

Exhibit 2.7: Historical Resources Compliance Report Format and Content Guide

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Exhibit 2.7: Historical Resources Compliance Report Format and Content Guide

Introduction

The Historical Resources Compliance Report (HRCR) is the summary document Caltrans uses as its consultation and decision-making document for projects and activities without federal involvement (CEQA only), as defined in Chapter 2. Under the Public Resources Code (PRC) 5024 Memorandum of Understanding (5024 MOU)¹ the HRCR documents delineation of the Project Area Limits (PAL), completion of the identification phase, and completion of National Register of Historic Place (NRHP/California Historical Landmarks (CHL) evaluation of cultural resources within the PAL. It may also be used to document effect findings that do not require a Finding of Effect report (FOE); that is when there are no Caltrans-owned historic resources within the PAL, no Caltrans-owned historical resources affected, or no adverse effect to Caltrans-owned historical resources with standard conditions, as explained below.

Technical studies are attached to the HRCR as supporting documentation. Use the summary sections in the HRCR to refer to the attachments for full technical details. Provide sufficient information on cultural resource studies in the HRCR summaries so that the reader can clearly understand the reasoning behind Caltrans' findings. Without the appropriate sections completed and applicable technical studies attached, the HRCR is considered incomplete. The Headquarters Cultural Studies Office (CSO) or the State Historic Preservation Officer's (SHPO) review time starts when complete documentation is received.

Concurrent Section 106 Compliance

When there are Caltrans-owned cultural resources in the PAL, Caltrans needs to document compliance with PRC 5024 by using the stipulations and attachments in the 5024 MOU. However, when the project is also a federal undertaking, the Section 106 Programmatic Agreement² (106 PA) may be used for concurrent compliance with Section 106 of the

¹ 2015 Memorandum of Understanding between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92, addended 2019.

² 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

National Historic Preservation Act. Pursuant to 5024 MOU Stipulation III, "...Caltrans shall use the Section 106 PA in its entirety and notify the SHPO that there are state-owned historical resources for which Caltrans is concurrently complying with PRC 5024. The SHPO shall use the information and documentation provided for the federal undertaking in its review and comments under PRC 5024." See Exhibit 2.6 for more information on documenting findings for Caltrans-owned resources involved in a federal undertaking.

HRCR Narrative and Form Templates

Caltrans has developed both an HRCR narrative template and an HRCR form template, either of which may be used in conjunction with compliance with the 5024 MOU. Both are available on-line at the Division of Environmental Analysis Standard Environmental Reference Volume 2-Cultural Resources (SERv2) website.

The narrative HRCR is typically used for projects that are large or complex, or those with a large number of Caltrans-owned cultural resources. Tabs may be used to guide reviewers to the various sections or attachments.

Use of the HRCR form is always optional. It is typically used for simple, straightforward projects that are not controversial.

The templates appear to be very long because they contain the range of most commonly used statements, with the appropriate language for each finding. Sections 3 to 6 contain the most frequently used statements and conclusions. One or more statements in these sections may apply. Delete statements that are not applicable.

If a section is not applicable, the heading will remain and the "Not Applicable" box may be checked, or the narrative statement is retained.

General HRCR Format

Whether using the form or narrative format, be sure to include the following information, as necessary:

Title Page (Narrative HRCR only)

The title page contains the following information:

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, effective January 1, 2014.

- Brief descriptive title with name and general location of project (e.g., "Minor Widening on State Route 53 between Fern Creek and Matador Road").
- County, route, and postmile or local street or road name.
- EA and/or E-FIS³ project number.
- Project contract number (if prepared by consultants).
- Name, title, and signature of the Caltrans Professionally Qualified Staff (PQS) or consultant PQS-equivalent who prepared the report. Also state the preparer's PQS or PQS-equivalent level and address or location.
- Name, title and signature of the PQS who reviewed the report for approval, along with the reviewer's location/address and PQS level (if different than preparer).
- Name, title, location and signature of the Caltrans Environmental Branch Chief (DEBC) for whom the report was prepared. The DEBC's signature on the title page indicates approval and acceptance of the document.
- Month/year HRCR was prepared (appears at bottom of page).

If the HRCR form is used the title page is not necessary. The signatures appear at the end of the form.

Summary of Findings (Narrative HRCR Only)

State the purpose of the document (e.g. to request SHPO concurrence with Caltrans' determination(s) of eligibility for evaluated cultural resources), and briefly summarize the results of cultural resource studies.

Ask SHPO to add any eligible building(s) or structure(s) to the Master List of Historical Resources (Master List) pursuant to PRC 5024(d).

If the HRCR form is used, the summary of findings is not necessary because the findings are summarized in Sections 5 or 6 of the form, as appropriate.

Project Description and Location

- Describe the project concisely, including information on the actual physical impacts such as the horizontal and vertical extent of any ground disturbance.
- Refer reader to the full project description, as well as the location and vicinity maps, in the attached documents.

³ Enterprise Resource Planning Financial Infrastructure. This is a 10-digit number, followed by a phase number of one or more digits.

- See Exhibits below for more information about location and vicinity maps.

Project Area Limits

- Include a description of the PAL stating how and why the boundaries were established. Include both vertical and horizontal boundaries
- Identify the PQS who approved the PAL, the Project Manager who approved the PAL, and dates of approval
- Attach appropriate mapping, including a signed PAL map, or refer to the technical study that includes the map (see Exhibits below)

Consulting Parties and Public Participation

Summarize coordination efforts and public comments received to date. If the project is simple, limit these to contacts (including form letter notifications) with local historical societies, Native American tribes/representatives, agencies, or other interest groups. Attach a consultation log if applicable. Provide the contact name and date, and the nature and date of any responses. For projects involving Negative Declarations (ND) and Environmental Impact Reports (EIR) public involvement may include map displays or public hearings. If Caltrans is the lead agency under CEQA, describe CEQA public involvement events that are expected as well as those that have occurred. Explain comments received and responses.

Summary of Identification Efforts

Include inventories, facilities, and persons consulted. At a minimum, the following should be consulted:

- Caltrans Cultural Resources Database (CCRD). (As the CCRD is for internal/Caltrans staff use only, consultants must coordinate with the appropriate PQS to ensure it has been consulted)
- Caltrans Historic Bridge Inventory
- National Register of Historic Places and updates
- California Register of Historical Resources
- California Inventory of Historic Resources
- California Historical Landmarks and updates
- California Points of Historical Interest and updates
- The appropriate Information Center of the California Historical Resources Information System
- Local government landmark and register listings

Note any other sources (human or archival) used, such as county assessor's records, historical society or museum archives, oral histories taken from property owners or informed, interested parties, etc. Briefly describe the results of the research within the PAL.

State-Owned Historical Resources Identified

State whether there are any Caltrans-owned cultural resources within the PAL. If Caltrans-owned cultural resources were identified within the PAL, list them and provide pertinent information for each of them. Refer to the supporting documentation, as warranted.

Be sure to include summary information about NRHP/CHL eligibility, identify the resources as state-owned and on/not on the Master List.

Under the 5024 MOU, Caltrans Districts are authorized to make eligibility determinations for Caltrans-owned cultural resources. For NRHP/CHL listed or eligible buildings and structures, request SHPO to add them to the Master List, per PRC 5024(d).

The District transmits the HRCR directly to SHPO and sends a copy to the PRC 5024 Coordination Branch Chief (PRC 5024 Branch) in CSO. When Caltrans has consulted with SHPO or any other consulting party regarding a determination of eligibility for resources in the PAL for which an evaluation was completed, the District, concurrent to sending the HRCR to the PRC 5024 Branch Chief, provides consulting parties with notification of the finding.

For the Narrative HRCR, include concise but sufficient background and contextual information about the evaluated resources.

Include the following statement/information as appropriate:

- No cultural resources are present within the PAL.
- State-owned resources are exempt from evaluation per 5024 MOU Attachment 4 as Resource Type 1, and that an appropriately qualified Caltrans PQS or consultant meeting the qualifications of the 5024 MOU Attachment 1 at the applicable PQS level has made the determination.
- State-owned resources are exempt from evaluation per 5024 MOU Attachment 4 as Resource Types 2-7, and that an appropriately qualified Caltrans PQS or consultant meeting the qualifications of the 5024 MOU Attachment 1 at the applicable PQS level has made the determination. Note: The address/location of state-owned cultural

resource types 2-7 need to be listed in the HRCR. Minimal recordation is required for resource types 3-7. See Exhibit 4.4.

- State-owned resources were previously evaluated as not eligible for the NRHP/CHL list with SHPO/Keeper concurrence, and those determinations are still valid. Attach SHPO or Keeper correspondence.
 - Bridges are listed as Category 5 in the Caltrans Historic Highway Bridge Inventory, and refer to the attached page from the inventory.
- State-owned resources were evaluated as not eligible for inclusion in the NRHP/CHL. Request SHPO concurrence with the determination. Refer to relevant attached supporting documentation.
- State-owned archaeological sites are considered eligible for purposes of the project only, in accordance with 5024 Stipulation VIII.C.3, because they will be protected through the establishment of Environmentally Sensitive Areas (ESAs).
- State-owned resources are considered eligible for purposes of the project only in accordance with 5024 MOU stipulation VIII.C.4 because evaluation was not possible. Note: this finding requires CSO approval prior to completion of the HRCR. The approval should be attached.
- State-owned resources were previously listed or determined eligible for the NRHP/CHL and those determinations are still valid. Include the date of listing, applicable criteria, level and period of significance, and a copy of the SHPO/Keeper's concurrence.
- State-owned resources were evaluated as eligible for the inclusion in the NRHP/as CHLs. Request SHPO concurrence with the determination, and request that SHPO add built environment resources to the Master List. Include the applicable criteria, level and period of significance. Refer to relevant attached supporting documentation.

To facilitate SHPO's ability to maintain the Office of Historic Preservation's (OHP) comprehensive, computerized inventories of eligible and not eligible resources, the identifying information for each resource needs to follow a specific format that includes the name of a property (if there is one), location information, the community the resource is in (or the nearest community), the Map Reference number that is keyed to the PAL map, and OHP Historical Resources Status Code, if available. For example:

None of the following resources are eligible for inclusion in the NRHP/as CHLs:

Name	Address/Location	Community	OHP Status Code	Map Ref. #
CA-SON-0000	PM 21.2	Anywhere (vic), CA	6	(MR #25)
Summit Maintenance Stn	10099 Highway 4	Anywhere, CA	6	(MR #26)

Do not list resources that meet the criteria for 5024 MOU Attachment 4 (State-owned Resources Exempt from Evaluation) as archaeological resources or built environment resource types 1-2. Instead include the appropriate paragraph as follows:

[Name of Caltrans or consultant architectural historian or archaeologist], who meets the Professionally Qualified Staff (PQS) Standards in PRC 5024 MOU Attachment 1 as a(n) [Indicate applicable PQS level], has determined that the only/only other resources present within the PAL meet the criteria for PRC 5024 MOU Stipulation VIII.C.1 and Attachment 4 (State-owned Cultural Resources Exempt from Evaluation) [indicate Archaeological Resources and/or Resource Type 1].

Addresses or locations of Caltrans-owned resources that meet the criteria for 5024 MOU Attachment 4 Resource types 2 through 7 must be listed in the HRCR, but do not need to be depicted on the PAL map, nor do they have an OHP Historical Resources Status Code. For example:

[Name of Caltrans or consultant architectural historian or archaeologist], who meets the Professionally Qualified Staff (PQS) Standards in PRC 5024 MOU Attachment 1 as a(n) [Indicate applicable PQS level], has determined that the only/only other resources present within the PAL meet the criteria for PRC 5024 MOU Stipulation VIII.C.1 and Attachment 4 (State-owned Cultural Resources Exempt from Evaluation) Resource Types 2-7.

Address/Location	Community
10990 Highway 4	Anywhere, CA

Provide the site trinomial (e.g., CA-TRI-433) for each archaeological site covered in the document. As some Information Centers have a backlog in assigning trinomials, using a primary number is acceptable for those counties. However, every effort should be made to acquire a trinomial for evaluated archaeological sites.

The OHP Historical Resources Status Codes listings and eligibility determinations have extensions for each code. For example, “1S” means a historic property individually listed in the NRHP and also listed in the CRHR, while “1CS” means a property individually listed in the CRHR only. Status code “4” applies only to state-owned resources that are included in the Master List through the PRC 5024 compliance process. See the [OHP Historical Resources Status Codes](#) for a full list of the codes.

Finding for the Project

Under the 5024 MOU, Caltrans Districts are authorized to make an effect finding for the project. Describe the effects to each Caltrans-owned resource as relevant, but make one effect finding for the project as a whole.

If using the HRCR form, summarize the finding below the appropriately checked box and refer the reader to the appropriate attachment for more detailed information. If using a narrative HRCR, provide a brief description and refer the reader to the appropriate attachment for more detailed information.

The possible findings are:

Finding of No State-Owned Historical Resources Affected

- Caltrans, pursuant to 5024 MOU Stipulation IX.A.2, has determined a **Finding of No State-Owned Historical Resources Affected** is appropriate for this project because there are no state-owned historical resources within the PAL / the following state-owned historical resources will not be affected. [Choose one or the other of the above statements. If there are previously listed/eligible state-owned resources within the PAL, identify them and explain why they would not be affected. The attached documentation must clearly explain why there is no effect to state-owned historical resources.]

Effects Undetermined

If effects are not yet determined, indicate that Caltrans will be continuing consultation with CSO and/or the SHPO on the assessment of effects.

- Caltrans, pursuant to 5024 MOU Stipulation IX.B, has determined that there are state-owned historical resources within the PAL that may be affected by the project. **Effects are still undetermined**, so in accordance with 5024 MOU Stipulation X, Caltrans will continue consultation with CSO and/or SHPO in the future on the assessment of effects.

[This notifies CSO, SHPO and reminds Caltrans that the effect findings require consultation.]

Finding of No Adverse Effect with Standard Conditions (FNAE-SC)

Caltrans, pursuant to 5024 MOU Stipulation X.B.1.a/b and Attachment 5, Caltrans Districts are required to send HRCR findings to CSO when Caltrans proposes a Finding of No Adverse Effect with Standard Conditions.

CSO has 15 days from receipt of complete documentation to object to the District's finding. CSO's approval of the effect finding is contingent upon SHPO's concurrence in the District's determination of eligibility, if applicable.

Concurrent with sending the finding to CSO, the District provides notification of the finding to any consulting parties that have expressed views regarding potential effect to Caltrans-owned historical resources, pursuant to 5024 MOU Stipulation X.B.1.

If Caltrans-owned resources can be protected from any project effects by establishment of an ESA, a "Finding of No Adverse Effect with Standard Conditions" (FNAE-SC-ESA) is appropriate under the 5024 MOU. Describe the ESA and attach an ESA Action Plan. Include all restrictions on activities within the ESA, describe how the restrictions will be enforced (e.g., by placing the restrictions in the Plans, Specifications and Estimates [PS&E], fencing, monitoring construction, etc.), and include the name and appropriate PQS level of the PQS who reviewed the ESA plan. Include any other relevant information to support the proposed finding. If using the HRCR form, summarize the finding below the appropriately checked box and refer the reader to the appropriate attachment for more detailed information. See Exhibits 2.8: Findings of No Adverse Effect and 2.11: ESA Action Plan.

If the project is limited to the stabilization, maintenance, repair, rehabilitation or alteration of Caltrans-owned historical resources and Caltrans proposes to use the SOIS to ensure the project will have no adverse effect, a "Finding of No Adverse Effect with Standard Conditions-SOIS" (FNAE-SC-SOIS) is appropriate under the 5024 MOU. For each resource, describe how the project complies with the SOIS and attach an SOIS Action Plan. Include the name and appropriate PQS level of the PQS who reviewed the work for compliance with the SOIS. If using the HRCR form, summarize the finding below the appropriately checked box and refer the reader to the appropriate attachment for more detailed information. See 2.8: Findings of No Adverse Effect and 2.12: SOIS Action Plan for additional guidance. For historic

bridges, see Exhibit 7.4: Historic Bridges and Tunnels - No Adverse Effects with Standard Conditions for more detailed information.

If the project is a transfer or relinquishment of a Caltrans-owned historical resource to a local agency or private owner and the resource has been designated by a Certified Local Government (CLG) under its preservation ordinance, a “Finding of No Adverse Effect with Standard Conditions-CLG (FNAE-SC-CLG) is appropriate under the 5024 MOU. Include a brief description of the ordinance and attach a copy of the designation. If using the HRCR form, summarize the finding below the appropriately checked box and refer the reader to the appropriate attachment for more detailed information.

- Caltrans, pursuant to 5024 MOU Stipulation X.B.1.a/b and Attachment 5, has determined a **Finding of No Adverse Effect with Standard Conditions-[select one or both: ESA and/or SOIS; or CLG]**, is appropriate for this project, and requests CSO approval. [Name], who meets the PQS Standards in 5024 MOU Attachment 1 as a(n) [Indicate applicable PQS level], has reviewed the attached documentation and determined that it is adequate. (Include ESA and/or SOIS Action Plan, or CLG ordinance designation as attachment.)

Finding of No Adverse Effect (FNAE)

Pursuant to 5024 MOU Stipulation X.B.2.a, Caltrans Districts are required to send findings to CSO when Caltrans proposes a Finding of No Adverse Effect for Caltrans-owned historical resources.

When the FNAE for the project applies to Caltrans-owned historical resources that are not on the Master List, if CSO does not disagree with the District’s finding, PRC 5024 compliance for the project is complete.

- Caltrans, pursuant to 5024 MOU Stipulation X.B.2.a, has determined a Finding of No Adverse Effect (without Standard Conditions) is appropriate for this project, and requests CSO approval. [Include FOE as attachment].

When the FNAE finding for the project applies to Caltrans-owned historical resources that are on the Master List, if CSO does not disagree with the District’s finding, CSO consults the SHPO and requests SHPO’s concurrence in this finding.

- Caltrans, pursuant to 5024 MOU Stipulation X.B.2.c, has determined a Finding of No Adverse Effect (without Standard Conditions) is appropriate for this project, and requests SHPO's concurrence in this finding. [Include FOE as attachment].

Finding of Adverse Effect (FAE) and Proposed Mitigation Measures

Pursuant to 5024 MOU Stipulation X.C., when adverse effects to Caltrans-owned historical resources cannot be avoided, Caltrans Districts may propose a finding of Adverse Effect. Districts are required to send HRCR findings and supporting documentation to CSO.

If the adverse effect is to a Caltrans-owned archaeological site that is not on the Master List (i.e. assumed eligible, determined eligible for listing in the NRHP/as a CHL), pursuant to 5024 MOU Stipulation X.C.1., the District may propose a finding of "Adverse Effect with Standard Mitigation Measures" (SMM). This finding may be used when the appropriate SMM described in Attachment 6 of the 5024 MOU is imposed, or when the District has developed a plan for managing any post-review discoveries that includes decision thresholds and procedures that would be implemented in accordance with 5024 MOU Stipulation XV. If CSO does not object to the finding, PRC 5024 compliance is complete.

- Caltrans, pursuant to 5024 MOU Stipulation X.C.1. has determined a Finding of Adverse Effect with Standard Mitigation Measures is appropriate for this project, and requests CSO approval. [Include documentation supporting the finding and standard mitigation as attachment].

If the adverse effect is to any other Caltrans-owned historical resource that is not on the Master List, pursuant to 5024 MOU Stipulation X.C.2.a, the District may propose a finding of "Adverse Effect." The HRCR with documentation supporting the finding (including proposed mitigation measures) is sent to CSO. If CSO does not object to the finding, PRC 5024 compliance is complete.

- Caltrans, pursuant to 5024 MOU Stipulation X.C.2.a has determined a Finding of Adverse Effect is appropriate for this project, and requests CSO approval. [Include documentation supporting the finding and proposed mitigation measures as attachment].

If the adverse effect is a Caltrans-owned historical resource on the Master List, pursuant to 5024 MOU Stipulation X.C.2b.a, the District may propose a finding of "Adverse Effect." The HRCR with documentation supporting the finding (including proposed mitigation measures)

is sent to CSO. If CSO does not disagree with the District's finding, CSO consults the SHPO and requests SHPO's concurrence on the finding and proposed mitigation measures.

- Caltrans, pursuant to 5024 MOU Stipulation X.C.2.b has determined a Finding of Adverse Effect is appropriate for this project, and requests SHPO's concurrence in this determination. [Include documentation supporting the finding and proposed mitigation measures as attachment].

Note that in accordance with 5024 MOU Stipulation X.E, when the effects to Caltrans-owned historical resources are highly controversial or there is substantial public interest in the project or activity's effects on the resources, CSO is required to forward a finding of no adverse effect or adverse effect with proposed mitigation measures to SHPO for notification under PRC 5024(f) or for concurrence under PRC 5024.5, as applicable regardless of Master List status. It is the District's responsibility to inform CSO of findings that may be highly controversial, or if there is substantial public interest in the effects to the Caltrans-owned resource(s).

CEQA Considerations

In order to minimize redundancy for Caltrans and to document compliance, CEQA consideration regarding cultural resources may be included in the HRCR Section 7. Consultation with SHPO is not required under CEQA. CEQA significance findings and avoidance and mitigation measures should not be included in the HRCR (these are decided by the Project Development Team in the Environmental Document). CEQA considerations aren't applicable if Caltrans is not the lead agency under CEQA. See the Caltrans SERv2 Chapter 2 Section 2.7 for additional information about what to include.

Section 7 of the HRCR form and narrative templates contains the following options:

List the cultural resources that were identified within the PAL, and provide pertinent information for each of them. Include concise but sufficient background and contextual information about the project area so that the reader can understand the significance of the evaluated resources. Use the format described in this exhibit. Be sure to include summary information about NRHP eligibility and why it is or is not a historical resource under CEQA.

One or more of the following findings may apply. Include, as appropriate:

- Not applicable (Caltrans is not the lead agency under CEQA).

- Caltrans PQS has determined that there are No Historical Resources within the PAL.
- Caltrans PQS has determined the following resources are not significant resources under CEQA: (List resources and indicate if Caltrans-owned).
- Caltrans PQS has determined that there are resources in the PAL that do not meet NRHP criteria but are historical resource(s) for purposes of CEQA.⁴
(List the resources and indicated how they were determined a CEQA resource, e.g. listed in the California Register of Historical Resources or were determined eligible for the California Register of Historical Resources by the State Historical Resources Commission; are included in a local register; were identified as significant in a local survey meeting Office of Historic Preservation standards; or Caltrans, as the lead agency, determined they meet the criteria for listing in the California Register of Historical Resources⁵).
- The following are historical resources for the purposes of CEQA (List resources and indicate if Caltrans-owned and whether they are on the Master List).

Exhibits

Include the following exhibits as applicable.

Location Map, Project Vicinity Map and PAL Map

Include, at minimum, a map showing project location and vicinity, and a PAL map illustrating the proposed project, upon which the Project Area limits have been delineated. The maps do not need to be attached separately if included within other attachments; just note where they can be found. All maps must be in color. The PAL map is signed by PQS and the Project Manager. If no cultural resources are present, the PAL map needs to be of sufficient scale to document the project area limits.

If cultural resources are present, the PAL map needs to be of sufficient scale (200' scale is preferred) and have enough project detail to demonstrate the relationship of Caltrans-owned historical resources to the proposed project. Clearly show the location of all discussed resources, the boundaries of any eligible or listed Caltrans-owned historical resources, and the boundaries of any ESAs used. Include a scale and north arrow.

⁴ See PRC 15064.5(a)(3) – (4).

⁵ See PRC 15064.5(a)(1) - (4).

Photographs and Other Exhibits

Include other appropriate exhibits. Good clear exhibits and graphics are invaluable to demonstrate the arguments and decisions discussed in the text.

Photos and graphics that illustrate the following can enhance the HRCR's effectiveness as a consultation tool:

- Integrity (or lack thereof) of cultural resource(s)
- Integrity of setting for cultural resource(s),
- Engineering plans,
- Profiles and cross-sections that show the actual limits of project impacts.

SHPO's copy of the HRCR either should contain original photographs or scanned images that are clear when printed out.

Attachments

Include, as appropriate:

- Caltrans Historic Bridge Inventory Sheet(s)
- Historical Resources Evaluation Report (HRER)
- Archaeological Survey Report (ASR)
- Extended Phase One Report (XPI)
- Archaeological Evaluation Report (AER, PII)
- Environmentally Sensitive Area (ESA) Action Plan
- Secretary of the Interior's Standards for the Treatment of Historic Properties (SOIS) Action Plan
- CSO Approval of Assumption of Eligibility
- Finding of Effect (FOE)
- Other (specify), e.g. phone logs documenting consultation; relevant correspondence from historical societies, Native American groups, local governments, other special interest groups, or the SHPO not already included with an attached technical study.

HRCR Preparation and Approvals

Under the 5024 MOU, PQS or a qualified consultant may prepare the draft HRCR. HRCRs need at least three reviews:

- Peer review of the draft HRCR by PQS, at the appropriate level for the contents of the HRCR
- Review of the final HRCR for EBC approval by PQS, at the appropriate level
- Review and approval of the final HRCR by the EBC

Because HRCRs are cover documents only, summarizing the findings of the various technical studies, PQS at either the Lead Archaeological Surveyor or Architectural Historian level or above may peer review the draft HRCR, as well as review the final HRCR for approval by the lead EBC. However, PQS in the appropriate discipline and at the required PQS level must peer review and review for approval any attached technical studies.

Chapter 2 Section 2.5.5 explains the reasons for the specified levels of PQS peer review, while Table C of Exhibit 2.14 contains a chart with the various HRCRs findings and who is certified to conduct peer review and review for approval.

Peer reviewers follow the guidelines in Exhibit 2.13: Guidelines for Peer Review of Cultural Resources Reports. Peer reviewers' names should be kept on record and comments retained in the project files. Once the HRCR has been peer reviewed and any revisions have been made, it is ready for approval.

After the draft HRCR has been peer reviewed and any necessary revisions are made, the PQS or consultant who prepares the HRCR signs, dates the final HRCR and includes his/her discipline, PQS level (as applicable) and district/headquarters or affiliation. The PQS reviewing the HRCR for approval likewise signs, dates, and includes his/her PQS discipline, level and district. If the document preparer is a PQS certified at the appropriate level to conduct reviews for approval, his or her signature on the final document also signifies review for EBC approval. The EBC signs and dates the HRCR to signify approval.