Exhibit 7.5: Secretary of the Interior’s Standards for the Treatment of Historic Properties Action Plan Format and Content Guide

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**Exhibit 7.5: Secretary of the Interior’s Standards for the Treatment of Historic Properties Action Plan Format and Content Guide**

**Introduction**

Within the context of avoiding adverse effects to historic properties, use of the Secretary of the Interior’s Standards for the Treatment of Historic Properties (SOIS), along with the relevant National Park Service guidance can avoid adverse effects to historic built-environment properties when an undertaking’s activities include stabilization, maintenance, repairs, rehabilitation, or alterations. Caltrans uses SOIS to fulfill various requirements Stipulation X.B.1.b and Attachment 5 of both the 106 PA¹ and the 5024 MOU² for state-owned historical resources. Attachment 5 requires the development of an SOIS Action Plan to ensure proper implementation of 106 PA / 5024 MOU Stipulation X.B.1.b, and to ensure compliance with CEQA. See Chapter 2 Sections 2.3.9.2, 2.7.6 and 2.8.6.1, Chapter 7 Section 7.12.3 for additional information on SOIS; Exhibit 2.8 for preparing Findings of No Adverse Effect Reports, and for historic bridges and tunnels, see the guidance in Exhibit 7.4 for the most common appropriate standard conditions to use for these property types.

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¹ First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act as it Pertains to the Administration of the Federal-Aid Highway Program in California, effective January 1, 2014.

² 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, effective January 1, 2015.
that meet the SOIS. The Chief of the Built Environment Preservation Services Branch is available for assistance and guidance when considering this approach.

The SOIS Action Plan describes the historic properties to be protected, documents the required treatments that meets the SOIS, identifies responsible parties and their appropriate tasks, and outlines an anticipated schedule and process. An SOIS Action Plan is required whenever SOIS are proposed to avoid or mitigate adverse effects to built-environment historic properties.

SOIS Action Plans are prepared under the following circumstances:

1) To support a finding of No Adverse Effect with Standard Conditions-SOIS, in accordance with Stipulation X.B.1.b and Attachment 5 of both the 106 PA and the 5024 MOU.

2) As a measure for resolution of adverse effects under a Memorandum of Agreement (MOA) or with State Historic Preservation Officer (SHPO) concurrence in a finding of No Adverse Effect without Standard Conditions.

3) To support a determination of No Substantial Adverse Change to historical resources under CEQA, demonstrating that impacts to historical resources have been mitigated below the level of significance.

4) For long term protection of historic properties during maintenance or other activities.

SOIS Action Plan Format

**Title Page**

- Name and type of project
- District, County, route and post-miles
- E-FIS\(^3\) project number and phase (For Local Assistance projects, use the Federal-Aid project number.)

The page also includes:

- Prepared for: Name, title, location and signature of the Caltrans District Branch Chief (DEBC) for whom the plan was prepared. The DEBC’s signature on the title page indicates approval and acceptance of the document
- Prepared by: Name, title, location and signature of the Caltrans Professionally Qualified Staff (PQS) or consultant PQS who prepared the plan
- Reviewed for Approval by: Name, title, location and signature of the Caltrans Professionally Qualified Staff (PQS) who reviewed the plan for approval
- Month and year plan was prepared (appears at bottom of page) If a qualified consultant prepared the plan, the project contract number should appear below the E-FIS project number (or Federal-Aid project number for Local Assistance projects)

**Summary of Action Plan**
This section should contain the information necessary for all parties to understand the intent, methods and applications of the SOIS. It includes:

- A concise description (abstract) of the proposed project
- List of historic properties for which the SOIS(s) are to be used
- Methods of establishing the SOIS
- Measures required during each stage of the project (pre-construction, during construction, post construction)
- Responsible parties for each measure
- Anticipated dates and duration for required measures.

**Project Description**

- General scope of the proposed work, specifying project components relevant to the application of the SOIS
- Description of the regulatory context for which the plan was prepared (e.g., 106 PA Attachment 5, 5024 MOU Attachment 5, MOA, etc.)

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\(^3\) E-FIS stands for Enterprise Resource Planning Financial Infrastructure. Beginning in July, 2010, the former project Expenditure Authorization number became an E-FIS project number. This is a 10-digit number, followed by a phase number of one or more digits.
**Historic Properties Description**

Describe each affected historic property, including:

- Date of National Register listing; date of Keeper determination of National Register eligibility, stating that it was a Keeper determination of eligibility; date of SHPO concurrence with the determination of eligibility, stating that it was a consensus determination; or state that an eligibility consensus determination with SHPO is pending, as applicable.

- National Register Criteria\(^4\) under which the property is listed or eligible, including a brief reason why and the level(s) and period(s) of significance.

- Brief National Register boundary description

- Description and ranking of their essential physical features, also known as character-defining features (CDFs), see Exhibit 7.1.

  - Photographs of the historic properties, including a general contextual view(s) and views depicting CDFs that would be affected by the proposed project work.

While these descriptions can be in narrative format, it may be more efficient to use a Character-defining Features Summary Form (CDF Summary Form) for each affected historic property. To reduce text in this section of the action plan, the form can be attached to the SOIS Action Plan with reference made to the form(s) in this section of the plan instead of a narrative description. In addition, these forms also can be provided in advance to the project manager and project team for reference when developing treatments that would avoid or minimize impact.

The CDF Summary Form template is available on the Caltrans Standard Environmental Reference Volume 2-Cultural Resources (SERv2) website and its use is explained in Exhibit 7.1.

**Analysis of Effects Related to Conditions Proposed**

Discuss in detail any conditions proposed to avoid adverse effect to each affected historic property. The details should be sufficient enough to allow a reviewer not familiar with the project or the project area to understand the extent of any direct or

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\(^4\) And, for state-owned historical resources, the California Historical Landmark criteria, if applicable.
indirect effects on each historic property and how use of the SOIS avoids adverse effects.

This discussion may be in narrative format or table format, such as the table developed in consultation with SHPO for assessing the effects of rehabilitation projects to individually eligible properties, contributors to historic districts and the historic districts. An example of this CDF Physical Conditions Record template is available on the (SERv2) website and includes discussion headings as identified below.

Whether in narrative or table form, include in the discussion:

- Issue or work item
- Affected CDF(s) and their ranking (e.g., most significant, significant, less significant)
- Proposed treatment
- How the proposed treatment meets the SOIS
- Specific contractual language that may be required to ensure that construction contractors comply with the SOIS Action Plan, such as Standard Special Provisions (SSP) or the Non-standard Special Provisions (NSSP). Examples of contractual language may be needed include specific language found in other guidance such as Preservation Brief 9: Repair of Historic Wooden Windows, Preservation Brief 31: Mothballing, Preservation Brief 32: Accessibility, or Preservation Brief 41: Seismic Retrofit (titles paraphrased). Questions regarding SSPs and NSSPs should be directed to the Chief of the Special Projects Archaeology Branch (SPA) in Headquarters Cultural Studies Office (CSO).
- Results of consultation with the State Historical Building Safety Board (SHBSB) regarding the application of the California Historical Building Code for code-related issues identified in the project that affect the historic properties, as required under per the California Health and Safety Code Section 18961. If not applicable because there are no code-related issues, include a statement to that effect.

**Monitors**
Only architects who meet the Secretary of the Interior’s Professional Qualification Standards for “historic architecture,” Caltrans PQS Principal Architectural Historians, or similarly qualified consultants, or Caltrans staff under the direction of a Caltrans
PQS Principal Architectural Historian serve as built-environment monitors. When monitoring is required, a general rationale for the monitoring – as well as specific location, intervals, and duration – needs to be clearly stated. Provide reference to the attached project plans and specifications.

**Responsible Parties**
Identify appropriate Caltrans staff, agency staff, consultants or others who are the responsible parties, as well as which aspects of the plan for which they are responsible. A clear chain of command should be established, with specific tasks and contact information identified for each responsible party (e.g., Caltrans PQS Principal Architectural Historian, Environmental Construction Liaison, and Resident Engineer). Identify the parties by Position/Title to ensure continuity of accountability in the event of personnel change on a project. All parties must be aware of and acknowledge their responsibilities. See the sample [SOIS Action Plan Table](#) at the end of this exhibit.

**Attachments**
Include the following:

- Project Vicinity and Location maps (unless already provided in an HPSR or HRCR or other notification documentation, as applicable)
- Project APE Map (detail location(s) of the historic property, including the National Register boundaries, in relation to the project and depict project effects on the property)
- Plans and specifications, with verification that they have been reviewed by or under the direct supervision of Caltrans PQS certified as a Principal Architectural Historian with the requisite experience
- Photographs or other useful graphics (e.g., construction drawings, photo simulations)
- Correspondence with the SHBSB, SHPO, Native Americans, and any other consulting parties, or the public (e.g., local government agency), as applicable.

**Peer Review and Approval**
Only Caltrans PQS (certified at the Principal Architectural Historian level) may peer review SOIS Action Plans or review them for approval, which the DEBC approves. After the Caltrans Principal Architectural Historian has peer-reviewed the draft Plan and any necessary revisions have been made, the Caltrans PQS or consultant who prepares the SOIS Action Plan signs, dates the final plan and includes his/her
discipline, PQS level (as applicable) and District/Headquarters or affiliation. The Caltrans PQS reviewing the SOIS Action Plan for approval likewise signs, dates, and includes his/her PQS discipline, level and District. The DEBC signs and dates the SOIS Action Plan to signify final approval.

Transmittal

If the SOIS Action Plan has been prepared in support of a finding of No Adverse Effect with Standard Conditions-SOIS pursuant to the 106 PA or the 5024 MOU, the plan is included in the notification documents concurrently submitted to Headquarters CSO for approval and other consulting parties. When the SOIS Action Plan involves state-owned resources that are listed or eligible for inclusion in the National Register of Historic Places or for registration as California Historical Landmarks, a copy of the plan is transmitted to Headquarters CSO for approval and to SHPO for notification purposes.

Sample SOIS Action Plan Responsible Parties Table:

<table>
<thead>
<tr>
<th>STAGE</th>
<th>RESPONSIBLE PARTIES</th>
<th>TASK</th>
<th>DATE TASK COMPLETED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-construction</td>
<td>Caltrans Architectural Historian* Project Manager Project Engineer</td>
<td>Caltrans Architectural Historian will ensure that SOIS for the Lucas McCain Barn is clearly described and illustrated in the plans, specifications and estimates (PS&amp;E).</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian Project Manager Project Engineer</td>
<td>All responsible parties, including the Caltrans Architectural Historian, will review the PS&amp;E package. Ensure that SSPs for SOIS are included in PS&amp;E package.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Environmental Branch Chief Caltrans Architectural Historian * Project Manager Project Engineer</td>
<td>Caltrans Architectural Historian will ensure the SOIS Action Plan is included in Environmental Commitment Record (ECR) and the RE Pending File.</td>
<td></td>
</tr>
</tbody>
</table>

5 Notification documentation may be a Historic Property Survey Report (HPSR), Supplemental HPSR, separate FNAE-SC-SOIS stand-alone document or, for state-only projects, a Historical Resources Compliance report. For more information see Exhibits 2.6, 2.8, and 2.14.
## SOIS Action Plan for ABC Project

<table>
<thead>
<tr>
<th>Stage</th>
<th>Responsible Parties</th>
<th>Task</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>During Construction</strong></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison * Resident Engineer * Contractor</td>
<td>All responsible parties will ensure that SOISs are discussed during the pre-construction meeting. The importance of SOISs will be discussed with construction personnel and it will be stressed that no construction activity (including storage or staging of equipment or materials) should occur within the SOISs and that workers must remain outside of the SOISs at all times. Additionally, personnel will be informed of historic preservation laws that protect historic properties against any disturbance or removal of artifacts.</td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian * Environmental Branch Chief * Environmental Construction-Liaison * Contractor</td>
<td>The Resident Engineer will notify Caltrans Architectural Historian and Environmental Branch Chief at least three weeks in advance of construction to ensure that a Caltrans Architectural Historian will be available to monitor roof repairs, siding replacement and allow for field review of SOIS locations</td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison * Resident Engineer * Contractor</td>
<td>All responsible parties perform field review of SOIS locations at least one calendar week prior to construction activities.</td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison * Resident Engineer</td>
<td>Contractor will install temporary plastic fencing around site the Lucas McCain Barn. The fencing will be installed at least one calendar week prior to initiating any work in those areas (see attached map). The Caltrans Architectural Historian will coordinate this activity with the Environmental Construction Liaison and Resident Engineer, and be present to supervise and monitor fence installation.</td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison * Resident Engineer</td>
<td>Caltrans Architectural Historian will be present to monitor all construction activities adjacent to the SOIS. The Environmental Construction Liaison will conduct a weekly inspection to ensure the integrity of SOISs.</td>
</tr>
<tr>
<td><strong>Post Construction</strong></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison</td>
<td>The Environmental Construction Liaison will inform the Caltrans Architectural Historian when construction is complete.</td>
</tr>
<tr>
<td></td>
<td>Caltrans Architectural Historian * Environmental Construction-Liaison</td>
<td>The Contractor, under supervision of the Environmental Construction Liaison and/or Caltrans Architectural Historian, will remove temporary fencing at the conclusion of construction.</td>
</tr>
</tbody>
</table>
### SOIS Action Plan for ABC Project

<table>
<thead>
<tr>
<th>Stage</th>
<th>Responsible Parties</th>
<th>Contact Information</th>
<th>Date Task Completed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Caltrans</td>
<td>Architectural Historian Iona Bevel <a href="mailto:ibevel@dot.ca.gov">ibevel@dot.ca.gov</a></td>
<td>(213) 555-1234</td>
<td></td>
</tr>
<tr>
<td>Environmental Branch Chief Sky Ribeiro</td>
<td><a href="mailto:sribeiro@dot.ca.gov">sribeiro@dot.ca.gov</a></td>
<td>(213) 555-1235</td>
<td></td>
</tr>
<tr>
<td>Environmental Construction-Liaison Joe Moratore</td>
<td><a href="mailto:jmoratore@dot.ca.gov">jmoratore@dot.ca.gov</a></td>
<td>(213) 555-1236</td>
<td></td>
</tr>
<tr>
<td>Resident Engineer Luis Agenciar</td>
<td><a href="mailto:lagenciar@dot.ca.gov">lagenciar@dot.ca.gov</a></td>
<td>(213) 555-1237</td>
<td></td>
</tr>
<tr>
<td>Contractor</td>
<td>To be determined</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Responsible parties as of 10-22-12