008-09	1359.3	1130.3	179.0	68.7	29.0	9.3	8.7
2009-10	1305.7	1106.7	196.3	66.7	27.7	7.7	10.0
2010-11	1263.0	1043.0	214.0	72.7	30.7	11.0	7.0
2011-12	1299.0	1068.3	207.0	78.7	27.3	14.0	5.3
2012-13	1340.7	1101.0	183.7	82.7	28.7	17.7	4.7
2013-14	1267.0	1032.0	166.7	72.0	31.3	19.3	5.0
2014-15	1184.3	943.7	147.0	62.0	34.7	21.3	5.3
2015-16	1208.0	950.0	185.7	50.0	36.7	24.7	6.0
2016-17	1238.7	973.3	193.7	57.7	37.3	29.7	7.3
2017-18	1322.0	1075.0	190.0	64.0	34.3	34.7	9.3
2018-19	1232.3	992.7	154.7	76.7	36.0	41.0	8.0
2019-20	1154.3	919.7	148.0	78.0	30.7	41.7	7.7
2020-21	987.3	747.0	149.3	78.3	29.0	47.3	6.3
2021-22	946.7	709.7	146.0	79.0	26.0	49.3	5.7
2022-23	875.3	646.3	135.3	73.3	34.0	49.7	5.3
2023-24	940.0	715.0	124.7	67.0	32.7	49.0	4.7
2024-25	1233.7	947.7	73.3	73.7	44.7	50.0	5.0
2025-26	N/A	N/A	N/A	N/A	N/A	N/A	N/A