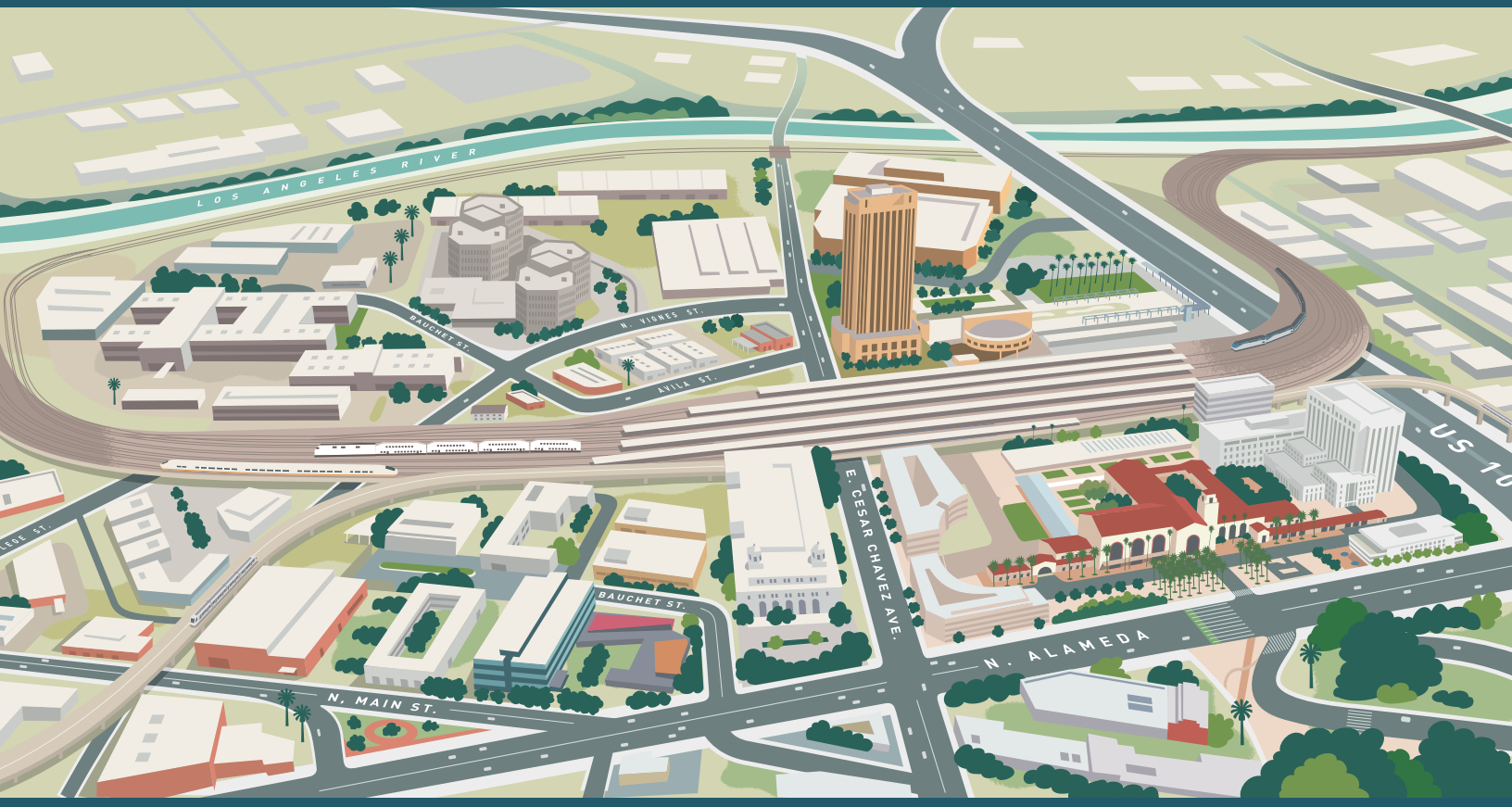
Los Angeles County
Metropolitan Transportation Authority

Link Union Station

Cultural Resources Impact Assessment Report

June 2019



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ACRONYMS and ABBREVIATIONS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADI	Area of Direct Impacts
AII	Area of Indirect Impacts
ASR	Archaeological Survey Report
ca.	circa
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHC	Cultural Heritage Commission
CRMMP	Cultural Resource Mitigation and Management Plan
CRHR	California Register of Historical Resources
DPR	Department of Parks and Recreation
EIR	Environmental Impact Report
FRA	Federal Railroad Administration
FHWA	Federal Highway Administration
HABS	Historic American Building Survey
HBI	Historic Bridge Inventory
HRER	Historic Resources Evaluation Report
HSR	High-Speed Rail
ICF	ICF International
LAHCM	City of Los Angeles Historic-Cultural Monument
LAUS	Los Angeles Union Station
Link US	Link Union Station
Metro	Los Angeles County Metropolitan Transportation Authority
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NRHP	National Register of Historic Places
OHP	California Office of Historic Preservation
OHR	City of Los Angeles Office of Historic Resources
PRC	Public Resources Code
Project	Link Union Station Project
ROW	right-of-way
SHPO	State Historic Preservation Officer
TATTN	Tongva Ancestral Territorial Tribal Nation

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ES.0 Executive Summary

This Cultural Resources Impact Assessment Report was prepared to present the methodology and results of identifying historical resources and tribal cultural resources (including human remains) within the Link Union Station (Link US or project) project study area; assess potential impacts on these resources that could occur from implementation of the proposed project or the build alternative; and provide mitigation measures to avoid, minimize, or reduce significant impacts. The Link US project study area encompasses the extent of environmental study associated with potential direct, indirect, and cumulative impacts on historical resources and tribal cultural resources that could result from implementation of the proposed project or the build alternative. For the purposes of identifying and assessing potential impacts to historical resources and tribal cultural resources, two geographic areas within the overall boundary of the project study area are considered in this study:

- The area of direct impacts (ADI), which encompasses the area where any ground-disturbing work for the proposed project or the build alternative would occur (including but not limited to excavation, grading, construction, demolition, utility relocations, and railroad track reconfiguration) that may directly impact resources.
- The area of indirect impacts (AII), which encompasses the ADI and any areas that may be subject to indirect impacts on resources, such as visual impacts, noise, vibration, or shadow. Additionally it includes areas for temporary access and staging areas. If any portion of a parcel is included in the ADI, that entire parcel is included within the AII.

As a result of previous identification efforts undertaken jointly by Metro and the Federal Railroad Administration (FRA), a Historic Properties Survey Report package—including a Historic Resource Evaluation Report (HRER; Attachment B) to identify and evaluate built environment resources, an Archaeological Survey Report (ASR; Attachment C) to identify archaeological resources, and a National Register of Historic Places (NRHP) evaluation of Archaeological Site CA-LAN-1575/H (Attachment D) was prepared by Metro and FRA and concurrence from the State Historic Preservation Officer (SHPO) was received in a letter dated September 27, 2018 (Attachment E).

The identification efforts for built environment and archaeological resources resulted in the identification of 18 resources that are considered historical resources for the purposes of CEQA within the AII. Seventeen of these are built environment resources and one is an archaeological resource; the prehistoric component of the archaeological resource is also considered a tribal cultural resource.

This study identifies six historical resources under CEQA to which the proposed project or the build alternative may cause a substantial adverse change in the significance:

- LAUS and Vignes Street Undercrossing (two separate but related historical resources, as explained in the HRER [Attachment B])
- William Mead Homes

- Friedman Bag Company—Textile Division Building
- North Main Street Bridge (Bridge #53C 1010)
- Archaeological Site CA-LAN-1575/H

Additionally, the proposed project or the build alternative may cause a substantial adverse change in the significance of a tribal cultural resource: Archaeological Site CA-LAN-1575/H.

For the proposed project, a summary of the level of significance after implementation of mitigation is as follows:

- For LAUS and the associated Vignes Street Undercrossing, Mitigation Measures HIST-1a through HIST-1d (described in Section 8.0) are proposed; however, impacts would remain significant and unavoidable.
- For William Mead Homes, Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 (described in Section 8.0) would reduce impacts to a level less than significant.
- For the Friedman Bag Company—Textile Division Building, Mitigation Measure HIST-3 (described in Section 8.0) is proposed; however, impacts would remain significant and unavoidable.
- For the North Main Street Bridge, Mitigation Measure HIST-4 (described in Section 8.0) would reduce impacts to a level less than significant.
- For Archaeological Site CA-LAN-1575/H, implementation of Mitigation Measures HIST-5 and HIST-6 (described in Section 8.0) would reduce impacts to a level less than significant.
- For human remains, Mitigation Measure HR-1 (described in Section 8.0) would reduce impacts to a level less than significant.
- For tribal cultural resources, implementation of Mitigation Measures HIST-5 and HIST-6, as well as TCR-1 (described in Section 8.0), would reduce impacts to a level less than significant.

For the build alternative, the level of significance for each of the resources above is the same as the proposed project, with exception of William Mead Homes. For the build alternative, upon implementation of Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 (described in Section 8.0), impacts at William Mead Homes would remain significant and unavoidable.

1.0 Introduction

The Los Angeles County Metropolitan Transportation Authority (Metro) is proposing the Link US project to transform Los Angeles Union Station (LAUS) from a "stub-end tracks station" into a "run-through tracks station" with a new passenger concourse that would improve the efficiency of the station and accommodate future growth and transportation demands in the region.

1.1 Project Location and Study Area

LAUS is located at 800 Alameda Street in the City of Los Angeles, California. LAUS is bounded by US-101 to the south, Alameda Street to the west, Cesar Chavez Avenue to the north, and Vignes Street to the east. Figure 1-1 depicts the regional location and general vicinity of LAUS.

Figure 1-2 depicts the project study area, which encompasses the extent of environmental study associated with potential direct, indirect, and cumulative impacts from implementation of the project. The project study area includes three main segments (Segment 1: Throat Segment, Segment 2: Concourse Segment, and Segment 3: Run-Through Segment). The existing conditions within each segment are summarized north to south below.

- Segment 1: Throat Segment – This segment, known as the LAUS throat, includes the area north of the platforms, from Main Street at the north to Cesar Chavez Avenue at the south. In the throat segment, all arriving and departing trains traverse five lead tracks into and out of the rail yard, except for one location near the Vignes Street Bridge where the tracks reduce to four lead tracks. Currently, special track work consisting of multiple turnouts and double-slip switches are used in the throat to direct trains into and out of the appropriate assigned terminal platform tracks.
- Segment 2: Concourse Segment – This segment is between Cesar Chavez Avenue and US-101 and includes LAUS, the rail yard, the Garden Tracks (stub-end tracks where private train cars are currently stored, just north of the platforms and adjacent to the existing Gold Line aerial guideway), the East Portal building, the baggage handling building with aboveground parking areas and access roads, the ticketing/waiting halls, and the pedestrian passageway with connecting ramps and stairways below the rail yard.
- Segment 3: Run-Through Segment – This segment is south of LAUS and extends east/west from Alameda Street to the west bank of the Los Angeles River and north/south from Keller Yard to Control Point Olympic. This segment includes US-101, the Commercial Street/Ducommun Street corridor, Metro Red and Purple Lines Maintenance Yard (Division 20 Rail Yard), BNSF West Bank Yard, Keller Yard, the main line tracks on the west bank of the Los Angeles River, from Keller Yard to Control Point Olympic, and the "Amtrak Lead Track" connecting the main line tracks with Amtrak's Los Angeles Maintenance Facility. Businesses within the run-through segment are primarily industrial and manufacturing related.

The project study area has a dense street network ranging from major highways to local city streets. The roadways within the project study area include the El Monte Busway, US-101, Bolero Lane, Leroy Street, Bloom Street, Cesar Chavez Avenue, Commercial Street, Ducommun Street, Jackson Street, East Temple Street, Banning Street, First Street, Alameda Street, Garey Street, Vignes Street, Main Street, Aliso Street, Avila Street, Bauchet Street, and Center Street.

1.2 Proposed Project Overview

The proposed project components are summarized north to south below.

- Throat and Elevated Rail Yard – The proposed project includes subgrade and structural improvements in Segment 1 of the project study area (throat segment) to increase the elevation of the tracks leading to the rail yard. The proposed project includes the addition of one new lead track in the throat segment for a total of six lead tracks to facilitate enhanced operations for regional/intercity rail service providers (Metrolink/Amtrak) and accommodate the planned High-Speed Rail (HSR) system within a shared track alignment. Regional/intercity and HSR trains would share the two western lead tracks in the throat segment. The rail yard would be elevated approximately 15 feet. New passenger platforms with individualized canopies would be constructed on the elevated rail yard, with an underlying assumption that the platform infrastructure and associated vertical circulation elements (stairs, escalators, and elevators) would be modified at a later date to accommodate the planned HSR system. The existing railroad bridges in the throat segment at Vignes Street and Cesar Chavez Avenue would also be reconstructed. North of Control Point Chavez, the proposed project also includes safety improvements at the Main Street public at-grade crossing on the west bank of the Los Angeles River (medians, restriping, signals, and pedestrian and vehicular gate systems) to facilitate future implementation of a quiet zone by the City of Los Angeles.
- Above-Grade Passenger Concourse with New Expanded Passageway – The proposed project includes an above-grade passenger concourse with new expanded passageway in Segment 2 of the project study area (concourse segment). The above-grade passenger concourse with new expanded passageway would include space dedicated for passenger circulation, waiting areas, ancillary support functions (back-of-house uses, baggage handling, etc.), transit-serving retail, office/commercial uses, and open spaces and terraces. The new passenger concourse would create an opportunity for an outdoor, community-oriented space and enhance Americans with Disabilities Act (ADA) accessibility at LAUS. The elevated portion of the above-grade passenger concourse would be located above the rail yard, approximately 90 feet above the existing grade with new plazas east and west of the elevated rail yard (East and West Plazas). The new expanded passageway would be located below the rail yard to provide additional passenger travel-path convenience and options. Amtrak ticketing and baggage check-in services would occur at two locations at the east and west ends of LAUS, and new carousels would be constructed within the new expanded passageway. The above-grade passenger concourse includes a canopy over the West Plaza up to 70 feet in height, with individual canopies that would extend up to 25 feet over each platform. New vertical circulation elements would also be constructed throughout the concourse to enhance

passenger movements throughout LAUS while meeting ADA and National Fire Protection Association platform egress code requirements.

- Run-Through Tracks – The proposed project includes up to 10 new run-through tracks (including a new loop track) south of LAUS in Segment 3 of the project study area (run-through segment). The run-through tracks would facilitate connections for regional/intercity rail trains and HSR trains from LAUS to the main line tracks on the west bank of the Los Angeles River. A "common" viaduct/deck over US-101 and embankment south of US-101, from Vignes Street to Center Street, would be constructed wide enough to support regional/intercity rail run-through service, and future run-through service for the planned HSR system.

The proposed project would also require modifications to US-101 and local streets (including potential street closures and geometric modifications); railroad signal, positive train control, and communications-related improvements; modifications to the Gold Line light rail platform and tracks; modifications to the main line tracks on the west bank of the Los Angeles River; modifications to Keller Yard and BNSF West Bank Yard (First Street Yard); modifications to the Amtrak lead track; new access roadways to the railroad right-of-way (ROW); additional ROW; new utilities; utility relocations, replacements, and abandonments; and new drainage facilities/water quality improvements.

1.3 Build Alternative Overview

The primary differences between the proposed project and the build alternative are related to the lead tracks north of LAUS and the new passenger concourse. Compared to the proposed project, the build alternative includes the following:

- Dedicated Lead Tracks North of LAUS – The build alternative includes reconstruction of the throat, with two new lead tracks that would be located outside of the existing railroad ROW, facilitating a dedicated track alignment, with a total of seven lead tracks. Reconfiguration of Bolero Lane and Leroy Street would also be required.
- At-Grade Passenger Concourse – The build alternative includes an at-grade passenger concourse below the rail yard.

All other infrastructure elements are similar to the proposed project. The components of the build alternative are described north to south below.

- Throat and Elevated Rail Yard – The build alternative accommodates future HSR trains on dedicated lead tracks in the throat segment. The build alternative includes the addition of two new lead tracks for a total of seven lead tracks in the throat segment (with future HSR trains and some express/intercity services using the two western dedicated lead tracks and most regional/intercity trains using the five eastern lead tracks). The rail yard would be elevated approximately 15 feet. New passenger platforms with a grand canopy covering the elevated rail yard would be constructed, with an underlying assumption that the platform infrastructure and associated vertical circulation elements (stairs, escalators, and elevators) would be modified at a later date to accommodate the

planned HSR system. The existing railroad bridges in the throat segment at Vignes Street and Cesar Chavez Avenue would also be reconstructed under the build alternative. North of Control Point Chavez, the build alternative also includes safety improvements at the Main Street public at-grade crossing on the west bank of the Los Angeles River (medians, restriping, signals, and pedestrian and vehicular gate systems) to facilitate future implementation of a quiet zone by the City of Los Angeles.

- At-Grade Passenger Concourse – The build alternative includes a new at-grade passenger concourse that would include space dedicated for passenger circulation, waiting areas, ancillary support functions (back-of-house uses, baggage handling, etc.), transit-serving retail, office/commercial uses, and open spaces and terraces. The at-grade passenger concourse would also create an opportunity for an outdoor, community-oriented space and enhanced ADA accessibility. The at-grade passenger concourse would be constructed below the elevated rail yard. Amtrak ticketing and baggage check-in services would occur at a centralized location where new carousels would be constructed at the concourse level. The at-grade passenger concourse also includes new plazas east and west of the elevated rail yard (East and West Plazas), and a grand canopy that would extend up to 70 feet above the elevated rail yard and West Plaza. New vertical circulation elements would also be constructed throughout the concourse to enhance passenger movements throughout LAUS while meeting ADA and National Fire Protection Association platform egress code requirements.
- Run-Through Tracks – The build alternative includes up to 10 new run-through tracks (including a new loop track) in the run-through segment. All infrastructure south of LAUS is the same as described above for the proposed project.

The build alternative would also require modifications to US-101 and local streets (including potential street closures and geometric modifications); railroad signal, positive train control, and communications-related improvements; modifications to the Gold Line light rail platform and tracks; modifications to the main line tracks on the west bank of the Los Angeles River; modifications to Keller Yard and BNSF West Bank Yard (First Street Yard); modifications to the Amtrak lead track; new access roadways to the railroad ROW; additional ROW; new utilities; utility relocations, replacements, and abandonments; and new drainage facilities/water quality improvements.

1.4 Purpose

As a result of previous identification efforts undertaken jointly by Metro and FRA for Link US, a Historic Properties Survey Report package—including an HRER; (Attachment B) to identify and evaluate built environment resources, an ASR; (Attachment C) to identify archaeological resources, and an NRHP evaluation of Archaeological Site CA-LAN-1575/H (Attachment D) was prepared by Metro and FRA and received concurrence from the State Historic Preservation Officer (SHPO) in a letter dated September 27, 2018 (Attachment E).

The purpose of this study was to:

- Determine if historical resources, including human remains, and tribal cultural resources are known or reasonably anticipated within the ADI and AII based on the previous identification efforts completed by Metro and FRA for the proposed project and build alternative
- Assess the potential for the proposed project or the build alternative to result in significant impacts on these identified resources
- Identify mitigation measures to avoid, minimize, or reduce impacts on identified resources that may occur from implementation of the proposed project or the build alternative

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Figure 1-1. Project Location and Regional Vicinity

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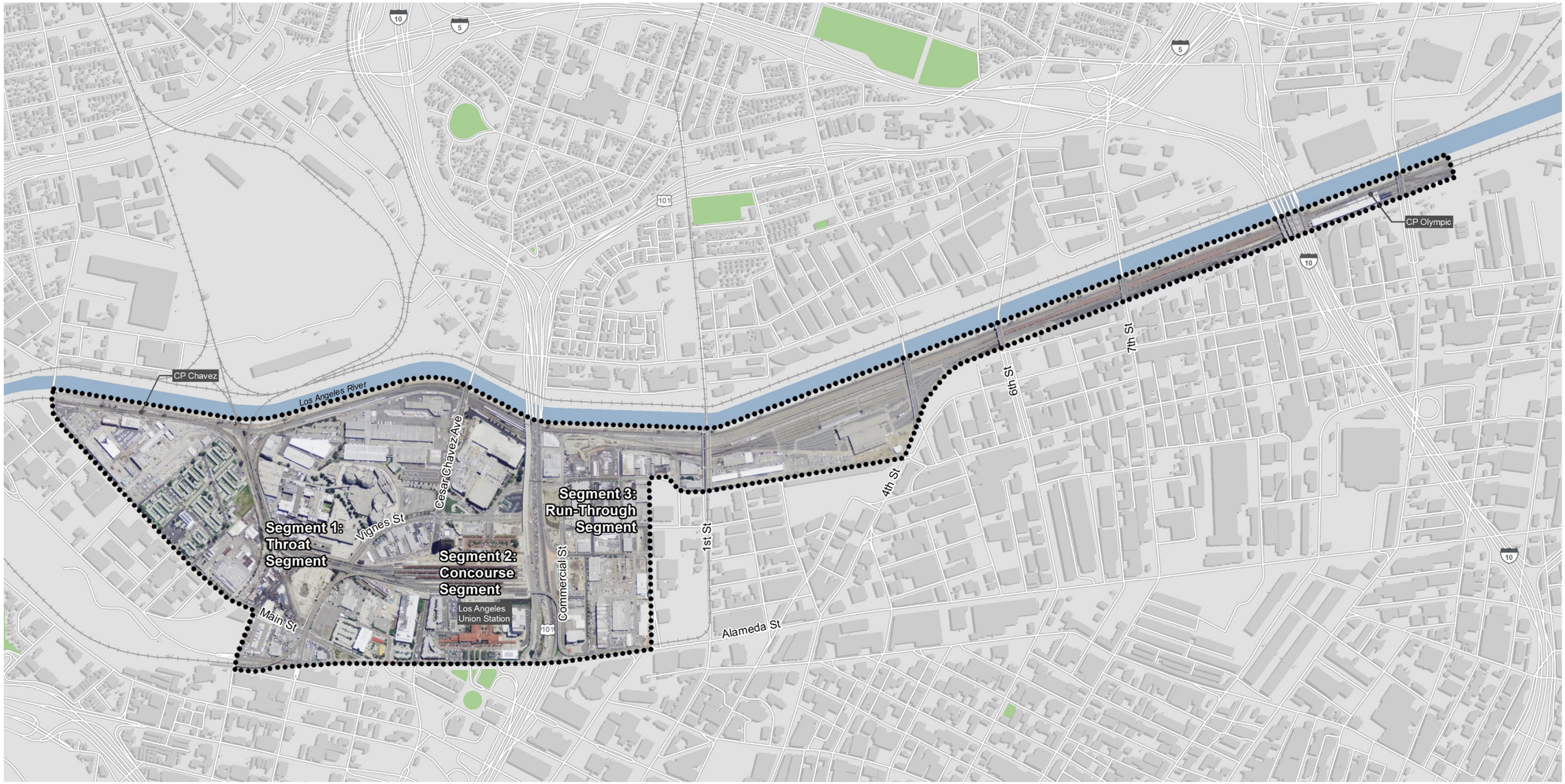
Figure 1-2. Project Study Area



LEGEND

Project Study Area

0 Feet 1,000

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2.0 Project Study Area/Area of Potential Impacts

The Link US project study area, shown on Figure 2-1, is in a dense urban setting. Along the east side of the project study area are railroad tracks and several bridges that cross the Los Angeles River, from Main Street at the north to Olympic Boulevard in the south. A description of the project study area, as pertains to the resources considered in this study, is summarized below:

- Segment 1: Throat Segment – North of the LAUS terminal building, the project study area includes the throat, with an existing public at-grade crossing at the North Main Street Bridge and incoming rail alignments, plus properties near and at Avila Street.
- Segment 2: Concourse Segment – At the LAUS terminal, the project study area includes the entirety of LAUS—both the primary building and an expanded historic district of associated resources, which were listed in the NRHP in 1980, the pedestrian passageway, in addition to various ramps, butterfly sheds, and track alignments above it. Patsaouras Transit Plaza and adjacent parcels to the east are also within the project study area.
- Segment 3: Run-Through Segment – The southern part of the project study area includes US-101 and undeveloped lots and early- to mid-twentieth-century industrial buildings. In this area, new ROW would be acquired to construct proposed elevated run-through tracks structures along the existing alignment of Commercial Street (which would be relocated to the north) to facilitate main line connections along the west bank of the Los Angeles River. At-grade track improvements would be required beneath multiple extant bridges, although no construction disturbance of any kind is proposed at any of these bridges.

For the purposes of identifying and assessing potential impacts on cultural resources, two geographic areas traversed by the boundary of the project study area are considered in this study:

- The ADI, which encompasses the area where any ground-disturbing work for the proposed project or the build alternative would occur (including but not limited to excavation, grading, construction, demolition, utility relocations, and railroad track reconfiguration) that may directly impact resources.
- The AII, which encompasses the ADI and any areas that may be subject to indirect impacts on resources such as visual impacts, noise, vibration, or shadow. Additionally, it includes areas for temporary access and staging areas. If any portion of a parcel is included in the ADI, that entire parcel is included within the AII.

2.1 Vertical Extent of Potential Impacts

The ADI takes into account the total depth of ground disturbance associated with construction of the proposed project or the build alternative.

Figure 2-2 and Figure 2-3 depict the approximate range of depths associated with the proposed project and the build alternative, which ranges from just below current ground surface to up to 100 feet below ground surface. Table 2-1 summarizes the anticipated vertical extent of excavations associated with the major components of the proposed project or the build alternative.

Table 2-1. Anticipated Vertical Extents of Link Union Station Excavations

Major Project Component	Related Ground Disturbance	Maximum Depth Associated with Ground Disturbance
Throat track reconstruction	Utility relocations	Up to 50 feet
	Track widening and retaining walls	Up to 20 feet
	Throat reconstruction (over-excavation only)	Up to 5 feet
	Vignes and Cesar Chavez Bridge supports	Up to 100 feet
	At-grade passenger concourse[2]	Up to 20 feet
	Utility relocations	Up to 50 feet
	Drainage improvements (cisterns)	Up to 20 feet
Run-through tracks	Support piers/bents	Up to 100 feet
	Utility relocations	Up to 20 feet
	Center Commercial Street lowering	Up to 10 feet

Notes:
[1] ***Ground disturbance associated with the proposed project only.***
[2] ***Ground disturbance associated with the build alternative only.***

Figure 2-1. Areas of Potential Direct and Indirect Impacts (Proposed Project and Build Alternative)

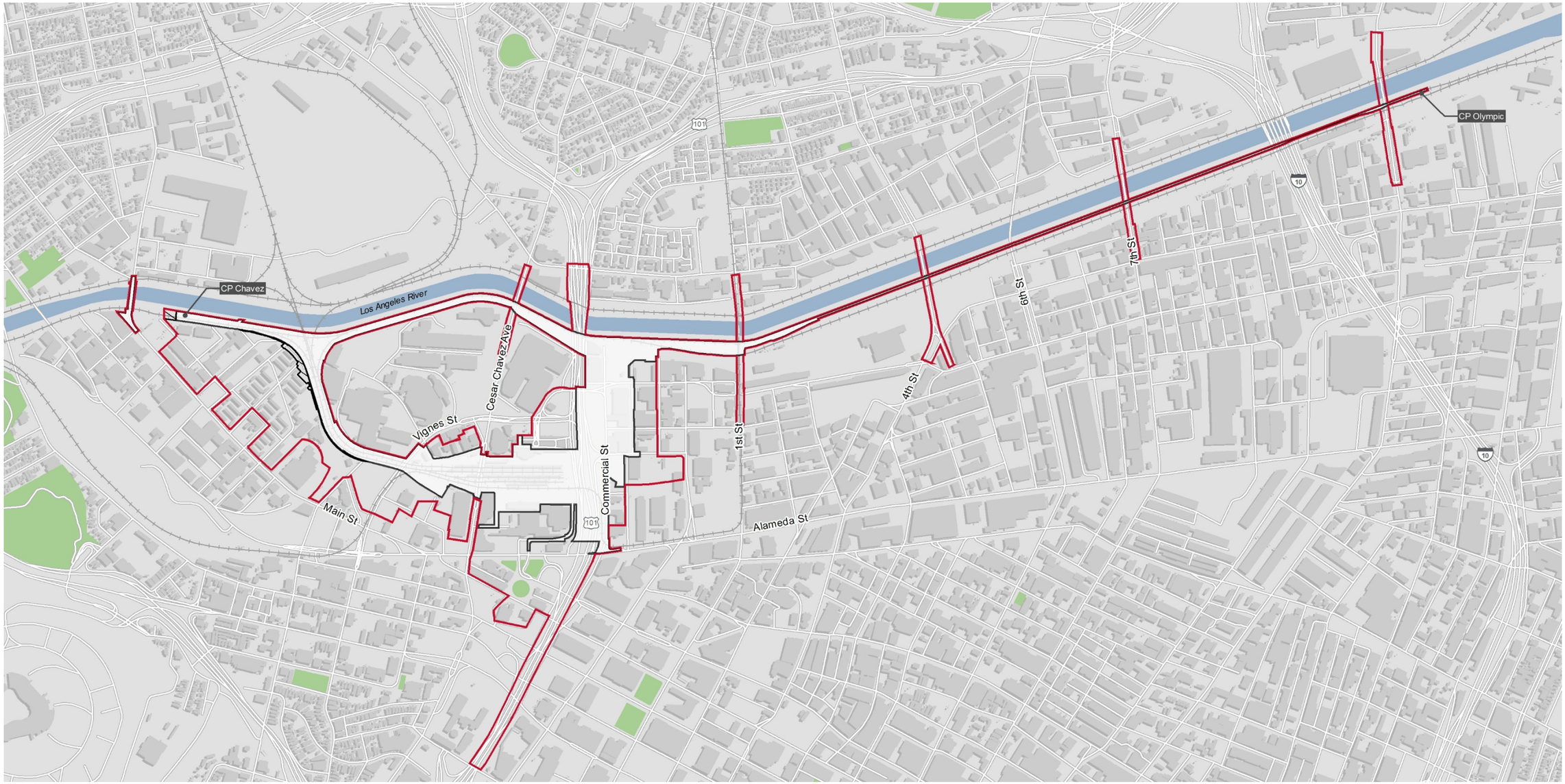

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Figure 2-2. Vertical Extent of Potential Impacts associated with the Proposed Project

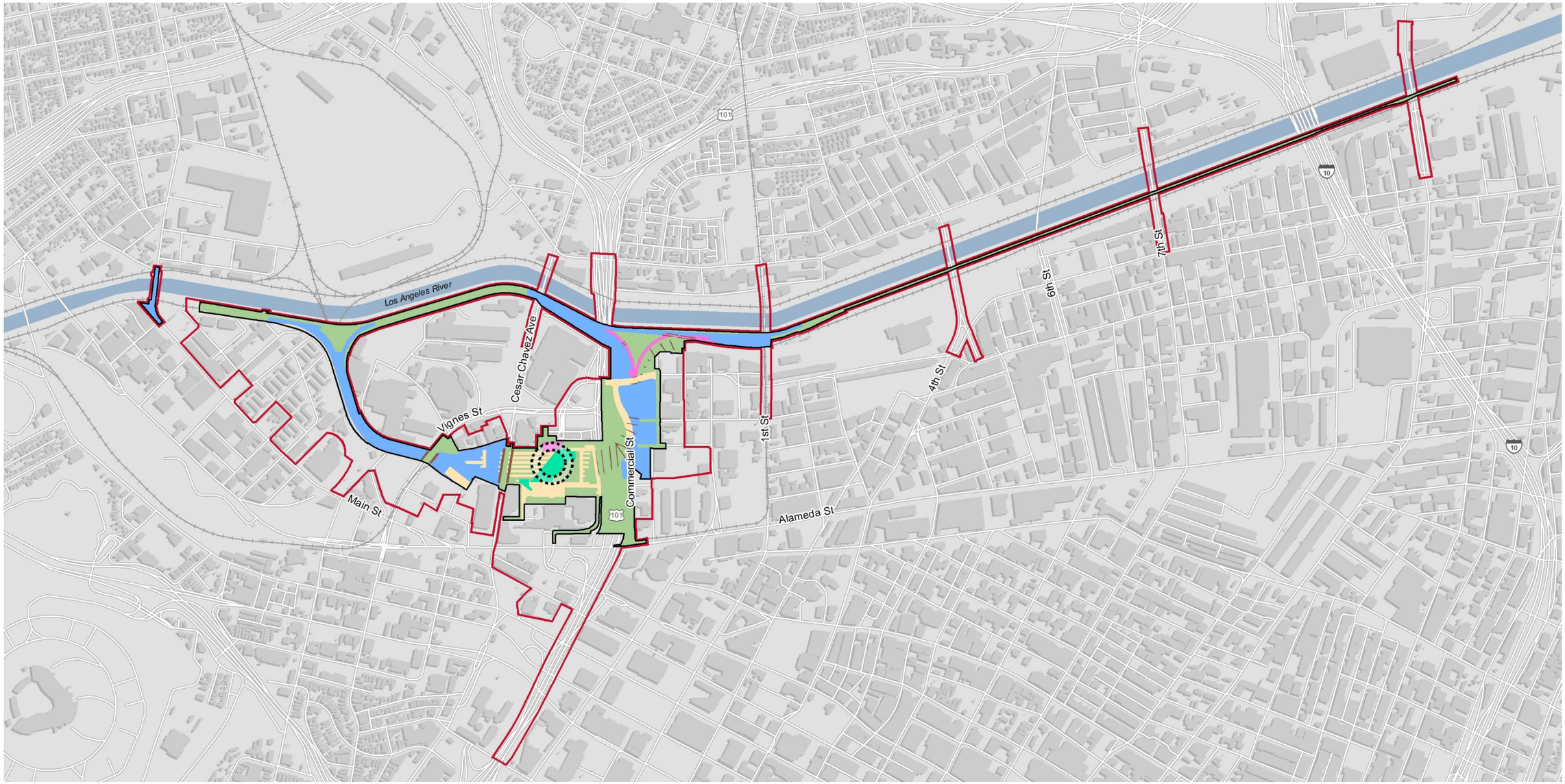

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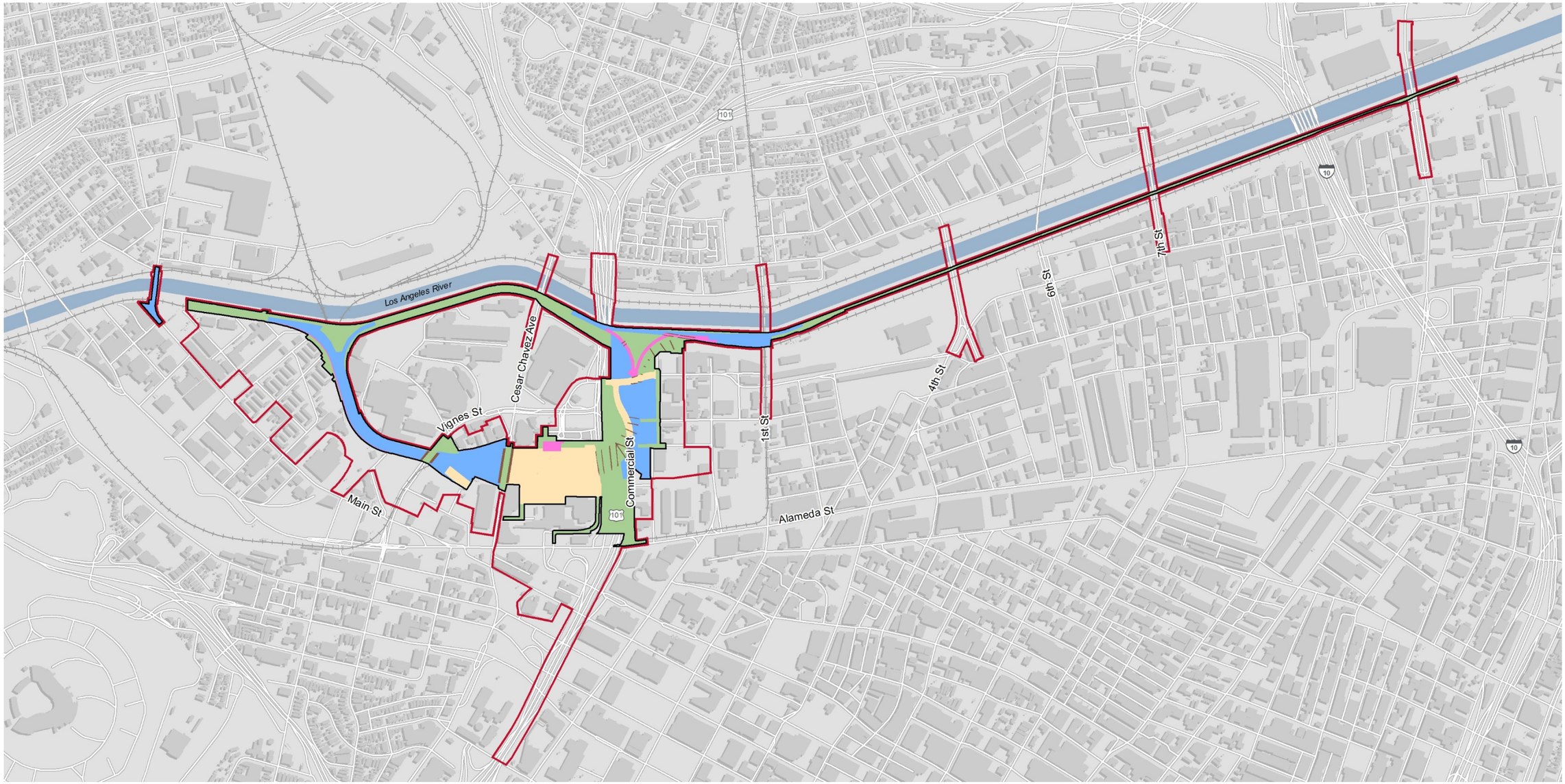
Figure 2-3. Vertical Extent of Potential Impacts associated with the Build Alternative



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3.0 Regulatory Framework

3.1 CEQA

The CEQA statutes are encoded in the California Public Resources Code (PRC), Sections 21000 et seq., with Guidelines for Implementation codified in the California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Sections 15000 et seq. Pursuant to CEQA, it is necessary for the lead agency to determine whether a proposed project may have a "significant effect on the environment" (PRC § 21082.2[a]). CEQA associates a significant effect on the environment with "a substantial adverse change in the significance" of a historical resource (PRC § 21084.1) or a tribal cultural resource (PRC § 21084.2).

3.1.1 Historical Resources under CEQA

For the purposes of CEQA review, a historical resource is defined as follows (14 CCR § 15064.5[a]):

1. A resource listed in, or determined eligible by the State Historical Resources Commission for listing in, the California Register of Historic Resources (CRHR);
2. A resource included in a local register of historical resources;
3. A resource identified as significant in a historical resource survey meeting the requirements specified in PRC § 5024.1(g); or
4. Any resource that the lead agency determines to be historically significant.

Generally, a lead agency shall consider a resource to be "historically significant" if the resource retains "sufficient integrity" and meets the criteria for listing on the CRHR (PRC § 5024.1). These include the following criteria (14 CCR § 4852[b]):

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
2. It is associated with the lives of persons important to local, California, or national history;
3. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Determining the integrity of a resource involves evaluating the authenticity of that resource's physical identity—that is, the survival of characteristics that were present during the resource's period of significance. In order to be listed on the CRHR, resources must "retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance" (14 CCR § 4852[c]). Integrity is evaluated with regard to the retention of location, design setting, materials, workmanship, feeling, and association (Section 3.1.2).

A "substantial adverse change" in the significance of a historic resource includes "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (14 CCR § 15064.5[b]). If the proposed project has the potential to cause a substantial adverse change in the significance of a historic resource, the lead agency shall identify potentially feasible measures to mitigate such change.

3.1.2 California Register of Historical Resources

The CRHR criteria are set forth in 14 CCR 4852(b)–(d), as follows:

(b) Criteria for evaluating the significance of historical resources. A historical resource must be significant at the local, state, or national level under one or more of the following four criteria:

(1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

(2) It is associated with the lives of persons important to local, California, or national history;

(3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or

(4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

(c) Integrity. Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. Historical resources eligible for listing in the CRHR must meet one of the criteria of significance described in Section 4852 (b) of this chapter and retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Historical resources that have been rehabilitated or restored may be evaluated for listing.

Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

(d) Special considerations:

(1) Moved buildings, structures, or objects. The Commission encourages the retention of historical resources on site and discourages the non-historic grouping of historic buildings into parks or districts. However, it is recognized that moving a historic building, structure, or object is sometimes necessary to prevent its destruction. Therefore, a moved building, structure, or object that is otherwise eligible may be listed in the CRHR if it was moved to prevent its demolition at its former location and if the new location is compatible with the original character and use of the historical resource. A historical resource should retain its historic features and compatibility in orientation, setting, and general environment.

(2) Historical resources achieving significance within the last fifty (50) years. In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than fifty (50) years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance.

(3) Reconstructed buildings. Reconstructed buildings are those buildings not listed in the CRHR under the criteria in Section 4853(b)(1), (2), or (3) of this chapter. A reconstructed building less than fifty (50) years old may be eligible if it embodies traditional building methods and techniques that play an important role in a community's historically rooted beliefs, customs, and practices; e.g., a Native American roundhouse.

Any historical resource in California that is listed on, or determined eligible for listing on, the NRHP is automatically included on the CRHR (PRC § 5024.1[d][1]). Under CRHR regulations, "it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the California Register" (14 CCR § 4852[c]). The CRHR also includes properties that are:

1. Registered State Historical Landmarks numbered 770 and above;
2. Points of Historical Interest that have been reviewed and recommended to the State Historical Resources Commission for listing; or
3. City- and County-designated landmarks or districts, if the criteria for designation are determined by the California Office of Historic Preservation (OHP) to be consistent with CRHR criteria (OHP 2004).

3.1.3 Unique Archaeological Resources under CEQA

CEQA also applies to archaeological sites that do not meet the criteria for historical resources but do meet the definition of a "unique archeological resource" (PRC § 21083.2[g]). A unique archaeological resource is an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If an archaeological resource is neither a historical resource nor a unique archaeological resource, the project effects on the resource shall not be considered significant (14 CCR § 15064.5[c][4]).

3.2 California Assembly Bill 52

California Assembly Bill (AB) 52 consists of amendments to PRC § 21073, 21074, 21080.3.1, 21080.3.2, 21083.09, 21084.2, and 5097.94. AB 52 requires lead agencies to establish a meaningful consultation process with California Native American tribal governments at the earliest possible point in the CEQA review process. AB 52 also seeks to recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities. Tribes may have expertise with regard to their tribal history and practices, which concern the tribal cultural resources with which they are traditionally and culturally affiliated. Tribal knowledge about the land and tribal cultural resources at issue should be included in environmental assessments for projects that may have a significant impact on those resources.

In order to recognize tribal cultural values, in addition to the scientific and archaeological values when determining impacts and mitigation, a new category of resources in CEQA called "tribal cultural resources" is identified under AB 52. In order to qualify as a tribal cultural resource, a resource must be listed, or determined eligible for listing, on the national, state, or local register of historic resources; or be a resource that a lead agency chooses to treat as a tribal cultural resource based on the CRHR criteria and the cultural value of a resource to a California Native American tribe (PRC § 21074).

Consultation is defined as "the meaningful and timely process of seeking, discussing, and considering carefully the views of others, in a manner that is cognizant of all parties' cultural values and, where feasible, seeking agreement. Consultation between government agencies and Native American tribes shall be conducted in a way that is mutually respectful of each party's sovereignty. Consultation shall also recognize the tribes; potential needs for confidentiality with respect to places that have traditional tribal cultural significance" (PRC § 21080.3.1[a]; Government Code § 65352.4).

For consultation to begin under AB 52, California Native American tribes must submit a written request to potential lead agencies stating that they wish to be notified of projects within their traditionally and culturally affiliated areas (PRC § 21080.3.1[b]). Under the provisions of PRC § 5097.94[m], a list of agencies that may be lead agencies under CEQA was to be provided by the Native American Heritage Commission (NAHC) on or before July 1, 2016. Within 14 days of determining that a project application is complete, or to undertake a project, a lead agency must provide formal notification, in writing, to tribes that have requested notification. The written notification must include the project description and location, and state that a tribe has 30 days to request consultation regarding the specific project. After receiving a request, a lead agency has 30 days to begin consultation. Consultation must take place prior to the determination of whether a negative declaration, mitigated negative declaration, or EIR is required for a project (PRC § 21080.3.1).

AB 52 specifically states that a project that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment (PRC § 21084.2). If it is determined that a project may cause a substantial adverse change to a tribal cultural resource, mitigation measures must be considered (PRC § 21084.3). Consultation concludes when the involved parties agree on mitigation measures or a party acting in good faith concludes that a mutual agreement cannot be reached (PRC § 21080.3.2[b]).

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4.0 Background

4.1 Environmental Setting

The project study area is located in the southeast portion of the San Fernando Valley, surrounded by the San Gabriel Mountains to the northeast, Verdugo Mountains to the east, Chalk Hills and Santa Monica Mountains to the south, and Simi Hills to the west. The region, including southern California, experiences a Mediterranean climate in the Köppen Climate Classification (Peel et al. 2007), characterized by warm, dry summers and cool, wet winters.

The Los Angeles River and several tributaries flow through the San Fernando Valley. The Los Angeles River starts at Bell and Calabasas creeks in Canoga Park and flows in the eastern direction along the San Fernando Valley's southern portions. In addition, the seasonal Tujunga Wash flows southwest from the San Gabriel Mountains through the Hansen Dam Recreation Center in Lake View Terrace. The Tujunga Wash continues south along the Verdugo Mountains and flows through the eastern portion of the San Fernando Valley, joining the Los Angeles River just north of the project study area. The Los Angeles River is located immediately east of the project study area, which is located on the river's floodplain. The elevation of the area is approximately 285 feet above sea level. The Pacific Ocean is approximately 15 miles west of the project study area. The project study area is completely urbanized and does not contain any native habitat.

4.2 Cultural Setting

The project study area has a complex cultural background. A review of the prehistory, history, and ethnography of the general area provides the context for identifying and assessing the historical significance of historical resources in the ADI and AII. Additional background information about the project study area is included in the attached HRER (Attachment B), ASR (Attachment C), and NRHP evaluation of Archaeological Site CA-LAN-1575/H (Attachment D).

4.2.1 Prehistoric Background

Humans have lived in southern California for at least 10,000 years, and several chronologies have been proposed to divide different periods of cultural habitation and development. The most-commonly used cultural chronology (Wallace 1955) divides human occupation of southern California into five broad periods: the Paleoindian Period (10,000 years BP to 8000 BP), the Early Period or Millingstone Horizon (8000 BP to 3000 BP), the Middle Period or Intermediate Horizon (3000 BP to AD 1000), the Late Prehistoric Period (AD 1000 to 1770), and the Historic Period (AD 1770 to present). Different patterns and types of material culture distinguish each of these periods.

Large fluted or leaf-shaped projectile points from the Paleoindian Period indicate a reliance on hunting large animals. Human diet during this period probably also included smaller game and harvested plants. Sites representing this period have been found mostly inland at prehistoric lakebeds (e.g., China Lake, Tulare Lake; Wallace 1955, 1978).

The Early Period or Millingstone Horizon, as the name suggests, was characterized by the widespread adoption of millingstones, including metates and manos used in the preparation of plant- and seed-based foods. Subsistence on terrestrial game supplemented the diet of people during this time (Wallace 1978:28). During the Middle Period or Intermediate Horizon, subsistence expanded to a greater diversity of plant and animal foods. Tools used during this period included mortars and pestles, likely indicating a new reliance on hard nut foods, such as acorns (Wallace 1978:30).

During the Late Prehistoric Period, the Tongva (Gabrieleno), Acjachemen (Juaneño), and Payómkawichum (Luiseño) lived throughout much of the southern California coastal area extending from present-day southern Los Angeles County to northern San Diego County. Villages among these groups were permanent to semi-permanent, with seasonal camps. Among them was Yangna (also transliterated as Yaagna), a Tongva village south of present-day LAUS. At this time, trade networks linking the coast, Channel Islands, mountains, and inland valleys became more complex and significant in shaping cultural practices (Bean and Shipek 1978; McCawley 1996).

The Historic Period began with the expansion of Spanish exploration and settlement in California. Critical turning points within this period were the establishment of Mission San Gabriel and the Asistencia of Los Angeles, Mexican independence, secularization of mission lands, the Mexican-American War, and American sovereignty in California. This period witnessed the decimation of native peoples throughout southern California through disease, loss of territories, incorporation into the Spanish mission system, and physical conflict. While some native people survived, many experienced great loss of culture and tradition despite efforts to keep them prospering. Many traditional cultural traditions are reflected in the artifacts found at archaeological sites (Estrada 2003; McCawley 1996).

4.2.2 Ethnography: Gabrielino

As discussed above, the project study area is on lands that were once inhabited by the Tongva, also known as the Gabrielino. The Tongva come from a Uto-Aztecan (or Shoshonean) group that likely entered the Los Angeles Basin as recently as 1500 BP from the southern Great Basin or interior California deserts. However, it is also possible that they migrated in successive waves over a longer period of time beginning around 4000 BP. It has been proposed that the Uto-Aztecan speakers displaced local Hokan occupants of the southern coast (Kroeber 1925:578–580), as Hokan language speakers in the area are represented by the Chumash to the north and the Diegueño to the south. Much of the review of the Tongva presented here is based on William McCawley's book, *The First Angelinos* (1996).

The Tongva lived in an area of more than 1,500 square miles that included the watersheds of the Los Angeles River, San Gabriel River, Santa Ana River, and Rio Hondo, as well as the southern Channel Islands. There were at least 50 residential communities, or villages, each with 50 to 150 individuals. Each community consisted of one or more lineages associated with a permanent territory represented by a permanent central settlement, with associated hunting, fishing, gathering, and ritual areas. A typical settlement had a variety of structures used for daily living, recreation, and rituals. In the larger communities, the layout was a little more intricate, characterized by a ritualistic or sacred enclosure that was encircled by the residences of the chief and community leaders, around which were smaller homes of the rest of the

community. Sweathouses, cemeteries, and clearings for dancing and playing were also common at larger settlements (McCawley 1996:32–33).

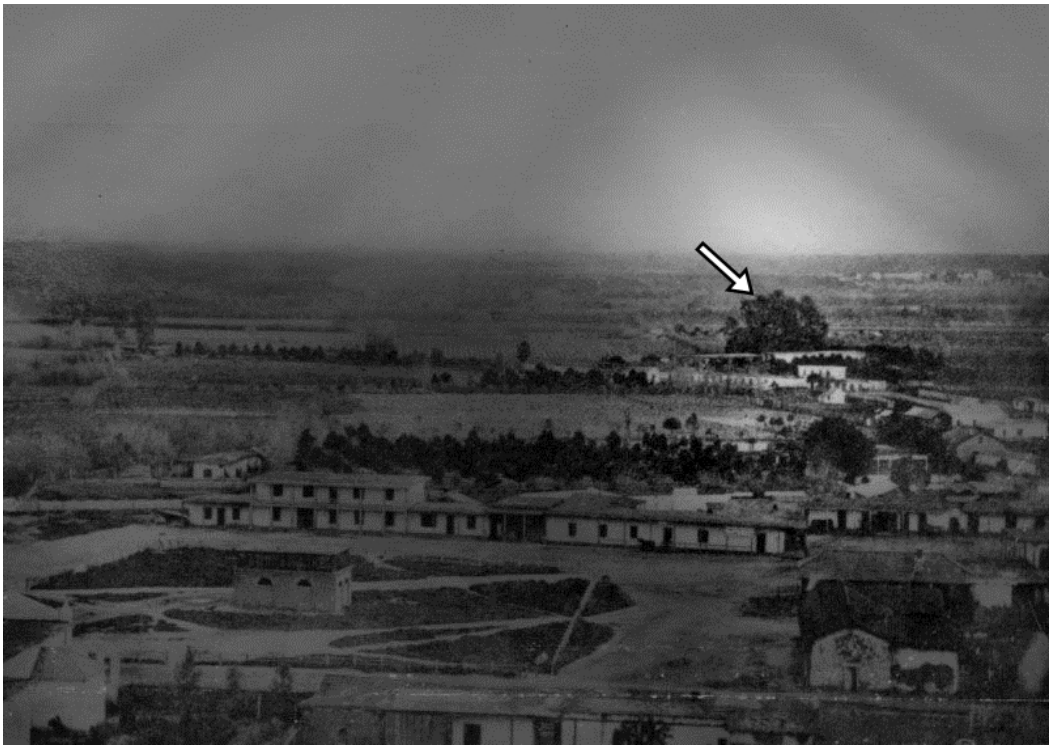
Tongva subsistence was inclusive of many surrounding resources, including forest, water, and mountain animals. These included mule deer, pronghorn, rabbits, small rodents, freshwater and maritime fish and shellfish, sea mammals, snakes, lizards, insects, quail, and mountain sheep. Botanical resources included native grass seeds, pine nuts, acorns, berries, and fresh greens and shoots. Food resources were managed by the chief, who was in charge of food reserves, and families were known to keep aside rations for times when resources were less abundant. A complex trade network among themselves and their neighbors made the Tongva among the most materially wealthy of California's native groups (McCawley 1996:141).

The Tongva were artistic people who had many forms of cultural materials, including beads, baskets, bone and stone tools and weapons, shell ornaments, wooden bowls and paddles, and steatite ornament and cooking vessels (Blackburn 1963). These items were also traded frequently, and with the Chumash, who often exchanged Olivella shell beads as currency for Tongva goods.

As with many other Native American groups, the settlement of Europeans in California brought many conflicts and disease as the Spanish sought to claim the lands as their own, and in the process incorporated Native American groups into the mission system. As a result of this and subsequent historical events, including the takeover of indigenous territories under Mexican and American rule, and the displacement of Native populations, the Tongva people, along with other groups, saw their populations and cultural traditions drastically decimated. Today, the Tongva continue their traditions in southern California, with an approximate representation of 2,000 individuals. The project study area is located north of the historically documented village of Yangna (or group of villages comprising the village community of Yangna).

Many accounts reported that a 60-foot-tall sycamore tree known as El Aliso was a place for important gatherings of tribal elders and traders of the Yangna community. The tree was located approximately 250 feet south-southeast of the southeast corner of LAUS. The location has been identified as 150 feet northeast of the intersection formed by Commercial Street and Garey Street, south of US-101, now believed to be a raised island adjacent to a US-101 on-ramp (Figure 4-1 and Figure 4-2).

Figure 4-1. A 1857 photograph of Los Angeles Plaza that shows El Aliso in the background, view toward east



Courtesy of the Los Angeles Public Library

Figure 4-2. A photograph from circa 1876 shows Los Angeles Plaza, with El Aliso standing in the background (indicated by white arrow), view toward east-southeast

Courtesy of the Los Angeles Public Library

4.2.3 Historical Background

Spanish Mexican Period (1781 to 1850)

Europeans first sailed up the coast of California in 1542 as part of a Spanish exploration expedition led by Captain Juan Rodriguez Cabrillo. Cabrillo sailed into San Pedro Harbor and called it "Bahía de los Fumos" (Bay of the Smokes) due to the Indian campfires he observed along the shores (Kipen 2011:25). It is estimated that the Tongva people numbered approximately 5,000 individuals at this time, spread across hundreds of villages throughout the Los Angeles Basin and the Channel Islands, though the population was as large as 10,000 (Kroeber 1925:883; Lepowsky 2004). Cabrillo reported passing by a large Tongva village on the west bank of the Los Angeles River, south of the current location of LAUS. This village is believed to be Yangna, one of the largest central villages of the Tongva people (California Department of Parks and Recreation 2011:6; King 2000:65).

Spain would not resume in-depth exploration and settlement of the region until much later, when Russian and French encroachment threatened Spain's interests in the territories known as Alta California (Upper California). The return of Spanish presence in California was highlighted by the 1769 expedition led by Captain Gaspar de Portolá (Treutlein 1968:291). Shortly thereafter, Spain began to establish a system of pueblos, presidios, ranchos, and missions along the California coast to bolster Spanish settlement and political presence. The Spanish Franciscan missionaries established a system of 21 missions, including the nearby San Gabriel Mission, along El Camino Real, and incorporated much of the Native American population during the process, leading to their decline and increasingly hostile relationships between the Europeans and the Native Americans.

As part of this network of Spanish presence, the City of Los Angeles was established in 1781 with 11 families brought in from San Gabriel Mission. Following Mexican independence from Spanish rule in 1821, and the subsequent Mexican-American war that ended in 1848, present-day California came under the jurisdiction of the United States government. Over the decades, lands that were once a part of Yangna were divided up and sold off (Rasmussen 2002).

In 1834, El Aliso and the property upon which it stood were acquired by Jean-Louis Vignes, a French vineyard owner. Figure 4-3 shows the tree surrounded by wine barrels in a circa 1875 drawing. The illustration is labeled "*EL ALISO at LOS ANGELES, the old VIGNES WINE ESTABLISHMENT*." In 1874, the Philadelphia Brew House (one of Los Angeles' first breweries) was built on the site of El Aliso but spared the tree. Rasmussen (2002) reported that El Aliso was subsequently cut down in either 1891 or 1892 for firewood and to make room for a brewery, which corresponds with the 1882 purchase of the Philadelphia Brew House by German immigrants Joseph Maier and George Zobelein, who renamed the brewery Maier & Zobelein (Figure 4-4).

The City of Los Angeles experienced extensive growth in the late nineteenth and early twentieth centuries, spurred on by an influx of new settlers looking to strike it rich during the Gold Rush, and the railroad and oil booms that followed.

Figure 4-3. El Aliso, circa 1875 (drawing by Edward Vischer)

Source: California Historical Society, USC Library

Figure 4-4. The Maier & Zobelein Brewery, circa 1900 (Aliso, Vignes, and Commercial Streets)

Source: Security Pacific National Bank Collection, Los Angeles Public Library

American Period (1850 to 1971)

In 1850, the Los Angeles census counted two Chinese men among its population, both of whom were resident servants near Los Angeles Plaza. In 1851, Anglo-American settler Matthew Keller purchased the property at the current location of LAUS and developed the land as a vineyard (Greenwood 1993b:5–6). Remains of Keller's sherry house were found during excavations for the Metropolitan Water District of Southern California (MWD) Headquarters (Costello et al. 1998:99).

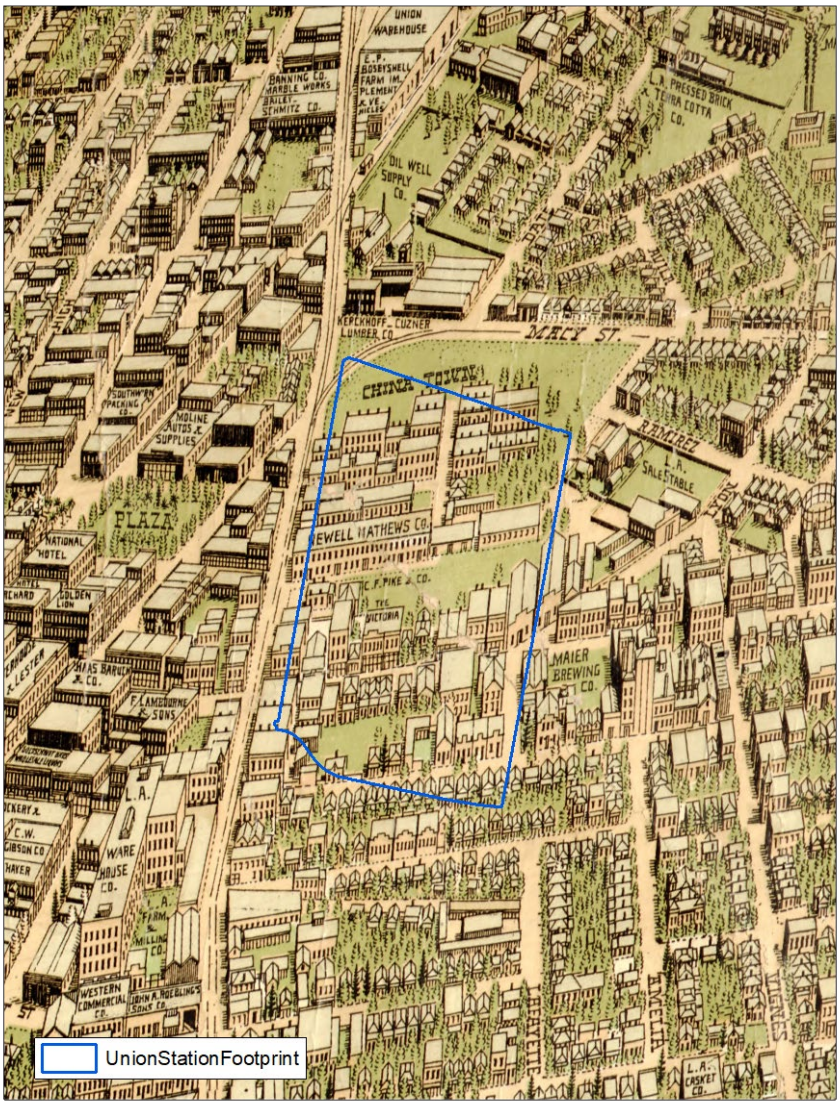
In the 1870s, residential lots were sold along Aliso Street by entrepreneurs like Thomas Keller. Initially purchased by upper-middle-class families for their private dwellings, by the 1880s the area was changing into a blue-collar neighborhood with residences rented rather than owned by the residents. The location continued to evolve with houses converted into rooming homes or replaced by commercial and industrial establishments. "After the properties were purchased by the Industrial Land and Development Company in anticipation of the building of Union Station, it is probable they were patronized by laborers and workmen involved in its construction" (Costello et al. 1998:82).

By 1900, the population of Los Angeles had exceeded 100,000, which included not only American settlers from the east and descendants of Spanish and Mexican settlers from earlier centuries, but immigrants from all over the world. By this time, Los Angeles had a fairly sizeable Chinese presence numbering approximately 600 people, mostly congregated within the boundaries of the current site of the LAUS (Greenwood 1993b:20). Here, the Chinese set up restaurants, laundries, general goods stores, vegetable markets, and other establishments within a rapidly growing metropolis. More than half of the Chinese population in 1880 lived along a narrow street called Negro Alley (McDannold 1973:21), just south of Los Angeles Plaza, on the opposite side of Alameda Street from Archaeological Site CA-LAN-1575/H, outside the ADI. Negro Alley was eventually renamed Los Angeles Street in 1887. The AII (especially the area beneath the train yard) historically had a mixture of uses. A review of Sanborn maps from 1888 and 1906, and a list of businesses compiled by the Los Angeles Chief of Police in 1909 (Elton 1909) indicate that most buildings were domestic residences, in addition to the following business establishments: barber, butcher, opium den, clothing store, gambling house, drug store/apothecary, vegetable market, general goods store, restaurants, tailor shop, tin shop, lodging house, launderer, and Chinese School (for children of Chinese descent).

The area immediately surrounding the AII, as depicted on a 1909 business directory map (, shows numerous large businesses ranging from breweries, stables, and lumber to auto suppliers, oil well suppliers, packing, and several others, all within a few blocks of the future site of LAUS (approximate location shown on Figure 4-5.

Los Angeles had major traffic congestion issues in the first part of the twentieth century. In the early 1920s, traffic was such a nuisance that there were dissertations written by engineering students at the University of California, Los Angeles, suggesting ways to improve commute times (Terrass 1922). One exhaustive study completed in 1925 by Kelker, De Leuw & Co., commissioned by the City of Los Angeles, recommended ways the City could accommodate Los Angeles' estimated 1,000,000 residents, preparing for the future needs of a city that was expected to reach more than 3,000,000. Although most agreed that a union or central station was needed, there was heated debate over how to run an expanded rail system to and through the city. The basic problem was that heavy trains cannot go uphill easily, so engineers needed to build tracks so that trains could "make the grade" by eliminating steep climbs. This was achieved by digging tunnels, digging trenches, raising tracks on fill, and elevating tracks on trestles.

Figure 4-5. Portion of a Los Angeles Business Directory Map published in 1909

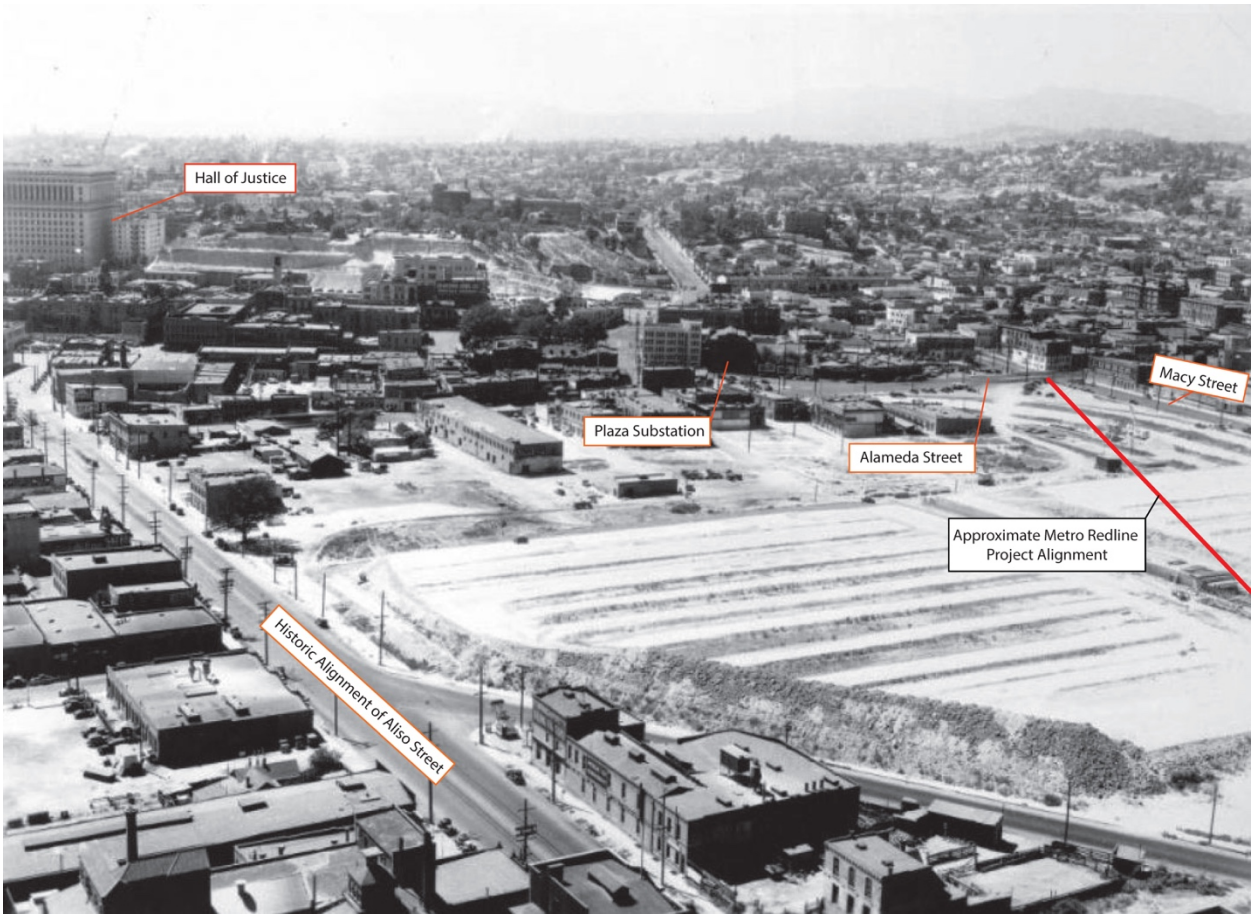


Source: US Library of Congress

In 1926, a measure was placed on the ballot in Los Angeles presenting a choice between a network of elevated railways and the construction of a new train station. Should voters choose the latter, they would also vote on putting the station either at Los Angeles Plaza or across from it in Chinatown. The voters chose to build the train station by a wide margin, and opted for Chinatown as the location of the new station. In 1933, the demolition of Chinatown began, making way for construction of LAUS throughout the 1930s. A "new" Chinatown, resulting from the displacement of the original Chinatown's residents and businesses, was formed west of Alameda Street and north of what is now Cesar Chavez Boulevard. The first passenger train arrived at the station on May 7, 1939. Construction of LAUS required huge amounts of fill to elevate the train yard area to maintain track grade (Figure 4-6). Estimates vary regarding the depth of fill. It ranges

from 1 to 3 feet in the southwest portion of the site to as much as 24 feet of fill under the track yard (Costello et al. 1998:1–3; see Lovret 1978, who estimates fill depths at 12 to 16 feet).

Figure 4-6. A 1935 photograph of Union Station from Aliso Street (road along left side of photograph), view toward northwest (shown with approximate Red Line excavation location)



Source: California Historical Society

5.0 Identification Efforts

5.1 Built Environment Resources

5.1.1 Sources of Information

In addition to property research and other information that has been incorporated from the 2005 *Run-Through Tracks EIR*, the following standard sources of information were reviewed in the process of compiling this report:

- NRHP (National Park Service 2018)
- California Points of Historical Interest (State of California 2018a)
- California Historical Landmarks (State of California 2018b)
- CRHR (State of California 2018c)
- California Historic Resource Inventory System (State of California 2018d)
- California Department of Transportation (Caltrans) Historic Highway Bridge Inventory (State of California 2018e)

ICF International (ICF) conducted a record search at the South Central Coastal Information Center at California State University, Fullerton, on November 17 and 19, 2014, and August 4, 2016. The record search included a review of the South Central Coastal Information Center databases for previously identified built resources in or near the AII and existing cultural resource reports pertaining to the general vicinity of the AII.

The following additional resources were consulted in the process of compiling this report:

- SurveyLA – City of Los Angeles Historic Resources Survey (Architectural Resources Group 2016; Historic Resources Group 2016)
- Caltrans As-Built Drawing Archives (State of California 2018f)
- Caltrans Historic Bridge Inventory (State of California 2018g)
- Historic Aerials (Nationwide Environmental Title Research 2018)
- Online Archive of California (California Digital Library 2018)
- Sanborn Fire Insurance Company maps (Library of Congress 2018)
- City Directories (Los Angeles Public Library 2018)
- Los Angeles Department of Building and Safety permits (City of Los Angeles 2018a)

- Los Angeles County archives, including the County assessor's improvement books (City of Los Angeles 2018b)
- ProQuest Historical *Los Angeles Times* Database (ProQuest 2018)
- Newspapers.com database (Ancestry 2018)
- Metro documents library (Metro 2018)
- Southern California Rapid Transit District Metro Rail project construction drawings (circa [ca.] 1987; Metro 2018)

5.1.2 Themes to Establish Historic Context

Historic context is not being provided for properties that were previously listed or determined eligible for listing in the NRHP. However, historic context is being provided to evaluate or reevaluate five properties in the AII. Four industrial properties that were constructed in 1963 or thereafter are being evaluated, and one property is being reevaluated because of historic context information provided by an interested party.

To establish the historic context, appropriate research was conducted to evaluate the resources within the AII. The following research themes were pursued:

- Notable early landowners
- Subdivision and development of property in the American Period
- The Macy Street Neighborhood
- The East Side Industrial District

5.1.3 Public Participation and Consultation

Letters were sent to government agencies and consulting and interested parties who may have knowledge or concerns about historic properties (which are automatically considered historical resources for the purposes of CEQA) in the area. Please refer to the HRER (Attachment B) and ASR (Attachment C) for details on the consultation.

5.1.4 Field Survey

Field surveys of all developed properties with buildings or structures within the AII were initially undertaken between November 2014 and July 2016 by ICF. Daniel Paul, architectural historian, acted as principal investigator for this project and also conducted the fieldwork and research. Andrew Bursan, historian, conducted the historic research analysis. Jessica Feldman, architectural historian, conducted fieldwork at the bridges and undercrossings. Salli Hosseini, architectural historian, prepared the analysis of US-101.

Additional field work was undertaken in April 2018 to confirm current conditions and determinations for two previously documented properties that were added to the AII:

1. Los Angeles Plaza Historic District (Map Reference #29) because of indirect visual effects from the above-grade passenger concourse.
2. Denny's Restaurant (Map Reference #30) because of proposed temporary staging areas in the parking lot.

The field work of those two properties was conducted by Margaret Roderick and Katrina Castaneda, both of whom have the necessary education in architectural history, but are still working toward the necessary years of experience required under 36 Code of Federal Regulations (CFR) Part 61. Their work was assigned and reviewed by fully qualified architectural historians and historians.

Daniel Paul, architectural historian, and Andrew Bursan, historian, prepared the California Department of Parks and Recreation (DPR) 523 forms. Elizabeth Hilton, architectural historian and consultant with ICF, helped prepare the technical reports. Rick Starzak, architectural historian, provided quality assurance and quality control. All persons, except as noted above, meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) in the disciplines of architectural history and/or history.

All parcels were observed from the public ROW or with owner permission, and digital photographs were taken of all buildings and structures that were visible on each property.

5.2 Archaeological Resources

5.2.1 California Historical Resources Information System Record Search

Information on previously documented resources and previous investigations in the ADI is based on five record searches conducted between 2014 and 2016. On November 17 and 19, 2014, ICF conducted record searches at the South Central Coastal Information Center at California State University, Fullerton, for the ADI (when the project was known as SCRIP). Those record searches encompassed the SCRIP project study area and a 0.25-mile radius beyond that ADI. The Link US ADI has grown and changed in size since the SCRIP project, and supplemental record searches were performed by archaeologist Ryan Moritz for Link US on June 7, 2016, June 23, 2016, and September 6, 2016, using a 0.25-mile buffer beyond the Link US ADI. The review included previously documented resources and listings on the NRHP, CRHR, California Historical Landmarks, California Points of Historical Interest, and historic General Land Office maps.

The record searches indicated that 50 previous investigations have been performed in the ADI, and that approximately 91 percent of the ADI has been previously surveyed for archaeological resources (Attachment C for details). Table 5-1 lists previously recorded resources within the ADI, ordered by primary number. Additional documentation on these resources is provided on California DPR 523 Forms included in Appendix A of the ASR (Attachment C).

Table 5-1. Archaeological Resources Within the Area of Direct Impacts (Proposed Project and Build Alternative)

Primary No.	Trinomial	Description and Age	Documentation	Evaluation and Eligibility
P-19-001575	CA-LAN-1575/H	Artifacts, features, and burials likely associated with Native American village site; structural features associated with Avila and Keller Vineyards; Historic Chinatown.	Costello et al. 1998, 1999; Foster 1989; Greenwood 1993a, 1993b; Goldberg et al. 1999; Warren et al. 2005	Status Code 2S2 – Individual property determined eligible for NRHP by a consensus through Section 106 process
P-19-003169	CA-LAN-3169H	Two segments of an abandoned rail siding along Commercial Street, ca. 1880 to ca. 1945; no longer extant.	Robinson and Harris 2003	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-187085	No trinomial assigned because resource is known only from historical records.	Mojave Road: network of pathways connecting the Los Angeles area to the Nevada border, through the Mojave Desert; subsequently used as a wagon road, ca. 1000 BP to AD 1883	Elder 1984	Status Code 7R – Identified in reconnaissance level survey: not evaluated

Three archaeological resources have been previously recorded within the ADI:

- P-19-001575 (CA-LAN-1575/H) – Historic Chinatown and early Los Angeles deposits (ca. 1860 to 1930s) and Late Prehistoric period Native American burial and deposits (ca. AD 1000 to 1850), located at the current site of LAUS.
- P-19-003169 (CA-LAN-3169H) – Two segments of an abandoned railroad siding, ca. 1880 to ca. 1945.
- P-19-187085 – Mojave Road, a network of pathways used to cross the Mojave Desert, eventually becoming a military wagon road that connected the Mojave Desert to communities in present-day Los Angeles, ca. 1000 BP to ca. AD 1883.

In addition, 16 resources were previously recorded within 0.25 mile of the ADI. Table 5-2 lists previously recorded resources within 0.25 mile of the ADI. Resources are ordered by primary number.

Table 5-2. Archaeological Resources Within 0.25 Mile of the Area of Direct Impacts (Proposed Project and Build Alternative)

Primary Number	Trinomial	Description and Age	Evaluation and Eligibility Status
P-19-000887	CA-LAN-887H	Wall and building foundations of eighteenth, nineteenth, and twentieth century buildings; trash lenses; portion of Zanja Madre; 25,000 artifacts in association with Spanish/Mexican period midden	Status Code 3S – Recommended eligible for the NRHP
P-19-002828	CA-LAN-2828H	Historic period commercial debris, late 1800s to early 1900s	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003103	CA-LAN-3103H	Zanja Madre (Water Conveyance Feature, this segment only), ca. 1781 to ca. 1904	Status Code 6Z – Evaluated and determined not eligible
P-19-003338	CA-LAN-3338H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003340	CA-LAN-3340H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-003353	CA-LAN-3353H	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004112	CA-LAN-4112H	Historic period residential and commercial debris and structural features, late 1800s to early 1900s	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004113	CA-LAN-4113H	An extension of Zanja 6-1 constructed ca. 1857	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004201	CA-LAN-4201H	Naud's Junction: former location of a railroad control tower, warehouse, industrial track segments of the Southern Pacific Railroad. Contains five features with 10 associated artifacts, and 249 artifacts consisting of ceramic tableware, animal bones, building materials, glass and ceramic bottles, horseshoes, hardware, and machinery parts, ca. 1881 to ca. 1945	Status Code 7R – Identified in reconnaissance level survey: not evaluated

Table 5-2. Archaeological Resources Within 0.25 Mile of the Area of Direct Impacts (Proposed Project and Build Alternative)

Primary Number	Trinomial	Description and Age	Evaluation and Eligibility Status
P-19-004202	CA-LAN-4202H	Four railroad segments associated with Southern Pacific Railroad, abandoned in place, ca. 1880s to ca. 1945	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004218	CA-LAN-4218H	Los Angeles Plaza Cemetery, located within the NRHP-listed Los Angeles Plaza Historic District. Cemetery contains remains of Hispanic, Native American, and people of other heritage associated with the Plaza Church, ca. 1821 to ca. 1850	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-004320	No trinomial assigned because resource was not recorded as an archaeological site.	Subsurface historic refuse deposit, nineteenth to early twentieth centuries	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-100515	No trinomial assigned because resource was not recorded as an archaeological site.	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-100882	No trinomial assigned because resource was not recorded as an archaeological site.	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-100887	No trinomial assigned because resource was not recorded as an archaeological site.	Subsurface historic refuse deposit	Status Code 7R – Identified in reconnaissance level survey: not evaluated
P-19-120014	No trinomial assigned because resource was not recorded as an archaeological site.	Subsurface pit feature containing historic artifacts	Status Code 7R – Identified in reconnaissance level survey: not evaluated

Previous archaeological investigations within 0.25 mile of the ADI consist of surveys and mitigation monitoring for a variety of development and improvement projects. Studies were conducted for rail, road, and other transportation infrastructural upgrades, as well as building construction, and general improvements in Los Angeles Plaza area. These investigations resulted in the discovery of prehistoric materials, as well as materials dating from the late eighteenth century, shortly after the City's founding, to

the early twentieth century and provide context for interpreting findings directly associated with Archaeological Site CA-LAN-1575/H, which is located within the ADI.

Investigations carried out for transportation projects uncovered deposits reflecting daily consumption of late nineteenth and early twentieth century activities in the form of glass bottles, ceramic plates, faunal bone, and building materials. In addition, these studies also uncovered structural features such as building foundations and segments of historic period *zanjas* that conveyed water (Amaral 2007; Dietler 2010; Ehringer et al. 2008; Gibson and Dietler 2011; Wesson 2002; Wlodarski and Greenwood 1978). It should be noted that historical maps demonstrate the Zanja Madre system was located west of the modern alignment of Alameda Street, outside the ADI (Figure 7-4 of the ASR [Attachment C]).

Archaeological investigations conducted at the Los Angeles Plaza, directly across Alameda Street from LAUS, revealed artifacts from the late eighteenth to early twentieth centuries. Investigations at the north end of Olvera Street revealed trash lenses, 25,000 artifacts, a portion of the Zanja Madre, and portions of wall and building foundations dating to the eighteenth, nineteenth, and twentieth centuries (Costello 1981). Immediately south along Olvera Street, subsurface investigations at the Hammel Building uncovered late nineteenth to early twentieth century materials as well as a portion of the Zanja Madre (Foster 2011; Slawson 2005; Slawson and Kay 2012). In addition, archaeological monitoring at the Los Angeles Plaza Cemetery, adjacent to the historic La Placita Church, resulted in the discovery of the remains of Hispanic people, Native American people, and people of other heritage associated with the Plaza Church, dating from ca. 1821 to ca. 1850 (Dietler and Murray 2011). This information, some of which is found immediately adjacent to the ADI, demonstrates the high sensitivity for the presence of archaeological resources in the Downtown Los Angeles area that are related to the same temporal periods as identified for Archaeological Site CA-LAN-1575/H, and likely represents an archaeological landscape that is both prehistoric and historic (industrial) in nature.

5.2.2 Other Background Sources

In a meeting regarding the Link US project engineering on May 9, 2016, a representative of the Los Angeles Department of Water and Power indicated that an archaeological study carried out on nearby Commercial Street discovered a historic period cobblestone road underneath the modern pavement (Mercado 2016). There is no documentation of this resource on file at the South Central Coastal Information Center, but the presence of the original cobblestone road is again suggestive of the high sensitivity of the entire ADI for the historic period landscape that may be associated with the same temporal components of Archaeological Site CA-LAN-1575/H.

Archaeological constituents discovered in association with historic period buildings near LAUS also indicate high potential for archaeological resources in or near the ADI. A study conducted at the William Mead Homes Site (P-19-002828/CA-LAN-2828) discovered a late nineteenth century deposit of ceramics, glass, animal bones, shellfish, and coal. The finds were likely associated with a restaurant or commercial food service establishment (Bissell 2000). Similarly, in 2011, Greenwood and Associates reported late nineteenth/early twentieth century artifacts recovered within and below the crawl space of the Hammel Building in Los Angeles Plaza on Main Street near Cesar Chavez Avenue (Foster 2011). Furthermore, the

segment of the Zanja Madre that runs through the Plaza also runs diagonally through the existing lot of the Hammel Building.

5.2.3 Field Survey

On June 15, 2016, Paleo Solutions archaeologists Michael Kay and Ryan Moritz conducted an intensive pedestrian survey within the ADI. Paleo Solutions obtained authorization for fieldwork and site visitation passes from Metro. Parallel transects spaced 15 meters (50 feet) apart were consistently employed across unpaved areas of the ADI. Visibility was obscured by elements of the built environment, paved roads, and existing infrastructure covering the vast majority of the ADI around LAUS, and areas that were visually or windshield surveyed include active train tracks, rail yards, and paved areas. Techniques used to navigate around the ADI and locate boundaries of reported sites included maps, tapes, compass, and Trimble Global Positioning System units. Survey conditions were recorded on survey forms and photographed with digital cameras. Field documents are on file at the Paleo Solutions Monrovia office. Updates were made on DPR 523 Site Record forms for resources, where necessary.

Starting on January 30, 2017, and continuing to the present, Paleo Solutions is conducting archaeological monitoring for preliminary Link US–related preconstruction geotechnical borings within the ADI; the borings will provide geotechnical information for the project. Geotechnical boring work is ongoing, and may include up to approximately 75 borings, using both hollow-stem auger and wet rotary methods. Where possible, soils recovered from the borings are inspected by the archaeological monitor for evidence of archaeological materials, although only the hollow-stem auger drilling produces spoil piles that can easily be monitored. The majority of the geotechnical borings have not been completed, and the final results are, therefore, not incorporated into this study, but initial results provide some insight. To date, no *in situ* subsurface artifacts, features, or deposits were discovered during monitoring efforts for borings within the ADI, although trace historic materials comprising non-diagnostic glass and ceramic fragments dating prior to 1920 were observed in the Commercial Street area in the ADI south of US-101. These historic materials were identified within a secondary fill deposit that had been introduced to form an embankment supporting the east wall along Metro's Red Line subway alignment in this area.

5.3 Tribal Cultural Resources

5.3.1 Summary of Assembly Bill 52 Consultation with Native American Tribes

In compliance with AB 52 revisions to CEQA, Metro has undertaken Native American consultation. This section provides a brief synopsis of the Native American consultation that has occurred as of the date of this report, as well as comments and requests from Native American groups. For a detailed summary of Native American consultation, refer to the ASR (Attachment C).

On May 5, 2016, Metro filed a Sacred Lands File Search with the NAHC. The NAHC responded that tribal resources are present within the ADI, but provided no specific information regarding their nature or location. The NAHC provided a list of Native American tribes that may have information regarding cultural

resources in or near the ADI, with recommendations to contact the Gabrieleño Band of Mission Indians – Kizh Nation and local tribal entities for more information regarding the cultural resources. This list of tribes was supplemented with the names of other local tribes who have cultural affiliation within the general project area.

On June 9, 2016, Metro mailed letters to the following Native American tribes, inviting them to be consulting parties under AB 52 for the identification of tribal cultural resources in the ADI:

- Soboba Band of Luiseño Indians, San Jacinto, California
- Gabrieleño Band of Mission Indians – Kizh Nation, Covina, California
- Tongva Ancestral Territorial Tribal Nation, Marina del Rey, California
- Gabrielino/Tongva Nation, Los Angeles, California
- Gabrielino-Tongva Tribe, Los Angeles, California
- Gabrieleno/Tongva San Gabriel Band of Mission Indians, San Gabriel, California
- Gabrielino Tongva Indians of California Tribal Council, Bellflower, California

Replies expressing interest in consulting were received from the Gabrieleño Band of Mission Indians – Kizh Nation, the Tongva Ancestral Territorial Tribal Nation, the Gabrielino/Tongva Nation, and the Gabrieleno/Tongva San Gabriel Band of Mission Indians. Metro consulted with the Soboba Band of Luiseño Indians (Soboba), but they are no longer active in consultation. Soboba concluded consultation via email dated February 1, 2017. No replies were received from the remaining tribes.

Because the Gabrieleño Band of Mission Indians – Kizh Nation and the Tongva Ancestral Territorial Tribal Nation are also consulting parties with FRA under Section 106, all further AB 52 consultation between these groups and Metro was conducted in parallel.

On September 12, 2016, Metro, in collaboration with FRA, sent an email inviting representatives from all aforementioned tribes to the September 19, 2016, Tribal Information Meeting for the Link US project, which was intended to provide information about the project as it relates to cultural resource investigations. None of the invitees attended the meeting.

On November 15 and 16, 2016, individual tribal consultation meetings were scheduled between FRA, Metro, and the three consulting tribes mentioned above to offer the latest project updates and provide a forum to discuss specific resource concerns. A brief summary of each meeting is provided below.

- Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation) – Andrew Salas, Chairperson, provided information that indicated the Kizh Nation's ancestral association to the general project area. He stated that the project is within the vicinity of a major trade route that once connected San Francisco to San Diego, but has since been paved over (possibly by US-101). He stated that the ADI is a highly sensitive area for the presence of cultural resources associated with the Kizh Nation. Chairperson Salas stated his support for the project and noted that the area is the birthright of the tribe to protect. He also indicated that the area is not only associated with one large village of Yangna, but rather with many villages of a larger network. The burials found in the area to date reflect the high archaeological potential of the area. The Kizh Nation also indicated that a very important large sycamore tree in the area where tribal and spiritual leaders met and prayed together (El Aliso) should be considered in the evaluation of Archaeological Site CA-LAN-1575/H. The Kizh Nation has requested that a monitor from the Kizh Nation be present during ground-disturbing activities.
- Tongva Ancestral Territorial Tribal Nation (TATTN) – John Tommy Rosas, Tribal Administrator, noted that the project is located at the site of the original Pueblo of Los Angeles and emphasized that artifacts may still remain undisturbed despite decades of development. TATTN noted that they have information the California Historical Resources Information System does not have, and would be willing to share that with the Link US project team. TATTN supports the project, but also wants to make sure that the resources are protected (in particular the village of Yangna). TATTN emphasized that there needs to be a proper discovery and treatment plan in place prior to construction that deals with testing the site. If resources are impacted, TATTN recommends that there should be *in situ* preservation wherever possible, specific treatment plans should be available, human remains should be reburied as close as possible to their original locations, and any artifacts should be reburied in the site area with any human remains found with them. There should be no analysis of human remains or associated burial goods. TATTN emphasized that there needs to be a strong Memorandum of Agreement or Programmatic Agreement developed with a strong treatment plan for management/treatment of discoveries. TATTN also requested that the Advisory Council on Historic Preservation be engaged in reviewing the treatment plans.
- Gabrielino/Tongva Nation – Sam Dunlap, Cultural Resources Director, has expressed that the Gabrielino/Tongva Nation is interested in being a consulting party for the project, but there have been no meetings with them to date. Mr. Dunlap has expressed a desire to monitor during the construction phase, and to continue to consult under Section 106.
- Gabrieleno/Tongva San Gabriel Band of Mission Indian – On May 18, 2017, Anthony Morales, Chairperson of the Gabrieleno/Tongva San Gabriel Band of Mission Indians, called Nina Delu (HDR) and stated that he wanted to consult with Metro (under AB 52) on the Link US project. Chairperson Morales was aware that project identification work was underway and that FRA is also

conducting Section 106 consultation for the project, but he has not contacted FRA to consult. He stated that Downtown Los Angeles is a very sensitive place for cultural resources and that this area is both culturally and spiritually significant to his tribe. Chairperson Morales noted that he did not think he would have much to offer in terms of specific knowledge of the resources of the area that we did not already have, and said that he believes that the Link US Team has done a good job on the identification studies. He stated that the project is very sensitive and Native Americans should be monitoring construction activities. He wants to be kept in the loop about the project and will be sent cultural reports as they become ready. When the project goes to construction, he would like to have his tribe involved as Native American monitors.

These suggestions from the Tribal Representatives are incorporated into appropriate mitigation measures for Cultural and Tribal Resources.

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6.0 Historical Resources Identified

The AII is centered primarily around LAUS, an NRHP/CRHR-listed property located in an urban setting with industrial properties and railroad tracks. The built environment and archaeological resource surveys resulted in the identification of 18 resources that are considered historical resources for the purposes of CEQA; these are discussed below. Seventeen of these are built environment resources and one is an archaeological resource.

6.1 Built Environment Resources

The 17 built environment resources identified as CEQA historical resources are listed in Table 6-1. Further detail on these resources can be found in the HRER (Attachment B). All resources are shown on Figure 6-1, which also shows the ADI, AII, and corresponding Map Reference numbers that identify each resource.

Table 6-1. California Environmental Quality Act Built Environment Resources in the Area of Indirect Impacts (Proposed Project and Build Alternative)

Name (Map Reference No.[1])	Address/Location	Community	OHP Status Code[2]
North Main Street Bridge (Bridge #53C 1010)	N. Main Street over the Los Angeles River	Los Angeles, CA	2S2, 5S1
Los Angeles Department of Water and Power, Main Street Center (#1)	1630 N. Main Street	Los Angeles, CA	2D2
William Mead Homes (#2)	1300 Cardinal Street	Los Angeles, CA	2S2
Mission Tower (# 3)	800 Alameda Street	Los Angeles, CA	2S2
Vignes Street Undercrossing (Bridge #53C 1764) (# 4)	0.2 mile northwest of Cesar Chavez Avenue	Los Angeles, CA	2D2
U.S. Post Office—Los Angeles Terminal Annex (#5)	900 Alameda Street	Los Angeles, CA	1S
Macy Street School (# 8)	900 N. Avila Street	Los Angeles, CA	3S
Los Angeles Union Passenger Terminal (LAUS) (#9)	800 Alameda Street	Los Angeles, CA	1S, 5S1
Cesar Chavez Avenue (formerly Macy Street) Viaduct (Bridge #53C 0130) (#10)	Cesar Chavez Avenue over the Los Angeles River, 0.12 mile north of US-101	Los Angeles, CA	2S2, 5S1

Table 6-1. California Environmental Quality Act Built Environment Resources in the Area of Indirect Impacts (Proposed Project and Build Alternative)

Name (Map Reference No.[1])	Address/Location	Community	OHP Status Code[2]
Los Angeles Plaza Historic District (#29)	Roughly bounded by Cesar Chavez Avenue to the north, Alameda and Los Angeles streets to the east, Arcadia Street to the south, and Spring Street to the west	Los Angeles, CA	1S
Denny's Restaurant (#30)	530 East Ramirez Street	Los Angeles, CA	3S
Thomas R. Barabee Store and Warehouse (#16)	611–615 Ducommun Street	Los Angeles, CA	5S3
Friedman Bag Company— Textile Division (#22)	801 E. Commercial Street	Los Angeles, CA	3S
First Street Viaduct (Bridge #53C 1166) (#10)	First Street over the Los Angeles River, 0.6 mile west of US-101	Los Angeles, CA	2S2, 5S1
Fourth Street Viaduct (Bridge #53C 0044) (#26)	Fourth Street over the Los Angeles River	Los Angeles, CA	2S2, 5S1
Seventh Street Viaduct (Bridge #53C 1321) (#27)	Seventh Street over the Los Angeles River	Los Angeles, CA	2S2, 5S1
Olympic Boulevard (Ninth Street) Viaduct (Bridge #53C 0163) (# 28)	Olympic Boulevard over the Los Angeles River	Los Angeles, CA	2S2, 5S1

Notes:

[1] ***This map reference code corresponds to Figure 6-1.***

[2] ***OHP Status Codes: 1S = Individual property listed in NRHP by the Keeper. Listed in the CRHR; 2D2 = Contributor to a district determined eligible for NRHP by consensus through Section 106 process. Listed in the CRHR; 2S2 = Individual property determined eligible for NRHP by a consensus through Section 106 process. Listed in the CRHR; 3S = Appears eligible for NR as an individual property through survey evaluation; 5S1 = Individual property that is listed or designated locally; 5S3 = Appears to be individually eligible for local listing or designation through survey evaluation.***

6.1.1 Properties Listed in the National Register of Historic Places/California Register of Historic Resources

To be included in the NRHP, a property goes through a formal nomination process, often with the documentation prepared by private individuals and organizations, or local governments and Native American tribes. The nomination is then considered by a professional review board, in the applicable state, that makes a recommendation of eligibility. The SHPO submits the recommended nomination to the National Park Service; if it is approved, the property is formally included in the NRHP and is automatically listed in the CRHR. Such properties did not require re-evaluation or further application of the NRHP/CRHR criteria by the Link US project, unless field survey investigation revealed that their listing status was compromised. The following three NRHP/CRHR listed historical resources are still extant and were identified within the AII, in order of Map Reference Number:

1. United States Post Office – Los Angeles Terminal Annex (Map Reference #5), 900 Alameda Street, Los Angeles, was the central mail processing facility for Los Angeles from 1940 to 1989. Constructed in 1937 to 1938, the architectural style is a Mission/Spanish Colonial Revival, and it was intentionally designed to be consistent in style with LAUS. The period of significance is 1938, the year construction was completed. Los Angeles Terminal Annex was found to meet NRHP Criterion C when it was listed in the NRHP on January 11, 1985 (NRHP SID #85000131), as part of the United States Post Office Thematic Resource nomination. The property is not a state landmark or local monument. The United States Post Office – Los Angeles Terminal Annex is automatically included in the CRHR and is a historical resource for purposes of CEQA.
2. Los Angeles Union Passenger Terminal (also known as LAUS or Union Station, Map Reference #9), 800 Alameda Street, Los Angeles, was constructed from 1934 to 1939 and was designed in the Spanish Colonial Revival and Streamline Moderne styles. The period of significance is 1939, the year construction was completed. It was listed in the NRHP on November 13, 1980 (NRHP SID #80000811), under NRHP Criteria A and C. Union Station was also found to be of exceptional importance and therefore met NRHP Criteria Consideration G for properties achieving significance within 50 years prior to the time of listing. The property is also listed as California Historical Landmark No. 892. LAUS was declared City of Los Angeles Historic-Cultural Monument (LAHCM) #101 on August 2, 1972. LAUS is automatically included in the CRHR and is a historical resource for purposes of CEQA.
3. Los Angeles Plaza Historic District (El Pueblo de Los Angeles Historic District/El Pueblo, Map Reference #29) is roughly bounded by Cesar Chavez Avenue to the north, Alameda and Los Angeles streets to the east, Arcadia Street to the south, and Spring Street to the west. The buildings feature an extensive range of nineteenth and early twentieth century architectural styles, including some from the Spanish Colonial and Mexican eras. The oldest extant resources remaining in the district were constructed in 1822: Nuestra Señora La Reina de Los Angeles (Old Plaza Church), and the Plaza Church Cemetery, site of the first cemetery of Los Angeles. The period of significance is 1818 to 1932. Los Angeles Plaza Historic District was first listed in the NRHP on November 3, 1972 (NRHP SID #72000231), its boundary was amended on

November 12, 1981, and the resource count was revised on June 21, 2016. Los Angeles Plaza Historic District was found to meet NRHP Criteria A and C at the local level of significance. The approximately 9.5-acre site comprises 20 contributing buildings, 2 contributing sites, 6 non-contributing buildings, and 1 non-contributing structure. Many of the individual resources have been designated at the national, state, and local levels. Six resources are listed as California Historical Landmarks: Nuestra Señora La Reina de Los Angeles (No. 144), Avila Adobe (No. 145), Los Angeles Plaza (No. 156), Pico House (Hotel; No. 159), Merced Theatre (No. 171), and Old Plaza Firehouse (No. 730). Under the name Los Angeles Plaza Park, the Olvera Street and Plaza portions were declared LAHCM #64 on April 1, 1970. The Los Angeles Plaza Historic District is automatically included in the CRHR and is a historical resource for purposes of CEQA.

Additional documentation on these resources is provided on California DPR 532 Forms included in Appendix A of the HRER (Attachment B).

6.1.2 Properties Previously Determined Eligible for the National Register of Historic Places/California Register of Historic Resources

Properties previously determined eligible for the NRHP as a result of a consensus between a federal agency and the SHPO are historic properties for the purposes of Section 106 and are historical resources under CEQA. Properties previously determined eligible for the NRHP have gone through a different process than those already listed in the NRHP as described in Section 6.1.1. Properties in this category differ because there is not a formal nomination process involving approval by the National Park Service. Properties may be determined eligible for the NRHP through a consensus determination by a federal agency and SHPO, usually through the Section 106 process.

For the Link US project, properties previously determined eligible for the NRHP/CRHR did not require re-evaluation or further application of the NRHP/CRHR criteria, unless field survey investigation revealed that their NRHP/CRHR eligibility status was compromised or needed to be updated. The following nine historical resources previously determined eligible for the NRHP/CRHR are still extant and were identified within the AII. Additional documentation on these historical resources is provided on California DPR 523 Forms included in Appendix A of the HRER (Attachment B).

1. North Main Street Bridge (Bridge #53C 1010, Map Reference #31): The North Main Street Bridge was previously evaluated in 1986 as part of the Caltrans Statewide Historic Bridge Inventory, which was updated in 2004. The North Main Street Bridge was determined eligible for the NRHP under Criterion C for its engineering. The North Main Street Bridge was constructed in 1910, a year that also serves as its period of significance. The bridge was a pioneering example of a three-hinge bridge design that originated in Europe, and one of the earliest of its kind in the western United States. As a result of that evaluation, the bridge was assigned a status code of 2S2, indicating that it was determined eligible for the NRHP by consensus through the Section 106 process and listed in the CRHR. In 2008, the bridge was designated as LAHCM #901. Through a recent project that appears to have complied with the Secretary of the Interior's Standards for the Treatment of Historic Properties, the bridge has undergone a seismic retrofit. The retrofitting involved uniform

concrete jacketing around structural elements of the bridge to improve seismic safety, as well as the restoration of original bridge elements (railing, lamp posts, etc.) that were removed in the 1970s. Based on visual observation, the property retains sufficient integrity to convey its significance as an early example of three-hinge bridge engineering. These significant structural elements are still extant beneath the concrete jacketing, and non-original elements including railing and lamp posts that detracted from the bridge's significance have been removed and restored with new features that are more in keeping with the bridge's original design. The property was re-surveyed as a part of the California High-Speed Rail Authority Burbank to Los Angeles Section Historic Architectural Survey Report in 2016. The 2S2 status code is still valid, while the 5S1 status code is also valid and reflects its listing on the local register as LAHCM #901. The North Main Street Bridge is determined eligible for the NRHP, automatically eligible for the CRHR, and a historical resource for purposes of CEQA.

2. Los Angeles Department of Water and Power Main Street Center (Map Reference #1), 1630 North Main Street, Los Angeles, is a substantially scaled, multi-building yard owned and operated by the Los Angeles Department of Water and Power. The eight earliest buildings on the property were constructed from 1923 to 1937. On the property are numerous shops, test labs, warehouses, repair facilities, garages, crane aisles, and offices designed in the industrial style. A Determination of Eligibility prepared by the Federal Emergency Management Agency after the Northridge Earthquake in 1994 found the eight earliest buildings on the property to be contributors to a historic district eligible for the NRHP under Criteria A and C. In 1995, SHPO concurred with the Federal Emergency Management Agency's Determination of Eligibility through the mechanism of a Programmatic Agreement. The district record prepared in 1994 established the period of significance as 1923 to 1944, stating that "the district boundaries incorporate a group of historic industrial buildings which are over 50 years old and retain a sense of time and place." While not explicitly stated, the close of the period of significance was set as 50 years before the evaluation in accordance with guidance in NRHP Bulletin 16A, and was not linked to the construction years of any of the buildings on the facility. This study for Link US confirms those findings from the 1995 Federal Emergency Management Agency Determination of Eligibility and recommends that the close of the period of significance be extended to 1965 to encompass the construction dates of four more buildings that share similar historic associations and design quality and also meet NRHP Criteria A and C, and that those four buildings be added as contributing features to the district. The property is not a state landmark or local monument. The Los Angeles Department of Water and Power Main Street Center is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

3. William Mead Homes (Map Reference #2), 1300 North Cardinal Street, Los Angeles, is a 17-acre multiple-family public housing complex designed in the Modern "garden apartments" style and constructed from 1943 to 1952. The period of significance was established as 1943 to 1952, based on the years of construction. William Mead Homes was determined eligible for the NRHP on June 3, 2002, with SHPO consensus, at the local level of significance through the Department of Housing and Urban Development Section 106 Programmatic Agreement for the City of Los Angeles. It was determined to meet Criterion A for its association with the development of public

and defense worker housing in Los Angeles during the Second World War, and to meet Criterion C as a Los Angeles public housing development based on the planning and design principles of the Garden City and Modern movements. The property is not a state landmark or local monument. William Mead Homes is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

4. Mission Tower (Map Reference #3), 1436 Alhambra Avenue, Los Angeles, was constructed in 1916 and enlarged in 1938. Its design was influenced by the Spanish Colonial Revival style. The period of significance is 1916 to 1938, based on when original construction was completed by the Atchison, Topeka and Santa Fe Railway and when it was enlarged for LAUS. Mission Tower was determined eligible for the NRHP by FRA, and SHPO concurred on January 15, 2004, as a result of the previous Run-Through Tracks Project Section 106 process. Mission Tower was determined to meet NRHP Criteria A and C at the local level of significance. The property is not a state landmark or local monument. Mission Tower is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

5. Cesar Chavez Avenue (formerly Macy Street) Viaduct over the Los Angeles River (Bridge #53C 0130, Map Reference #10) was constructed in 1926 and designed in the Spanish Colonial Revival architectural style. The period of significance is 1926, the year construction was completed. It was previously determined eligible for inclusion in the NHRP in 1986 through a consensus determination process by the Federal Highway Administration (FHWA) and SHPO as a result of the Caltrans Historic Bridge Inventory (HBI), under NRHP Criteria A and C at the local level of significance. The bridge was declared LAHCM #224 on August 1, 1979. Cesar Chavez Avenue Viaduct is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

6. First Street Viaduct over the Los Angeles River (Bridge #53C 1166, Map Reference #25), located 0.6 miles west of US-101, was constructed from 1926 to 1929 and was designed in the Neo-Classical architectural style. The period of significance is 1929, the year construction was completed. It was previously determined eligible for inclusion in the NRHP in 1986 through a consensus determination process by FHWA and SHPO as a result of the Caltrans HBI. Furthermore, on December 5, 2001, SHPO concurred with a finding that the bridge was eligible for the NRHP under Criterion C. The bridge was declared LAHCM #909 on January 30, 2008. First Street Viaduct is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

7. Fourth Street Viaduct (Bridge #53C 0044, Map Reference #26), spanning the Los Angeles River from Mission Road at the east to Santa Fe Avenue at the west, was constructed from 1930 to 1931 and was designed in the Beaux Arts and Gothic Revival architectural styles. The period of significance is 1930 to 1931, the years of construction. It was previously determined eligible for inclusion in the NRHP in 1986 at the local level of significance under Criterion C through a consensus determination process by FHWA and SHPO as a result of the Caltrans HBI. Fourth Street Viaduct was declared LAHCM #906 on January 30, 2008. Fourth Street Viaduct is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

8. Seventh Street Viaduct (Bridge #53C 1321, Map Reference #27), spanning the Los Angeles River from approximately Myers Street at the east to Santa Fe Avenue at the west, was initially constructed in 1910 with subsequent work in 1927. It was originally designed in the Beaux-Arts style. The period of significance is 1910 to 1927. It was previously determined eligible for inclusion in the NRHP in 1986 at the local level of significance under Criterion C through a consensus determination process by FHWA and SHPO as a result of the Caltrans HBI. Seventh Street Viaduct was declared LAHCM #904 on January 30, 2008. Seventh Street Viaduct is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.
9. Olympic Boulevard (Ninth Street) Viaduct (Bridge #53C 0163, Map Reference #28), spanning the Los Angeles River from Rio Vista Avenue at the east to Enterprise Street at the west, was constructed in 1925 as Ninth Street Viaduct and was re-named in commemoration of the 1932 Olympic Games. The period of significance is 1925, the year construction was completed. Its design features Classical style structural elements combining Doric and Corinthian orders. It was previously determined eligible for inclusion in the NRHP in 1986 at the local level of significance under Criterion C through a consensus determination process by FHWA and SHPO as a result of the Caltrans HBI. The structure was declared LAHCM #902 on January 30, 2008. Olympic Boulevard Viaduct is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

6.1.3 Properties Recently Evaluated and Determined Eligible for the National Register of Historic Places/California Register of Historic Resources

All built environment properties more than 50 years old were evaluated for eligibility for the NRHP/CRHR by architectural historians and historians with qualifications that meet the Secretary of the Interior's Professional Qualifications Standards (Appendix A to 36 CFR Part 61). All properties less than 50 years old in the AII were determined to be ineligible for the NRHP or CRHR because they lacked exceptional importance and did not meet NRHP Criteria Consideration G or CRHR Special Consideration 2. Survey work was conducted between November 2014 and July 2016, with updates in April 2018. All parcels were observed from the public ROW or with owner permission, and digital photographs were taken of all buildings and structures visible on each property.

In addition to the 11 properties previously listed in or formally determined eligible for the NRHP detailed in Sections 6.1.1 and 6.1.2, respectively, 19 other built environment resources more than 50 years of age were evaluated. Properties that were evaluated and recommended eligible for the NRHP/CRHR are detailed here. Properties evaluated and recommended not eligible for the NRHP but considered eligible for CEQA are detailed in Section 6.1.4. Properties evaluated and not recommended eligible for the NRHP or CEQA are described in Section 6.1.5. SHPO concurred on the eligibility of these resources in a letter dated September 27, 2018 (Attachment E).

Three architectural resources were determined eligible for the NRHP with SHPO concurrence (Attachment B and Attachment E) as a result of this study and are automatically considered historical resources under CEQA. They are listed below in order of Map Reference Number. Additional

documentation on these properties is provided on California DPR 523 Forms included in Appendix A of the HRER (Attachment B).

1. Vignes Street Undercrossing (Bridge #53C 1764, Map Reference #4) carrying LAUS tracks over Vignes Street, was constructed from 1933 to 1939 as part of LAUS, but is just outside that property's NRHP boundary. It was designed essentially in the Streamline Moderne style with Spanish Colonial Revival influence. Its period of significance is 1933 to 1939, based on the years of construction. The Vignes Street Undercrossing contributes to the significance of LAUS, and was recommended eligible for the NRHP under Criterion A at the local level of significance. The SHPO has concurred with this recommendation. The property is not a state landmark or local monument. Vignes Street Undercrossing is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.
2. Macy Street School (Map Reference #8), 900 North Avila Street, Los Angeles (alternate address 505 Clara Street), was constructed in 1915 and designed in the English Renaissance Revival style. The period of significance is 1915 to 1930, based on the year of construction and the tenure of School Principal Nora Sterry. The Macy Street School was recommended eligible for the NRHP at the local level of significance under Criterion A for associations to the Progressive Era and with ethnic settlement and assimilation in this part of Los Angeles, and under Criterion B for associations with early Principal Nora Sterry. The SHPO has concurred with this recommendation. The property is not a state landmark or local monument. Macy Street School is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.
3. Denny's Restaurant (Map Reference #30), 530 East Ramirez Street, Los Angeles, was constructed in 1965. It is an excellent example of a "Googie" style coffee shop designed by architect Larry A. Ray, based on the Armet & Davis prototype design from 1958. The period of significance is 1965, the year construction was completed. It was recommended eligible for the NRHP at the local level of significance under Criterion C. This NRHP eligibility determination is consistent with the findings of SurveyLA, the Los Angeles Historic Resources Survey, published in September 2016. The SHPO has concurred with this recommendation. The property is not a state landmark or local monument. Macy Street School is automatically eligible for the CRHR and is a historical resource for purposes of CEQA.

6.1.4 CEQA-Only Built Environment Historical Resources

The City of Los Angeles Office of Historic Resources (OHR) has provided information, in the form of a comment regarding draft survey findings that resulted in two of the built environment resources considered to be historical resources under CEQA, as follows:

1. Thomas R. Barabee Store and Warehouse (Map Reference #16), 611–615 Ducommun Street, Los Angeles, was constructed in 1926, and was designed in the Commercial/Industrial Vernacular style. The period of significance is 1926, based on the year it was constructed. It is not eligible for the NRHP but is being considered a CEQA historical resource. The building was previously surveyed in 2002 and was determined ineligible for the NRHP by FRA; SHPO concurred with this finding on

January 15, 2004 (FRA031117A). In an email on December 19, 2014, responding during the Section 106 process for SCRIP (the predecessor project to Link US), the City of Los Angeles OHR stated that it believed the Thomas R. Barabee Store and Warehouse is a historical resource for the purposes of CEQA. In 2014, OHR believed that the property is a significant example of commercial architecture and provided information related to context, theme, and property type for citywide commercial architecture. However, when OHR published its SurveyLA findings nearly 2 years later in September 2016, the property was not among the individual resources identified as significant in the Central City North area. Based on the information provided by OHR in 2014, it is considered to be a historical resource under CEQA. The property is not a state landmark or local monument. FRA has determined that this property remains ineligible for listing in the NRHP and the SHPO has concurred with this determination.

2. Friedman Bag Company—Textile Division Building (Map Reference #22), 801 East Commercial Street, Los Angeles. The oldest portion of this building was constructed in 1902, with additions in 1906, 1941, and 1954. It is designed in the Industrial/Utilitarian style. The period of significance is 1902, based on the year the oldest extant portion of the building was constructed. The building was previously surveyed in 2002 and was determined ineligible for the NRHP by FRA; SHPO concurred with this finding on January 15, 2004 (FRA031117A). As a result, the entire property is considered not eligible for the NRHP because of a previous Section 106 consensus determination. However, the northwest portion of the building that was originally constructed in 1902 was identified as significant in 2016 by the OHR's SurveyLA program for associations to early industrial development in Los Angeles between 1880 and 1945. Therefore, the northwest portion of the building constructed in 1902 is a historical resource under CEQA because it was found to be significant in a historical resources survey conducted by a local government agency. The property is not a state landmark or local monument. FRA has determined that this property remains ineligible for listing in the NRHP and the SHPO has concurred with this determination.

Additional documentation on these two properties is provided on California DPR 523 Forms included in Appendix A of the HRER (Attachment B).

6.1.5 Other Properties

All other resources in the Link US AII were determined not eligible for the NRHP and not CEQA historical resources.

A total of eight properties, listed below in order of Map Reference Number, were recommended not eligible for the NRHP through the Section 106 process with SHPO concurrence (Attachment E). None of these eight properties are considered historical resources under CEQA. Additional documentation on these properties is provided on California DPR 523 Forms included in Appendix A of the HRER (Attachment B).

1. Gonzalez Candle Shop manufacturing building, 940 North Avila Street, Los Angeles, OHP Status Code 6Y, Map Reference #6.
2. Interstate Rubber Company, 908 North Avila Street, Los Angeles, OHP Status Code 6Y, Map Reference #7.
3. US 101 Slot (Santa Ana Freeway), US-101, Post Mile 1.3 to Post Mile 0.7, approximately located between Grand Avenue and Vignes Street, Los Angeles, OHP Status Code 6Y, Map Reference #11.
4. American Warehouse and Realty Company, 430 Commercial Street, Los Angeles, OHP Status Code 6Y, Map Reference #13.
5. Maier Brewing Company, 620 Commercial Street, Los Angeles, OHP Status Code 6Y, Map Reference #14.
6. Friedman Bag Company, Polyethylene Division, North Building, 711 Ducommun Street, Los Angeles, OHP Status Code 6Y, Map Reference #18.
7. Friedman Bag Company, Polyethylene Division, South Building, 706 Ducommun Street, Los Angeles, OHP Status Code 6Y, Map Reference #19.
8. Manley Oil Company/ Southern California Gas Company, 410 Center Street, Los Angeles, OHP Status Code 6Y, Map Reference #21.

Six additional properties, listed below in order of Map Reference Number, were determined not eligible for listing in the NRHP as a result of previous studies, and are not considered historical resources under CEQA. They were previously assigned an OHP status code of 6Y. The updated evaluations performed for the project confirm that retention of status code 6Y is appropriate. Additional documentation on these properties is provided on California DPR 523 Forms included in Appendix A of the HRER (Attachment B).

9. US-101 Bridge #53-0405, US-101 over the Los Angeles River, Los Angeles, OHP Status Code 6Y, Map Reference #12.
10. Friedman Bag Company—Storage Building, 500 Garey Street, Los Angeles, OHP Status Code 6Y, Map Reference #15.
11. Los Angeles Unified School District District H Facilities Services and Maintenance Operations, 611 Jackson Street, Los Angeles, OHP Status Code 6Y, Map Reference #17.

12. Los Angeles Casing Company, 710–714 Ducommun Street, Los Angeles, OHP Status Code 6Y, Map Reference #20.
13. New York Junk Company, 622 Frontage Road (825 Commercial Street), Los Angeles, OHP Status Code 6Y, Map Reference #23.
14. Amay's Bakery & Noodle Company, 837 Commercial Street, Los Angeles, OHP Status Code 6Y, Map Reference #24.

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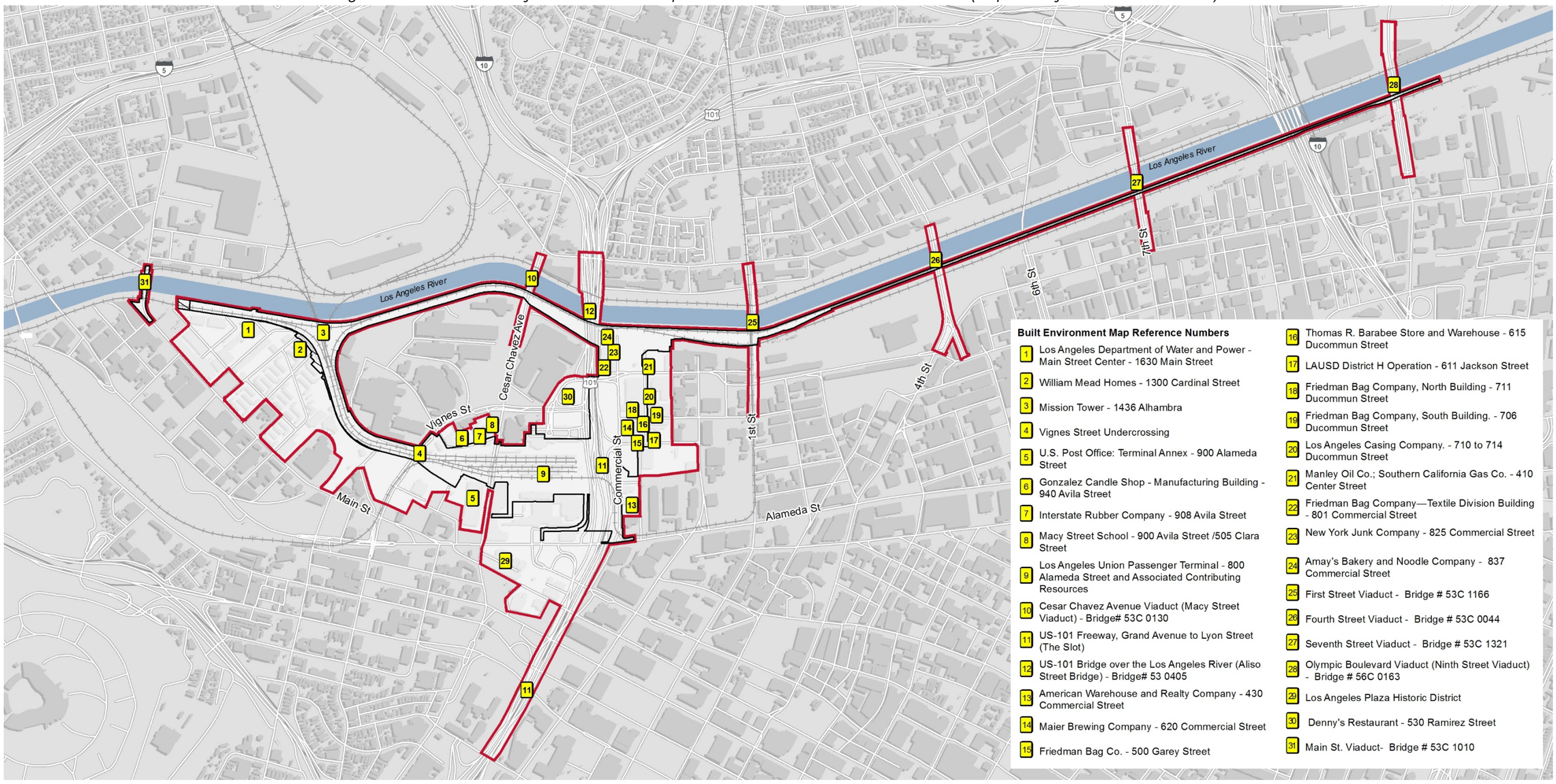
Figure 6-1. Link Union Areas of Direct and Indirect Impacts and Built Environment Resource Location (Proposed Project and Build Alternative)



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6.2 Archaeological Resources

The identification of archaeological resources is discussed in detail in the confidential ASR (Attachment C). One archaeological resource was determined eligible for the NRHP with SHPO concurrence (Attachment D and Attachment E) and is automatically considered a historical resource under CEQA. Two archaeological resources were determined ineligible for listing in the NRHP/CRHR and are not considered historical resources under CEQA. SHPO concurred with these determinations on September 27, 2018 (Attachment E).

6.2.1 P-19-001575 (CA-LAN-1575/H)

Archaeological Site P-19-001575 (herein CA-LAN-1575/H) is a large multicomponent subsurface archaeological site located in Downtown Los Angeles, California. Site boundaries are currently defined as the block north of US-101, bounded on the west by Alameda Street, on the north by Cesar Chavez (formerly Macy) Avenue, and by the eastern edge of the railroad tracks east of 800 Alameda Street: the general location of LAUS (see confidential map in Attachment A). Greenwood (1993a) originally defined the size of the site as covering approximately 88,000 square meters with dimensions of 330 by 266 meters. Review of these dimensions against the actual bounding landmarks gives an area of 350 by 330 meters, or 115,500 square meters. These boundaries are based on historical research and archaeological discoveries made during past construction projects that exposed portions of the site. Because the site boundary was determined through discovery of components within the ADI as a result of previous construction projects, it is highly probable that the site boundary, specifically the Native American component, extends well beyond the ADI. The entire landscape in and around the ADI is considered highly sensitive for buried cultural resources.

Subsurface deposits of Archaeological Site CA-LAN-1575/H are below and beyond the developed and operational portions of LAUS, which was built between 1933 and 1939 on approximately up to 24 feet of fill covering a portion of Historic Los Angeles Chinatown. There are no portions of the archaeological site that are visible or accessible within the modern developed surface area of LAUS.

Past historical, ethnographic, and archaeological research, as well as past construction projects that encountered portions of the site, have helped to define the site boundary and components within the ADI. Artifacts and features uncovered during past projects include prehistoric burials, habitation deposits, and remnants of Historic Los Angeles Chinatown. The previously uncovered material assemblage and features can be grouped into three broad overlapping temporal/cultural components:

- The Prehistoric/Historic Native American Period (AD 1000–1848)
- The Spanish-Mexican Period (1781–1850)
- The American Period – Historic Los Angeles Chinatown (1850–1966)

Archaeological testing, monitoring, and excavations at Archaeological Site CA-LAN-1575/H were performed for three projects:

- Metro Redline Subway (Costello 1981; Greenwood 1993b)
- MWD Headquarters Project (Costello et al. 1998, 1999; Goldberg et al. 1999)
- Union Station Village Apartments and Catellus Corporation Head Start Building Projects (Warren et al. 2005)

The Metro Red Line subway archaeological excavations recovered mostly historic-period materials and features associated with Chinatown; however, a scattering of prehistoric materials and one prehistoric human interment were also found. The MWD Headquarters Project recovered extensive materials from Chinatown and a prehistoric cemetery, while Union Station Village and the Head Start Building Projects recovered only historic-period materials associated with Chinatown.

Native American Archaeological Component

Excavations in 1996 (Goldberg at al. 1999) recovered the remains of 19 individuals, 14 found in primary interments and 5 as cremations. These prehistoric and historic-period Native American remains date from 1000 BP to approximately 130 BP (Goldberg et al. 1999). Three burials were found at depths ranging from approximately 1.7 to 2.5 meters (5.6 to 8.2 feet) below the asphalt of the LAUS parking lot.

Hundreds of shell, schist, talc, and jadeite beads and a few shell ornaments were found associated with these burials and cremations. Other prehistoric artifacts found with these remains included projectile points, a metate fragment, a stone pipe fragment, a bowl mortar fragment, ceramic vessel fragments, bone awls and hairpins, a steatite drinking bowl, and four charred basketry fragments. This portion of Archaeological Site CA-LAN-1575/H has been interpreted as representing an area used specifically as a cemetery, and not a village occupation area.

Historical Period Archaeological Components

Spanish-Mexican Period. The only artifact or feature dating from the Spanish-Mexican Period found to date at Archaeological Site CA-LAN-1575/H is Zanja 654. This earthen ditch feature was likely built for the Avila vineyards of the 1820s and subsequently improved into a wooden conduit in 1881 when the winery was upgraded by new managers. Discovered during archaeological investigations at the MWD property (Costello et al.1998), Costello's research concluded that Zanja 654 was not part of the Zanja Madre system, but was likely an agricultural irrigation feature.

American Period. The American Period component of Archaeological Site CA-LAN-1575/H consists of remains associated with the development of Chinatown and its decline during the 1860s to 1933. Greenwood (1993b) discusses intact deposits from Chinatown identified during construction of the Metro Red Line tunnel under the LAUS Yard.

Historical features documented during subsequent excavations for the MWD Headquarters building (Costello et al. 1998, 1999; Goldberg et al. 1999) included hundreds of privies, extensive refuse deposits, and numerous structural foundations, including those of Matthew Keller's sherry house, the Sisters of Charity Orphan Asylum, several family residences, and the foundations of numerous brothels and Chinese cribs. Thousands of historic-era artifacts were recovered, including ceramics, bottles, and glassware, Chinese ceramics and coins, and numerous types of household items (Costello et al. 1998, 1999). Individual features found include wells, and the remains of a large brick three-burner wok stove.

No archaeological materials from the historic period after construction of LAUS (1934 to 1968) have been found at the site.

Integrity

Pre-1933 surface features and buildings in the area of Archaeological Site CA-LAN-1575/H were destroyed or removed when the area was cleared and filled for the construction of LAUS. Although surface constituents of the site no longer exist, subsurface artifacts and features discovered during previous investigations suggest that the site retains integrity of objects, deposits, or features dating to the Native American and American periods in the history of Los Angeles.

An intact prehistoric cemetery containing the remains of 19 individuals along with an extensive collection of burial goods discovered underneath the MWD Headquarters Project site (Goldberg et al. 1999) strongly suggest that additional Native American archaeological materials still exist within the boundaries of Archaeological Site CA-LAN-1575/H.

While little archaeological evidence of the Spanish-Mexican Period has been found to date (a single ditch segment), this single find may signal that other agricultural features also remain. So, too, might evidence of agricultural practices associated with the extensive vineyards of the Spanish-Mexican era. However, continued use of the area for vineyards and orchards well into the American Period likely removed or obscured evidence of the Spanish-Mexican Period agriculture. It should be noted that historical maps demonstrate the Zanja Madre system was located west of the modern alignment of Alameda Street, outside the ADI (Figure 7-4 of the ASR [Attachment C]). In addition, numerous artifacts, features, and deposits associated with Chinatown discovered in situ during the Metro Red Line Project (Greenwood 1993b) suggest that other portions of the site retain integrity of objects associated with the early Chinese in American history.

Excavations for the MWD Headquarters building, the Metro Red Line tunnel, and the Catellus Head Start Building and Mozaic Apartments likely destroyed any archaeological materials within their footprints. All projects required construction excavations that extended well below the calculated maximum depth for any archaeological resources.

Eligibility

For Link US, FRA evaluated the historical significance of Archaeological Site CA-LAN-1575/H for each of the site's cultural components with reference to the NRHP eligibility criteria at 36 CFR 60.4 (Appendix D). FRA determined and SHPO concurred that Archaeological Site CA-LAN-1575/H is:

- Not Eligible Under Criterion A/1: The site does not qualify for listing in the NRHP/CRHR according to eligibility Criterion A/1 for the following cultural components of the site:
    - *Prehistoric/Historic Native American Period*: Despite uncovering significant Native American remains dating from ca. 1000 BP to ca. 130 BP, no relationship to significant events can be recognized.
    - *Spanish-Mexican Period*: Archaeological Site CA-LAN-1575/H manifests scant evidence of remains from the Spanish-Mexican Period with only one previous discovery of a zanja that does not appear to be part of the larger zanja system. Despite the historical associations with vineyards, the Spanish-Mexican component of Archaeological Site CA-LAN-1575/H does not maintain integrity of design, setting, materials, workmanship, feeling, and association. The entire environment of the site has been transformed, particularly with the development of the LAUS complex and the modern urban development of Los Angeles. As such, this component does not qualify under Criterion A/1.
    - *American Period*: Despite the historical associations with Historical Los Angeles Chinatown, Archaeological Site CA-LAN-1575/H does not maintain integrity of design, setting, materials, workmanship, feeling, and association. The entire environment of the site has been transformed with the development of the LAUS complex and the modern urban development of Los Angeles. Because there are no remnants of the Chinatown community, the American Period component does not qualify under Criterion A/1.
- Not Eligible Under Criterion B/2: The site does not qualify for listing in the NRHP/CRHR according to eligibility Criterion B, since after review of ethnographic literature and consultation with Native American Tribes and review of historic period documents, the site lacks any known associations with historically important persons or legendary beings.
- Not Eligible Under Criterion C/3: The site does not qualify for listing in the NRHP according to eligibility Criterion C because the site does not exhibit qualities that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- NRHP Eligible Under Criterion D/4: The site has yielded and still has the potential to yield significant archaeological data/information regarding the Late Prehistoric Period and American Period. As demonstrated by past investigations, artifacts, deposits, features and other archaeological materials retain the integrity necessary to answer pertinent and current research questions, through recovery and interpretation of the archaeological record at the site.

Archaeological Site CA-LAN-1575/H was determined NRHP eligible under Criterion D by FRA with SHPO concurrence on September 27, 2018 (Appendix E), and is automatically eligible for the CRHR. The period of significance for Link US archaeological materials is Late Prehistoric Period (AD 1000) to AD 1940, which encompasses Native American cultural remains and cultural materials deposited up until the demolition of the Original Los Angeles Chinatown and subsequent completion of LAUS.

The recent field survey for Link US did not result in any observations of any remnants or indications of Archaeological Site CA-LAN-1575/H. The recorded area of the site is completely covered by buildings, structures, and pavement; however, based on previous investigations of the site, Archaeological Site CA-LAN-1575/H is present within the ADI under the current urban landscape and, therefore, the potential for the ADI to yield buried historic and prehistoric archaeological resources is considered high.

6.2.2 P-19-003169 (CA-LAN-3169H)

Resource P-19-003169 (CA-LAN-3169H), two segments of an abandoned railroad siding, was first recorded in 2003 by Applied EarthWorks (Robinson and Harris 2003) for the Run-Through Tracks Project. The resource was described as being in two separate segments at two places: on Commercial Street near the intersection with Center Street; and in a vacant city block south of Commercial Street and north of Ducommun Street, between North Garey Street and North Hewitt Street. This resource has been removed and paved over and no longer exists within the ADI.

6.2.3 P-19-187085

The Mojave Road (also known as Mojave Trail) is solely represented by a State Historical Landmark (No. 963) located a considerable distance from the project study area. The landmark monument is located at the Midway Rest Area along Interstate Highway 15 North, approximately 30 miles northeast of Barstow. The portion of this resource that may have been located in Downtown Los Angeles has been paved over, buried, or no longer exists along its reported alignment, which is based on historical descriptions and maps. The resource may have crossed the project study area, but the actual historical alignment within the vicinity of the project study area is not known, and no remnants or signs of the resource exist within or near the ADI.

6.3 Tribal Cultural Resources

The NAHC was contacted to incorporate the opinions and concerns of Native Americans in the ADI. The NAHC consulted its Sacred Lands File for Native American burial sites and sacred places that could exist in the ADI. The NAHC indicated the presence of sacred sites in the ADI, recommended contacting the Gabrieleño Band of Mission Indians – Kizh Nation for more information about these sites, and suggested that other individuals of Native American descent with an interest in the general project area could have additional information, knowledge, or concerns regarding resources.

A tribal cultural resource is defined as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and either:

- Is on, or eligible for, the CRHR or a local historic register
- The lead agency, "in its discretion and supported by substantial evidence," determines that the resource meets the register criteria

As a result of tribal consultation conducted under AB 52 by Metro, the Native American component of Archaeological Site CA-LAN-1575/H is considered a Tribal Cultural Resource.

The Native American component of Archaeological Site CA-LAN-1575/H, which was determined eligible (with SHPO consensus) for the NRHP under Criterion D, is automatically eligible for the CRHR under Criterion 4.

Chairman Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation addressed the significance of the area in a letter dated June 15, 2016:

> Your project lies in an area where the Ancestral territories of the Kizh (Kitc) Gabrieleño's villages Such as Yangna adjoined and overlapped with each other, at least during the Late Prehistoric and Protohistoric Periods. The homeland of the Kizh Gabrieleño was probably the most influential Native American group in aboriginal Southern California (Bean and Smith 1978a:538), was centered in the Los Angeles Basin, and reached as far east as the San Bernardino-Riverside area. The homeland of our neighbors the Serrano's was primarily the San Bernardino Mountains, including the slopes and lowlands on the north and south flanks. Whatever the linguistic affiliation, Native Americans in and around the project area exhibited similar organization and resource procurement strategies. Villages were based on clan or lineage groups. Their home/base sites are marked by midden deposits often with bedrock mortars. During their seasonal rounds to exploit plant resources, small groups would migrate within their traditional territory in search of specific plants and animals. Their gathering strategies often left behind signs of special use sites, usually grinding slicks on bedrock boulders, at the locations of the resources.

Given the project location and the high sensitivity for archaeological resources within the ADI, all tribes that have met with Metro under AB 52 have requested that a Native American Monitor be present on site for any and all ground disturbance (including but not limited to pavement removal, pot holing, augering, boring, grading, excavation, and trenching) to protect any cultural resources that may be impacted during construction of the proposed project or the build alternative.

Additionally, the Gabrieleño Band of Mission Indians – Kizh Nation, through consultation, has recommended that a robust monitoring and mitigation plan be in place prior to the start of construction. This was also a recommendation made by the Soboba Band of Luiseño Indians.

In regard to this tribal cultural resource, in a meeting held on November 15, 2016, between FRA, Metro, and Mr. John Tommy Rosas of the TATTN, Mr. Rosas noted that this site should be tested prior to construction, and that there should be a specific treatment plan in place prior to the start of construction that details the plan of action in case human remains are encountered and to address the long-term disposition of artifacts. Mr. Rosas stated a preference for the reburial of Native American human remains as close as possible, as well as for the reburial of any artifacts found during excavations.

Follow-up meetings with tribal representatives in August 2018 did not result in additional information that altered the analysis that the Native American component of Archaeological Site CA-LAN-1575/H is significant under Criteria D/4 and extremely sensitive to the consulting tribes. Tribal representatives expressed concerns that burials discovered near the location of the El Aliso sycamore tree may be burials of people who had high status, based on burial goods found in nearby contexts. They were also concerned that the area in which Native American remains and burials may be encountered is much larger than the ADI. The probability that additional Native American burials may be discovered during construction was reiterated. It was requested that the monitoring and treatment plans carefully analyze where construction may impact Native American remains and that the plans should emphasize a heightened sensitivity in the areas where Native American components may be present. It was requested that testing occur prior to construction.

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7.0 Impact Assessment

7.1 Built Environment Resources

7.1.1 Built Environment Resources Determined to have No Impact

The following five bridges that are classified as historical resources, as defined in §15064.5, and located within the AII would result in no impact because no physical alteration to any of the bridges would result from the proposed project or the build alternative:

- Cesar Chavez Avenue viaduct over the Los Angeles River
- First Street viaduct over the Los Angeles River
- Fourth Street viaduct over the Los Angeles River
- Seventh Street viaduct over the Los Angeles River
- Olympic Boulevard viaduct over the Los Angeles River

While some track work would occur where the railroad tracks pass under the bridge structures, and the tracks, ties, and ballast constitute "physical features within the setting" of the bridges, they have been subject to regular replacement over the years as part of routine maintenance and do not comprise historic material that contributes to the significance of the bridges themselves. Therefore, there would be no impact on these historical resources.

Additionally, the Thomas R. Barabee Store and Warehouse is classified as a historical resource and would result in no impact because the proposed project or the build alternative would result in no physical alteration to the building. Therefore, there would be no impact on this historical resource.

The following six built environment resources are classified as historical resources to which the proposed project or the build alternative may cause a substantial adverse change in the significance:

- LAUS and Vignes Street Undercrossing (two separate but related historical resources, as explained in the HRER [Attachment B])
- William Mead Homes
- Friedman Bag Company-Textile Division Building
- North Main Street Bridge (Bridge #53C 1010)

7.1.2 Direct Impacts – Construction

The proposed project and build alternative have the potential to result in direct impacts on the following built environment historical resources: LAUS and Vignes Street Undercrossing, William Mead Homes, Friedman Bag Company—Textile Division Building, and North Main Street Bridge.

Los Angeles Union Station and Vignes Street Undercrossing

Proposed Project and Build Alternative

In the interim condition, demolition of Platform 4 and the associated butterfly shed canopy would occur to implement new run-through service.

In the full build-out condition, the rail yard would be elevated up to approximately 15 feet above the existing elevation to accommodate the Caltrans vertical clearance requirements for new run-through tracks over both the El Monte Busway and US-101. The new passenger concourse would also be constructed in the full build-out condition. A portion of the characteristics that qualify LAUS for listing in the NRHP/CRHR would be destroyed or substantially altered; therefore, the proposed project or the build alternative would have a substantial adverse change in significance on the following character-defining features (Figure 7-1 and Figure 7-2):

- Platforms – The 21-foot-wide concrete platforms would be demolished, and new, longer, wider concrete platforms (29 feet wide) would be constructed to enhance safety; allow space for proposed elevators, stairs, and escalators; and accommodate building code requirements for loading (ramps and railings would not be replaced). The proposed platforms would be lengthened and elevated up to approximately 15 feet above their present elevation. The proposed project or the build alternative would have a similar impact on this feature.
- Butterfly Shed Canopy – The butterfly shed canopies above the remaining existing platforms would be demolished because they are too narrow, are not long enough to perform their historic function on the widened and lengthened platforms, and do not take into account the design requirements of multiple operating agencies, each with their own unique needs and train types and each with different design criteria for proximity and clearance of canopies. The newly proposed canopies over each individual platform (proposed project) or the grand canopy over the rail yard (build alternative) would not convey the historic feeling and association currently experienced by visitors or travelers to LAUS.
- Pedestrian Passageway (Tunnel), Ramps, Platform Railings, Solid Balustrades – The pedestrian passageway, passenger ramps, platform railings, and solid balustrades would be demolished to make space for the construction of the concourse. The concourse would include multiple egress routes, with public areas integrated into the design. For the proposed project, an above-grade passenger concourse with new expanded passageway would be constructed, and the existing pedestrian passageway below the rail yard would be demolished. The new expanded passageway would provide additional passenger travel-path convenience and options. For the build alternative

with the at-grade passenger concourse, the pedestrian passageway would be demolished to accommodate the at-grade concourse-related improvements. For both the proposed project and the build alternative, new elevators, escalators, stairs, and ramps would be constructed to achieve compliance with California Building Code egress and ADA standards. The above-grade passenger concourse with new expanded passageway (proposed project) or at-grade passenger concourse (build alternative) would not convey the historic feeling and association currently experienced by visitors or travelers to LAUS.

- Terminal Tower – The Terminal Tower would be moved and either reoriented at grade or raised vertically, depending on final design. The proposed project or the build alternative would have a similar impact on this feature.
- Car Supply Building – The Car Supply Building and retaining walls would be demolished in order to raise the rail yard by up to 15 feet. The proposed project or the build alternative would have a similar impact on this feature.
- Undercrossings – The Cesar Chavez Avenue and Vignes Street undercrossings would be demolished and replaced with new bridges to accommodate the elevated rail yard and the egress requirements from the platforms. The proposed project or the build alternative would have a similar impact on this feature.
- South Retaining Wall – The proposed run-through track structure over the El Monte Busway and US-101 would be designed to span above the existing south retaining wall, which would be largely obscured from public view, but may still be altered (likely with the run-through tracks structure crossing through the wall) but would be reconstructed in-kind, where feasible, and visible from US-101. The proposed project or the build alternative would have a similar impact on this feature.

As described above, the portions of the LAUS property that would be demolished under either the proposed project or the build alternative would include the following contributing features: platforms, butterfly shed canopies, ramps, railings, pedestrian passageway, solid balustrades off the passageway to the platforms, Cesar Chavez Avenue Undercrossing, and Car Supply Building. Further, the Vignes Street Undercrossing (Figure 7-3 and Figure 7-4) would also be demolished. The physical removal of these features would be a substantial change in significance of the historical resource, even though LAUS would retain enough integrity to remain listed in the NRHP/CRHR due to the preservation of the historic main building (e.g., tile roof, stucco wall cladding, arched main entrance, decorated beams, and tile floors) and other features such as the ticketing halls, arcades, clock tower, and patios. There would be substantial alterations to the south retaining wall and Terminal Tower. While not a qualifying characteristic, approximately 5 to 7 feet of the Bauchet Street wall at the location where it joins the Avila Street wall would be demolished and replaced by a new wall to provide adequate fire access.

For LAUS and the associated Vignes Street Undercrossing, this is considered a significant impact. Mitigation Measures HIST-1a through HIST-1d are proposed to mitigate this impact; however, impacts would remain significant and unavoidable.

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Figure 7-1. Los Angeles Union Station Historical Resource Boundary and Areas of Direct and Indirect Impacts (Proposed Project)

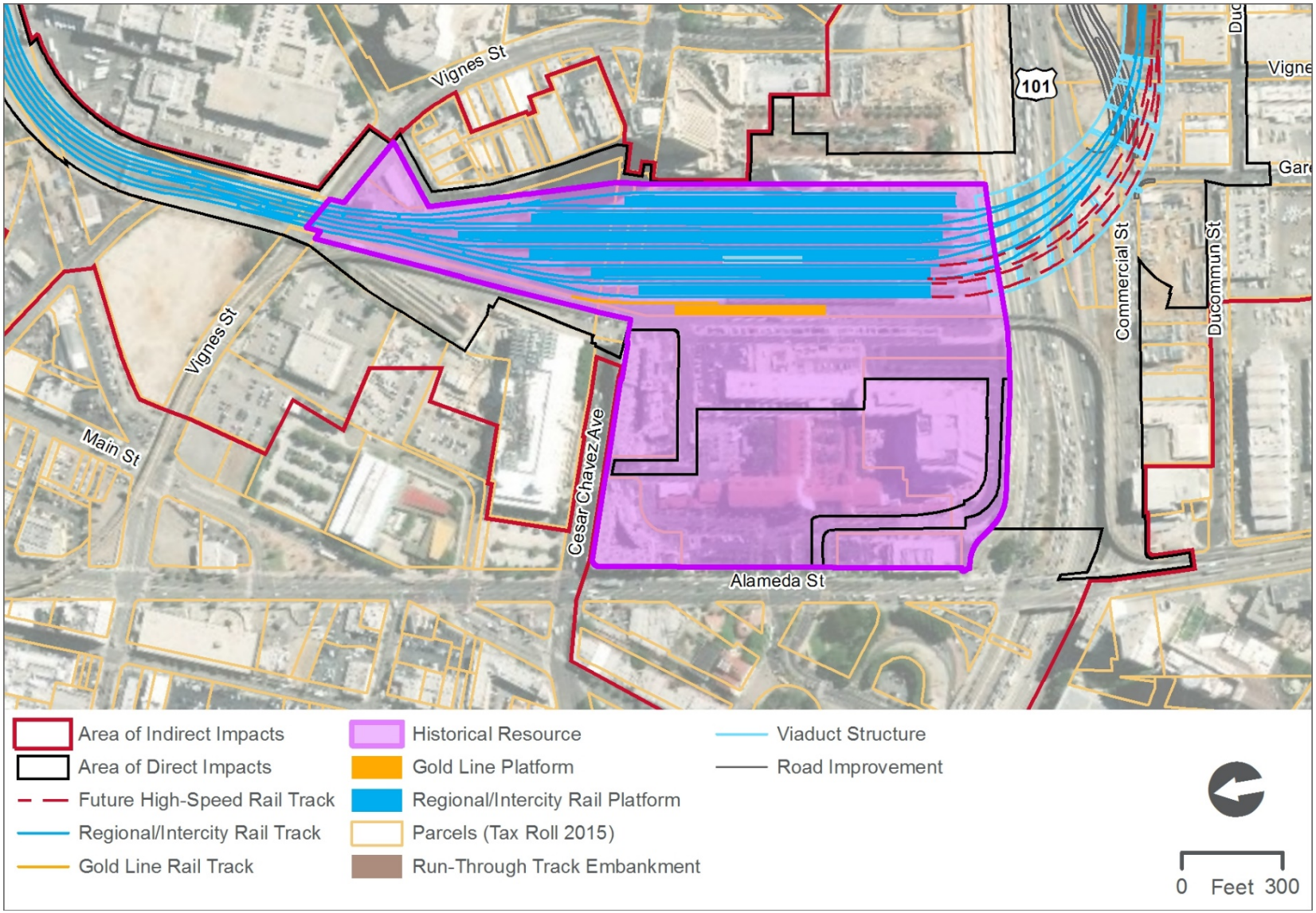

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Figure 7-2. Los Angeles Union Station Historical Resource Boundary and Areas of Direct and Indirect Impacts (Build Alternative)

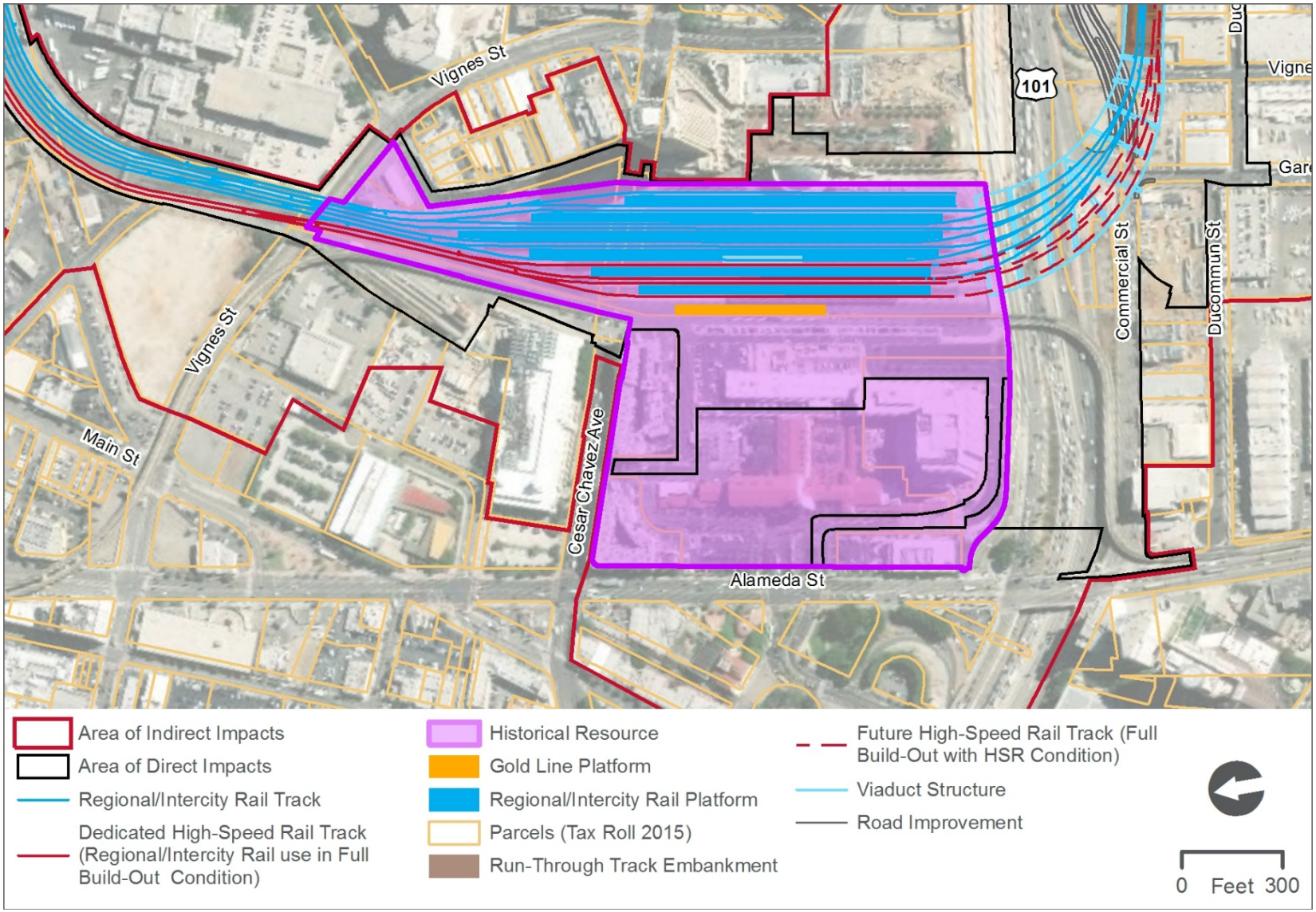

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Figure 7-3. Vignes Street Undercrossing Historical Resource Boundary and Areas of Direct and Indirect Impacts (Proposed Project)

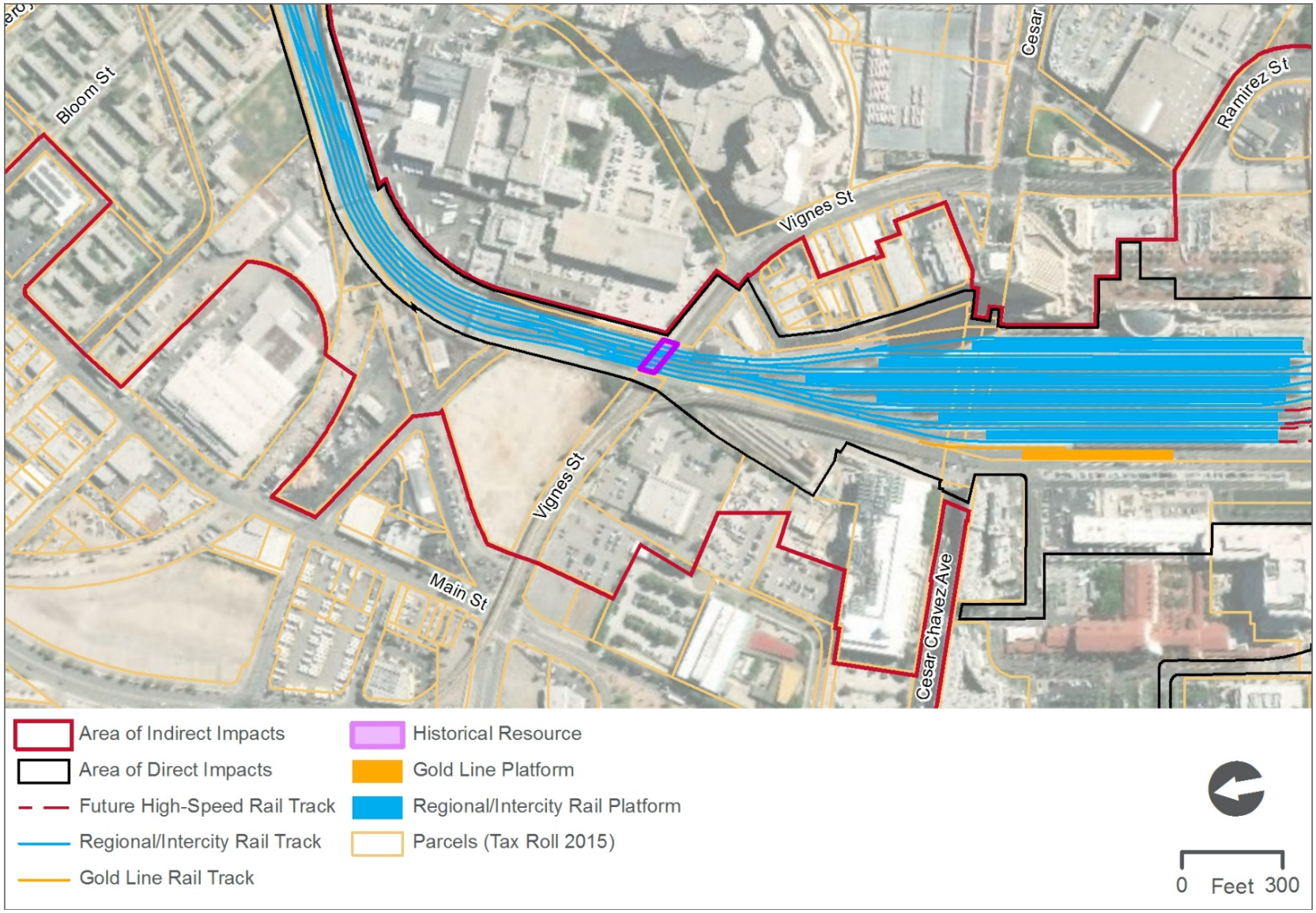

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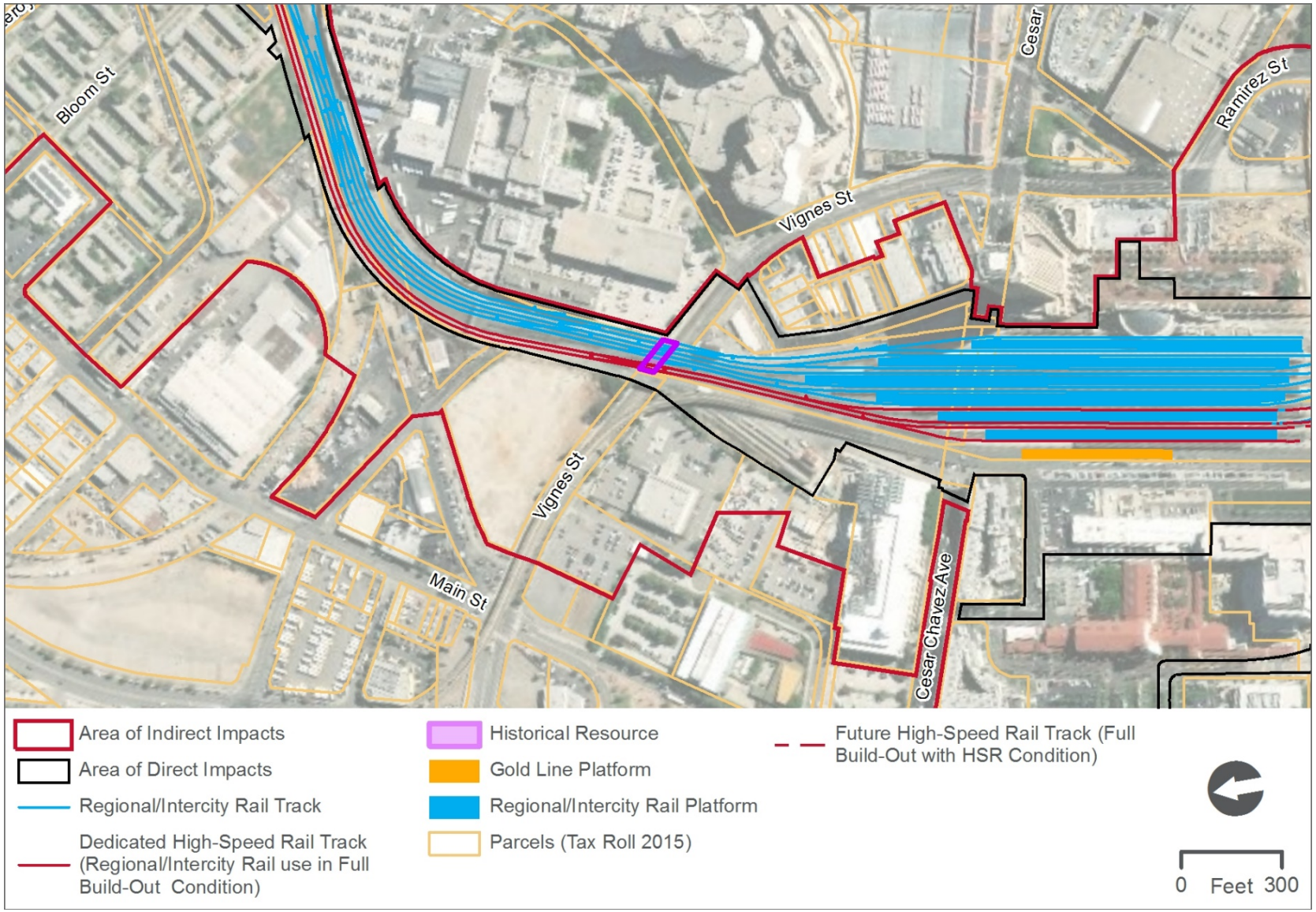
Figure 7-4. Vignes Street Undercrossing Historical Resource Boundary and Areas of Direct and Indirect Impacts (Build Alternative)



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William Mead Homes

Proposed Project

The ADI includes track improvements and a retaining wall/sound wall that would be located within the railroad ROW. A temporary construction easement is required outside of the railroad ROW to provide space for construction vehicles and equipment to construct the retaining wall/sound wall. Proposed activities within the temporary construction easement would include excavation to set wall footings and staging activities. No permanent encroachment or impacts on the William Mead Homes property, including recreation areas, sidewalks or streets, would result from the proposed project (Figure 7-5). Although construction of a retaining wall and sound wall would introduce new visual elements, these features would be restricted to Metro's existing ROW and situated at the rear of the property such that they would not be visible from the property frontage. Nonetheless, this is considered a significant impact for William Mead Homes. Through ongoing coordination with the Housing Authority of the City of Los Angeles and the residents of William Mead Homes to identify appropriate aesthetic treatments, such as wall treatments, captured in Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 (described in Section 8.0) are proposed to reduce impacts to a level less than significant.

Build Alternative

In contrast to the proposed project, the track improvements including two new lead tracks for the planned HSR system and a retaining wall/sound wall associated with the build alternative would extend outside of the railroad ROW; thereby resulting in a physical encroachment along the southern edge (or rear) of the property (Figure 7-6). This encroachment would require a partial acquisition along the property's southern border, which in turn would require the modification to portions of Bolero Lane. The modifications would extend the roadway centerline into the lawn areas closer to the existing buildings, and remove up to 21 parking spaces, a portion of one of the laundry areas, a modern handball court, and small portion of the baseball field. None of the contributing buildings would be acquired or altered. Nonetheless, this is considered a significant impact. Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 (described in Section 8.0) are proposed to reduce impacts; however, impacts would remain significant and unavoidable.

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Figure 7-5. William Mead Homes Historical Resource Boundary and Areas of Direct and Indirect Impacts (Proposed Project)

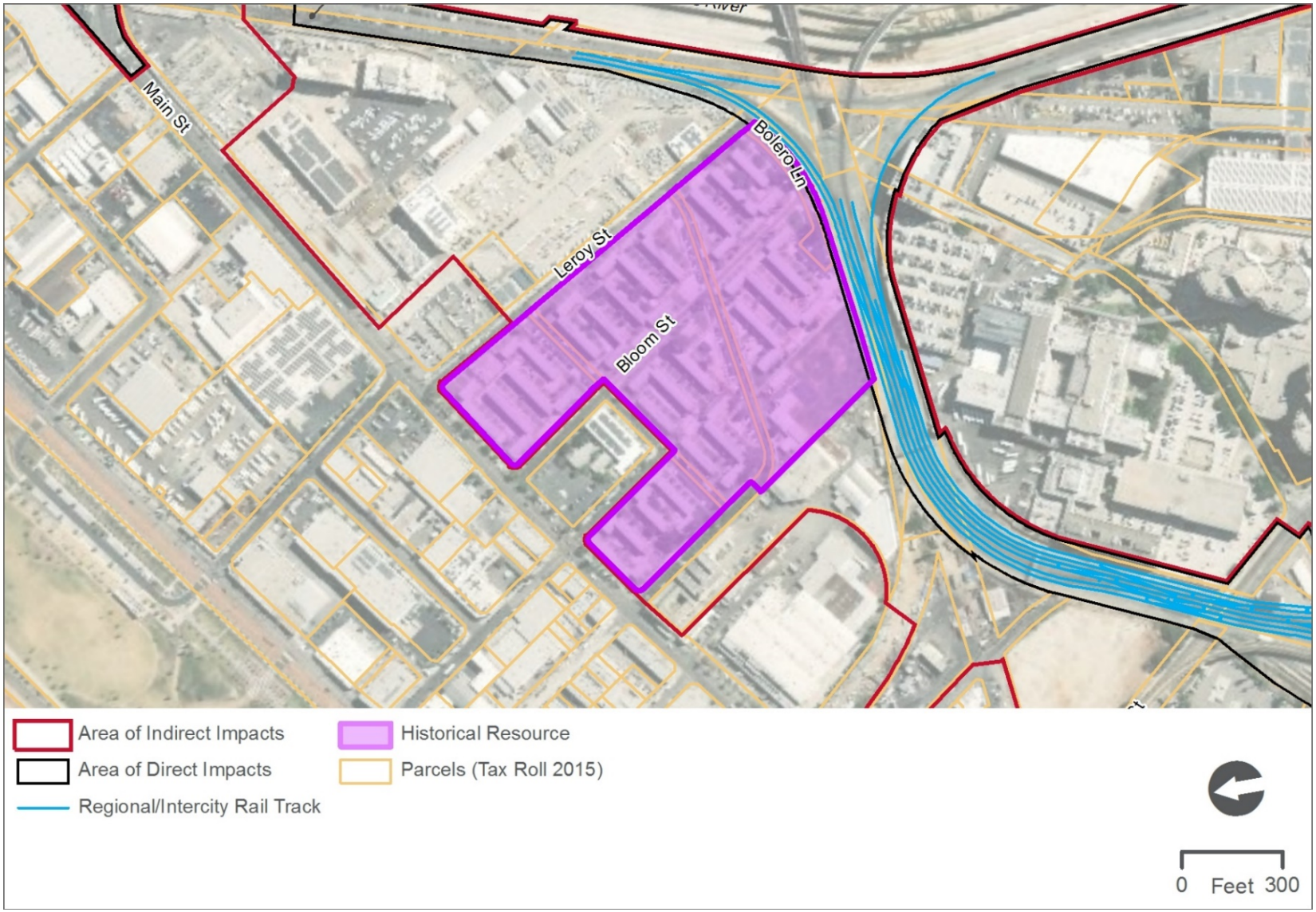

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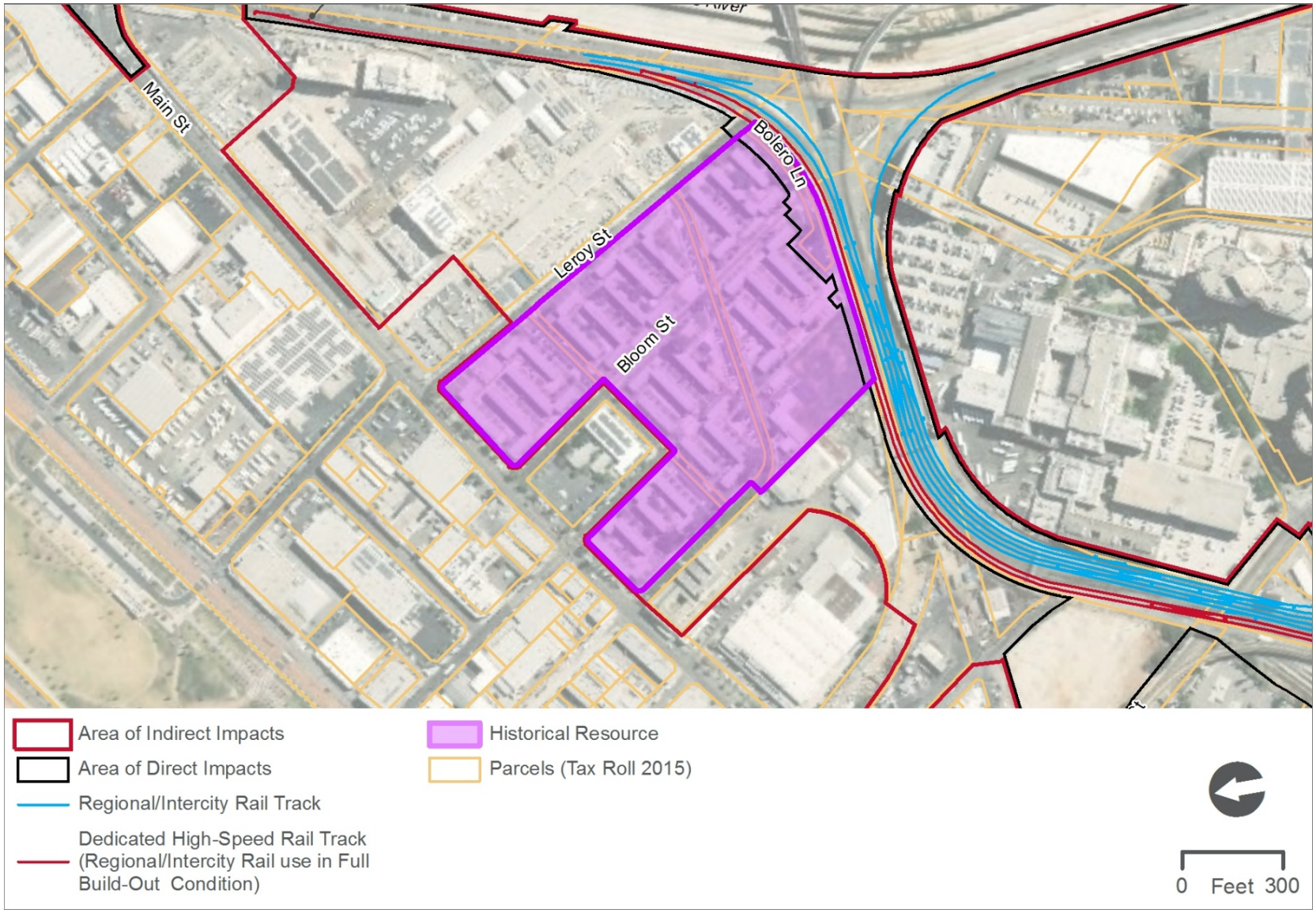
Figure 7-6. William Mead Homes Historical Resource Boundary and Areas of Direct and Indirect Impacts (Build Alternative)



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Friedman Bag Company-Textile Division Building

Proposed Project and Build Alternative

The Friedman Bag Company—Textile Division Building would be demolished in the interim condition for construction of the loop track (Figure 7-7). This is considered a significant impact. Mitigation Measure HIST-3 is proposed to reduce this impact; however, impacts would remain significant and unavoidable.

North Main Street Bridge (Bridge #53C 1010)

Proposed Project and Build Alternative

Both the proposed project and the build alternative would include the same type of safety improvements at the North Main Street Bridge location (Figure 7-8 and Figure 7-9). Safety improvements at the North Main Street Bridge include: new sidewalk and curb ramps for ADA access; proposed Metrolink wire mesh fence, gates, and hand-railings to keep pedestrians within the sidewalk; modification of northwest and southwest wingwalls to accommodate pedestrian access; modification of the bridge roadway to add a new median (8 inch high, 8 foot wide, and 100 feet in length); new pavement and restriping of the roadway to accommodate the new median and other safety improvements. Work nearby, but not upon, the North Main Street Bridge includes railroad gate and traffic signal improvements, the addition of a second median to the west of the railroad tracks on Main Street, and reconfiguration of an existing utility manhole to grade.

These safety improvements have potential to cause a significant impact on the North Main Street Bridge as a historical resource. The bridge's wingwalls are an important character defining feature, and there is no historic period precedent for a median upon its decking where the new median would be constructed. Mitigation Measure HIST-4 (described in Section 8.0) includes provisions that require the design of sidewalks, decking, and wingwalls to follow the Secretary of Interior's Standards for the Treatment of Historic Properties, and for the City of Los Angeles CHC to review the proposed modifications pursuant to Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance. Mitigation Measure HIST-4 is proposed to reduce impacts to a level less than significant.

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Figure 7-7. Friedman Bag Company Historical Resource Boundary and Areas of Direct and Indirect Impacts (Proposed Project and Build Alternative)

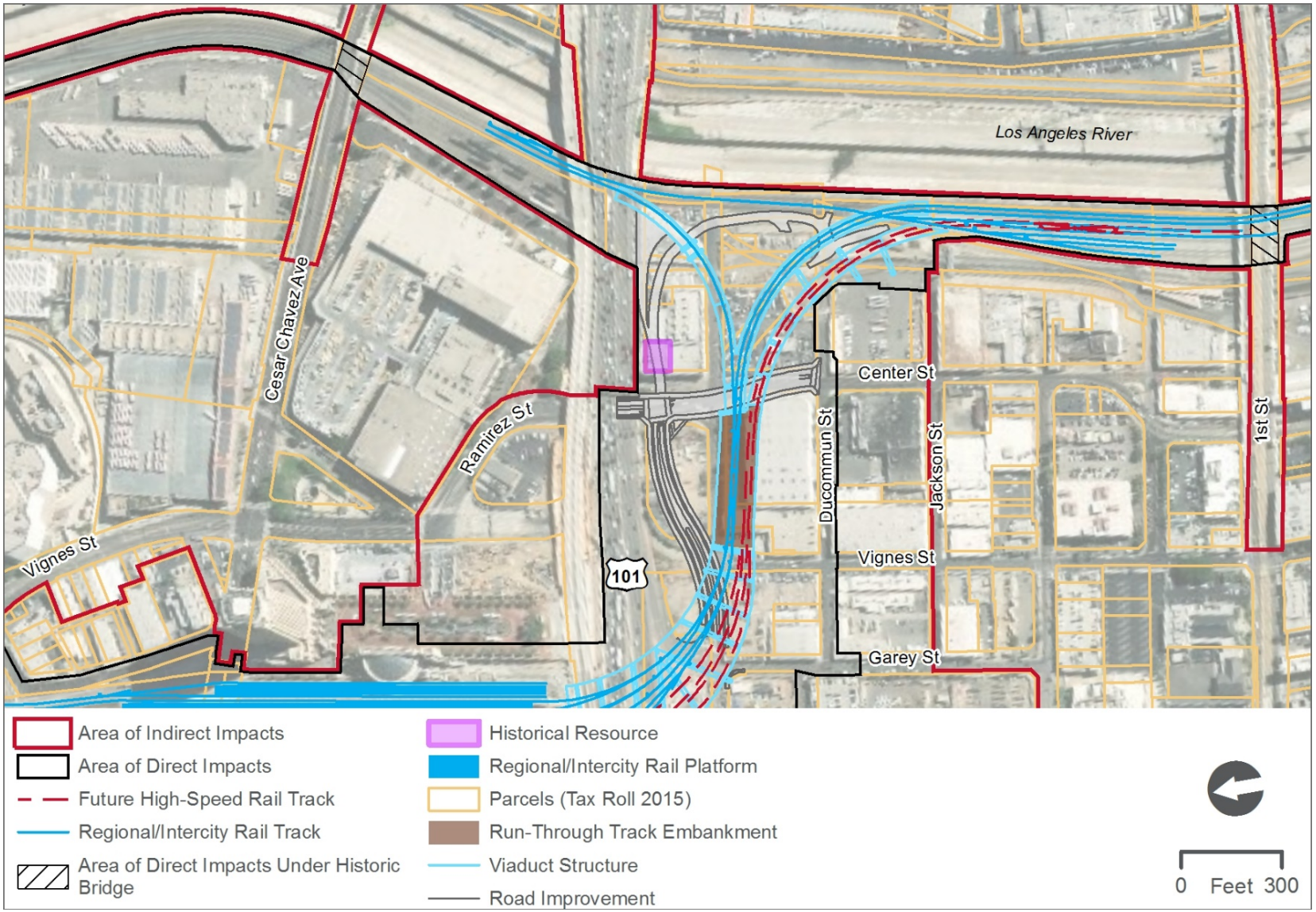

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Figure 7-8. North Main Street Bridge Historical Resource Boundary and Areas of Direct and Indirect Impacts (Proposed Project)

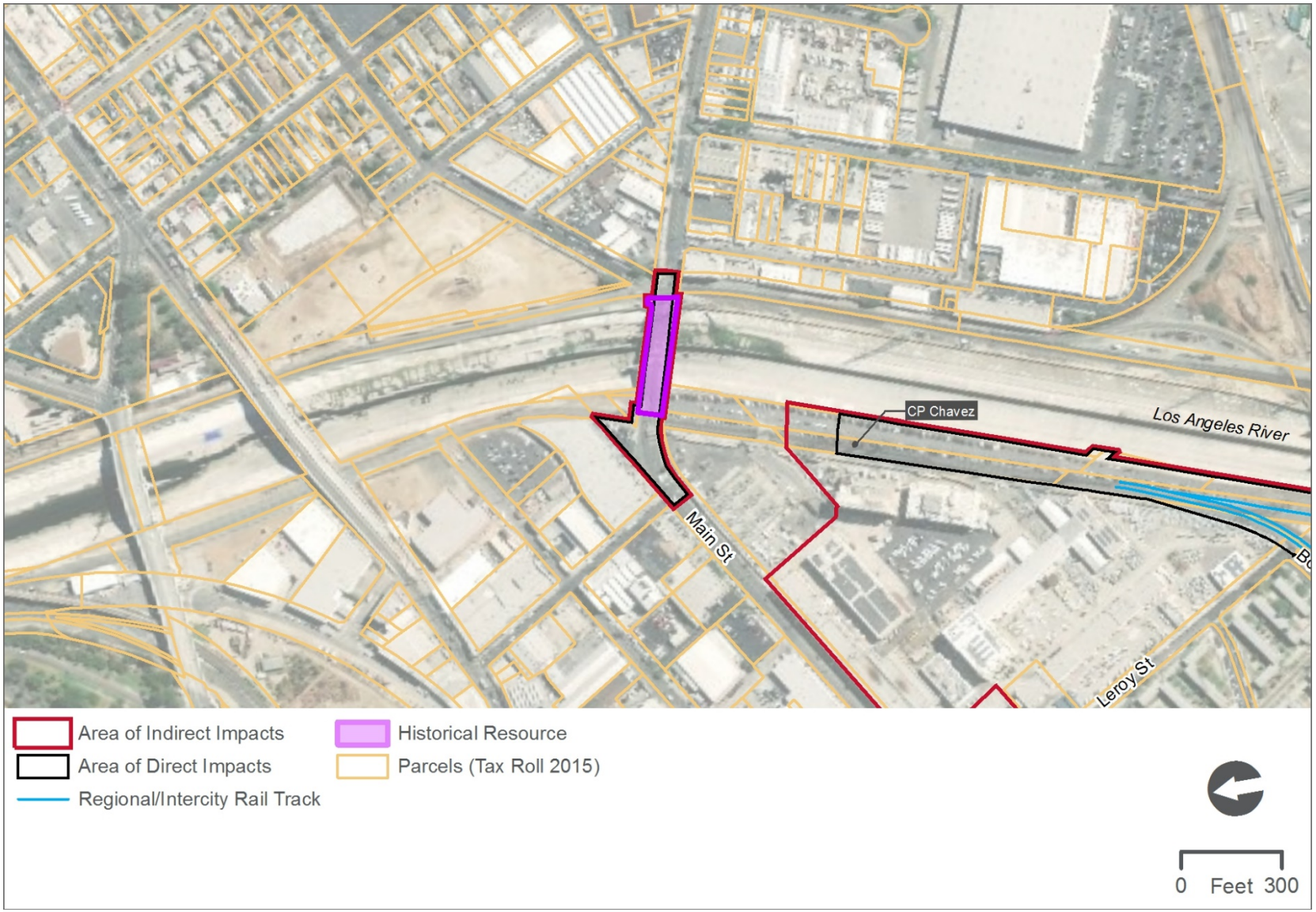

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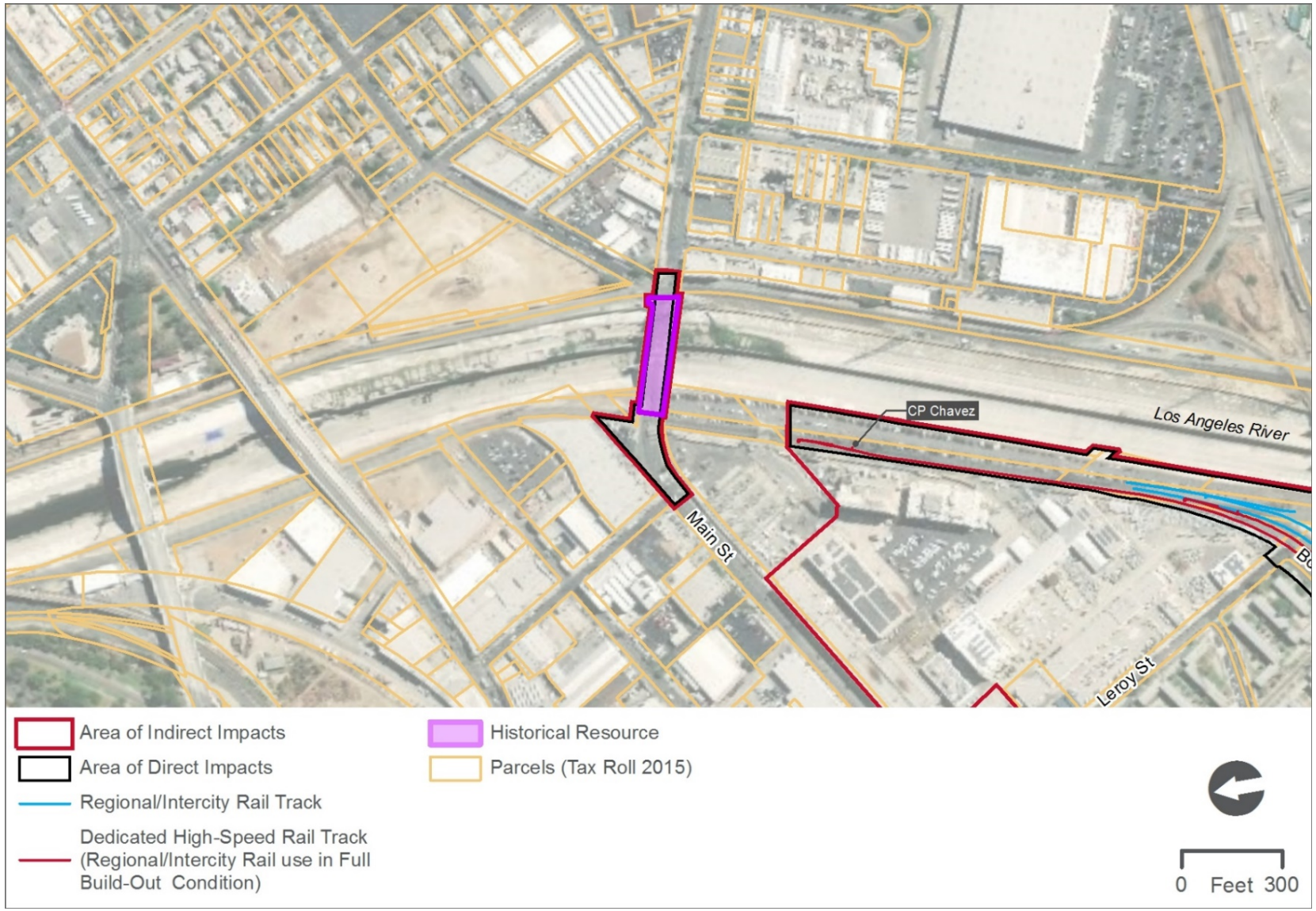
Figure 7-9. North Main Street Bridge Historical Resource Boundary and Areas of Direct and Indirect Impacts (Build Alternative)



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7.1.3 Direct Impacts – Operations

Proposed Project and Build Alternative

Once operational, the proposed project or the build alternative would involve passenger train operations along the railroad corridor and periodic maintenance on the railroad ROW. There are no anticipated corresponding impacts on any of the built environment historical resources as the result of long-term operations. No impacts from long-term operations would occur.

7.1.4 Indirect Impacts

Proposed Project and Build Alternative

The following historical resources are considered for potential indirect impacts:

LAUS – The above-grade passenger concourse with the new expanded passageway (proposed project) and the at-grade passenger concourse (build alternative) are incompatible with LAUS as a historical resource, resulting in indirect visual impacts. Additionally, at this early stage of project design, the elevated portion of the above-grade passenger concourse may include a modern design element over the rail yard, which is incompatible with the historic fabric and other character-defining features of LAUS. The elevated portion of the above-grade passenger concourse is vertical in nature, and with a 90-foot maximum height above existing grade, it would be visible behind the historic concourse and outdoor courtyards, which are extant character-defining features of LAUS. Though the above-grade passenger concourse incorporates a new expanded passageway in the same general location as the present historic pedestrian passageway that is at-grade and offers a similar pattern of east to west circulation across LAUS, this new expanded passageway is of non-historic dimensions, design, and materials and would have new vertical and expanded horizontal circulation elements. The at-grade passenger concourse is similar in this manner to the newly proposed expanded passageway element of the above-grade concourse. Unlike the existing condition at LAUS, the elevated portion of the above-grade passenger concourse design would include lighting that would illuminate at night.

Historically, LAUS and its landscape have been experienced primarily, though not completely, in a horizontal, at-grade capacity. A transit rider enters the complex from Alameda Street, either into the waiting room or the ticketing concourse, ultimately moving through enclosed, rectangular courtyards that are traditional features of Spanish Renaissance and Spanish Revival architecture. A visitor might sit and wait temporarily in any of these areas before continuing eastward through the existing passenger concourse and into the pedestrian passageway before ascending up ramps to their respective boarding platform.

As originally designed, LAUS separated the circulation of inbound and outbound passengers through means such as a three part passenger concourse, which is now altered, and a taxi pickup that was once located off the south courtyard, among other features. Arrival and departure separation is no longer a LAUS circulation feature, and though horizontal circulation was a primary feature, axial circulation was not. As presented above, a vertical circulation element with the ascent or descent up or down ramps to board trains

has always been historically present, and the introduction in the early 1990s of the Red and Purple Line subways set a precedent for pronounced vertical circulation, compromising the horizontal circulation many historically experienced within LAUS prior. The difference with the elevated portion of the above-grade passenger concourse is that its vertical and expanded circulation elements are prominently expressed in newly introduced and incompatible massing, height, volume, and form, where such elements did not pre-exist, and in a modern style.

Though LAUS's historic courtyards would not be directly impacted, both the elevated portion of the above-grade passenger concourse and the grand canopy associated with the at-grade passenger concourse may be visible from within them. The at-grade passenger concourse features a grand canopy structure that would be 70 feet above the elevated rail yard platforms although lower than the proposed height of the elevated portion of the above-grade passenger concourse. Neither the new expanded passageway element of the above-grade passenger concourse nor the at-grade passenger concourse would be visible from the historic courtyards, LAUS, or beyond.

These indirect impacts on LAUS are considered a significant impact for LAUS. While Mitigation Measures HIST-1a through HIST-1d (described in Section 8.0) are proposed to reduce impacts at LAUS, the impacts would remain significant and unavoidable.

William Mead Homes – Construction of a sound wall atop the retaining wall adjacent to the William Mead Homes complex would result in indirect impacts on the property because visual elements associated with a sound wall would occur where there was not previously one. For both the proposed project and the build alternative, the retaining wall and sound wall would be situated at the rear of the property such that they would not be visible from the property frontage. Nonetheless, this is considered a significant indirect impact for William Mead Homes. Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 (described in Section 8.0) are proposed to reduce impacts to a level less than significant.

Los Angeles Department of Water and Power Main Street Center – The proposed project or the build alternative would introduce a retaining wall within the railroad ROW and adjacent to the historical resource boundary, but neither would acquire any portion of the historical resource nor any of the contributing buildings. Los Angeles Department of Water and Power Main Street Center resource has a utilitarian/industrial character, and the visual impact associated with introduction of a new retaining wall and movement of existing railroad tracks closer to the contributing buildings on the property is considered less than significant.

Mission Tower – The tracks that connect to LAUS that would be elevated for the proposed project or the build alternative would return to grade well before they reach Mission Tower. The visual change from the existing condition would be minimal at Mission Tower, and the integrity of the characteristics that qualify it for the CRHR would not be diminished. Therefore, impacts are considered less than significant.

Terminal Annex – The rear of the building would not be destroyed, damaged, nor altered and no portion of the property would be acquired as a result of the proposed project or the build alternative. Potential

vibration from work in parcels adjacent to the property is unlikely to disturb the current occupants and function of the building, because drilling, and not pile driving, is proposed at this location. Impacts are considered less than significant.

Macy Street School – Under either the proposed project or the build alternative, the setting at LAUS, west of the Macy Street School, would be changed, but it does not contribute to historic significance under Criterion 1 (association with events that have made a significant contribution to the broad patterns of history) for ethnic heritage or Criterion 2 (association with the lives of historically important persons) for association with Principal Sterry. Impacts are considered less than significant.

Los Angeles Plaza Historic District – No direct impact on the Los Angeles Plaza Historic District would occur because it would not be physically disturbed or altered by the proposed project or the build alternative. The elevated portion of the above-grade passenger concourse would be a maximum height of 90 feet above existing grade, and the grand canopy associated with the at-grade passenger concourse would be a maximum height of 70 feet above the elevated rail yard platforms. The appearance of these infrastructure elements may result in an indirect visual impact since they may be visible from portions of the plaza area. However, none of the characteristics that qualify Los Angeles Plaza Historic District for the CRHR would have their integrity diminished because the views east from the Plaza have changed substantially since the end of the period of significance (1932). This view of the landscape has changed dramatically over the last 8 decades because of the construction of LAUS, modernization of Alameda and Los Angeles Streets, construction of US-101 and the El Monte Busway, high-rise condominium buildings, Gateway Plaza, and the MWD Headquarters. Therefore, impacts are considered less than significant.

Denny's Restaurant – The parking lot would be used as a temporary staging area for the proposed project or the build alternative. The Denny's building would not be physically disturbed or altered, and its setting would be unchanged after construction is completed. Impacts are considered less than significant.

7.2 Archaeological Resources

7.2.1 Direct Impacts – Construction

Archaeological Site CA-LAN-1575/H

Proposed Project and Build Alternative

Archaeological Site CA-LAN-1575/H extends throughout the parcel boundaries of LAUS and likely extends farther than the currently defined boundary (Attachment A). Implementation of any phase of the proposed project or the build alternative would result in disturbance, displacement, or damage to archaeological remains present in Archaeological Site CA-LAN-1575/H. This site has components that are NRHP/CRHR eligible under Criterion D/4 that have yielded and are anticipated to yield significant archaeological data related to the Prehistoric/Historic Native American Period (AD 1000 to 1848) and the American Period (1850 to 1966). Past archaeological projects that impacted the site indicate that significant components of Archaeological Site CA-LAN-1575/H would be directly impacted by construction of the proposed project or

the build alternative. Features from the remains of Chinatown, including privies and architectural elements such as floors, foundations, and a large number of items left by the residents who were forced to relocate, may be encountered. Artifacts, features, and possibly human remains may be uncovered from the Native American component.

Ground-disturbing construction activities during any phase of work would occur in areas known to contain Archaeological Site CA-LAN-1575/H and in areas that may contain previously undiscovered prehistoric and historical archaeological sites. Under any phase of the proposed project or the build alternative, Archaeological Site CA-LAN-1575/H may sustain direct impacts as the result of proposed construction activities (e.g., excavations for utility relocations, retaining walls, bridge supports, and drainage improvements). Although a large percentage of the site has been covered in artificial fill, the proposed depth of construction activities for both the proposed project and the build alternative range from 5 to 100 feet below the present ground surface. Many activities would penetrate below the maximum recorded level of artificial fill and would likely impact significant archaeological deposits. For the proposed project, the above-grade passenger concourse would have generally shallower excavations punctuated with deep support piles (of up to 100 feet in depth) to support the structure over the rail yard. The build alternative with an-at-grade passenger concourse would result in greater potential for impacts as to the proposed project due to the substantially greater amount of excavation that would occur. This is considered a significant impact. Mitigation Measures HIST-5 and HIST-6 (described in Section 8.0) are proposed to reduce impacts to a level less than significant.

7.2.2 Direct Impacts – Operations

Proposed Project and Build Alternative

Once operational, the proposed project or the build alternative would involve passenger train operations along the railroad corridor and periodic maintenance on the railroad ROW. Since operations would occur at ground surface, and intact archaeological resources are buried, there would be no anticipated corresponding impacts on archaeological historical resources throughout operations. No impacts from long-term operations would occur.

7.2.3 Indirect Impacts

Proposed Project and Build Alternative

During construction activities for any phase of the proposed project or the build alternative, even though the construction site would be fenced and off-limits to the general public, indirect impacts may still result from increased accessibility to archaeological resources (such as artifacts) by construction personnel that could lead to resource looting or vandalism activities. Damage to improperly curated artifacts and other specimens is considered a significant impact. Mitigation Measure HIST-5 (described in Section 8.0) is proposed to reduce impacts to a level less than significant.

7.3 Human Remains

Native American burials have been encountered during previous projects at LAUS and in the ADI, and there is a high likelihood that more undiscovered burials are present in the area.

7.3.1 Direct Impacts – Construction

Proposed Project and Build Alternative

Ground-disturbing construction activities associated with the proposed project or the build alternative during all phases of work would occur in areas with the potential to contain human remains. This is considered a significant impact. Mitigation Measure HR-1 (described in Section 8.0) is proposed to reduce impacts to a level less than significant.

7.3.2 Direct Impacts – Operations

Proposed Project and Build Alternative

Once operational, the proposed project or the build alternative would involve passenger train operations along the railroad corridor and periodic maintenance of the railroad ROW. Since operations would occur at ground level and the discovery of human remains would occur only with ground-disturbing construction, there would be no anticipated corresponding impacts of these operations on human remains. No impact from operations would occur.

7.3.3 Indirect Impacts

Proposed Project and Build Alternative

Indirect impacts on human remains during any phase of the proposed project or the build alternative are not anticipated. No impact would occur.

7.4 Tribal Cultural Resources

Tribal Cultural Resource CA-LAN-1575/H has been identified within the ADI. Its boundary is currently associated with the parcel boundaries of LAUS, although it is likely to extend farther than its currently defined boundary (Attachment A).

7.4.1 Direct Impacts – Construction

Proposed Project and Build Alternative

Ground-disturbing construction activities for any phases of the proposed project or the build alternative that would have excavations in areas with the potential to contain Tribal Cultural Resource CA-LAN-1575/H as it relates to the descendants of groups that inhabited the area in the Native American period is

considered a significant impact. Mitigation Measures HIST-4 and HIST-5, in addition to TCR-1 (described in Section 8.0), are proposed to reduce this impact to a level less than significant.

7.4.2 Direct Impacts – Operations

Proposed Project and Build Alternative

Once operational, the proposed project or the build alternative would involve passenger train operations along the railroad corridor and periodic maintenance of the railroad ROW. Since operations would occur at ground surface and the intact tribal cultural resource is buried, there would be no anticipated corresponding impacts of these operations to tribal cultural resources. No impact would occur.

7.4.3 Indirect Impacts

Proposed Project and Build Alternative

Even though the construction site would be off limits to the general public, during construction activities associated with any phase of the proposed project or the build alternative, indirect impacts may result from increased accessibility by construction personnel to the tribal cultural resource (such as artifacts or sacred items) that could lead to resource looting or vandalism activities. Damage to improperly curated artifacts and other specimens is considered a significant impact. Mitigation Measure HIST-4 (described in Section 8.0) is proposed to reduce impacts to a level less than significant.

8.0 Mitigation Measures

8.1 Built Environment Resources

Per Section 15126.4(a)(4)(b) of the CEQA Guidelines, mitigation measures must be roughly proportional to the impacts of the project. As result, the mitigation measures for LAUS Historical Resources include four parts (HIST-1a to HIST-1d) because the historical resource is recognized as significant at multiple levels (LAHCM, California Historical Landmark, and listed in the NRHP/CRHR when it was found to have exceptional importance) and because multiple character-defining features would be demolished or altered as a result of the proposed project or the build alternative. In addition, due to the association of the historical resource Vignes Street Undercrossing with LAUS, the mitigation measures for the undercrossing are included under relevant LAUS mitigation measures (HIST-1a to HIST-1b).

Similarly, the mitigation measures for William Mead Homes, Friedman Bag Company-Textile Division Building (HIST-2 and HIST-3), and the North Main Street Bridge (HIST-4) are commensurate with the significance of each resource and the extent of impacts from implementation of the proposed project or the build alternative.

HIST-1a LAUS City of Los Angeles Cultural Heritage Commission (CHC) Review and Consultation: Metro shall comply with the applicable Cultural Heritage Ordinance sections for LAUS. Per Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of any designated historic-cultural monument without first having applied for and been granted a permit. The Director of Planning may refer a permit to the CHC when there is a potential discrepancy between the proposal and the standards. The commission may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180-day extension to the objection period upon a vote of the City Council.

HIST-1b LAUS Historic American Building Survey- (HABS) Like Documentation: Historic Resource Recordation: Impacts resulting from the demolition or alteration of character-defining features of LAUS shall be minimized through archival documentation of as-built and as-found conditions. Prior to initiation of construction work at LAUS, Metro shall ensure that documentation of the character-defining features proposed for demolition is completed in a manner similar to a HABS, Level I survey documentation. The further documentation of LAUS shall include large-format photographic recordation, detailed historic narrative report, and compilation of historic research. The documentation shall be completed by a qualified architectural historian or historian who meets the Secretary of the Interior's Professional Qualification Standards for History or Architectural History. The archival documentation shall be donated to a suitable repository, such as the City of Los Angeles Public Library.

At a minimum, but not limited to, the following character-defining features shall be included in this documentation:

- Pedestrian passageway
- Ramps
- Railings
- Platforms
- Butterfly shed canopies
- South retaining wall
- Terminal Tower
- Car Supply/Maintenance Building
- Cesar Chavez Avenue Undercrossing
- Vignes Street Undercrossing (this bridge, which was constructed as part of LAUS, does not require additional individual HABS documentation)

HIST-1c LAUS Restoration of the Existing Passenger Concourse: To ensure compatibility with the architecturally significant buildings that comprise LAUS, and to mitigate the demolition and/or alteration of character-defining features at LAUS, the original passenger concourse, shall be restored, where feasible, from an engineering and constructability standpoint, to its 1939 appearance in accordance with the Secretary of the Interior's Standards for Restoration. The original passenger concourse is a distinct transitional space between the waiting hall and the pedestrian passageway, having a low and flat ceiling with chamfered, rectangular columns with flared capitals. The original passenger concourse presently contains multiple retail spaces, restrooms, Amtrak ticketing and baggage handling, and the entrance to the subterranean Red and Purple subway lines. This includes possible re-design of the entrance to the Metro Red Line Subway to be more compatible with the historic LAUS design. Metro shall design and implement the restoration in consultation with and with approval from the City of Los Angeles CHC and OHR prior to final design.

HIST-1d LAUS Educational Exhibit: Because the passenger interface (i.e., the pedestrian passageway, ramps, railings, and butterfly shed canopies) between the trains and the architecturally significant buildings at LAUS would be demolished and replaced by a new design, an educational display shall be created by Metro and installed at LAUS that can be viewed by the public to demonstrate the history of LAUS and how it was used by past railroad passengers. Metro shall design and implement the educational display in consultation with the City of Los Angeles CHC and OHR during final design.

HIST-2 William Mead Homes Consultation: Mitigation Measure AES-1 (described in the *Link US Visual Impact Assessment*) requires coordination with HACLA on the aesthetic treatments for the proposed retaining wall and sound wall. Metro shall send copies of pertinent consultation documentation regarding proposed retaining wall and sound wall design and/or aesthetic treatments including plans, specifications, and other documentation to the City of Los Angeles OHR to keep them apprised of the consultation process.

HIST-3 Friedman Bag Company—Textile Division Building-City of Los Angeles Office of Historical Resources Review and Consultation and HABS-Like Documentation: Prior to demolition, the character-defining features of the historical resource shall be photographed in a manner similar to HABS standards, submitted to the City of Los Angeles OHR for review and approval, and the archival documentation shall be donated to a suitable repository, such as the City of Los Angeles Public Library.

HIST-4 North Main Street Bridge City of Los Angeles CHC Review and Consultation: Metro shall ensure that prior to construction, work proposed on all elements and character-defining features of the North Main Street Bridge, including, but not limited to, its sidewalks, decking, and wingwalls, shall follow the Secretary of Interior's Standards for the Treatment of Historic Properties. The North Main Street Bridge is designated a LAHCM (#901). Pursuant to Article 1, Section 22.171.14 of the City Cultural Heritage Ordinance, no person, owner or other entity shall demolish, alter, rehabilitate, develop, construct, restore, remove, or change the appearance of the North Main Street Bridge without first having applied for and been granted a permit by the City of Los Angeles. The Director of Planning may refer a permit to the CHC when there is a potential discrepancy between the proposal and the standards. The commission may vote to object or not object to the issuance of a permit, for up to 180 days, with an additional 180-day extension to the objection period upon a vote of the City Council.

8.2 Archaeological Resources

Mitigation measures for Archaeological Site CA-LAN-1575/H (HIST-5 and HIST-6) are presented below.

HIST-5 Archaeological Site CA-LAN-1575/H: Preparation of a Cultural Resource Mitigation and Management Plan (CRMMP): Prior to construction, Metro's qualified archaeologist shall develop a CRMMP that includes the treatment and management for known historical resources, determines thresholds of significance for each of the feature types encountered, and the process for treating unanticipated discoveries. The CRMMP shall contain a robust research design, a data recovery plan, a monitoring plan for sensitive areas, and a plan for the analysis and long-term curation of archaeological materials recovered during construction. The CRMMP shall detail the discovery protocol if human remains and/or funerary objects, sacred objects, and objects of cultural patrimony are encountered and shall include a plan for reburial in an appropriate location. The CRMMP shall be consistent with the Secretary of Interior's Standards and Guidelines for Archaeological Documentation and the California Office of Historic Preservation's *Archaeological Resources Management*.

Consulting Tribes under AB 52 for the project shall have the opportunity to review and comment on the Draft CRMMP. Provisions within the CRMMP may include arrangements with tribal representatives, for example, to respectfully reinter tribal resources on site if practicable.

The CRMMP shall include, at a minimum, the following:

- *Efforts to Preserve and Protect in Place*: The CRMMP, per CEQA Guidelines 15162.4(b)(3), shall attempt to avoid impacts on Archaeological Site CA-LAN-1575/H and preserve in place any areas where significant components of Archaeological Site CA-LAN-1575/H are known to exist.
- *Development of a Preconstruction Site-Specific Sensitivity Model:* Final design feature location and the respective level and depth of ground disturbance shall serve as the basis for impact to known locations of previously recorded archaeological features. Comparison with historic maps for the area shall identify specific site features buried within the project study area, if any. Further, specific geotechnical boring results and past archaeological reports that identify depth of fill shall determine the level of sensitivity to encounter archaeological remains for each construction component. A three-dimensional model or other relatable graphic depiction shall be created to assist Metro with the interpretation of potential archaeological impacts.
- *Phasing of Feature Testing in Advance of Construction, Excavation, and Recovery:* The CRMMP shall contain very specific methodology regarding testing of known features identified through the development of the sensitivity model. Due to the extreme constraints posed by the project area location (affecting public transportation through closure of roads, etc.), testing shall occur as part of the preconstruction activities. This CRMMP shall also contain specific methodology regarding feature evaluation, data recovery, and analysis for reporting.
- *Archaeological Monitoring*: The CRMMMP shall identify monitoring locations and protocols based on the final design and potential impacts. Metro shall retain archaeological monitors who will be supervised by a qualified archaeologist who meets the Secretary of Interior's Professional Qualification Standards in Archaeology and experienced in analysis and evaluation of the types of material anticipated to be encountered. All archaeological monitors shall be trained in the types of materials they may encounter. The CRMMP shall rely on an Occupational Safety and Health Administration-qualified determinations in regards to the safety of monitoring locations and the potential for contaminated soils or other hazards.

- *Worker Environmental Awareness Program Training (WEAP):* A qualified archaeologist shall be retained to prepare a cultural resource-focused WEAP training that shall be given to all ground-disturbing construction personnel to minimize harm to Archaeological Site CA-LAN-1575/H and any previously undiscovered archaeological resources. Topics to be included for WEAP training shall be identified in the CRMMP. All site workers shall be required to complete WEAP Training, with a focus on cultural resources, including education on the consequences of unauthorized collection of artifacts, and a review of discovery protocol. WEAP training shall also explain the requirements of mitigation measures that must be implemented during ground-disturbing construction activities in archaeologically sensitive areas.
- *Archaeological Reporting*: All archaeological reports shall meet the requirements set forth for reporting in the CRMMP and be submitted to Metro.
    - *Evaluation and Data Recovery Reports:* Where archaeological evaluation and data recovery are required, the results shall be documented in an evaluation and data recovery report. This document shall summarize the evaluation efforts and data recovery results. For each site or feature that undergoes data recovery, the report shall be prepared in accordance with the guidelines established by the Secretary of the Interior's Standards for Archaeological Documentation and the Archaeological Resource Management Reports: Recommended Contents and Format.
    - *Archaeological Monitoring Report:* Metro's qualified archaeologist shall prepare a yearly written report detailing monitoring activities performed at Archaeological Site CA-LAN-1575/H and at any other previously undiscovered archaeological site. A final monitoring report shall be written by Metro's qualified archaeologist upon completion of grading and excavation activities within cultural bearing soils. The yearly report shall include the results of the fieldwork for the time period and all appropriate laboratory and analytical studies that were performed in conjunction with excavations.
- *Curation of Archaeological Collections:* Archaeological collections are comprised of several components, including but not limited to artifacts, environmental and dating samples, field documentation, laboratory documentation, photographic records, related historical documents, and reports. All artifacts, notes, photographs, and other materials recovered during the monitoring program related to Archaeological Site CA-LAN-1575/H, and any historical resource encountered during construction shall be curated or reburied by Metro, following the specific guidelines presented in the CRMMP.

HIST-6 Development of a Public Participation or Outreach Plan: Prior to construction, Metro shall develop a public outreach and educational plan that includes continued consultation and input from Native American Tribes consulting under AB 52 and other potential stakeholders. The plan may include visual/educational exhibits or murals within LAUS, the development of an educational telephone application, or other published or digital educational material that may be used to inform the public regarding the significance of Historic Chinatown or earlier use and sacredness of the area as it relates to Native Americans.

8.3 Human Remains

Implementation of the following mitigation measure would avoid, minimize, or reduce significant impacts related to human remains.

HR-1 Human Remains: In the event that any human remains or related resources are discovered during construction, such resources shall be treated in accordance with applicable state and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate. All construction affecting the discovery site shall immediately cease until the County Coroner is contacted (within 24 hours of the discovery of potential human remains, as required by CEQA Guidelines, Section 15064.5[e]), and the human remains are evaluated by the County Coroner for the nature of the remains and cause of death. The County Coroner must determine within 2 working days of being notified if the remains are subject to their authority. PRC Section 5097.98 requires that the immediate vicinity where the discovery occurred be subject to no further disturbances and be adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. If the remains are determined to be of Native American origin, the coroner shall contact the NAHC by phone within 24 hours, and the NAHC shall be asked to determine the most likely descendants who are to be notified or, if the remains are unidentifiable, to establish the procedures for burial within 48 hours of notification. All parties involved shall ensure that any such remains are treated in a respectful manner and that all applicable local, state, and federal laws are followed. This discovery protocol shall be included in the CRMMP.

8.4 Tribal Cultural Resources

Implementation of the following mitigation measure would avoid, minimize, or reduce significant impacts related to tribal cultural resources.

TCR-1 Native American Monitoring*:* To ensure tribal cultural resources are treated with culturally appropriate dignity, Metro shall retain a Native American monitor to be present at all phases of work with the potential to impact Archaeological Site CA-LAN-1575/H. A Native American monitor shall also be present at all phases of work with the potential to impact other previously undiscovered archaeological resources related to ethnohistoric or prehistoric archaeological deposits. The Native American monitor shall be selected from a tribal group with ancestral ties to this location, to be present alongside the archaeological monitor. The CRMMP shall guide Native American monitoring and shall include details on the potential discovery of previously undiscovered ethnographic and prehistoric archaeological deposits, human remains, and other sensitive resources.

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9.0 Level of Significance after Mitigation

For the proposed project, a summary of the level of significance after implementation of mitigation is as follows:

- For LAUS and the associated Vignes Street Undercrossing, Mitigation Measures HIST-1a through HIST-1d are proposed; however, impacts would remain significant and unavoidable.
- For William Mead Homes, Mitigation Measures AES-1 (described in the *Link US Visual Impact Assessment*) and HIST-2 would reduce impacts to a level less than significant.
- For the Friedman Bag Company—Textile Division Building, Mitigation Measure HIST-3 is proposed; however, impacts would remain significant and unavoidable.
- For the North Main Street Bridge, Mitigation Measure HIST-4 would reduce impacts to a level less than significant.
- For Archaeological Site CA-LAN-1575/H, implementation of Mitigation Measures HIST-5 and HIST-6 would reduce impacts to a level less than significant.
- For human remains, Mitigation Measure HR-1 would reduce impacts to a level less than significant.
- For tribal cultural resources, implementation of Mitigation Measures HIST-5 and HIST-6, as well as TCR-1, would reduce impacts to a level less than significant.

For the build alternative, the level of significance for each of the resources above is the same as the proposed project, with exception of William Mead Homes. For the build alternative, upon implementation of Mitigation Measures AES-1 and HIST-2, impacts at William Mead Homes would remain significant and unavoidable.

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