



Caltrans Advance Mitigation Program

REPORT TO THE LEGISLATURE

State of California
Natural Resources Agency
Department of Fish and Wildlife

2026 Report

Executive Summary

Streets and Highways Code Section 800.6 directs the California Department of Fish and Wildlife (CDFW) to submit to the Legislature every two years a report on the California Department of Transportation (Caltrans) Advance Mitigation Program. Specifically, CDFW is to report on the extent to which the Advance Mitigation Program improved the quality and effectiveness of habitat mitigation provided by Caltrans for transportation projects and make related recommendations on how to maximize these attributes. This is CDFW's fifth biennial report. This report covers the period from January 1, 2024, through December 31, 2025.

Caltrans Regional Advance Mitigation Needs Assessments (RAMNAs) scope and justify advance mitigation projects for Caltrans Districts' internal funding decisions. During this reporting period, CDFW reviewed six RAMNAs. Each RAMNA can generate multiple advance mitigation projects that address District-specific species and habitat mitigation needs.

The Caltrans Advance Mitigation Program has 18 funded projects in the project delivery stage across 11 Districts. When approved, the advance mitigation credits will satisfy mitigation for transportation impacts throughout the state across a wide array of habitat types and species, and since the land will be durably protected, help contribute to the 30 x 30 goals of Executive Order N-82-20.

CDFW recommends that the Advance Mitigation Program: 1) continue to promote early engagement between Caltrans Districts, CDFW Regions, and other natural resource regulatory agencies, especially early in a credit establishment project's development and prior to receiving proposals; 2) continue to create Caltrans-specific information and guidance for the credit establishment project proposal solicitation process that references CDFW and other natural resource regulatory agency official guidance, templates, and information; 3) include CDFW within the credit establishment project development process, as allowable, to ensure proposals are selected that maximize the quality and effectiveness of habitat mitigation; 4) after a credit establishment project proposal has been selected and awarded, create a communication plan across all parties and consult the existing bank Review Teams promptly to help identify any potential issues; and 5) continue to work with CDFW on its emerging Regional Conservation Investment Strategy, Mitigation Credit Agreement, and Connectivity Advance Mitigation subprograms.

1. Program Background and Purpose

The California Department of Transportation (Caltrans) Advance Mitigation Program (AMP) was formed to meet the requirements of the Road Repair and Accountability Act of 2017 (Senate Bill 1, Beall, Chapter 5, Statutes of 2017) and Senate Bill 103 (Committee on Budget and Fiscal Review, Chapter 95, Statutes of 2017), to plan and implement advance mitigation¹ solutions for future Caltrans transportation projects. In addition to Caltrans-specific requirements, the Act directs the following:

- Caltrans to consult with CDFW on all AMP activities (Streets and Highways Code Section 800(a));
- CDFW and Caltrans to regularly report to the Legislature on the extent to which Caltrans AMP has improved the quality and effectiveness of habitat mitigation and contributed to transportation project acceleration, respectively (Streets and Highways Code Section 800.6 (f); 800.6(g)); and
- CDFW to make recommendations on how to maximize the quality and effectiveness of habitat mitigation developed pursuant to the AMP (Streets and Highways Code Section 800.6(g)).

This report is the fifth CDFW biennial report and covers activity in the Caltrans AMP from January 1, 2024, to December 31, 2025.

2. Caltrans AMP Planning Phase

Caltrans finalized its [Advance Mitigation Final Formal Guidelines](#) in October of 2019. The program consists of five major planning steps (Figure 1, taken from the AMP Guidelines), followed by five project delivery steps (Figure 2, taken from the AMP Guidelines). In short, the AMP planning phase uses a Geographic Information System (GIS) model to estimate future mitigation needs statewide, assigns areas of interest within each District, and assembles all relevant conservation information within the areas to inform, scope, and justify potential advance mitigation projects for funding approval. When approved by the Caltrans Director, the advance mitigation project moves to the AMP project delivery phase. The Caltrans guidelines and past CDFW legislative reports provide more detail for each step in Figure 1.

¹ The Act defines "advance mitigation" as "mitigation implemented before, and in anticipation of, environmental effects of planned transportation improvements (Streets and Highways Code Section 800.5(c)).

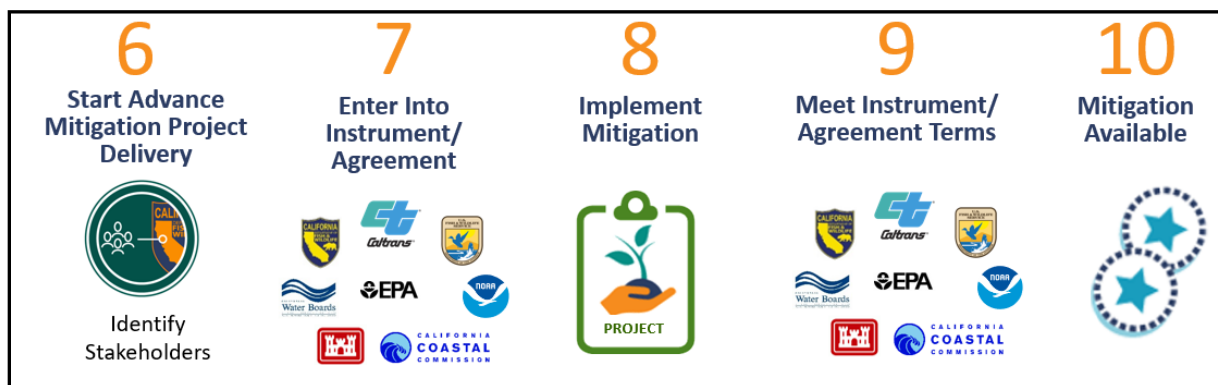
Figure 1. Caltrans AMP Steps for the Planning Phase



3. Caltrans AMP Project Delivery Phase

The Caltrans AMP project delivery phase consists of implementing existing advance mitigation pathways or procedures under development. The AMP project delivery process consists of five steps culminating in mitigation being available for transportation projects (Figure 2, taken from the Caltrans AMP Guidelines). The five steps follow established state and federal natural resource regulatory agency advance mitigation instrument review and implementation processes. The Caltrans guidelines and past CDFW legislative reports provide more detail for each step in Figure 2.

Figure 2. Caltrans Steps for the AMP Project Delivery Phase



4. Advance Mitigation Program – Accomplishments

The following major accomplishments have occurred during this reporting period:

- Biweekly coordination with Caltrans:** CDFW Headquarters continues to meet with the Caltrans AMP to help inform and guide various aspects of the program's planning and implementation, as well as address any pressing issues.

- **Regional liaisons:** In 2025, Caltrans added three CDFW Region liaisons to assist with advance mitigation projects. Regional liaisons work on AMP authorized expenditures and meet quarterly with CDFW Headquarters, Caltrans AMP, and Caltrans Districts on specific advance mitigation projects.
- **Interagency coordination:** As part of the implementation of the Statewide Advance Mitigation Initiative Memorandum of Understanding (SAMI MOU 2011; renewed in 2016 and 2021), CDFW meets monthly with Caltrans and six other state and federal natural resource regulatory agencies to discuss advance mitigation topics (California Coastal Commission, California State Water Board, National Marine Fisheries Service, U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, and U.S. Fish and Wildlife Service).
- **Caltrans Statewide Advance Mitigation Needs Assessment (SAMNA) 2.0:** Since 2023, Caltrans and CDFW regularly update and improve the foundational GIS data for the SAMNA model as new data become available, including from the CDFW Biogeographic Data Branch Vegetation Classification and Mapping Program (VegCAMP), California Wildlife Habitat Relationship system (CWHR), and Range and Distribution Mapping Analysis Project (RADMAP) programs. The SAMNA 2.0 model will be continuously updated over time. SAMNA reports are publicly posted on the Caltrans AMP [webpage](#).
- **Regional Advance Mitigation Needs Assessments (RAMNAs):** Caltrans has finalized two RAMNAs and four are in final draft stage (see Appendix Table 1 for specific information). Final RAMNAs are publicly posted on the Caltrans AMP [webpage](#).
- **Coordination on advance mitigation documents:** Caltrans commented on CDFW's Banking Guidelines update and the new Conservation Bank Enabling (CBEI) Instrument template. Caltrans is also creating Caltrans-specific bank instrument exhibits for advance mitigation credit sales and transfers.
- **CDFW Regional Conservation Investment Strategies (RCIS) Program:** Caltrans commented on the North Baylands (north San Francisco Bay) and San Joaquin Valley RCISs.

5. Quality and Effectiveness of Habitat Mitigation

Since the finalization of the AMP Guidelines in 2019, Caltrans has finalized RAMNAs across all 12 Caltrans Districts, covering approximately 80% of the state (Appendix, Map 1). The RAMNA forms the basis for scoping species and habitat-specific advance mitigation projects within each District. For this reporting period, Caltrans has finalized two RAMNAs, and four are in final review (Appendix, Table 1).

Each RAMNA incorporates goals, objectives, and sub-objectives for target wildlife and aquatic resources within the Geographic Area of Interest (GAI) from state and regional conservation plans, goals, objectives, and data resources, as well as relevant

information from local government and non-governmental sources. The resulting RAMNA conservation goals and objectives are intended to support future State Highway Operation and Protection Program (SHOPP) and State Transportation Improvement Program (STIP) project mitigation needs, support the goals and objectives of natural resource regulatory agencies for the species and habitats identified in the RAMNA, address conservation pressures and stressors, and support species population recovery and success in the GAI.

As of this report, 11 of 12 Caltrans Districts have moved to the advance mitigation project delivery phase and are in the early stages of delivering advance mitigation projects for species and habitats identified in the associated RAMNA. Appendix Table 2 outlines the programmed Caltrans advance mitigation projects for this reporting period. Programmed projects are projects that have identified the mitigation needs in the area, received funding, and are in the project delivery process to purchase or establish new credits. Eighteen projects have been programmed with advance mitigation credit needs identified across all natural resource regulatory agencies that Caltrans seeks permits under. The Caltrans AMP is focused on purchasing existing bank mitigation credits or establishing new bank mitigation credits.

In the previous reporting period, the AMP purchased 7.38 advance mitigation credits from the National Fish and Wildlife Foundation's Sacramento District California In-Lieu Fee Program (project 06-1C640, Appendix, Table 2). For this reporting period, the AMP has transferred 0.20 credits from this project to help meet the mitigation requirements of eight Caltrans transportation projects.

Each proposed and programmed advance mitigation project follows established natural resource regulatory agency mitigation instrument pathways, such as mitigation and conservation banking and the federal In-Lieu Fee program. Utilizing mitigation credits from established pathways will enhance the likelihood that the credits will meet the needs of natural resource regulatory agencies. CDFW strives to only release credits in high quality habitat, therefore CDFW credits purchased or established for one of the advance mitigation projects in Appendix Table 2 can be considered quality habitat mitigation. Projects that establish new CDFW-approved bank credits will also contribute to the 30 x 30 goals of Executive Order N-82-20.

6. Recommendations

CDFW provides the following recommendations:

Recommendation 1: CDFW recommends that the AMP continue to promote early engagement between Caltrans Districts, CDFW Regions, and other natural resource regulatory agencies throughout the advance mitigation project development and delivery processes. The addition of three CDFW Regional AMP liaisons in 2025 should enhance this effort for their respective regions. CDFW headquarters will help facilitate early engagement in regions without liaisons as well as help coordinate advance mitigation efforts across all regions. Early engagement is critical to identify potential

mitigation opportunities, red flags, conceptual service areas, and opportunities to meet multiple species and habitat goals and objectives outlined in the RAMNA. Caltrans is developing one or more early communication guidance documents with input from the SAMI MOU agencies, which will help advance this recommendation.

Recommendation 2: For projects to establish advance mitigation credits, CDFW recommends that the AMP publish Caltrans-specific information and guidance for their request for proposal process that references CDFW and other natural resource regulatory agency official guidance, templates, and information. Specific and tailored guidance will help potential bank sponsors generate better proposals, in terms of quality habitat and a reduced timeline for review. CDFW also recommends the proposal process and guidance incentivize, as allowable, meeting multiple goals and objectives outlined within the associated RAMNA. Caltrans is preparing guidance with input from SAMI MOU agencies to help advance this recommendation.

Recommendation 3: For projects to establish advance mitigation credits in proposal review stage, CDFW recommends involving CDFW and SAMI MOU agencies, if their credits are sought, in the review process to share information that may aid in proposal reviews. Recognizing there are constraints to the proposal review and contracting process, there may still be opportunities for these agencies to provide information on their instrument review process, clarifications on their agency requirements, and general guidance for the specific credits sought.

Recommendation 4: After a proposal to establish an advance mitigation credit project is accepted and the project is awarded, CDFW recommends Caltrans create a communication plan that includes the sponsor and the relevant natural resource regulatory agencies. There are opportunities in the regulatory bank establishment process for the sponsor to meet early with the Review Teams, especially at key milestones such as site evaluation and selection. These agencies could provide information on any potential site red flags, land information needs, or other issues that commonly affect bank review timelines. Early identification of potential issues would likely contribute to project success.

Recommendation 5: CDFW recommends that the AMP continue to support and collaborate with CDFW's emerging RCIS, Mitigation Credit Agreement, and Connectivity Advance Mitigation subprograms. CDFW will need Caltrans' support and engagement to work with sponsors on projects proposed within Caltrans right of way. CDFW is exploring a few connectivity projects, and Caltrans support will be critical to determine if they are feasible within potential right of way constraints.

APPENDIX

Map 1. RAMNA Geographic Areas of Interest

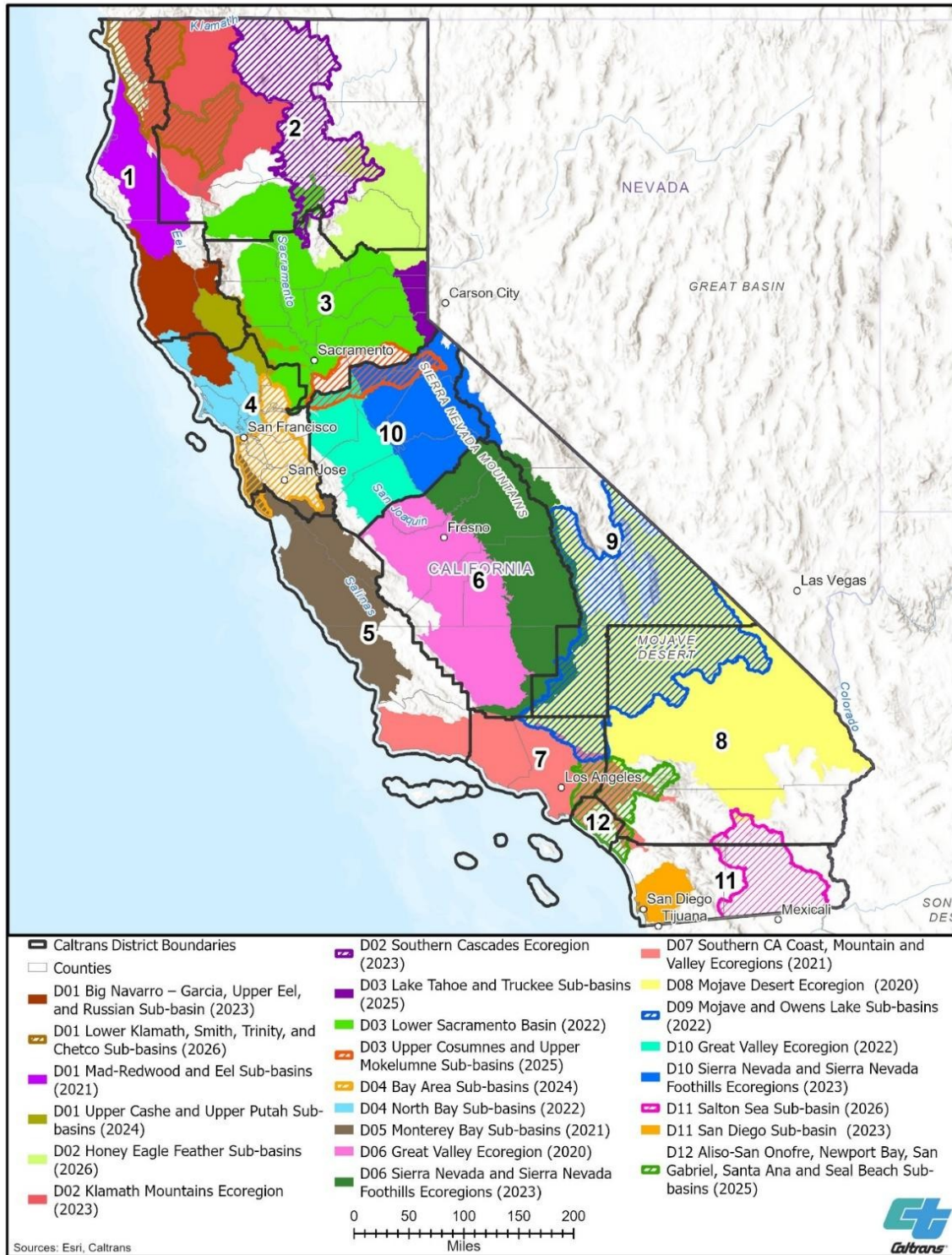


Table 1. Caltrans RAMNAs: Final or in Preparation, January 1, 2024 to December 31, 2025

Caltrans District and Office Location	Geographic Area of Interest	RAMNA Status	CDFW Region Reviews
District 10, Stockton	Sierra Nevada and Sierra Nevada Foothills Ecoregion Sections within Caltrans District 10	Final Draft	Region 2 and 4
District 3, Marysville	Upper Cosumnes and Upper Mokelumne Sub-basins	Final Draft	Region 2
District 3, Marysville	Lake Tahoe and Truckee Sub-basins	Final Draft	Region 2
District 12, Orange County	Aliso-San Onofre, Newport Bay, Santa Ana, and Seal Beach Sub-basins and Five Watersheds within the San Gabriel Sub-basin	Final Draft	Regions 5 and 6
District 4, Oakland	Coyote, San Francisco Bay, San Francisco Coastal South, and Suisun Bay Sub-basins	Final – June 2024	Region 3
District 1, Eureka	Upper Cache and Upper Putah Sub-basins	Final – March 2024	Regions 1 and 2

Table 2. Programmed Caltrans Advance Mitigation Projects Contributing to Mitigation

Caltrans District and Project #	Project Name	Potential Project Location(s)	Credit Acquisition Type	General Credit Types Pursued Across All Regulatory Agencies
01-0M260	Inland Mad-Redwood, Lower Eel (MRLE) and South Fork Eel Sub-basins Advanced Mitigation Project	Humboldt and Mendocino Counties	Credit Establishment	Fish habitat* Riparian habitat* Waters of the State* Waters of U.S.
01-0M610	Coastal MRLE Mitigation Bank Project	Humboldt County	Credit Establishment	Coastal Environmentally Sensitive Habitat Areas (ESHA) Riparian habitat* Waters of the State* Waters of U.S.
01-0P520	Upper Cache and Upper Putah Aquatic Advance Mitigation Project	Lake County	Purchase Existing Credits	Riparian habitat* Waters of the State* Waters of U.S.
02-0K590	SIS-TRI Mitigation Bank	Siskiyou and Trinity and Counties	Credit Establishment	Riparian habitat* Waters of the State* Waters of U.S.

Caltrans District and Project #	Project Name	Potential Project Location(s)	Credit Acquisition Type	General Credit Types Pursued Across All Regulatory Agencies
03-3J860	Great Valley Ecoregion Advanced Mitigation Project	Multiple locations in Colusa, Sacramento, Sutter, Yolo, and Yuba Counties	Purchase Existing Credits	Riparian habitat* Waters of the State* Waters of U.S.
03-4J990	Sierra Nevada and Foothills (SN&F) Ecoregions Advance Mitigation Project	El Dorado, Nevada, Placer and Sierra Counties	Purchase Existing Credits	Riparian habitat* Waters of the State* Waters of U.S.
04-2Y340	North Bay Aquatic Resources Mitigation Credit Purchase	Within the Gualala-Salmon, San Pablo Bay, and Tomales-Drake Bays HUC-8 Sub-basins	Purchase Existing Credits	Waters of the State* Waters of U.S.
04-3Y700	North Bay Coastal Mitigation Establishment Project	Sonoma County	Credit Establishment	California red-legged frog Myrtle silverspot butterfly Coastal waters Riparian habitat* Waters of the State* Waters of U.S.

Caltrans District and Project #	Project Name	Potential Project Location(s)	Credit Acquisition Type	General Credit Types Pursued Across All Regulatory Agencies
04-1X200	San Francisco Peninsula Mitigation Establishment Project	San Francisco and San Mateo counties	Credit Establishment	California red-legged frog Coastal waters Riparian habitat* Waters of the State* Waters of U.S.
05-1P770	Advance Mitigation Aquatic Resource Central Coast Region	San Luis Obispo, Monterey, and Santa Cruz Counties	Purchase Existing Credits	California tiger salamander* California red-legged frog Waters of the State* Waters of U.S.
05-1Q920	D5 Aquatic Resources Advance Mitigation	Monterey, San Luis Obispo, and Santa Cruz Counties	Purchase Existing Credits and/or Credit Establishment; MCA if Possible	Coastal waters Riparian habitat* Waters of the State* Waters of U.S.

Caltrans District and Project #	Project Name	Potential Project Location(s)	Credit Acquisition Type	General Credit Types Pursued Across All Regulatory Agencies
06-1C640	Advance Mitigation Aquatic Resource and Desert Species Credits	Fresno, Kern, Kings, and Tulare Counties	Purchase Existing Credits	Waters of the State* Waters of U.S. (Purchase completed for 7.38 aquatic resource ILF credits)
07-39160	D7 Aquatic Advance Mitigation Project	Los Angeles and Ventura Counties	Purchase Existing Credits	Riparian habitat* Waters of the State* Waters of U.S.
07-39780	D7 Second Aquatic Advance Mitigation Project	Santa Clara, Ventura River, Santa Monica Bay, Los Angeles, San Gabriel, and Calleguas HUC-8 sub-basins	Purchase Existing Credits	Riparian habitat* Waters of the State* Waters of U.S.
08-1L920	Desert Advance Mitigation Project	San Bernardino County	Purchase Existing Credits and/or Credit Establishment	Desert tortoise* Riparian habitat* Waters of the State* Waters of U.S.

Caltrans District and Project #	Project Name	Potential Project Location(s)	Credit Acquisition Type	General Credit Types Pursued Across All Regulatory Agencies
09-39920	Antelope Fremont Valley Advance Mitigation Credits	Kern County	Purchase Existing Credits	Desert tortoise* Mohave ground squirrel* Waters of the State* Waters of U.S.
10-1U240	Great Valley California Tiger Salamander Advance Mitigation Project	Within the Great Valley Ecoregion within Caltrans District 10	Purchase Existing Credits	California tiger salamander*
11-43280	D11 Aquatic Resources Advance Mitigation	In District 11, San Diego HUC-8 Sub-Basin	Purchase Existing Credits	Coastal waters Waters of the State* Waters of U.S.

* Denotes CDFW-approved credits. Credits may be aligned with other natural resource regulatory agencies