

Exhibit 6.1: **Cultural Resources Letter Report Format and Content Guide**

**(Used only when Section 106 Programmatic
Agreement does not apply)**

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Exhibit 6.1:

Cultural Resources Letter Report Format and Content Guide

Use of the Cultural Resources Letter Report

Letter Reports are used only when Section 106 Programmatic Agreement does not apply **and all the cultural resources** within the APE or Project Area Limits **lack significance**.

Federal Undertakings

When Caltrans has an undertaking on or affecting Tribal Lands, the Section 106 Programmatic Agreement (Section 106 PA) does *not* apply. In this situation, Caltrans uses the Cultural Resources Letter Report (Letter Report) to consider cultural resources that normally would be exempted under [Section 106 PA Attachment 4](#). The Letter Report is used to justify that certain historical archaeological and built environment cultural resources are not eligible for inclusion in the National Register of Historic Places (National Register).

Caltrans also uses the Letter Report for projects that are federal undertakings but do not involve the Federal Highway Administration (FHWA). The Section 106 PA does not apply because FHWA is not involved. Examples of projects that are federal undertakings but do not involve FHWA include, but are not limited to projects for which Caltrans must obtain a permit from the U.S. Army Corps of Engineers or the U.S. Coast Guard, or projects in which Caltrans needs to perform work on U.S. Forest Service land.

State-Only Projects

It is not necessary to use the Letter Report for state-only projects affecting Tribal Lands unless there is a federal nexus as described above. There may be situations in which the District, at its discretion, would choose to use the Letter Report on state-only projects. However, in using the Letter Report to justify that certain cultural resources lack National Register significance, for CEQA purposes it also is necessary to include information on why the affected resources would not qualify as historical resources for purposes of CEQA.

Cultural Resources that clearly lack significance

The Letter Report is reserved for cultural resources that *clearly* lack significance either due to loss of integrity or the absence of historical associations or research values that would qualify the cultural resource as eligible for inclusion in the National Register of Historic Places or would make it a historical resource for purposes of CEQA. [Section 106 PA Attachment 4](#) may be used for guidance to document that a resource clearly is not National Register eligible:

- When archaeological resources are the subject of the Letter Report, a Caltrans PQS archaeologist at the Lead Surveyor level or above or appropriately qualified consultant who meets the standards in [Section 106 PA Attachment 1](#) completes the Letter Report.
- When the cultural resources in question are minor, ubiquitous or fragmentary infrastructure elements, or are less than thirty years old, a Caltrans PQS archaeologist at the Lead Surveyor level or above, Caltrans PQS at the Architectural Historian level or above or appropriately qualified consultant who meets the standards in Section 106 PA Attachment 4 completes the Letter Report.
- For built environment resources that are between 30 and 50 years of age, fifty years old or older and have been moved in the past fifty years, or fifty years old or older and have been altered, a Caltrans PQS at the Architectural Historian level or above or qualified consultant who meets the standards for Architectural Historian outlined in Section 106 PA Attachment 4 completes the Letter Report.

Letter Report Format

As this Letter Report follows standard Caltrans correspondence guidance, include the appropriate information as follows:

- **Date:** Enter the date the report is finalized (following required peer review).
- **Project Reference:** Indicate the district, county, route, post mile, project name, and E-FISⁱ project number and phase, or for a Local Assistance project, use the Federal-Aid number (e.g. "07-Ven-118, P.M. 17.5018.0, E-FIS 07000004170").
- **Addressee:** List the name title, office name and location of the Caltrans Environmental Branch Chief for whom the report was prepared.

ⁱ 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.

- **Evaluator/Author:** A Caltrans PQS at the Lead Surveyor level or above, Caltrans PQS at the Architectural Historian level or above, or an appropriately qualified consultant, as appropriate, signs the Letter Report after peer review has been completed.

Include the following information in the body of the Letter Report:

- **Project Undertaking:** Succinctly describe the scope and purpose of the undertaking, referring to the Historic Property Report (HPSR) for detailed descriptions.
- **Research Methods:** Describe sources consulted and field inspection methods. Refer to the project Archaeological Survey Report (ASR) or Historical Resources Evaluation Report (HRER) as appropriate to eliminate redundancies.
- **Background Research:** Discuss available information regarding the historical associations and use of the property and results of the research. If a detailed historical context or research discussion is necessary, the Letter Report is not appropriate.
- **Description of Resource:** For archaeological sites, briefly describe the physical remains present at the site and its condition vis-à-vis the seven aspects of integrity, but refer to the DPR 523 forms for detailed descriptions. For built environment resources briefly describe the property type, its date of construction, date moved, date of alterations, as appropriate (e.g., single-family residence built in 1977).
- **Statement of Non-Significance:** Provide a cogent statement of the reasons why this cultural resource is clearly not eligible for the National Register and also is not a historical resource under CEQA.
- **Attachments:**
 - Vicinity Map (unless provided in HPSR and identified as such)
 - Project Location Map (Portion of USGS 7.5' quadrangle), unless provided in HPSR and identified as such
 - Appropriate DPR 523 form(s).

NARRATIVE LETTER REPORT FORMAT	
•	Date
•	Project Reference
•	Addressee
•	Evaluator/Author
•	Project Undertaking
•	Research Methods
•	Background Research
•	Description of Resource(s)
•	Statement of Non-significance
•	Attachments

Peer Review and Approval

As with all cultural resources documents, for historical archaeological resources Caltrans PQS certified at the Co-Principal Investigator—Historical Archaeology level or higher must peer review the draft Letter Report. For built-environment resources, Caltrans PQS certified at the Architectural Historian or higher must peer review the draft Letter Report. Peer reviewers in both disciplines should follow the guidelines in [Exhibit 2.13: Peer Review Guidelines](#). Peer reviewers' names should be kept on record and comments retained in the project files.

Only Caltrans PQS Co-Principal Investigator—Historical Archaeology or Architectural Historian level or higher may review Letter Reports for approval. The Caltrans PQS or consultant who prepares the final Letter Report signs, dates and includes the appropriate discipline, PQS level (as applicable) and District/Headquarters or affiliation. The Letter Report then is attached to the HPSR. When the Caltrans PQS reviewing the HPSR for approval and the DEBC both sign and date the HPSR, indicating their approval, the Letter Report is considered to be approved.

Letter Report Form

Caltrans has developed a Letter Report form template that may be used. *Using the form is optional*; using a narrative Letter Report always is another option.

To ensure consistency and to facilitate faster reviews of the Letter Report, the headings are write-protected, and different versions of the document can be saved under a different name using the “Save As” command in Microsoft Word. If a section is not applicable, the heading will remain and the “Not Applicable” box may be checked. Deleting most of the instructions and irrelevant statements can shorten the form. Since the form is in a table format in Word, to delete the irrelevant lines:

- Highlight the row(s) of text or space to be deleted
- On the menu, click on Table (or its appropriate icon), then
- Click on “Delete,” and the lines should disappear

A sample of the Letter Report form template appears on the following pages. The template appears to be very long because it contains the range most commonly used statements with the appropriate language for each finding; *those that do not apply may be deleted* for the reasons stated above.

State of California	Department of Transportation					
CULTURAL RESOURCES LETTER REPORT						
<p>For use with federal undertakings <u>only</u> when the Section 106 Programmatic Agreement provisions cannot be used <u>and</u> the cultural resources have no potential for historic significance under National Register of Historic Places Criteria.</p>						
1. UNDERTAKING DESCRIPTION AND LOCATION						
District	County	Route	Post Miles	Unit	E-FIS Project Number	Phase
District	County	Funding Source	Federal-Aid Proj. No.	Location	E-FIS Proj. No	Phase
<i>For Local Assistance projects off the highway system, use headers in italics)</i>						
Project Description:						
<i>Insert project description below & refer reader to attached location and vicinity maps)</i>						
2. RESEARCH METHODS						
<i>(Check all that apply. This instruction line and statements that are not applicable may be deleted)</i>						
The resources in the Project APE for this project were reviewed						
<ul style="list-style-type: none"> - In the field - From photographs 						
By _____ <i>[Name and indicate whether person is Caltrans or consultant architectural historian or archaeologist]</i> , _____ <i>[Indicate applicable PQS level]</i> , who is qualified to make the required determinations.						
3. BACKGROUND RESEARCH						
<i>(When appropriate, discuss available information regarding the historical associations and use of the property and results of the research. This instruction line and statements that are not applicable may be deleted)</i>						
<ul style="list-style-type: none"> - Not Applicable - Archaeological Site Records <i>[List names of Institutions & date below]</i> <ul style="list-style-type: none"> • - Other sources consulted <i>[e.g., historical societies, city archives, etc. List names, dates and results below]</i> <ul style="list-style-type: none"> • - Results: <i>(Provide a brief summary of records search and research results, as well as inventory findings)</i> <ul style="list-style-type: none"> • 						
4. DESCRIPTION OF RESOURCE(S)						
<i>(Briefly describe archaeological sites: physical remains present at the site and its condition vis-à-vis the seven aspects of integrity, and refer to the DPR 523 forms for detailed descriptions. For built environment resources briefly describe the property type, its date of construction, date moved, date of alterations, as appropriate (e.g., single-family residence built in 1977). This instruction line and statements that are not applicable may be deleted)</i>						
<p>[LtrRpt form rev: 07-22-10] Copyright © 2014 California Department of Transportation. All rights reserved.</p>						Page 1

State of California	Department of Transportation
CULTURAL RESOURCES LETTER REPORT	
5. STATEMENT OF NON-SIGNIFICANCE	
<p><i>(Check all that apply. This instruction line and statements that are not applicable may be deleted)</i></p> <ul style="list-style-type: none"> - The only/only other cultural resources present within the Project APE are properties that have no potential for historic significance under the National Register of Historic Places eligibility criteria, nor are they historical resources for the purposes of CEQA because they are: <ul style="list-style-type: none"> - Archaeological property types or resources that do not warrant recordation - Minor, ubiquitous, or fragmentary infrastructure elements that are not over 50 years old and are not properties that may contribute to the significance of larger historic properties such as districts or cultural landscapes - Buildings, structures, objects, districts, and sites less than 30 years old - Buildings, structures, objects, districts, and sites so altered as to appear less than 30 years old. - Buildings, structures, objects, districts, and sites 30 to 50 years old and do not warrant recordation or evaluation, as determined by a qualified Architectural Historian or Principal Architectural Historian - Buildings, structures, and objects moved within the past 50 years and do not warrant recordation or evaluation, as determined by a qualified Architectural Historian or Principal Architectural Historian - Buildings, structures, and objects moved 50 or more years ago and do not warrant recordation or evaluation, as determined by a qualified Architectural Historian or Principal Architectural Historian - Property Type 6: Altered buildings, structures (including roads, highways and associated features other than bridges, railroads and other than buildings or bridges), objects, districts, and sites that appear to be more than 30 years old ago, do not warrant recordation or evaluation, as determined by a qualified Architectural Historian or Principal Architectural Historian, are not listed in a local survey of historical properties, and the conclusion of not historically significant is not controversial. 	
6. LIST OF ATTACHED DOCUMENTATION	
<p><i>(Check all that apply. This instruction line and statements that are not applicable may be deleted)</i></p> <ul style="list-style-type: none"> - N/A. Project Vicinity, Location, and APE Maps are attached to the HPSR - Project Vicinity, Location, and APE Maps - DPR 523 Primary Records for archaeological sites <i>(List below)</i> <ul style="list-style-type: none"> • - Other <i>(Specify below)</i> <ul style="list-style-type: none"> • 	
7. CULTURAL RESOURCES LETTER REPORT PREPARATION AND APPROVAL	
Prepared by <i>(sign on line)</i> :	
District/Region ___ Caltrans PQS	<i>PQS level and discipline</i>
	Date
Prepared by: <i>(sign on line)</i>	
Consultant / discipline:	<i>[Appropriate PQS discipline]</i>
Affiliation	<i>[Firm/company and location]</i>
Reviewed for approval by: <i>(sign on line)</i>	
District/Region ___ Caltrans PQS	<i>[PQS certification level]</i>
discipline/level:	Date