Los Angeles County
Metropolitan Transportation Authority

West Santa Ana Branch Transit Corridor

Revised Final Cultural Resources Effects Report



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WEST SANTA ANA BRANCH TRANSIT CORRIDOR PROJECT

Revised Final Cultural Resources Effects Report

Prepared for:

Metro

Los Angeles County
Metropolitan Transportation Authority

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January 22, 2024

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APPENDICES

APPENDIX A – CULTURAL RESOURCES APE MAP

APPENDIX B – SUMMARY OF CONSULTATION

APPENDIX C – CONSTRUCTION VIBRATION RESULTS

ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AB 52	California Assembly Bill 52
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
CRMDP	Cultural Resources Monitoring and Discovery Program
DPR	Department of Parks and Recreation
EIR	environmental impact report
EIS	environmental impact statement
FOE	Finding of Effect
FTA	Federal Transit Administration
HCM	(City of Los Angeles) Historic-Cultural Monument
HPOZ	(City of Los Angeles) Historic Preservation Overlay Zone
I-	Interstate
ITS	Intelligent Transportation System
kV	kilovolt
LA	Los Angeles
LACDA	Los Angeles County Drainage Area
LADWP	Los Angeles Department of Water and Power
LAX	Los Angeles International Airport
LPA	Locally Preferred Alternative
LRT	light rail transit
LRTP	Long Range Transportation Plan
LRV	light rail vehicle
Metro	Los Angeles County Metropolitan Transportation Authority
MRN	map reference number

Acronym	Definition
MSF	maintenance and storage facility
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
P-	Primary number
P.L.	Public Law
PEIR	program environmental impact report
PEROW	Pacific Electric Right-of-Way
PQS	Professional Qualifications Standards
PRC	Public Resources Code
PWA	Public Works Administration
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
SHPO	State Historic Preservation Officer
SOI Standards	Secretary of the Interior's Standards for the Treatment of Historic Properties
TCP	traditional cultural property
TCR	Tribal Cultural Resource
TPSS	traction power substation
UPRR	Union Pacific Railroad
USACE	United States Army Corps of Engineers
USC	United States Code
WSAB	West Santa Ana Branch

1 INTRODUCTION

1.1 Study Background

This Revised Final Cultural Resources Effects Report was prepared to present an analysis of effects of the West Santa Ana Branch (WSAB) Transit Corridor Project (Project) on historic properties in accordance with Section 106 of the National Historic Preservation Act (NHPA) (Section 106) and an analysis of significant impacts on historical resources in accordance with the California Environmental Quality Act (CEQA).

1.1.1 Cultural Resources Studies in Support of the Draft EIS/EIR

An initial cultural resources investigation was conducted for the Project in support of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). That investigation, with methodology and results summarized in the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 1* (Survey Report—Rev 1; Los Angeles County Metropolitan Transportation Authority [Metro 2020a]), identified historic properties/historical resources with the potential to be affected/impacted by the Project, which initially consisted of four Build Alternatives (Alternatives 1, 2, 3, and 4). The investigation consisted of the following: delineation of an Area of Potential Effects (APE) through consultation among the Federal Transit Administration (FTA), Metro, and the State Historic Preservation Officer (SHPO); a background research effort that included searches of the California Historical Resources information System (CHRIS) and consultation with Native American contacts and local interested parties in compliance with Section 106 and Assembly Bill (AB) 52; built environment and archaeological surveys of the APE; and the recordation and evaluation of 436 properties for listing in the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), and local registers as applicable.

The investigation summarized in the Survey Report—Rev 1 resulted in the identification of the following in the APE:

- Seven previously recorded archaeological resources assumed eligible for listing in the NRHP
- Eighteen built environment resources that were previously listed in or determined eligible for the NRHP and/or CRHR
- Thirty-six built environment resources eligible for listing in the NRHP and CRHR
- Fourteen properties ineligible for listing in the NRHP but eligible for the CRHR and/or local designation

The Survey Report—Rev 1 was submitted to the SHPO on March 30, 2020. SHPO did not provide comments or objections on the APE or a review of the eligibility determinations as presented in the Survey Report—Rev 1.

An effects/impacts[1] analysis was performed for all archaeological and built environment historic properties/historical resources identified in the Survey Report—Rev 1 and was presented in the *West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report* (Preliminary Cultural Resources Effects Report; Metro 2020b). Along with the Survey Report—Rev 1, the Preliminary Cultural Resources Effects Report was circulated with the Project's Draft EIS/EIR. The Draft EIS/EIR and supporting technical studies were circulated for public review and comment from July 30, 2021, to September 28, 2021.

1.1.2 Cultural Resources Studies in Support of the Final EIS/EIR

1.1.2.1 Area of Potential Effects

Following circulation of the Draft EIS/EIR, the APE was expanded as a result of design modifications, traffic mitigation measures, and changes in temporary construction easements.

The APE was delineated to consider all potential effects (physical, noise, vibration, visual, cumulative) of the four originally proposed Build Alternatives on archaeological and built environment historic properties; this includes direct effects, those that may occur concurrently with the Project, and indirect and cumulative effects that may occur following project implementation (Advisory Council on Historic Preservation [ACHP] 2019). While the APE was originally delineated to consider all potential effects of the four proposed Build Alternatives, the current report only focuses on the potential effects of the Locally Preferred Alternative (LPA). Due to distance, none of the historic properties/historical resources located north of the LPA have the potential to be impacted/affected by construction or operation. However, one historic property/historical resource (map reference number [MRN] 8-013/a portion of the Pueblo Del Rio Public Housing Complex Historic District), located just north of the northern terminus of the LPA, was included in the effects/impacts assessment to ensure that potential effects/impacts were adequately considered.

The "direct APE" encompasses roadway rights-of-way (ROWs) where construction would occur. It also captures potential vibration, settlement, and visual effects to historic properties and includes areas with ground disturbance. The APE incorporates consideration for indirect effects to built environment resources in an "architectural APE." Generally, the architectural APE encompasses the direct APE plus one parcel out from the areas of construction or the first row of adjacent parcels in all areas where the alignment is underground or aerial. Within locations where the alignment would be at-grade, within existing highway, railroad, or Metro ROW, the architectural APE is the same as the direct APE.

Since 2022, the APE was expanded in select locations, primarily to account for consideration of temporary construction easements and minor design changes resulting from stakeholder coordination and public comments received on the Draft EIS/EIR. A summary of these changes is included in Chapter 2 of this document. Expansion of the APE followed the delineation methodology outlined above. However, in areas where small-scale, low-lying modifications consistent with the existing urban environment are proposed on parcels adjacent to road ROWs (for example, curb construction and sidewalk realignment) or where

[1] The analysis presented in this study complies with both Section 106 and CEQA. The language used by Section 106 and CEQA varies. Therefore, throughout the document a slash ("/") is used to differentiate between the language used for analysis in compliance with each law. For example, Section 106 analyzed effects to historic properties whereas CEQA analyzed significant impacts to historical resources, addressed throughout this document as "effects/impacts" and "historic properties/historical resources."

acquisitions may be needed to facilitate such modifications, the direct APE was expanded to encompass the construction footprint associated with those changes. In these locations, the architectural APE was limited to the parcel on which such modifications are proposed because the associated potential effects would be minor, visually unobtrusive, and would cause little change to the existing setting in a highly developed area.

Additionally, portions of the direct APE coincide with existing roadway ROW. In these locations, the direct APE considers ground disturbance associated with construction of roadway modifications, for example changes to lane geometry or the addition of traffic signals or at-grade crossing equipment. The methodology employed in expanding the APE in these areas assumes that in these locations, the direct APE extends up to 10 feet on adjacent parcels to account for potential ground disturbance associated with driveway regrading and curb and/or sidewalk reconstruction. Because the modifications proposed in these areas are consistent with existing conditions and their introduction does not have the potential to affect adjacent parcels as a whole, the architectural APE coincides with the direct APE in these areas. As noted in Section 8.1, FTA and Metro discussed delineation methods associated with the APE expansion that occurred following circulation of the Draft EIS/EIR with representatives from the SHPO's office in a meeting held on May 22, 2023. These methods were detailed in the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report–Rev 2* (Survey Report—Rev 2 [Metro 2023a]), which is further described in Section 1.1.2.2 and was submitted to SHPO on May 11, 2023, with concurrence received on June 29, 2023.

As originally delineated and presented in the Draft EIS/EIR, the vertical extent of the APE varied to encompass the depth of ground disturbance associated with tunneling and the maximum height of the Project in areas where the alignment was proposed to be aerial. It originally extended from approximately 115 feet below the existing ground surface to approximately 90 feet above the existing ground surface. However, following circulation of the Draft EIS/EIR and SHPO concurrence on the Survey Report—Rev 2, the depth of the APE was expanded from approximately 115 to approximately 150 feet below the existing ground surface to account for the depth associated with geotechnical borings necessary to support future stages of design and project construction. The height of the APE above grade remains approximately 90 feet. A detailed APE map is included in Appendix A.

1.1.2.2 Updated Cultural Resources Survey Report

The LPA for the Project, presented in the Survey Report—Rev 1, Survey Report—Rev 2, and Preliminary Cultural Resources Effects Report as Alternative 3, was selected by the Metro Board of Directors in January 2022. The Survey Report—Rev 1 was updated to account for the following: expansion of the APE; an update in the Project's construction schedule from a completion date of 2028 to 2034; consideration of the historical significance of portions of three river channels (the Los Angeles River [LA River] Channel, the Rio Hondo Channel, and the San Gabriel River Channel) as a result of comments received on the Draft EIS/EIR from the United States Army Corps of Engineers (USACE); and integration of information related to one of the archaeological historic properties/historical resources previously assumed eligible for listing in the NRHP in the Survey Report—Rev 1 (P-19-002849), which indicated that this archaeological resource is no longer extant. Additional analysis necessary due to these updates is presented in the Survey Report—Rev 2. Consistent with the Survey Report—Rev 1, the Survey Report—Rev 2 identified historic properties/historical resources in the APE associated with the four Build Alternatives.

The updated study summarized in the Survey Report—Rev 1 and Survey Report—Rev 2 resulted in the identification of the following within the APE associated with the LPA:

- Zero known archaeological historic properties/historical resources
- Eight built environment historic properties/historical resources previously listed in or determined eligible for listing in the NRHP
- Eleven built environment historic properties/historical resources that were determined eligible for listing in the NRHP
- Three built environment historical resources that do not qualify as historic properties under Section 106 due to their ineligibility for NRHP listing and are only considered resources for the purposes of CEQA

The Survey Report—Rev 2 was submitted to SHPO on May 11, 2023. On June 14, 2023, representatives from the SHPO's office reached out to FTA via email stating that their review was in process and that clarification was needed regarding the addresses of four properties that were recommended ineligible for listing in the NRHP. FTA provided clarification via email on June 23, 2023. In a letter to FTA dated June 29, 2023, SHPO provided concurrence with FTA's documentation and delineation of the APE. Additionally, SHPO provided concurrence with FTA's determination of NRHP eligibility of 3 properties and NRHP ineligibility of 27 properties not included in the Survey Report—Rev 1 but included in the Survey Report—Rev 2 due to the previously described APE expansion. Supporting materials related to the SHPO consultation is provided in Appendix B.

1.1.2.3 Updated Cultural Resources Effects Report

The Cultural Resources Effects Report was updated consistent with the Survey Report—Rev 2 to account for updates to the APE and project design changes; findings were presented in the Final Cultural Resources Effects Report (Metro 2023d), which was submitted to SHPO on November 17, 2023. While the Survey Report—Rev 2 included the entire APE that encompassed the four Build Alternatives evaluated in the Draft EIS/EIR, the Final Cultural Resources Effects Report presents only the portion of the APE that encompasses direct or indirect effects associated with the LPA. The Final Cultural Resources Effects Report presented an assessment of effects/impacts of a No Build Alternative and of the LPA, including design option, on the historic properties and historical resources located in the APE associated with the LPA. This Revised Final Cultural Resources Effects Report was updated to incorporate comments provided by SHPO on the Final Cultural Resources Effects Report in a meeting on January 3, 2024, and in a subsequent letter dated January 4, 2024. A summary of consultation that occurred following release of the Draft EIS/EIR resulting in revisions to the Cultural Resources Effects Report is included in Section 8. Supporting materials for the consultation are provided in Appendix B.

In accordance with guidance provided by the ACHP, potential direct effects are those that may come from the Project at the same time and place with no intervening cause; indirect effects are those that are caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable; and cumulative effects are effects on the environment that result from the incremental effects of the action when added to the effects of other past, present, and reasonably foreseeable actions (ACHP 2019; n.d.). Potential direct, indirect, and cumulative effects to identified historic properties were assessed using the standards for federal undertakings, as described in Section 106 of the NHPA and its implementing regulations 36 Code of Federal Regulations (CFR), Part 800. Potential impacts

to historical resources were assessed using the CEQA thresholds of significance as outlined in Section 15064.7.

In accordance with Section 106, this Revised Final Cultural Resources Effects Report concluded that the LPA will have no adverse effect on archaeological or built environment historic properties; therefore, treatment measures are not required.

In accordance with CEQA, the study concluded that the LPA will have no significant impact to built environment historical resources and no mitigation is required. Ground-disturbing activities associated with construction of the LPA may result in significant impacts to unanticipated archaeological discoveries that may qualify as historical resources. Through implementation of Mitigation Measures CR-1 through CR-4 which addresses unanticipated discoveries to archaeological resources, significant impacts to archaeological historical resources will be reduced to less than significant.

1.2 Disposition of Data

Upon the conclusion of consultation with SHPO, this report will be filed with the FTA, Metro, the South Central Coastal Information Center (SCCIC) located at California State University, Fullerton, and Rincon Consultants, Inc. (Rincon).

2 PROJECT DESCRIPTION

This section describes the No Build Alternative and the LPA studied in the WSAB Transit Corridor Final EIS/EIR, including station locations, and the MSF. The LPA was developed through a comprehensive alternatives analysis process and meets the purpose and need of the Project.

The No Build Alternative and LPA are generally defined as follows:

- **No Build Alternative:** Reflects the transportation network in the 2042 horizon year without the LPA. The No Build Alternative includes the existing transportation network along with planned transportation improvements that have been committed to and identified in the constrained *Metro 2009 Long Range Transportation Plan* (2009 LRTP) (Metro 2009) and SCAG's *2016-2040* RTP/SCS (SCAG 2016), as well as additional projects funded by Measure M that would be completed by 2042.
- **LPA:** The LPA consists of a 14.5-mile LRT line that will extend from the northern terminus in the City of Los Angeles/Florence-Firestone community of LA County to a southern terminus in the City of Artesia.

Figure 2-1 illustrates the LPA. The northern terminus of the LPA will be located just south of the intersection of Long Beach Avenue and Slauson Avenue, connecting to the current Slauson/A Line Station. South of Slauson Avenue, the LPA will follow the UPRR-owned La Habra Branch[2] ROW east along Randolph Street. At the Ports-owned San Pedro Subdivision ROW, the LPA will turn southeast to follow the San Pedro Subdivision ROW and then transition to the PEROW south of the I-105 freeway. The LPA will then follow the Metro-owned PEROW to the southern terminus at the Pioneer Station in Artesia. Figure 2-2 depicts the alignment sections that will require freight track relocation. The LPA will be grade separated where warranted, as indicated on Figure 2-1.

[2] The La Habra Branch may also be referred to as the La Habra Subdivision. La Habra Branch is used within this document.

Figure 2-1. Locally Preferred Alternative Alignment by Grade



Source: WSP and TAHA 2023

Figure 2-2. Existing Rail Right-of-Way Ownership



Source: WSP and TAHA 2023

2.1 No Build Alternative

For the NEPA evaluation, the No Build Alternative is evaluated in the context of the existing transportation facilities in the project corridor (the corridor extends approximately 2 miles from each side of the four alternatives evaluated in the Draft EIS/EIR) and other capital transportation improvements and/or transit and highway operational enhancements that are reasonably foreseeable. Because the No Build Alternative provides the background transportation network against which the LPA's impacts are identified and evaluated, the No Build Alternative does not include the Project.

The No Build Alternative reflects the transportation network in 2042 and includes the existing transportation network along with planned transportation improvements that have been committed to and identified in the constrained Metro 2009 LRTP and the SCAG 2016 RTP/SCS, as well as additional projects funded by Measure M, a sales tax initiative approved by voters in November 2016. The No Build Alternative includes Measure M projects that are scheduled to be completed by 2042.

The required environmental baseline socioeconomic growth projections, including the reasonably foreseeable transportation network in 2042, were established in July 2017 when the preparation of the Draft EIS/EIR began. The SCAG 2016-2040 RTP/SCS was the adopted current regional growth forecast at the time the Draft EIS/EIR baseline was established. Specifically, the baseline year 2017 and future year 2042 population, housing, and employment are derived from the Transportation Analysis Zone-level estimates from the SCAG 2016-2040 RTP/SCS.

Table 2.1 lists the existing transportation network and planned improvements included as part of the No Build Alternative based on the Metro 2009 LRTP and SCAG 2016 RTP/SCS.

Table 2.1. No Build Alternative – Existing Transportation Network and Planned Improvements

Project	To / From	Location Relative to Study Area
Rail (Existing)		
Metro Rail System (LRT and Heavy Rail Transit)	Various locations	Within Study Area
Metrolink (Southern California Regional Rail Authority) System	Various locations	Within Study Area
Rail (Under Construction/Planned)[1]		
Metro Westside D Line Extension	Wilshire/Western to Westwood/VA Hospital	Outside Study Area
Metro C Line Extension[2] to Torrance	96th Street Station to Torrance	Outside Study Area
Metro C Line Extension	Norwalk to Expo/Crenshaw	Outside Study Area
Metro East-West Line/Regional Connector/Eastside Phase 2	Santa Monica to Lambert Road Santa Monica to Peck Road	Within Study Area
Metro North-South Line/Regional Connector/Foothill Extension to Claremont Phase 2B	Long Beach to Claremont	Within Study Area

Project	To / From	Location Relative to Study Area
Metro Sepulveda Transit Corridor	Metro G Line to Metro E Line	Outside Study Area
Metro East San Fernando Valley Transit Corridor	Sylmar to Metro G Line	Outside Study Area
Los Angeles World Airport Automated People Mover	96th Street Station to LAX Terminals	Outside Study Area
Metrolink Capital Improvement Projects	Various projects	Within Study Area
California High-Speed Rail	Burbank to LA LA to Anaheim	Within Study Area
Link US[3]	LAUS	Within Study Area
Bus (Existing)		
Metro Bus System (including BRT, Express, and local)	Various locations	Within Study Area
Municipality Bus System[4]	Various locations	Within Study Area
Bus (Under Construction/Planned)		
Metro G Line (BRT)	Del Mar (Pasadena) to Chatsworth Del Mar (Pasadena) to Canoga Canoga to Chatsworth	Outside Study Area
Vermont Transit Corridor (BRT)	120th Street to Sunset Boulevard	Outside Study Area
North San Fernando Valley BRT	Chatsworth to North Hollywood	Outside Study Area
North Hollywood to Pasadena	North Hollywood to Pasadena	Outside Study Area
Highway (Existing)		
Highway System	Various locations	Within Study Area
Highway (Under Construction/Planned)		
High Desert Multi-Purpose Corridor	SR-14 to SR-18	Outside Study Area
I-5 North Capacity Enhancements	SR-14 to Lake Hughes Road	Outside Study Area
SR-71 Gap Closure	I-10 to Rio Rancho Road	Outside Study Area
Sepulveda Pass Express Lane	I-10 to US-101	Outside Study Area
SR-57/SR-60 Interchange Improvements	SR-57/SR-60	Outside Study Area
I-710 South Corridor Project (Phases 1 and 2)	Ports of Long Beach and LA to SR-60	Within Study Area
I-105 Express Lane	I-405 to I-605	Within Study Area
I-5 Corridor Improvements	I-605 to I-710	Outside Study Area

Source: Metro 2018, WSP 2019
Notes: [1] Where extensions are proposed for existing Metro rail lines, the origin/destination is defined for the operating scheme of the entire rail line following completion of the proposed extensions and not just the extension itself.
[2] The Metro C Line extension to Torrance includes new construction from Redondo Beach to Torrance; however, the line will operate from Torrance to 96th Street.

[3] Link US rail walk times included only.
[4] The municipality bus network system is based on service patterns for Bellflower Bus, Cerritos on Wheels, Cudahy Area Rapid Transit, Get Around Town Express, Huntington Park Express, La Campana, Long Beach Transit, Los Angeles Department of Transportation, Norwalk Transit System, and the Orange County Transportation Authority.
BRT = bus rapid transit; LA = Los Angeles; LAUS = Los Angeles Union Station; LAX = Los Angeles International Airport; LRT = light rail transit; SR = State Route; VA = Veterans Affairs

2.2 Locally Preferred Alternative

2.2.1 Refinements to the Locally Preferred Alternative

The LPA evaluated in this report is Alternative 3 from the Draft EIS/EIR with refinements to address stakeholder coordination and comments on the Draft EIS/EIR. Refinements to the LPA include the following:

- Shift the Slauson/A Line aerial station platform south and add a second set of vertical circulation and pedestrian circulation elements between the Slauson/A Line Station and the existing A Line Station. Additionally, a set of stairs was added between the A Line station and street level.
- Swap the location of the freight and LRT tracks within the La Habra Branch ROW compared to the Draft EIS/EIR design. Freight tracks will be located on the north side of the ROW and LRT tracks on the south side to accommodate potential freight connectivity to an existing industrial track on the north side of the ROW.
- Open or close at-grade crossings and implement left-turn restrictions over the LRT tracks in the City of Huntington Park:
  - Open crossings previously proposed for closure at Albany Street and Rugby Boulevard
  - Close crossings previously proposed to remain open at Malabar Street and Arbutus Avenue
  - Implement left-turn restrictions at Santa Fe Avenue, Pacific Boulevard, Miles Avenue, and State Street
- Modify roadway design at the southeast corner of Florence Avenue and California Avenue to avoid partial acquisition of infrastructure related to a water well.
- Redesign a freight spur track connection north of Rayo Avenue on the west side of the freight tracks to avoid impacts to a spur track.
- Close the private at-grade crossing at Miller Way. The private business will be displaced by the Project.
- Extend the LRT viaduct north of Imperial Highway to avoid impacts to a spur track and full acquisition of a property.
- Reconfigure the I-105/C Line Station parking facility by removing dedicated transit parking on the west side of the freight tracks and expanding the parking facility on the east side of the freight tracks to the north; also add a new driveway entrance to the parking facility at Century Boulevard.
- Eliminate demolition and reconstruction of the Arthur Avenue and Façade Avenue bridges; modify Façade Avenue to an emergency exit only from the I-105/C Line infill station (rather than a station entrance and exit).
- Modify the replacement freight bridge at I-105 to a four-span structure, consistent with the current bridge, rather than the previously proposed two-span structure.

- Replace the proposed pedestrian undercrossing with a pedestrian bridge at Paramount High School that will span the entire rail ROW.
- Realign the MSF site entrance on Somerset Boulevard to align with Bayou Avenue to allow for a signalized pedestrian crossing of Somerset Boulevard.
- Add protected left turn and a traffic signal on Clark Avenue at Los Angeles Street to accommodate dedicated turning movements to the community.
- Modify alignment of the LRT tracks and soundwall at the Bellflower Mobile Home Park to minimize parking loss and provide replacement parking elsewhere on the property to maintain the existing number of parking spaces.
- Redesign retaining walls on the southeast side of the 183rd Street/Gridley Road crossing from retained fill to columns.
- Incorporate the Artesia Historic District Recreation Trails as an existing, rather than future, condition in the Final EIS/EIR plan set.
- Add a design option that will close 186th Street but keep 187th Street open to traffic in the City of Artesia, and turn Corby Avenue into a cul-de-sac with an access driveway for the existing business.
- Modify the entrance to the Pioneer Station parking structure to align with Solana Place and shift structure north to provide alley egress resulting in an additional level on the Pioneer parking structure to maintain the number of parking spaces identified in the Draft EIS/EIR.
- Extend the median located north of the LRT tracks at the Pioneer Boulevard grade crossing to prohibit left turns from a shopping center driveway along the east side.
- Incorporate Mitigation Measures NOI-4 (Crossing Signal Bell Shrouds) and NOI-5 (Gate-Down-Bell-Stop Variance), recommended in the Draft EIS/EIR to further reduce noise at grade crossings, as Project Measure NOI PM-1 and NOI PM-2 in the Final EIS/EIR to be implemented as part of the LPA.
- Add Project Measure VA PM-8 (Residential Screening for Aerial Structures), which requires privacy screening along portions of the aerial structure adjacent to the rear of residential properties in the Cities of Paramount, Bellflower, and Cerritos if the soundwall in those locations will not be sufficiently tall to provide similar privacy screening.
- Add Project Measures BIO PM-1 (Invasive Plant Species Best Management Practices) and BIO PM-2 (Prohibition of Invasive Plant Species in Landscape Plans) to provide options to minimize the spread of invasive species during construction and prohibit the inclusion of invasive species in landscape plans; add Project Measure BIO PM-3 (LA Metro Tree Policy) to require adherence to LA Metro Tree Policy, adopted by Metro in October 2022.
- Add Project Measure CR PM-1 (Secretary of the Interior Standards Design Review), which requires review and approval of the design of the new LRT bridge and C Line station that will be constructed within the Century Freeway-Transitway Historic District and extension of the Union Pacific LA River Rail Bridge's existing concrete piers by a professional who meets the Secretary of the Interior's Professional Qualification Standards in architectural history, history, or architecture.

Refinements also included the following modifications to construction laydown/staging areas:

- Relocate the construction laydown area near State Street and Randolph Street to east of State Street in the railroad ROW.
- Relocate the laydown area at the southeast corner of Imperial Highway and Garfield Place to north of Imperial Highway within the San Pedro Subdivision ROW.
- Locate a construction laydown/staging area on the east side of the ROW between Rayo Avenue and Southern Avenue.

Additionally, refinements included changes to traction power substations (TPSS) site locations:

- Relocate TPSS Site 14 from the northwest corner of Randolph Street and State Street to the east within railroad ROW.
- Eliminate optional TPSS Sites 16E and 12E in the City of Huntington Park.
- Add Optional TPSS Site 7E within the reconfigured parking facility east of the tracks at the I-105/C Line Station parking facility.
- Relocate the proposed TPSS Site 2 from the northwest side of the intersection of 183rd Street/Gridley Road to the southeast side.

2.2.2 Alignment Configuration

This section summarizes the LPA alignment. The general characteristics of the LPA are summarized in Table 2.2. Figure 2-3 illustrates the freeway crossings along the alignment. Additionally, the LPA will require relocation of existing freight rail tracks within the ROW to maintain existing operations where freight tracks will be in a shared corridor with the LRT tracks. Figure 2-2 depicts the alignment sections that will require freight track relocation.

Table 2.2. Summary of LPA Components

Component	Quantity
Alignment length	14.5 miles
Length of at-grade and aerial	12.1 miles at-grade; 2.4 miles aerial[1]
Station configurations	9 along WSAB alignment, 1 at-grade infill station along C Line 3 aerial; 6 at-grade
Parking facilities	5 total: 4 surface lots and 1 parking structure (approximately 2,800 spaces)
At-grade crossings	30
Elevated street crossings	15
Freight crossings	6
Freeway crossings	4 (1 aerial/overcrossing at I-105; 3 freeway undercrossings[2] at I-710, I-605, SR 91)
Freight realignment	8.7 miles
River crossings	3 (Rio Hondo, LA River and San Gabriel)
TPSS facilities	17
Maintenance and Storage Facility site	1 (City of Bellflower)

Source: WSP 2023, based on December 2023 Plan Set
Notes: [1] Alignment configuration measurements count retained fill embankments as at-grade.
[2] The light rail tracks crossing beneath freeway structures.
LA = Los Angeles; TPSS = traction power substation; WSAB = West Santa Ana Branch

Figure 2-3. Freeway Crossings



Source: WSP 2023

The total alignment length of the LPA will be approximately 14.5 miles, consisting of approximately 12.1 miles of at-grade and 2.4 miles of aerial alignment. The LPA will include nine new LRT stations along the WSAB alignment, of which six will be at-grade and three will be aerial. Additionally, the Project will add one new infill station along the C Line at I-105 to allow transfers between the WSAB alignment and the C Line. Five of the stations will include parking facilities, providing a total of approximately 2,800 dedicated transit parking spaces. Four of the parking facilities will be surface lots and the fifth will be a parking structure. The alignment will include 30 at-grade crossings, 4 freeway crossings (3 freeway undercrossings and 1 aerial freeway crossing), 3 river crossings, 15 aerial road crossings, and 6 freight crossings. The following further describes the LPA along the alignment.

Northern terminus (City of Los Angeles/Florence-Firestone community of LA County): The northern terminus of the LPA will begin at the Slauson/A Line Station, which will serve as a transfer point to the Metro A Line. Transfers between the Slauson/A Line Station and the existing Metro A Line will be accommodated via two pedestrian bridges between the two station platforms. The pedestrian bridges will be located at the southern and northern ends of the platforms and will be accessed by stairs, escalators, and/or elevators. Stairs, escalators, and/or elevators will also connect with the street level on the north side of the station, while stairs will connect with the street level on the south side of the station. An additional set of stairs will be added to the existing A Line Station providing access to street level. Tail tracks[3] accommodating layover storage for a three-car train will extend approximately 1,000 feet north from the station.

La Habra Branch ROW[4] (City of Huntington Park): South of the Slauson/A Line Station, the alignment will turn east along the existing UPRR owned La Habra Branch ROW in the median of Randolph Street. The alignment will be on the south side of the La Habra Branch ROW, and the freight tracks will be realigned but remain in the northern portion of the ROW. The alignment will transition to an at-grade configuration west of Alameda Street and will proceed east along the Randolph Street median. Wilmington Avenue, Regent Street, and Malabar Street will be closed to traffic crossing the ROW, altering the intersection design to a right-in, right-out configuration. The Pacific/Randolph Station will be located just east of Pacific Boulevard. From the Pacific/Randolph Station, the alignment will continue east at-grade. Arbutus Avenue and Rita Avenue will be closed to traffic crossing the ROW, altering the intersection design to a right-in, right-out configuration.

San Pedro Subdivision ROW (Cities of Huntington Park, Bell, Cudahy, South Gate, Downey, and Paramount): At the San Pedro Subdivision ROW, the alignment will transition to an aerial configuration and turn south to cross over Randolph Street and the freight tracks, returning to an at-grade configuration north of Gage Avenue. The alignment will be located on the east side of the existing San Pedro Subdivision ROW freight tracks, and the existing track(s) will be relocated to the west side of the ROW. The alignment will continue at-grade within the San Pedro Subdivision ROW to the at-grade Florence/Salt Lake Station south of Florence Avenue.

[3] Tail tracks are additional tracks that extend beyond the end of the mainline tracks and can be used for temporarily parking, storing, or reversing the direction of trains. While the tracks are designed to allow for layover if needed, trains will not sit at the end of the line.

[4] The La Habra Branch may also be referred to as the La Habra Subdivision. La Habra Branch is used within this document.

The alignment will continue southeast from the at-grade Florence/Salt Lake Station within the San Pedro Subdivision ROW, crossing Otis Avenue, Santa Ana Street, and Ardine Street at-grade. The alignment will be located on the east side of the existing San Pedro Subdivision freight tracks, and the existing tracks will be relocated to the west side of the ROW. South of Ardine Street, the alignment will transition to an aerial structure to cross over the existing UPRR tracks and Atlantic Avenue. The Firestone Station will be located on an aerial structure between Atlantic Avenue and Firestone Boulevard. The Firestone Station will include a dedicated transit parking facility providing approximately 600 parking spaces with a vehicle underpass under the freight tracks to access the parking facility.

The alignment will then cross over Firestone Boulevard and transition back to an at-grade configuration prior to crossing Rayo Avenue at-grade. The alignment will continue south along the San Pedro Subdivision ROW, crossing Southern Avenue at-grade and continuing at-grade until it transitions to an aerial configuration to cross over the LA River. The LRT bridge will be constructed next to the existing freight bridge. South of the LA River, the alignment will transition to an at-grade configuration, then passing under the I-710 freeway through a new box tunnel structure. The alignment will then return to an aerial structure to cross over the Rio Hondo Channel. South of the Rio Hondo Channel, the alignment will transition to an aerial structure to cross over a realigned spur track, Imperial Highway and Garfield Avenue. South of Garfield Avenue, the alignment will transition to an at-grade configuration and serve the Gardendale Station north of Gardendale Street.

From the Gardendale Station, the alignment will continue south in an at-grade configuration, crossing Gardendale Street and Main Street to serve the I-105/C Line Station, which will be located at-grade north of Century Boulevard. The I-105/C Line Station will include a dedicated transit parking facility providing approximately 340 to 360 parking spaces, depending on the location of the TPSS. The alignment will continue at-grade, crossing Century Boulevard, then will cross over the I-105 freeway in an aerial configuration within the existing San Pedro Subdivision ROW bridge footprint. A new Metro C Line Station will be constructed in the median of the I-105 freeway. The I-105/C Line Station will be connected to the new infill C Line Station in the middle of the freeway via a pedestrian walkway on the new LRT bridge. Vertical pedestrian access will be provided from the LRT bridge to the new C Line Station platform via stairs, escalators, and/or elevators. Emergency egress from the C Line Station will also be provided at Façade Avenue via stairs and elevators. To accommodate construction of the new station platform, the existing Metro C Line tracks will be widened and, as part of the I-105 Express Lanes Project, the I-105 lanes will be reconfigured.

PEROW (Cities of Paramount, Bellflower, Cerritos, and Artesia): South of the I-105 freeway, the alignment will continue at-grade within the San Pedro Subdivision ROW. In order to maintain freight operations and allow for freight train crossings, the alignment will transition to an aerial configuration as it turns southeast and enter the PEROW. The existing freight track will cross beneath the aerial alignment and align on the north side of the PEROW east of the San Pedro Subdivision ROW. The Paramount/Rosecrans Station will be located in an aerial configuration west of Paramount Boulevard and north of Rosecrans Avenue. The existing freight track will be relocated to the northeast side of the alignment adjacent to the viaduct structure. The Paramount/Rosecrans Station will include a dedicated transit parking facility providing approximately 490 parking spaces located south of the alignment between Los Angeles Department of Water and Power property and Rosecrans Avenue.

The alignment will continue southeast in an aerial configuration over the Paramount Boulevard/Rosecrans Avenue intersection and descend to an at-grade configuration. The alignment will return to an aerial configuration to cross over Downey Avenue descending back to an at-grade configuration north of Somerset Boulevard. The existing Paramount High School pedestrian bridge will be reconstructed over the LPA and freight tracks to maintain the connection between Paramount High School and the athletics fields. One of the adjacent freight storage tracks at the World Energy facility will be relocated to accommodate the new LRT tracks and maintain storage capacity. There are no active freight tracks south of the World Energy facility (Somerset Boulevard).

The alignment will cross Somerset Boulevard at-grade. South of Somerset Boulevard, the at-grade alignment will parallel the existing Bellflower Bike Trail that is currently aligned on the south side of the PEROW. The alignment will continue at-grade crossing Lakewood Boulevard, Clark Avenue, and Alondra Boulevard. The at-grade Bellflower Station will be located west of Bellflower Boulevard. The Bellflower Station will include a dedicated transit parking facility providing approximately 260 parking spaces.

East of Bellflower Boulevard, the Bellflower Bike Trail will be realigned to the south side of the PEROW to accommodate an existing historic building located near the southeast corner of Bellflower Boulevard and the PEROW. The realigned bike trail will then match the existing bike trail east of the historic building near Bellflower Boulevard. The LRT alignment will continue southeast within the PEROW and transition to an aerial configuration near Cornuta Avenue, crossing over Flower Street and Woodruff Avenue. The alignment will return to an at-grade configuration south of Woodruff Avenue. South of Woodruff Avenue, the Bellflower Bike Trail will be realigned along the north side of the PEROW. Continuing southeast, the LRT alignment will cross under the SR-91 freeway in an existing undercrossing. The alignment will cross over the San Gabriel River on a new bridge, replacing the existing abandoned freight bridge. South of the San Gabriel River, the alignment will transition back to an at-grade configuration before crossing Artesia Boulevard at-grade.

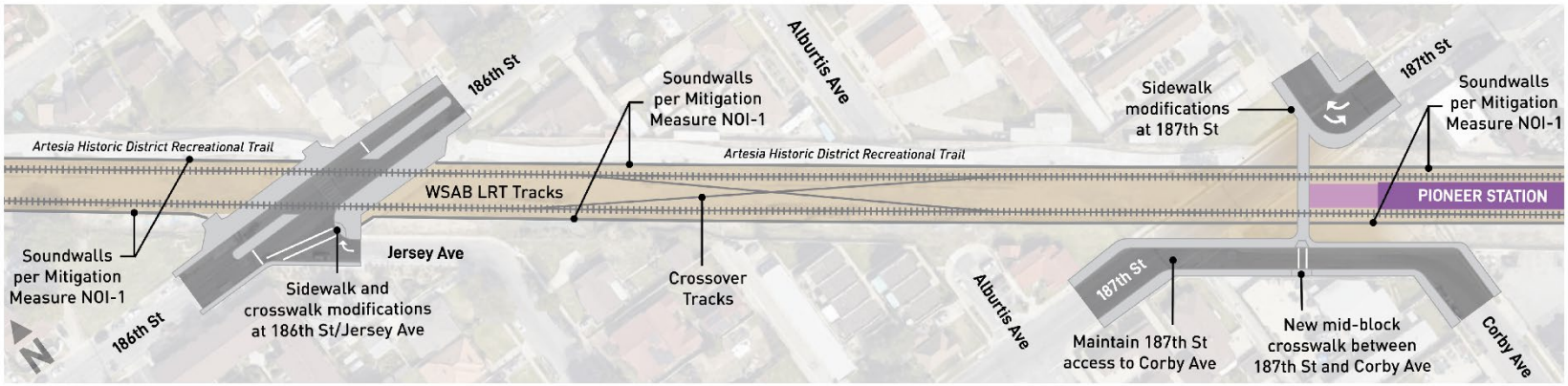
East of Artesia Boulevard, the alignment will cross beneath the I-605 freeway in an existing underpass. Southeast of the underpass, the alignment will continue at-grade, crossing Studebaker Road. North of Gridley Road, the alignment will transition to an aerial configuration to cross over 183rd Street and Gridley Road. The alignment will return to an at-grade configuration and cross 186th Street and 187th Street at-grade. The alignment will then pass through the Pioneer Station on the north side of Pioneer Boulevard at-grade. The Pioneer Station will include a dedicated transit parking facility providing approximately 1,100 parking spaces. Tail tracks accommodating layover storage for a three-car train will extend approximately 1,000 feet south from the station, crossing Pioneer Boulevard and terminating north of South Street.

2.2.3 Design Option – Close 186th Street

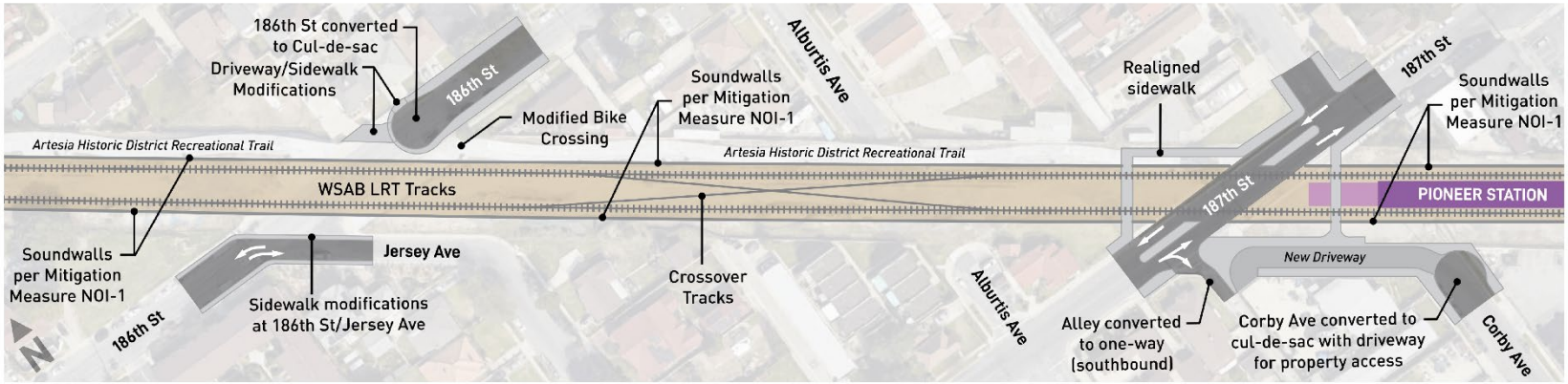
The LPA includes one design option:

- **Design Option:** Close 186th Street – The design option would close 186th Street but keep 187th Street open to traffic in the City of Artesia. Corby Avenue would become a cul-de-sac with an access driveway for the existing business (Figure 2-4).

Figure 2-4. Locally Preferred Alternative and Design Option: Close 186th Street



Locally Preferred Alternative



Design Option 1: Close 186th Street

Source: Cityworks Design and WSP 2023

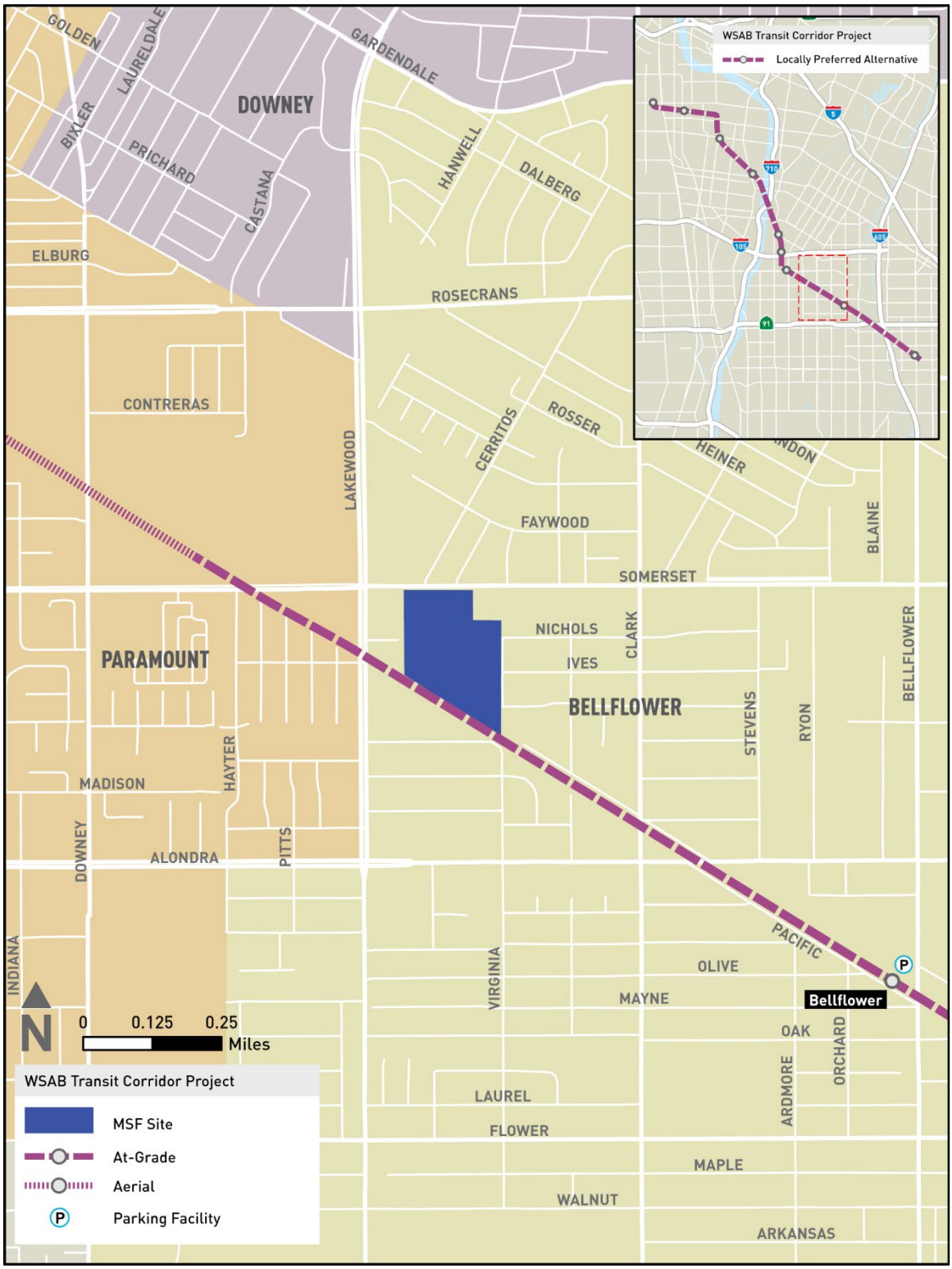
2.2.4 Maintenance and Storage Facility

Generally, each LRT project requires an MSF facility to provide daily servicing and cleaning, inspection and repairs, and storage of light rail vehicles (LRVs). Activities may take place in the MSF throughout the day and night depending upon train schedules, workload, and the maintenance requirements.

In January 2022, the Metro Board identified the Bellflower MSF as the WSAB Project's MSF site. The MSF site is located in the City of Bellflower and is bounded by a mobile home community and industrial facilities to the west, Somerset Boulevard and apartment complexes to the north, residential homes to the east, and the PEROW and Bellflower Bike Trail to the south. Access to the site will be via a signalized driveway at Somerset Boulevard and Bayou Avenue (Figure 2-5). In total, the MSF site is approximately 21 acres and could accommodate up to 80 LRVs to serve the Project's operations plan.

The MSF will have storage tracks, each with sufficient length to store three-car train sets and a maintenance-of-way vehicle storage. The facility will include a main shop building with administrative offices, a cleaning platform, a TPSS, employee parking, a vehicle wash facility, a paint and body shop, and other facilities as needed. The east and west yard leads (i.e., the tracks leading from the mainline to the facility) will have sufficient length for a three-car train set.

Figure 2-5. Maintenance and Storage Facility Site



Source: WSP and TAHA 2023

3 REGULATORY FRAMEWORK

This section discusses the applicable federal, state, and local regulations that 1) define historic properties and historical resources, and 2) provide thresholds for determining effects to historic properties under the NHPA and impacts to historical resources under CEQA.

3.1 Federal

Historic Properties are considered during federal undertakings chiefly under Section 106 of the NHPA of 1966 (as amended) through one of its implementing regulations, 36 CFR Part 800 (Protection of Historic Properties). Properties of traditional religious and cultural importance to Native Americans are considered under Section 101(d)(6)(A) of the NHPA and Section 106 (36 CFR 800.3–800.10).

3.1.1 National Environmental Policy Act

The National Environmental Policy Act of 1969, as amended (Public Law [P.L.] 91-190, 42 United States Code [USC] 4321- 4347, January 1, 1970, as amended by P.L. 94-52, July 3, 1975; P.L. 94-83, August 9, 1975; and P.L. 97-258 § 4(b), September 13, 1982), recognizes the continuing responsibility of the federal government to "preserve important historic, cultural, and natural aspects of our national heritage" (§ 101 [42 USC § 4321], No. 382) and requires that agencies consider the effects of their actions (federal undertakings) on all aspects of the human environment. Federal undertakings (36 CFR 800.16[y]) include projects requiring a federal permit, license, or approval and/or projects receiving federal funding.

3.1.2 National Historic Preservation Act

The National Historic Preservation Act of 1966 (as amended) (54 USC § 300101 through § 320303) is the cornerstone of the federal cultural resources preservation program, as it sets forth the policy and procedures regarding "historic properties." It requires federal agencies to take into account the effects of their undertakings, such as construction projects, on historic properties and properties that an Indian Tribe regards as having religious and/or cultural importance (i.e., traditional cultural properties [TCPs]). Direct effects to historic properties are defined as those that come from an undertaking at the same time and place with no intervening cause. Indirect effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable (ACHP 2019).

Historic properties are defined as any prehistoric or historic districts, sites, buildings, structures, or objects that are included in or eligible for inclusion in the NRHP. To be eligible for inclusion in the NRHP, properties must be significant in American (including state and local) history, architecture, archaeology, engineering, or culture, and generally must be at least 50 years old. Properties must also possess integrity of location, design, setting, materials, workmanship, feeling, or association, and meet at least one of the following criteria (36 CFR 60.4):

A) Are associated with events that have made a significant contribution to the broad patterns of our history
B) Are associated with the lives of persons significant in our past

C) Embody the distinctive characteristics of a type, period, or method of installation, 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
D) Have yielded, or may be likely to yield, information important in prehistory or history

TCPs are properties eligible for inclusion in the NRHP based on associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community (Parker and King 1998). TCPs are typically identified through consultation with tribes or other consulting parties as part of the Section 106 process, as outlined in 36 CFR 800.2.

Section 106 of the NHPA (54 USC § 306108.) requires federal agencies to afford the ACHP, acting through the State OHP or the Tribal Historic Preservation Office, a reasonable opportunity to comment on the effects of an undertaking. It does so through consultation, the goal of which is to identify historic properties potentially affected by the undertaking, assess the undertaking's effects on the historic properties, and seek ways to avoid or minimize (through minimization measures) any adverse effects on historic properties.

3.1.3 American Antiquities Act

The American Antiquities Act of 1906 (6 USC 431-433) establishes a penalty for disturbing or excavating any historic or prehistoric ruin or monument or object of antiquity on federal lands.

3.1.4 Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 (16 USC 470aa et seq.) strengthened protection of archaeological resources on federal and tribal lands. The Archaeological Resources Protection Act also prohibits trafficking in archaeological resources from public and tribal lands and requires notification of affected Native American tribes if archaeological investigations would result in harm to or destruction of any location considered by tribes to have religious or cultural importance. When archaeological investigations are performed under contract to the installation or facility where such sites are located, these contracts serve in lieu of a permit. The implementing regulations are provided in 32 CFR Part 229.

3.1.5 The American Indian Religious Freedom Act

The American Indian Religious Freedom Act of 1978 (P.L. No. 95-341, 92 Stat. 469) requires consultation with Native American groups concerning actions on sacred sites or affecting access to sacred sites. It establishes federal policy to protect and preserve the right to free exercise of religion for American Indians, Eskimos, Aleuts, and Native Hawaiians. It allows these people to access sites, use and possess sacred objects, and to have the freedom to worship through ceremonial and traditional rites. In practical terms, the Act requires federal agencies to consider the impacts of their actions on religious sites and objects that are important to Native Americans, including Alaska Natives and Native Hawaiians, regardless of the eligibility for the NRHP.

3.2 State

The protection of historical resources in California is addressed through the regulatory measures of CEQA.

3.2.1 California Environmental Quality Act

CEQA of 1970 (Public Resource Code [PRC] § 21000 et seq.), requires evaluation of proposed projects that may cause significant effects on historical resources. Under CEQA, "historical resources" must be identified; expected impacts must be analyzed; and mitigation must be identified and implemented, where necessary.

The CEQA Guidelines, in § 15064.5 – Determining the Significance of Impacts to Archaeological and Historical Resources, state that the term "historical resources" shall include the following:

> (1) A resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code — § 5024.1, Title 14 CCR, Section 4850 et seq.).
>
> (2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resources as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
>
> (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources (Pub. Res. Code, §5024.1, Title 14 CCR, Section 14 CCR, Section 4852).

The CEQA Guidelines continue in § 15064.5 (b) stating that, "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." It explains the following:

> (1) Substantial adverse change in the significance of an historic resources means 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.
>
> (2) The significance of an historical resource is materially impaired when a project:
>
> > (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or

> (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
> (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Section 15064.5(b)(3) goes on to explain that:

> (3) Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior' Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than significant on the historical resource.
>
> (4) A lead agency shall identify potentially feasible measures to mitigate significant adverse changes in the significance of an historical resource. The lead agency shall ensure that any adopted measures to mitigate or avoid significant adverse changes are fully enforceable through permit conditions, agreements, or other measures.

3.2.2 The California Register of Historical Resources

The CRHR was established under California PRC § 5024.1 to serve as an authoritative guide to the state's significant historic and archaeological resources. A resource is considered historically significant if it meets the criteria for listing in the CRHR (PRC § 5024.1, Title 14 CCR, § 4852). For a property to be considered eligible for listing in the CRHR, it must be found to be significant under at least one of the following four criteria by the State Historical Resources Commission:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values
4. Has yielded, or may be likely to yield, information important in prehistory or history

In addition to possessing one of the above characteristics, to be eligible for listing in the CRHR, resources must retain "substantial" integrity to their period of significance. The seven aspects or qualities of integrity are the same as those applied to NRHP-eligible properties: location, design, setting, materials, workmanship, feeling, and association.

The CRHR also includes properties that:

- Have been determined eligible for listing in, or are listed in, the NRHP
- Are registered State Historical Landmark No. 770 and all consecutively numbered landmarks above Number 770
- Are points of historical interest that have been reviewed and recommended to the State Historical Resources Commission for listing
- Are City- and County-designated landmarks or districts

Historic districts are a concentration of historic buildings, structures, objects, or sites within precise boundaries that share a common historical, cultural, or architectural background. Individual resources in a historic district may lack individual significance but be considered a contributor to the significance of the historic district.

3.2.3 Assembly Bill 52

With the enactment of AB 52, the CEQA of 1970 (PRC § 5024) was expanded to include a new resource category, Tribal Cultural Resources (TCR). In order to qualify as a TCR, 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 TCR based on the CRHR criteria and the cultural value of a resource to a California Native American tribe (PRC § 21074). AB 52 establishes that "a project with an effect that may cause a substantial adverse change in the significance of a TCR is a project that may have a significant effect on the environment" (PRC § 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a TCR, when feasible (PRC § 21084.3). Appendix G of the CEQA Guidelines contains the following questions related to TCRs:

a) Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i) Listed or eligible for listing in the California Register of Historical Resources, or a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
   ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

In recognition of California Native American tribal sovereignty and the unique relationship of California local governments and public agencies with California Native American tribal governments and with respect to the interests and roles of project proponents, it is the intent of AB 52 to accomplish all of the following:

1. Recognize that California Native American prehistoric, historic, archaeological, cultural, and sacred places are essential elements in tribal cultural traditions, heritages, and identities

2. Establish a new category of resources in CEQA called "Tribal Cultural Resources" or TCRs that considers the tribal cultural values in addition to the scientific and archaeological values when determining impacts and mitigation
3. Establish examples of mitigation measures for TCRs that uphold the existing mitigation preference for historical and archaeological resources of preservation in place, if feasible
4. Recognize that California Native American tribes may have expertise with regard to their tribal history and practices, which concern the TCRs with which they are traditionally and culturally affiliated (because CEQA calls for a sufficient degree of analysis, tribal knowledge about the land and TCRs at issue should be included in environmental assessments for projects that may have a significant impact on those resources)
5. In recognition of their governmental status, establish a meaningful consultation process between California Native American tribal governments and lead agencies, respecting the interests and roles of all California Native American tribes and project proponents, and the level of required confidentiality concerning TCRs, early in the CEQA environmental review process, so that TCRs can be identified, and culturally appropriate mitigation and mitigation monitoring programs can be considered by the decision-making body of the lead agency
6. Recognize the unique history of California Native American tribes and uphold existing rights of all California Native American tribes to participate in, and contribute their knowledge to, the environmental review process pursuant to CEQA
7. Ensure that local and tribal governments, public agencies, and project proponents have information available, early in the CEQA environmental review process, for purposes of identifying and addressing potential adverse impacts to TCRs and to reduce the potential for delay and conflicts in the environmental review process
8. Enable California Native American tribes to manage and accept conveyances of, and act as caretakers of, TCRs
9. Establish that a substantial adverse change to a TCR has a significant effect on the environment

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed in the jurisdiction of the lead agency.

3.2.4 California Health and Safety Code

California Health and Safety Code § 7050.5 requires that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined that the remains are not subject to the provisions of §27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death.

If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

3.2.5 Public Resources Code 5024 and 5024.5

The California State Legislature enacted PRC § 5024 and 5024.5 as part of a larger effort to establish a state program to preserve historical resources. These sections of the code require state agencies to take a number of actions to ensure preservation of state-owned historical resources under their jurisdiction. These actions include evaluating resources for NRHP eligibility and California Historical Landmark (California Landmark) eligibility; maintaining an inventory of eligible and listed resources; and managing these historical resources so that that they will retain their historic characteristics.

3.3 Local

For the purposes of CEQA, resources eligible for or listed in the CRHR are, by definition, "historical resources." Resources included in a local register of historical resources or deemed significant at the local level (i.e., given a California Historical Resources Status Code 3 through 5 in a survey meeting the California OHP requirement) are presumed to be historically or culturally significant for purposes of CEQA. This section presents the applicable local ordinances and policies that address identified historical resources within the APE for the LPA.

3.3.1 County of Los Angeles

Los Angeles County maintains an active historic preservation program, which includes the County's Historic Preservation Ordinance that establishes criteria and procedures for the designation, preservation, and maintenance of landmarks and historic districts. The program applies only to properties located in unincorporated areas of Los Angeles County. Section 22.124.070 outlines the county's designation criteria for locally eligible landmarks and historic districts:

A. A structure, site, object, tree, landscape, or natural land feature may be designated as a landmark if it is 50 years of age or older and satisfies one or more of the following criteria:

    1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;
    2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;
    3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;
    4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;

5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;
6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with a historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

B. Property less than 50 years of age may be designated as a landmark if it meets one or more of the criteria set forth in Subsection A, above, and exhibits exceptional importance.

C. The interior space of a property, or other space held open to the general public, including but not limited to a lobby, may be designated as a landmark or included in the landmark designation of a property if the space qualifies for designation as a landmark under Subsection A or B, above.

D. Historic Districts. A geographic area, including a noncontiguous grouping of related properties, may be designated as a historic district if all of the following requirements are met:

1. More than 50 percent of owners in the proposed district consent to the designation;
2. The proposed district satisfies one or more of the criteria set forth in Subsections A.1 through A.5, above; and
3. The proposed district exhibits either a concentration of historic, scenic, or sites containing common character-defining features, which contribute to each other and are unified aesthetically by plan, physical development, or architectural quality; or significant geographical patterns, associated with different eras of settlement and growth, particular transportation modes, or distinctive examples of parks or community planning.

3.3.2 City of Los Angeles

A. Los Angeles Historic-Cultural Monuments (HCM). Local landmarks in the City of Los Angeles are known as HCMs and are managed under the aegis of the City of Los Angeles Planning Department, Office of Historic Resources. A monument or local landmark is defined in the Cultural Heritage Ordinance as follows:

- Any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, state or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age (Los Angeles Municipal Code Section 22.171.7 added by Ordinance No. 178,402, Effective 4-2-07).

B. Historic Preservation Overlay Zones (HPOZ). As described by the City of Los Angeles Office of Historic Resources, the HPOZ Ordinance (Ordinance No. 184903) was adopted in 1979 and amended in 2004:

- To identify and protect neighborhoods with distinct architectural and cultural resources, the City developed an expansive program of HPOZs, commonly known as historic districts, provide for review of proposed exterior alterations and additions to historic properties in designated districts.

The City of Los Angeles General Plan, Conservation Element: Chapter II Resource Conservation and Management, Section 3 outlines an objective and policy for the protection of paleontological resources:

- Objective: protect the city's archaeological and paleontological resources for historical, cultural, research and/or educational purposes.
- Policy: continue to identify and protect significant archaeological and paleontological sites and/or resources known to exist or that are identified during land development, demolition, or property modification activities (City of Los Angeles 2001).

3.3.3 City of Huntington Park

In 2006, the City of Huntington Park adopted a historic preservation ordinance (Title 9, Chapter 3, Article 18), which allowed for the designation of significant public or semi-public interior spaces and signage, in addition to landmarks and historic districts. The city maintains a small list of historic resources that includes single-family homes, civic structures, and one historic district. The ordinance also includes provisions for local designation criteria:

A. Historic Resource. A Historic Resource is a building, structure, site, object, landscape, sign, or contributing member to a Historic District that is significant in American history, architecture, engineering, archeology, or culture and is designated by the City according to the following criteria:

1. Associated with events that have made a significant contribution to the broad patterns of the history of the city, region, state, or nation
2. Associated with the lives of persons who are significant in the history of the city, region, state, or nation
3. Embodies the distinctive characteristics of a Historic Resource property type, period, architectural style, or method of construction, or that is a representation of the work of an architect, designer, engineer, or builder whose work is significant to the city, region, state, or nation, or that possesses high artistic values that are of city, regional, state-wide, or national significance
4. Has yielded, or may be likely to yield, information important in prehistory or history of the city, region, state, or nation

B. A Historic Resource designation may include significant public or semi-public interior spaces and features. The criteria used to determine if an interior is significant includes the following:

1. Historically the space has been open to the public.
2. The materials, finishes and/or detailing are intact or later alterations are reversible.

3. The plan, layout, and features of the space are illustrative of its historic function.
4. Its form and features articulate a particular concept of design.
5. There is evidence of distinctive craftsmanship.

C. Historic Signs. A Historic Sign shall include all signs designated historically significant by the Historic Preservation Commission and such sign meets the criteria described in Section 9-3.1806(A)(3). All other regulations described in Title 9, Chapter 3, Article 12 of this Code shall also apply.

D. Historic District. A Historic District is an area that is geographically defined as possessing a concentration of Historic Resources or a thematically related grouping of properties which contribute to each other and is designated by the City according to the procedures set forth by the NRHP Bulletin #21: "Defining Boundaries for National Register Properties" and the following criteria:

1. The grouping of properties is unified by planned or physical development or a significant and distinguishable entity of citywide importance
2. The components of the properties may lack individual distinction but are important as a collection representing one or more of a defined historic, cultural, development and/or architectural context(s) (Section 2 (part) Ord. 789-NS, eff. October 5, 2006, as amended by § 1, Ord. 862-NS, eff. December 15, 2010)

3.3.4 City of Cudahy

The City of Cudahy does not have a historic preservation ordinance. Cudahy conducted a citywide residential historic survey in 1984 that resulted in the identification of 21 historic structures and has not since been updated. The city's most recent General Plan, Cudahy 2040 (adopted March 2018), does not mention cultural resources in particular.

3.3.5 City of South Gate

The City of South Gate adopted a historic preservation ordinance in 1983 (Title 7, Chapter 7, Article 68) allowing for the designation of significant landmarks. The city maintains a small list of historic resources that includes the South Gate Community Center, a U.S. Post Office building, the Glenn T. Seaborg Residence, and a tile mosaic at the Civic Center Community Building. The ordinance includes provisions for local designation of culturally significant landmarks, which can include any site or improvement, manmade or natural, that has special character or special historical, cultural, architectural, community, or aesthetic value as part of the heritage of the city, state, or nation.

Upon application to the City Council of the City of South Gate by any interested parties, the City Council is empowered to designate a culturally significant landmark if it manifests one or more of the following criteria:

A. It possesses a significant character, interest, or value attributable to the development, heritage or cultural characteristics of the city, the southern California region, the state of California or the United States of America or if it is associated with a person whose life is historically significant
B. It is the site of a historic event with a significant place in history
C. It exemplifies the cultural, political, economic, social, or historical heritage of the community
D. It portrays the environment in an era of history characterized by a distinctive architectural style

E. It embodies those distinguishing characteristics of an architectural type or engineering specimen
F. It is the work of a person or persons whose work has significantly influenced the development of the city or the southern California region
G. It contains elements of design, detail, materials, or craftsmanship which represent a significant innovation
H. It is a part of or related to a distinctive area that is developed according to a specific historical, cultural, or architectural motif
I. It represents an established and similar visual feature of a neighborhood or community due to its unique location or specific distinguishing characteristics
J. It is, or has been, a valuable information source important to the prehistory or history of the city of South Gate, the southern California region, the state of California or the United States of America (Ord. 1576 § 1 (part), eff. August 8, 1983)

3.3.6 City of Downey

The City of Downey does not have a historic preservation ordinance, nor does it have any historic surveys. Adopted in 2005, the City of Downey General Plan lists six resources that are recognized as historically significant. The General Plan identifies enhancing the city's cultural resources as one of its goals and lists the following three policies aimed at achieving that goal:

- Policy 8.4.1 Identify the city's cultural resources
- Policy 8.4.2 Preserve the city's cultural resources
- Policy 8.4.3 Enhance the city's existing cultural resources

3.3.7 City of Bellflower

The City of Bellflower does not have a historic preservation ordinance, nor does it maintain a list of historically significant resources or surveys. However, the city's 1994 General Plan Conservation Element includes the following goals, policies, and implementation programs:

3.3.7.1 Goal 6.

Identify and encourage the preservation of significant architectural, historical, and cultural resources.

- Policies:

  6.1. In the downtown area, in particular, encourage the adaptive reuse of buildings and structures of significant historical or cultural value.
  6.2 Encourage and provide incentives for the preservation of significant architectural, historical, and cultural buildings.

3.3.7.2 Implementation Programs

1. Compile and maintain a current inventory of architectural, cultural, and historical resources in Bellflower. These buildings and landmarks include but are not limited to: Heritage Square, the Pacific Electric Railway Depot building, the Carpenter House, the Gerald House (Walnut Street), and numerous buildings in the downtown area. This action is done to facilitate the application for grants and funding for rehabilitation and improvement of these properties.

2. Continue working with the Southern Pacific Railroad to ensure the Pacific Electric Railway Depot building is maintained and preserved.
3. Utilize economic incentives, such as façade rebate programs and low interest loans, to facilitate the architectural renovation of the downtown area. In particular, efforts should be made to restore architecturally significant buildings to their original design.

3.3.8 City of Artesia

The City of Artesia does not have a formal process for the designation of historic resources, nor has it conducted any citywide historic surveys. The city established an ordinance, however, that led to the designation of a historic district that includes the city's old fire station. The Community, Culture, and Economic Element in the city's 2010 General Plan identifies some significant sites, including the Artesia Water Tower and Artesia Divino Espírito Santo Hall; this element sets forth some goals toward their preservation.

According to City of Artesia Municipal Code Title 5 Chapter 16, Designation of Local Historical Landmarks, the City Council may designate a building, landmark, or other property in Artesia as a local historical landmark in special recognition of the property's role during the formation or existence of the city. The Artesia Municipal Code Section 5-16.02, Method of Designation, outlines the process for designation of local historical landmarks, and Artesia Municipal Code Title 9 Chapter 2 Article 31.5, Historic District Zone, is established to preserve the historic nature of buildings located in the Historic District Zone. The Historic District Zone is established to promote the general welfare, education, and recreational pleasure of the public through the identification, preservation, and enhancement of those buildings, structures, neighborhoods, landscapes, places, and areas with special historical, cultural, architectural, or archaeological significance.

3.4 Effects/Impacts Criteria

3.4.1 Federal Criteria

As mandated by Section 106 of the NHPA, federal agencies must consider the effects of their undertakings on historic properties, assess the effects, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties (36 CFR 800.1[a]). Effects may be direct, those that may come from the Project at the same time and place with no intervening cause; indirect, those that are caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable; or cumulative (ACHP 2019). For identified historic properties in the APE, the agency shall apply the criteria of adverse effect (36 CFR 800.5[a]). According to federal regulations, "Effect means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register" (36 CFR 800.16[i]). The criteria of adverse effect are defined as follows:

> An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative. (36 CFR 800.5[a][1]).

According to 36 CFR 800.5[a][2], examples of an adverse effect on historic properties include, but are not limited to, the following:

(i) Physical destruction of or damage to all or part of the property;
(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;
(iii) Removal of the property from its historic location;
(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

When the effects of the proposed undertaking do not meet the criteria of adverse effect, then a finding of no adverse effect may be proposed (36 CFR 800.5[b]). If an adverse effect is found, the agency shall act pursuant to 36 CFR 800.6 (36 CFR 800.5[d][2]) to resolve the adverse effect by developing and evaluating alternatives or modifications to the undertaking that "could avoid, minimize or mitigate adverse effects on historic properties" (36 CFR 800.6[a]).

3.4.2 State Criteria

Under CEQA Guidelines Appendix G – Environmental Checklist Form, V. Cultural Resources, adverse impacts to cultural resources would be considered significant if the proposed project would:

- "Cause a substantial adverse change in the significance of a historical resource" as defined in § 15064.5"
- "Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5"
- "Disturb any human remains, including those interred outside of dedicated cemeteries"

Section 15064.5 of the CEQA Guidelines provides that, in general, a resource not listed on state or local registers of historical resources shall be considered by the lead agency to be historically significant, stating that, "Generally, a resource shall be considered by the lead agency to be 'historically significant' if the resource meets the criteria for listing in the California Register of Historical Resources." The Section additionally provides that "Substantial adverse change in the significance of an historical resource means 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" (CEQA Guidelines, 14 CCR §15064.5 [b][1]).

3.5 Types of Effects/Impacts

As stated above, Section 106 defines an effect, including both direct and indirect, as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register [of Historic Places]." In assessing effects, Section 106 states that an adverse effect occurs when "…an undertaking may alter, directly or indirectly, any of the characteristics of a historic property…" Similarly, CEQA defines a significant impact to a historical resource as one that may cause a substantial adverse change in the significance of a historical resource (§ 21084.1.). CEQA defines a substantial adverse change as the "…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" (15064.5).

This study considered both direct, indirect, and cumulative effects to historic properties/historical resources. Physical impacts to historic properties/historical resources primarily include their alteration or modification. In addition to physical effects/impacts, those such as noise, vibration, and visual effects/impacts were considered, as they too have the capability to adversely affect historic properties and significantly impact historical resources. The thresholds and methods for evaluating noise, vibration, and visual effects/impacts on historic properties/historical resources are further described in the following sections.

3.5.1 Noise Effect/Impacts

FTA has not established noise thresholds to determine the level of noise that would constitute an adverse effect/significant impact to historic properties/historical resources. Further, what constitutes a noise impact under NEPA may or may not be applicable or equivalent to effects on historic properties under Section 106 or significant impacts under CEQA. Under Section 106, an adverse noise effect would occur during operation or construction if the project were to alter the characteristics of a historic property that make it eligible for the NRHP or diminish its ability to convey its historic significance (i.e., the property's integrity). Similarly, under CEQA, a significant noise impact would occur if it resulted in the substantial adverse change in the significance of a historical resource.

Potential noise effects/impacts of the Project were evaluated and presented in the *West Santa Ana Branch Transit Corridor Project Final Noise and Vibration Impact Analysis Report* (Noise and Vibration Impact Report) (Metro 2023b), prepared in support of the Draft EIS/EIR. However, as noted above, an adverse effect/significant impact as assessed in the Noise and Vibration Impact Report does not necessarily imply an adverse effect/significant impact to a historic property/historical resource for the purposes of Section 106 or CEQA. Therefore, in the analysis presented in this study, noise effects/impacts were considered specifically for their ability to affect/impact the significance of historic properties/historical resources within the APE. In doing so, a property's sense of quiet or solitude as necessary to convey its historic significance was considered as part of the effects/impact analysis.

3.5.2 Vibration Effects/Impacts

Ground-borne vibration generated by construction equipment or project operation has the potential to result in damage to historic properties/historical resources. Physical damage to a historic property/historical resource may alter its characteristics such that it is no longer eligible for the NRHP or that its ability to convey its historic significance is diminished. Physical damage may also constitute the substantial adverse change in the significance of a

historical resource if the resource or its surroundings are physically altered. Depending on the nature and extent, physical damage to historic properties/historical resources due to vibration may constitute an adverse effect under Section 106 and a significant impact under CEQA.

Similar to noise effects/impacts, potential vibration effects/impacts of the Project were evaluated and presented in the Noise and Vibration Impact Report (Metro 2023b) prepared in support of the Draft EIS/EIR. The vibration analysis was updated for the LPA and is included in Appendix C of this report. That study concluded that there are no locations in the APE in close proximity to a historic property/historical resource where construction or operation of the LPA will exceed the FTA-established thresholds for fragile buildings with mitigation identified pursuant to NEPA (Metro 2023b and Appendix C). For the purposes of the analysis presented herein, vibration effects/impacts that do not have the potential to result in damage to historic properties/historical resources were considered not adverse or significant.

3.5.3 Visual Effects/Impacts

Adverse visual effects under Section 106 are those that diminish a historic property's integrity, negatively affecting its ability to convey historic significance and, hence, compromising its eligibility for historic designation. Similarly, under CEQA, visual changes to a historical resource have the ability to result in substantial adverse change in the significance of that resource. Examples of such potential effects/impacts include the introduction of elements into the setting of a property and the alteration of the viewsheds to and from a historic property/historical resource.

Determining why a property is significant and understanding what characteristics make it so are essential to assessing visual effects/impacts. For the purposes of the analysis presented in this study, the existing relationship of a historic property/historical resource to its current setting and the reason for its significance and character-defining features were identified. The setting of a historic property/historical resource may or may not contribute to its significance and, therefore, the visibility of the Project from a given historic property/historical resource may or may not result in an adverse effect/significant impact. Visual effects/impacts were analyzed for their ability to diminish a property/resource's integrity of setting, if in fact setting is essential to the property's ability to convey significance.

4 PROPERTIES DETERMINED ELIGIBLE

The following section presents the results of the Survey Report–Rev 2 (Metro 2023a) as they relate to the LPA. The information in this section provides the basis for the effects/impacts analysis contained in Section 5. As previously noted, the Survey Report—Rev 2 identified historic properties/historical resources in the APE associated with four Build Alternatives (Alternatives 1, 2, 3, and 4). However, the information presented in this section focuses on the historic properties/historical resources in the APE associated with the LPA, which corresponds to Alternative 3.

The Survey Report—Rev 2 consists of a summary of methods and results of the following: delineation of an APE through consultation among FTA, Metro, and SHPO; a background research effort that included searches of the CHRIS and consultation with Native American contacts and local interested parties in compliance with Section 106 and AB 52; built environment and archaeological surveys of the APE; and the recordation and evaluation of 470 properties for NRHP and CRHR eligibility. The study summarized in the Survey Report—Rev 2 resulted in the identification of the following within the APE for the LPA:

- Zero known archaeological historic properties/historical resources
- Twenty-two built environment resources, 19 of which are both historic properties under Section 106 and historical resources under CEQA and 3 that are historical resources under CEQA only

These historic properties/historical resources are described in further detail below. For a thorough description of the methodology associated with identification efforts, refer to the Survey Report—Rev 2 (Metro 2023a). As noted in Section 1.1.2.2, the Survey Report—Rev 2 was submitted to SHPO on May 11, 2023. On June 14, 2023, representatives from the SHPO's office reached out to FTA via email stating that their review was in process and that clarification was needed regarding the addresses of four properties recommended ineligible for listing in the NRHP. FTA provided clarification via email on June 23, 2023. In a letter to FTA dated June 29, 2023, SHPO provided concurrence with FTA's documentation and delineation of the APE. Additionally, SHPO provided concurrence with FTA's determination of NRHP eligibility of 3 properties and NRHP ineligibility of 27 properties not included in the Survey Report—Rev 1 but included in the Survey Report—Rev 2 due to the previously described APE expansion. Associated documentation is included in Appendix B.

4.1 Archaeological Historic Properties/Historical Resources

The entirety of the APE for the LPA is located in previously developed areas, including public ROWs (streets and railroads), and areas occupied with industrial, commercial, and residential development. During the field survey conducted for this study, ground visibility was relatively poor (less than 10 percent) throughout most of the direct APE due to the presence of existing development, including rail track and ballast, buildings and structures, pavement, and/or landscaping. The horizontal extent of the direct (archaeological) APE for the LPA encompasses all areas of ground disturbance, areas with permanent site improvements, and areas for staging and temporary construction activities. Although the depth of disturbance varies along the project alignment, the vertical limit of the direct APE extends up to 150 feet below the current ground surface and 90 feet above the current grade. Based on the

information presented in the Survey Report—Rev 2, the direct APE associated with the LPA contains zero known archaeological historic properties/ historical resources (Metro 2023a).

4.2 Built Environment Resources

The architectural APE includes all areas that may be subject to potential direct and indirect effects, including visual, noise, vibration, and/or ground settlement that may result from construction or implementation of the Project. The architectural APE encompasses the direct APE plus one parcel out from the areas of construction or the first row of adjacent parcels in all areas where the alignment is underground or aerial. Within locations where the alignment would be at-grade, within existing highway, railroad, or Metro ROW, the architectural APE is the same as the direct APE.

Since 2022, the APE was expanded in select locations, primarily to account for consideration of temporary construction easements and minor design changes resulting from stakeholder coordination and public comments received on the Draft EIS/EIR. In areas where small-scale, low-lying modifications consistent with the existing urban environment are proposed on parcels adjacent to road ROWs (for example, curb construction and sidewalk realignment) or where acquisitions may be needed to facilitate such modifications, the direct APE was expanded to encompass the construction footprint associated with those changes. In these locations, the architectural APE was limited to the parcel on which such improvements are proposed because the associated potential effects would be minor, visually unobtrusive, and would cause little change to the existing setting in a highly developed area.

Additionally, portions of the direct APE coincide with existing roadway ROW. In these locations, the direct APE considers ground disturbance associated with construction of roadway modifications, for example changes to lane geometry or the addition of traffic signals or at-grade crossing equipment. The methodology employed in expanding the APE in these areas assumes that in these locations, the direct APE extends up to 10 feet on adjacent parcels to account for potential ground disturbance associated with driveway regrading and curb and/or sidewalk reconstruction. Because the modifications proposed in these areas are consistent with existing conditions and their introduction does not have the potential to affect adjacent parcels as a whole, the architectural APE coincides with the direct APE in these areas.

The architectural APE for the LPA contains 19 properties, including portions of 4 historic districts, that are listed in or determined eligible for listing in the NRHP. Of these, eight properties were listed or determined eligible for listing in the NRHP by other projects or studies (Table 4.1) and the remainder were determined NRHP-eligible during investigations conducted as part of this Project (Table 4.2). Properties listed in or determined eligible for listing in the NRHP are considered historic properties for the purposes of Section 106 and historical resources under CEQA.

One property that is depicted on Figure 4-1, Sheet 8 is not included in this effects analysis. Our Lady of the Rosary Church (MRN 24-001) was previously identified as eligible for listing in the NRHP and CRHR in the Survey Report—Rev 2 and was originally included in the APE, which was delineated to include the Paramount MSF site option evaluated in the Draft EIS/EIR. In January 2022, the Metro Board of Directors selected the Bellflower MSF site. As the Paramount MSF is not part of the LPA, this property is not discussed further.

Table 4.1. Built Environment Historic Properties Listed or Determined Eligible for Listing in the NRHP by Other Projects or Studies

Property Name/Address	Map Reference No.	APN(s)	CHR Status Code	Eligibility Criteria (NRHP/CRHR/Local)[1]
Pueblo Del Rio Public Housing Complex Historic District (portion of) /5024 Holmes Avenue, Los Angeles (P-19-188179)	8-013	5105005900; 5105006900; 5105006901; 5105006902; 5106027901	3S; 3CS; 5S3	A/1/1 and C/3/3
No Address; LADWP Boulder Lines 1 and 2 (P-19-188983)	17-005	6222001279; 6222003270; 6222005273	1S	A/1 and C/3
LA River Channel,[2] South Gate (portion of)	17-007	Various	Not currently known	A and C
No Address; Southern California Edison Long Beach-Laguna Bell 60kV and 220 kV Transmission Lines (P-19-192309)	18-016	6233003803; 6233002806; 6233003800; 6233002800	2S2	A/1 and C/3
Rio Hondo Channel,[2] South Gate (portion of)	18-017	Various	Not currently known	A and C
Rancho Los Amigos Medical Center Historic District, Downey (P-19-189330)	19-013	6245016934	2S2	A/1 (district)
Century Freeway-Transitway Historic District (portion of)	21-027	N/A	2D2	A/1 and C/3 (district)
San Gabriel River Channel,[2] Cerritos (portion of)	29-025	Various	Not currently known	A and C

Source: Metro 2023

Notes:

[1]- All eligibility criteria are presented with NRHP criteria first, followed by CRHR criteria, and then local criteria (for example: A/1/1); see the Regulatory Framework (Section 3) of this report for further description of NRHP, CRHR, and applicable local eligibility criteria.

[2] Segment of a channelized river that is contributing to a larger historic district encompassing elements of the Los Angeles County Drainage Area Project.

APN = Assessor's Parcel Number; CHR= California Historic Resource Status Code; CRHR = California Register of Historical Resources; LA = Los Angeles; LADWP = Los Angeles Department of Water and Power; kV=kilovolt; N/A = not applicable; NRHP = National Register of Historic Places; WSAB = West Santa Ana Branch

Table 4.2. Built Environment Historic Properties Determined Eligible for Listing in the NRHP During Investigations Conducted as Part of the WSAB Project

Property Name/Address	Map Reference No.	APN(s)	CHR Status Code	Eligibility Criteria (CRHR/Local)[1]
6000 Alameda Street, Huntington Park[2]	9-015	6321007015; 6321007016; 6321007017	3S; 3CS; 5S3	C/3/3
L & F Machine Company/2110 Belgrave Avenue, Huntington Park	9-034	6321006025	3S; 3CS; 5S3	A/1/1
6101 Santa Fe Avenue, Huntington Park	10-012	6321011035; 6321011900	3S; 3CS; 5S3	C/3/3
2860 Randolph Street, Huntington Park	10-017	6319001002	3S; 3CS; 5S3	C/3/3
Huntington Park High School/6020 Miles Avenue, Huntington Park	10-021	6310019904	3S, 3CS, 5S3	C/3/3
Randolph Substation/Randolph Street, Huntington Park	11-016	6319021801	3S; 3CS; 5S3	C/3/3
6300-6302 State Street, Huntington Park	11-018	6319009014	3S, 3CS, 5S3	C/3/3
Cudahy Substation/Salt Lake Avenue, Cudahy	15-032	6224007801; 6224007800	3S, 3CS, 5S3	C/3
Union Pacific LA River Rail Bridge, South Gate	17-006	6222040903	3S; 3CS; 5S3	C/3 and E (local)
Bellflower Pacific Electric Railway Depot/16336 Bellflower Boulevard, Bellflower (P-19-186111)	28-008	7109009903	3S; 3CS	A/1 and C/3
10040 Flora Vista Street, Bellflower	28-009	7109009004	3S; 3CS	C/3

Source: Metro 2023

Notes:

[1] All eligibility criteria are presented with NRHP criteria first, followed by CRHR criteria, and then local criteria (for example: A/1/1); see the Regulatory Framework (Section 3) of this report for further description of NRHP, CRHR, and applicable local eligibility criteria.

[2] Property mistakenly addressed as 1978 Belgrave Avenue in the Draft EIS/EIR.

APN = Assessor's Parcel Number; CHR=California Historical Resources; CRHR = California Register of Historical Resources; NRHP = National Register of Historic Places; WSAB = West Santa Ana Branch

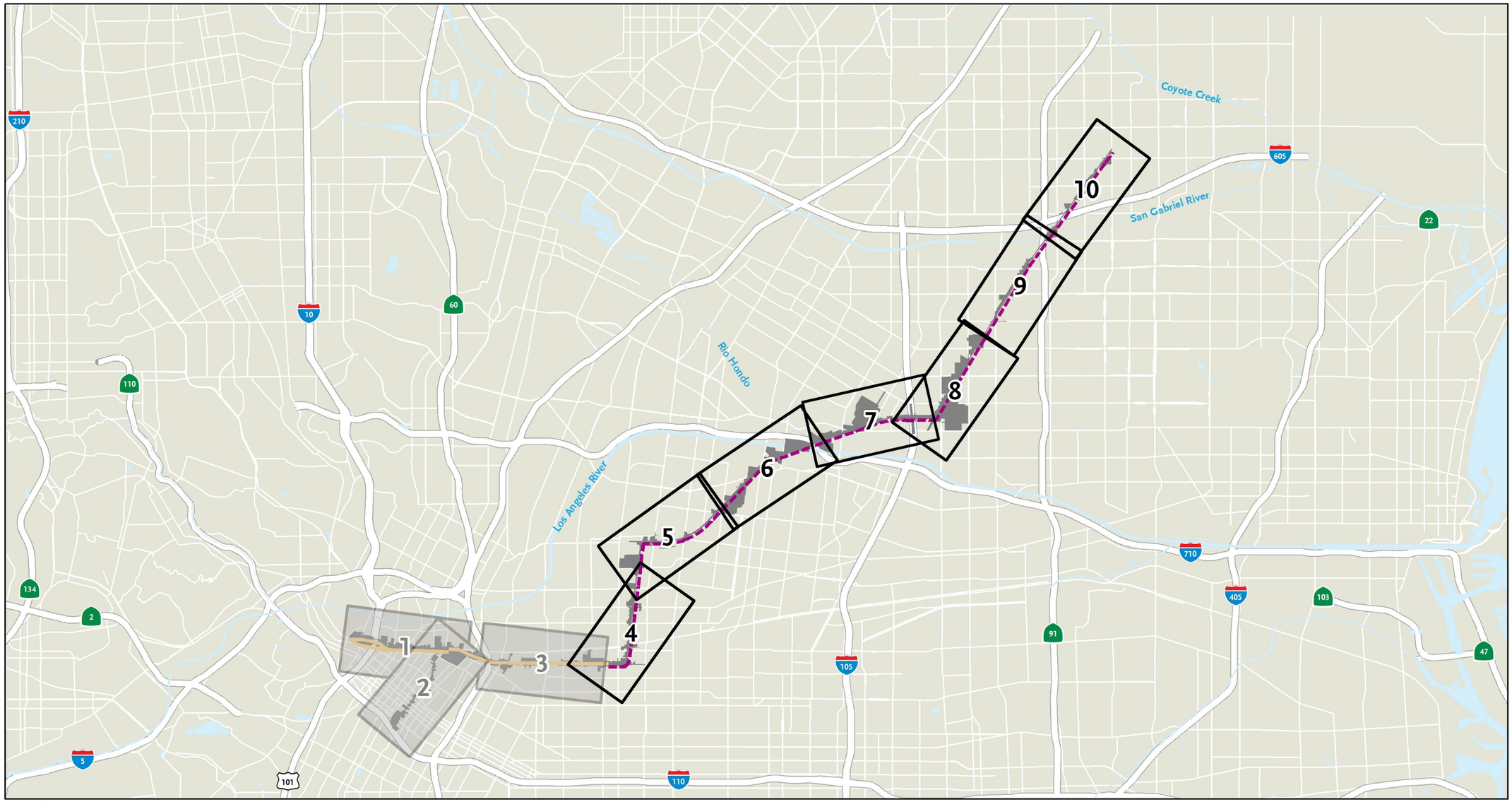
The architectural APE for the LPA additionally includes three properties that are ineligible for listing in the NRHP but eligible for the CRHR and/or local designation. As properties not eligible for listing in the NRHP but eligible for listing in the CRHR and/or for local designation, the properties listed in Table 4.3 are considered historical resources for the purposes of CEQA and are not historic properties under Section 106 of the NHPA. Figure 4-1 shows both historic properties and historical resources, all labeled by their MRN.

Table 4.3. Built Environment Historical Resources Eligible for Listing in the CRHR and/or Local Designation During Investigations Conducted as part of the WSAB Project

Property Name/Address	Map Reference No.	APN(s)	CHR Status Code	Eligibility Criteria (CRHR/local)[2]
6231 Maywood Avenue, Huntington Park	13-001	6318007006	3CS; 5S3	3/3
3477 East Gage Avenue, Huntington Park	13-003	6318007001	3CS; 5S3	3/3
The Frampton-Dantema House/18644 Alburtis Avenue, Artesia	32-021[1]	7039010901	5D1	3 (local)

Source: Metro 2023
Notes: [1] Contributor to the Artesia Historic District
[2] All eligibility criteria are presented with CRHR criteria first, followed by local criteria (for example: 1/1); if resource is only locally eligible, "local" is noted in parentheses; see the Regulatory Framework (Section 3) of this report for further description of NRHP, CRHR, and applicable local eligibility criteria.
APN = Assessor's Parcel Number; CHR = California Historical Resource; CRHR = California Register of Historical Resources; WSAB = West Santa Ana Branch

Figure 4-1. Built Environment Properties in the APE that are Listed in, Determined, or Assumed Eligible for the NRHP and/or CRHR



Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Sheet Index

Sheet Index - Located Outside the Locally Preferred Alternative

Architectural APE

West Santa Ana Branch (WSAB) Proposed

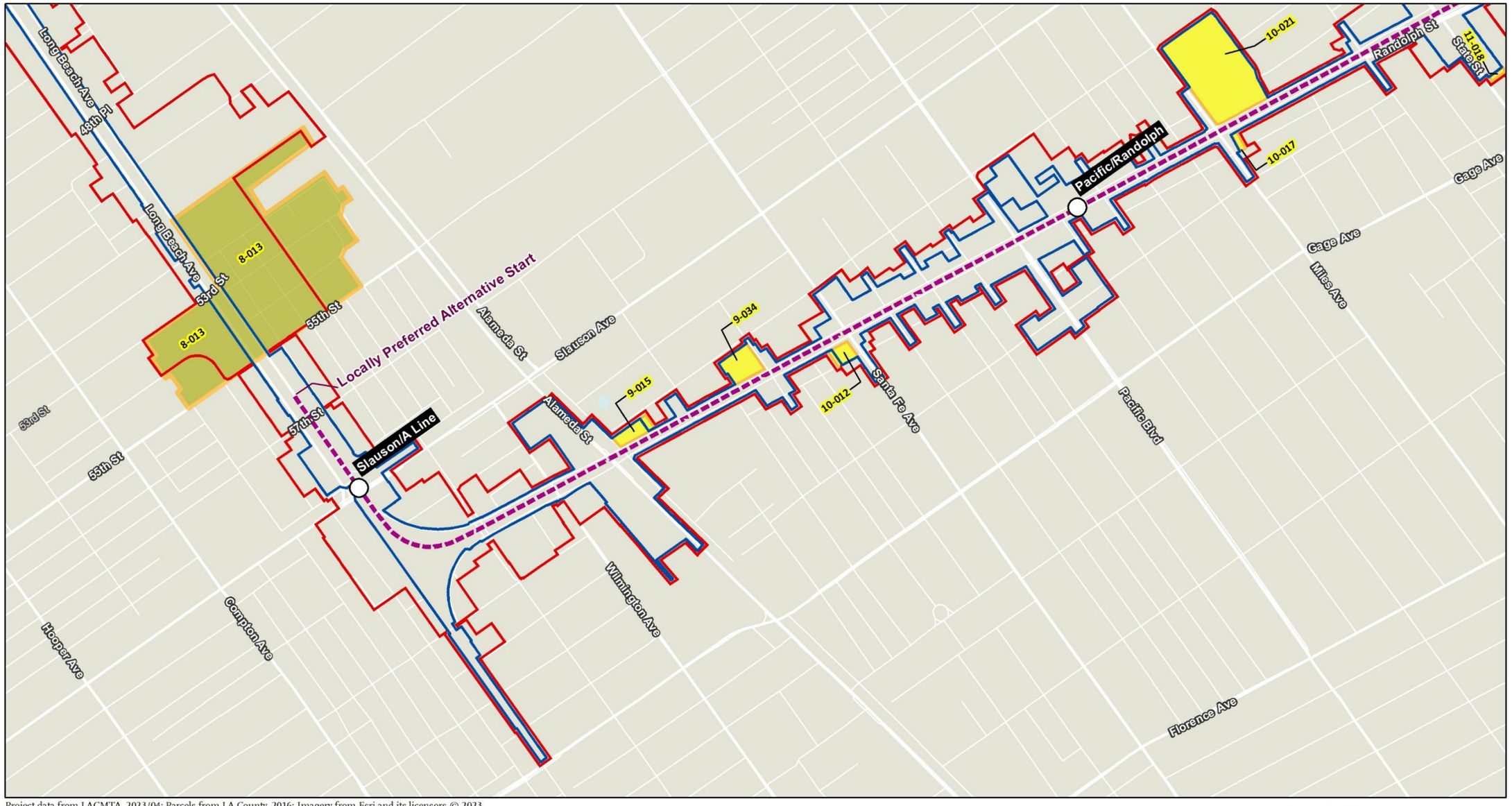
Draft EIS/EIR Build Alternatives 1 and 2

Locally Preferred Alternative (Alternative 3)

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

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Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

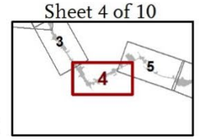
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- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the NRHP
- Historic District Listed or Eligible for Listing in the NRHP

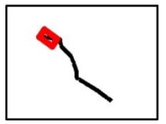
Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

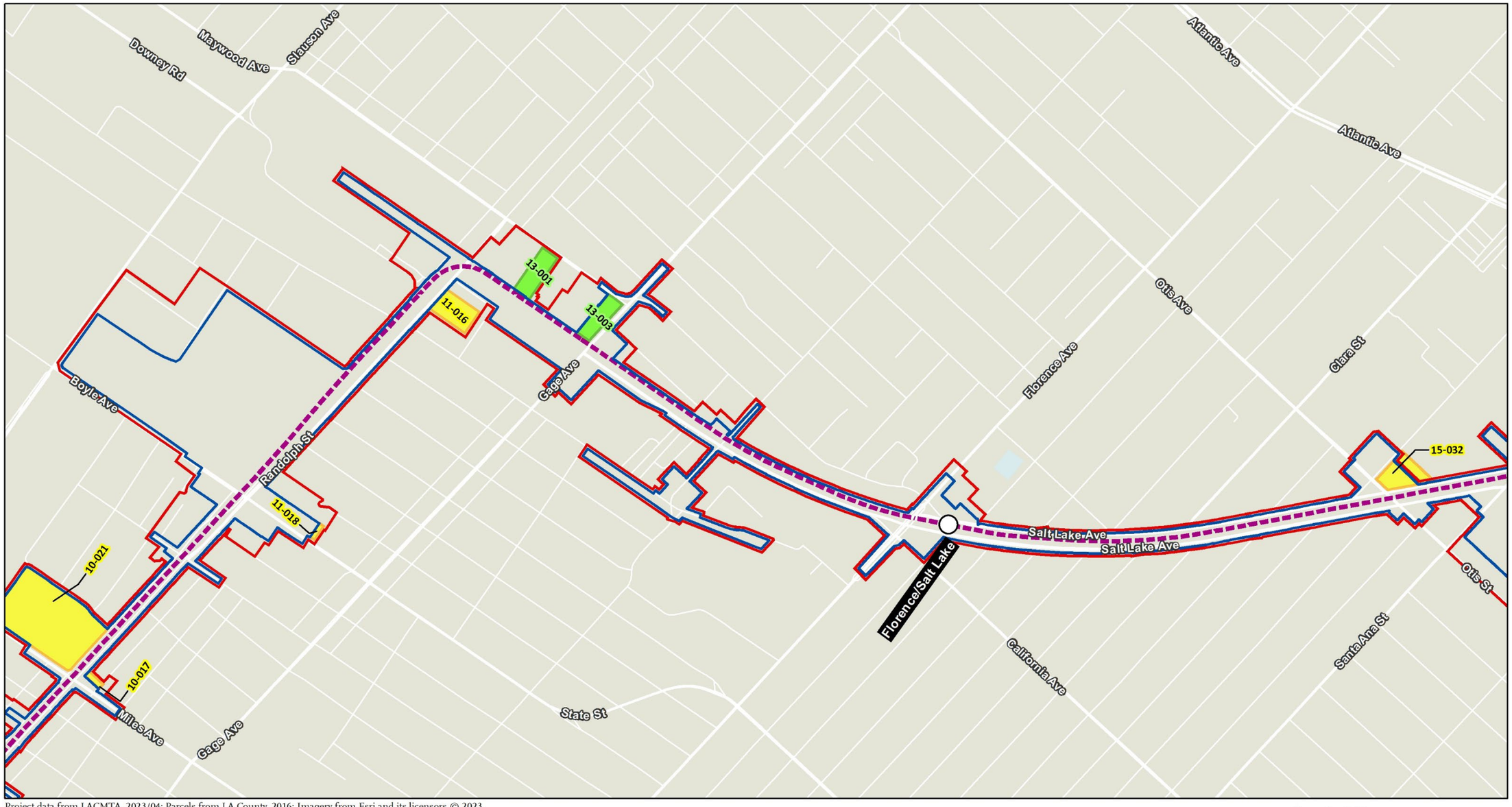
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Sheet 4 of 10







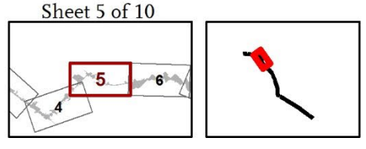
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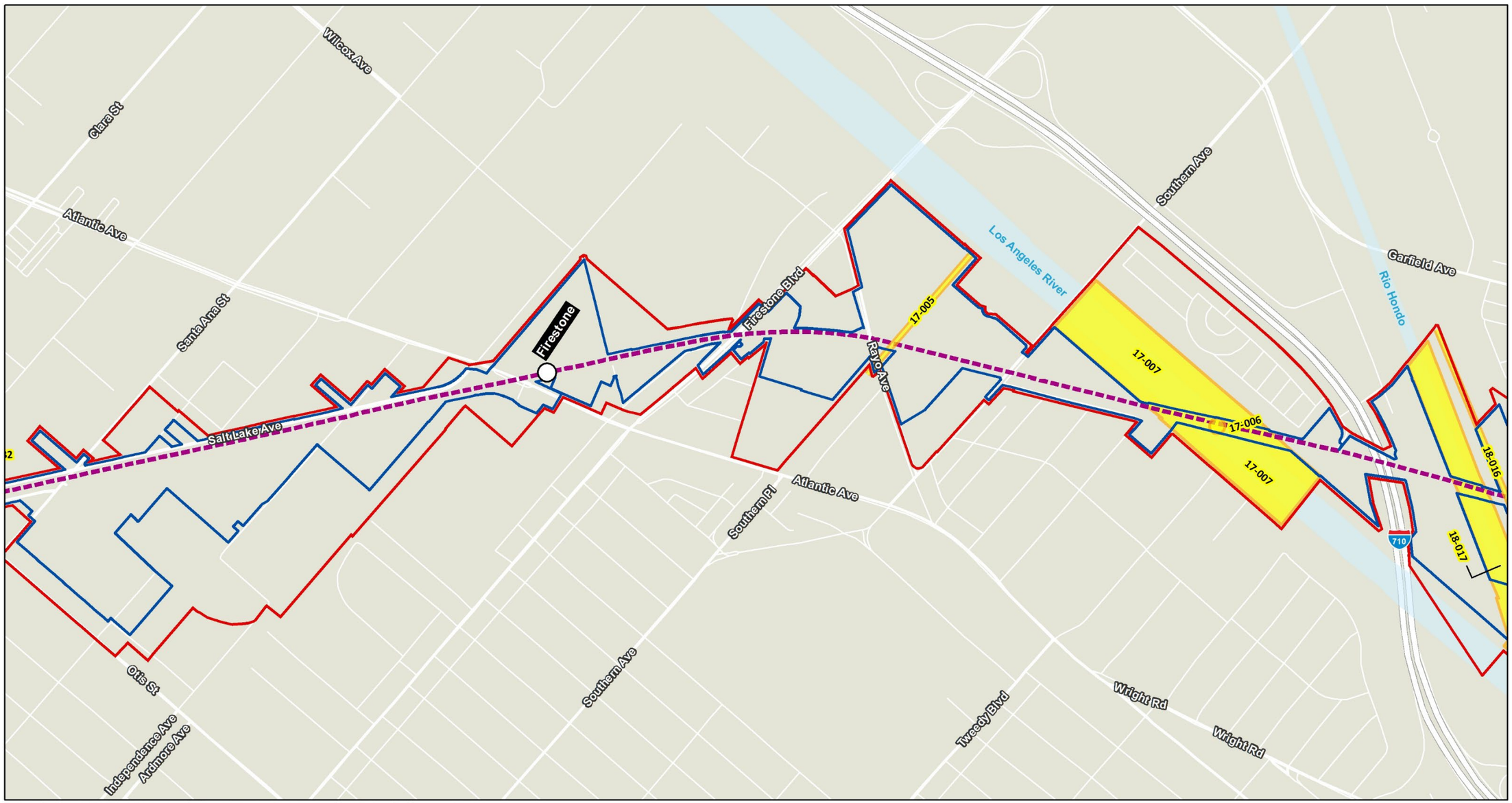
- Direct APE
- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the NRHP
- Properties Listed and/or Eligible for Listing in the CRHR and/or for Local Listing

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

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Sheet 5 of 10





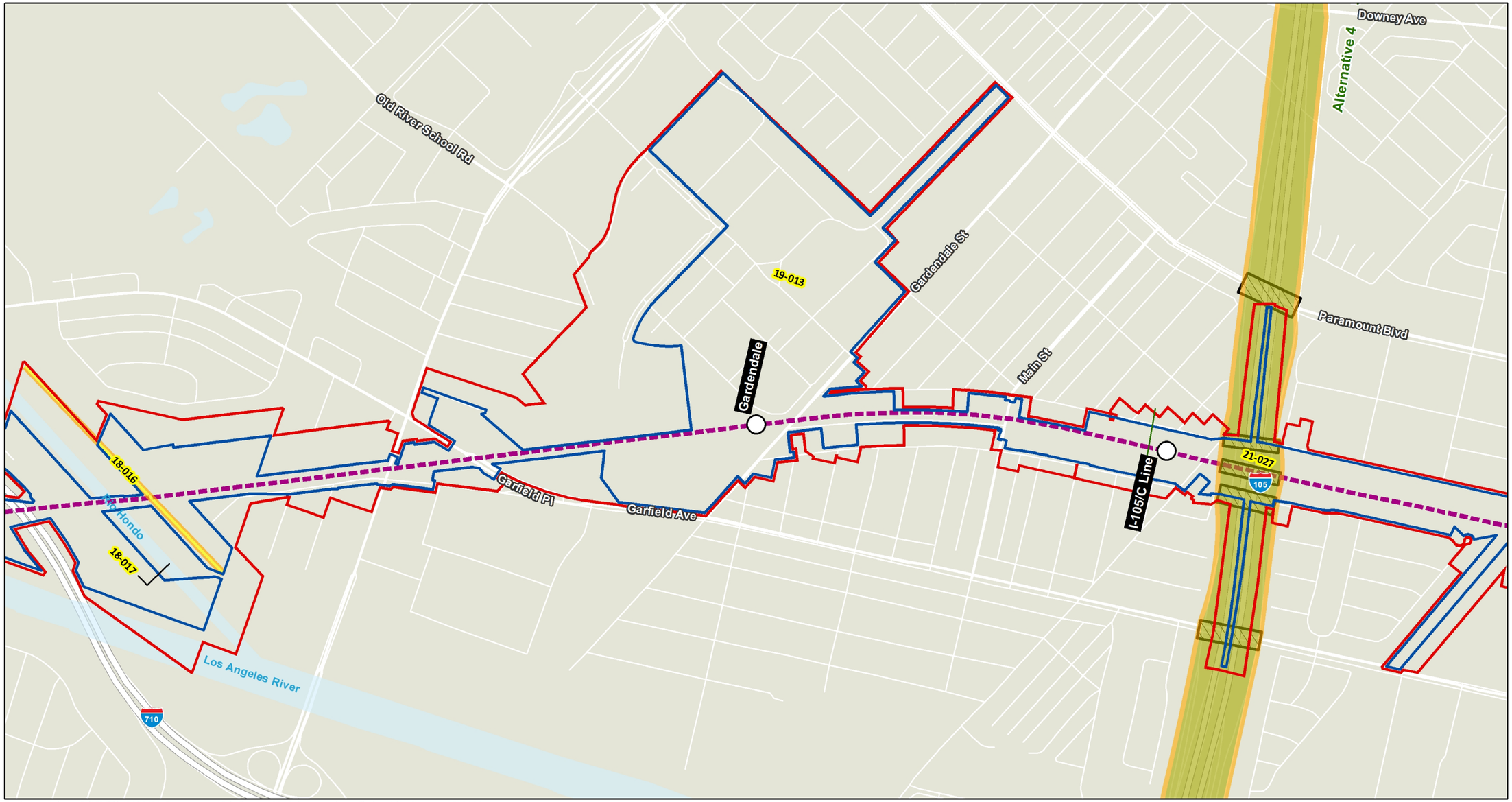
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

- Direct APE
- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the NRHP
- Linear Non-Parcel Resource Listed in and/or eligible for listing in the NRHP
- Non-Parcel Resource Listed in and/or Eligible for Listing in the NRHP

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

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Sheet 6 of 10



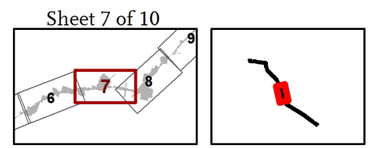
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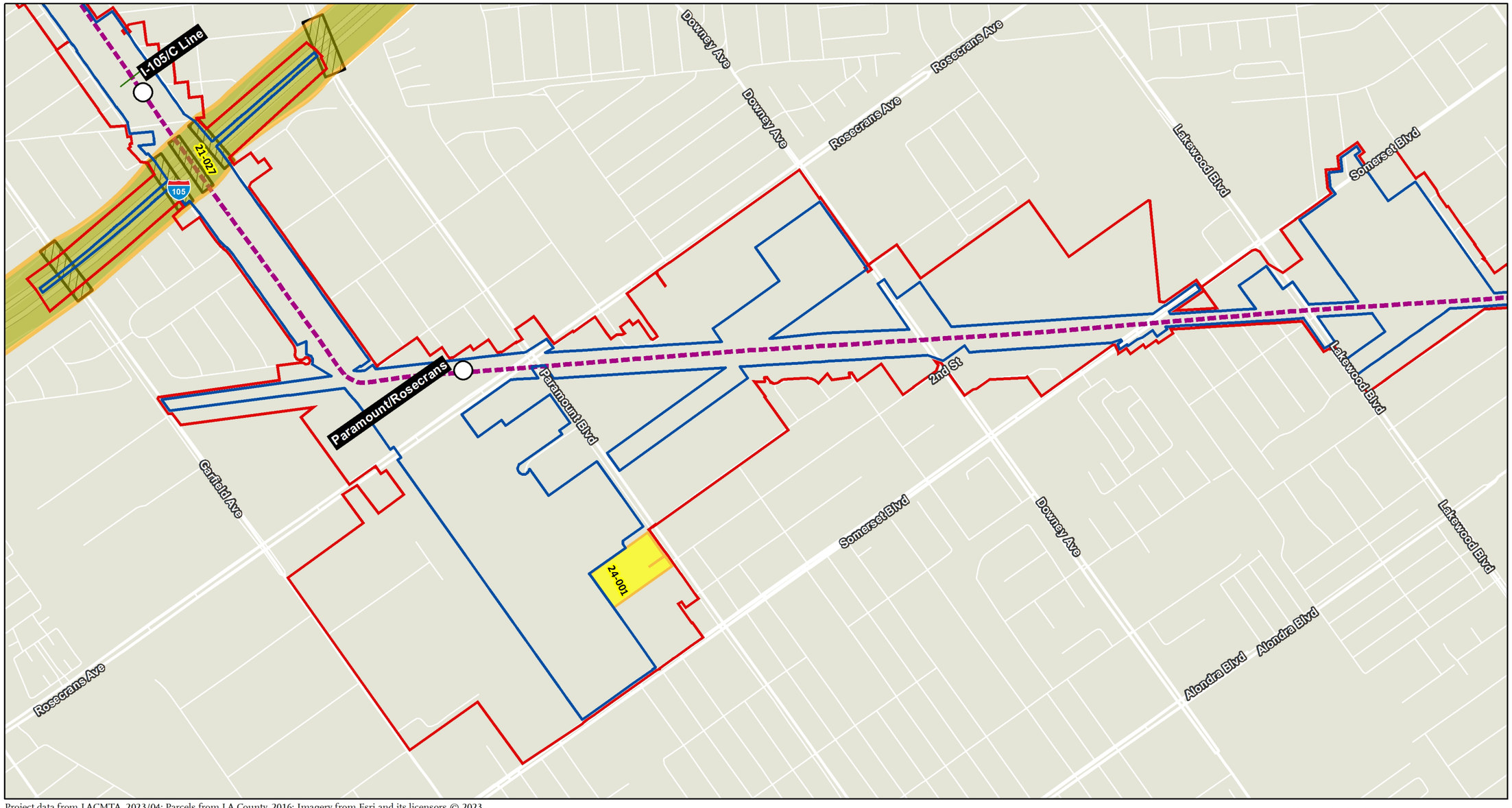
- Direct APE
- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the NRHP
- Historic District Listed or Eligible for Listing in the NRHP
- Linear Non-Parcel Resource Listed in and/or eligible for listing in the NRHP
- Contributing Bridges to the Century Freeway-Transitway Historic District

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

0 400 800 Feet

Sheet 7 of 10





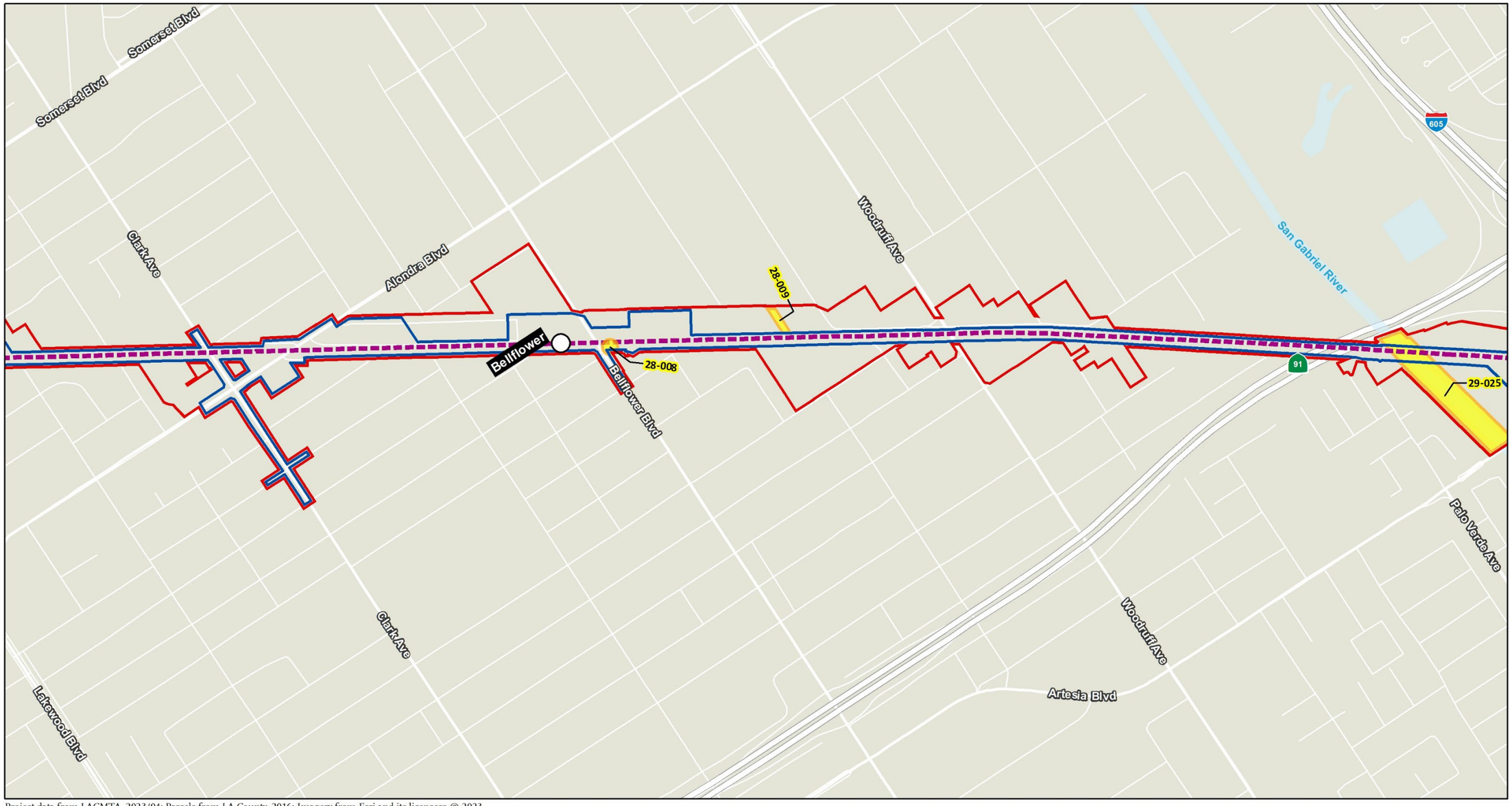
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

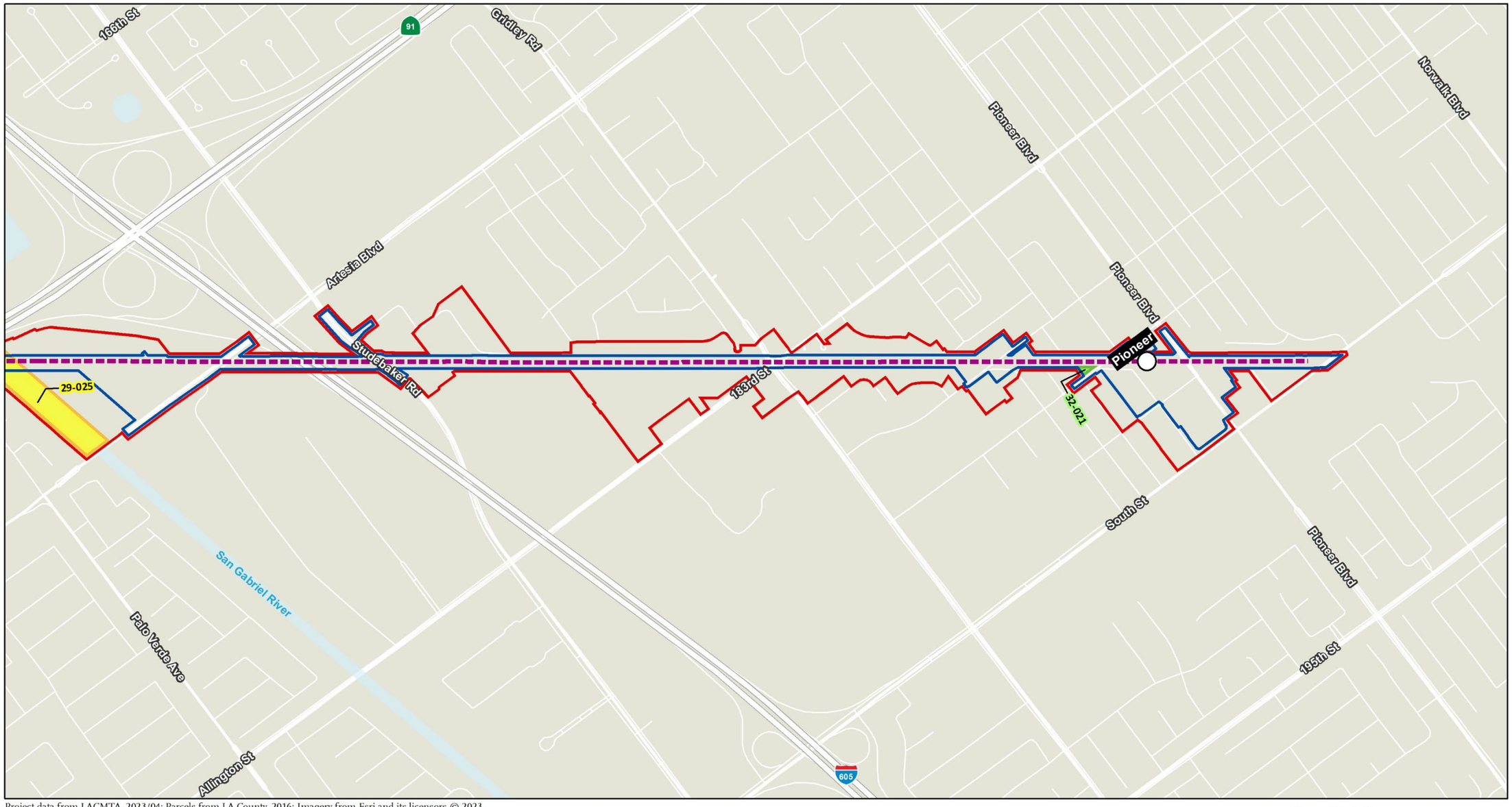
- Direct APE
- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the NRHP
- Historic District Listed or Eligible for Listing in the NRHP
- Contributing Bridges to the Century Freeway-Transitway Historic District

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

0 400 800 Feet

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Somerset Blvd
Somerset Blvd
Clark Ave
Alondra Blvd
Bellflower
Bellflower Blvd
28-008
28-009
Woodruff Ave
San Gabriel River
605
91
29-025
Palo Verde Ave
Clark Ave
Woodruff Ave
Artesia Blvd
Lakewood Blvd
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.
Direct APE
Architectural APE
Station
Locally Preferred Alternative
Properties Listed and/or Eligible for Listing in the NRHP
Non-Parcel Resource Listed
in and/or Eligible for Listing in the NRHP
Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.
N
0
400
800
Feet
Sheet 9 of 10
8
9
10



Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

- Direct APE
- Architectural APE
- Station
- Locally Preferred Alternative
- Properties Listed and/or Eligible for Listing in the CRHR and/or for Local Listing
- Property Listed and/or Eligible for Listing in the NRHP

Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade.

0 400 800 Feet

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5 EFFECTS/IMPACTS ANALYSIS

The following analysis presents the results of the effects/impacts[5] to historic properties/historical resources that are located with the APE that is associated with the LPA. While the Survey Report—Rev 2 included the entire APE that encompassed the four Build Alternatives evaluated in the Draft EIS/EIR, this Revised Final Cultural Resources Effects Report presents only the portion of the APE that encompasses direct or indirect effects associated with the LPA.

5.1 Archaeological Effects/Impacts

No known archaeological resources qualify as historic properties/historical resources within the APE. Therefore, this section summarizes the archaeological sensitivity in the APE and potential for unanticipated discoveries, which are discussed further in the WSAB Survey Report—Rev 1 and Rev 2 (Metro 2020a; Metro 2023a).

The area has been heavily developed for several decades with multiple periods of development and redevelopment. Historic-era maps indicate that much of the area encompassing the LPA was developed in the early decades of the twentieth century. Currently, the APE for the LPA consists of industrial, commercial, and residential developments. Based on the lack of known resources and long history of ground-disturbing activities, the APE for the LPA is characterized by a low to moderate sensitivity for archaeological historic properties/historical resources. Portions of the LPA are in proximity to major waterways (LA River, Rio Hondo, and San Gabriel River) where the sensitivity for buried resources is considered more moderate. Areas in proximity to natural waterways are generally more sensitive for archaeological resources as water is necessary for sustaining life. However, the potential for intact buried resources remains low based on the existing conditions of the APE for the LPA.

5.1.1 No Build Alternative

Under the No Build Alternative, no new infrastructure would be built or operated in the direct APE, aside from projects currently under construction or projects funded for construction, environmentally cleared, planned to be in operation by 2042, and identified in the constrained Metro 2009 LRTP and SCAG's 2016 RTP/SCS, and other projects funded by Measure M. Therefore, no effects/impacts to archaeological historic properties/historical resources would occur with the No Build Alternative.

5.1.2 Locally Preferred Alternative

No known archaeological resources qualifying as historic properties/historical resources are present within the APE for the LPA. As summarized in Section 5.1, the APE for the LPA is considered to have low to moderate sensitivity for the presence of buried archaeological deposits that could qualify as historic properties/historical resources. Operation of the LPA will not require ground-disturbing activities. Therefore, there will be no effects/impacts to archaeological historic properties/historical resources during operation of the LPA.

[5] The analysis presented in this study complies with both Section 106 and CEQA. The language used by Section 106 and CEQA varies. Therefore, throughout the document a slash ("/") is used to differentiate between the language used for analysis in compliance with each law. For example, Section 106 analyzed effects to historic properties whereas CEQA analyzed significant impacts to historical resources, addressed throughout this document as "effects/impact" and "historic properties/historical resources."

Construction of the LPA will involve ground disturbance, including grading, excavation, and trenching. Based on the results of the cultural resources investigations and the low to moderate sensitivity, adverse effects to resources are unlikely to occur during ground-disturbing activities. Because there are no known archaeological resources qualifying as historic properties within the APE for the LPA, minimization measures are not required in accordance with Section 106 of the NHPA. However, the procedures included in the standard measures outlined in Section 6 will be implemented if unanticipated archaeological resources are discovered during construction of the LPA. In accordance with CEQA, despite the unlikelihood of unanticipated discoveries, ground-disturbing activities associated with construction of the LPA may result in significant impacts to unanticipated archaeological resources discovered during construction of the LPA that may qualify as historical resources. Standard measures to reduce/mitigate potential impacts to resources that may be encountered during construction are included in Section 6.

5.2 Built Environment Effects/Impacts

This section presents the analysis of effects of the LPA to built environment historic properties under the NHPA and impacts to built environment historical resources under CEQA. The analysis incorporates the findings of other applicable technical studies prepared in support of the Project, including noise and vibration studies. Also included are a discussion of the potential effects to historic properties and impacts to historical resources under the No Build Alternative and the LPA, with the design option.

5.2.1 No Build Alternative

Under the No Build Alternative, the Project would not be developed, properties would not be acquired for the Project, and no structures along the project alignment would be demolished. The existing freight tracks within the rail ROWs would remain undisturbed and no aerial structures would be constructed along the public or rail ROWs. No project-related noise or vibration would occur. The environmental setting would remain in current conditions (including currently planned and funded projects) and no substantial physical impacts to historic properties would occur. Therefore, under the No Build Alternative, there would be no effect to built environment historic properties and no impacts to built environment historical resources.

5.2.2 Locally Preferred Alternative

The potential effects/impacts to built environment historic properties and/or historical resources in the APE from activities associated with construction and operation of the LPA are summarized in the following sections by property/resource. A description and the designation status of each historic property/historical resource along with a description of project-related activities that will occur in its vicinity is provided. An assessment of effects/impacts is then provided for each historic property/historical resource. The analyses detailed below are additionally summarized in Table 5.3 located at the conclusion of Section 5. Based on the results of the study, there will be no adverse effect to built environment historic properties and less than significant impacts to built environment historical resources in accordance with Section 106 of the NHPA and CEQA.

5.2.2.1 6000 Alameda Street, Huntington Park

Map Reference No. 9-015

Description and Designation Status of Historic Property

6000 Alameda Street is a two-story, daylight factory building developed for the National Automatic Pan Corporation in 1925 (Figure 5-1). Located at the northeast corner of the intersection of Alameda and Randolph Streets in Huntington Park, the brick-clad building features a sawtooth roof and expanses of steel industrial sash windows, character-defining elements of the daylight factory building type that allowed for the maximum penetration of natural light into interior workspaces. In 1929, the building was augmented with a one-story, north-elevation addition that is consistent with the building's original design and is a contributing element to its historical significance. The building is eligible for listing in the NRHP, the CRHR, and the Huntington Park Historic Register under Criteria C/3/3 as an intact example of a daylight factory building. Its period of significance begins with its original construction in 1925 and concludes with the completion of the 1929 addition. Located in an urban, industrial area, the property occupies nearly half a city block. It fronts an Alameda Corridor rail trench completed in recent years and is paralleled by the railroad ROW that runs down the center of Randolph Street. Nearby properties are similar in scale and function to 6000 Alameda Street and mostly date from between the 1920s and 1980s. Despite some recent construction, including the rail trench, the property still retains its integrity of setting. Its integrity of design, however, was somewhat compromised with the construction of a rear addition in the 1950s or 1960s. Visible alterations elsewhere on the building are relatively minor and do not diminish the building's overall integrity of design, and the property also retains its integrity of location, materials, workmanship, feeling, and association.

Figure 5-1. 6000 Alameda Street, South Elevation



Source: Rincon 2018

Project Activities in the Vicinity of the Property

The LPA will be located at-grade in the existing La Habra Branch ROW in the vicinity of 6000 Alameda Street. Modifications to the existing grade crossing at the intersection of Randolph Street and Alameda Street will be required adjacent to the property. The property will not be subject to any temporary or permanent easements or displacement.

The LPA will introduce new permanent visual elements within the ROW, including additional rail-related features such as tracks, fencing, pedestrian crossing gates, a grade crossing house, and a train control house in the vicinity of 6000 Alameda Street. However, the property is located in an urban environment adjacent to the road ROW within which a rail line is currently located. The proposed visual elements will be similar in scale and massing to the existing rail-related features currently in the vicinity of the property.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary because construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify 6000 Alameda Street. Therefore, the property's integrity of location, design, materials, or workmanship will not be diminished by the LPA. Due to the nature of the existing urban environment, the addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. Temporary construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of 6000 Alameda Street that qualify it for inclusion in the NRHP, CRHR, or for local designation and will not diminish the property's integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for 6000 Alameda Street.

5.2.2.2 L & F Machine Company/2110 Belgrave Avenue, Huntington Park

Map Reference No. 9-034

Description and Designation Status of Historic Property

Constructed beginning in 1946 and reaching its current form by 1955, the double-volume warehouse building and office were constructed for the L & F Machine Company (Figure 5-2). Founded by industrialist Ralph Larrabee in 1935 and incorporated in 1956, L & F Machine Company was a contract machine shop that fabricated equipment and parts for a number of customers in the Los Angeles area. Most notably, L & F Machine Company was the principal fabricating shop for Boller and Chivens, the leading precision manufacturer of astronomical equipment in the post-World War II era. L & F Machine Company fabricated all the company's large telescopes and weldments beginning in the late 1940s and continuing through the late 1970s. L & F Machine Company operated from this location until about 1995, when it relocated to Beaumont, California, where it operated until it dissolved in 2003. The building derives its significance from its association with post-World War II manufacturing and is eligible under Criteria A/1/1 for its role in the industrial and defense sector. The building, largely unchanged since 1955, conveys its historic significance for manufacturing large-scale astronomical equipment through its large footprint, double-volume height, and distinctive sawtooth roof. Its associated period of significance is 1946, the date of its construction, to 1985, the date by which L & F Machine Company appears to have ceased being the principal fabricating shop for Boller and Chivens.

Figure 5-2. 2110 Belgrave Avenue



Source: Rincon 2023

Project Activities in the Vicinity of the Property

The LPA will be located at-grade in the existing La Habra Branch ROW along Randolph Street in the vicinity of 2110 Belgrave Avenue. It will require modifications to the existing grade crossing at the intersection of Randolph Street and Albany Street adjacent to the property. The property will not be subject to any temporary or permanent easements or displacement. The LPA will introduce new permanent visual elements within the ROW, including additional rail-related features such as tracks, fencing, pedestrian crossing gates, soundwalls, a grade crossing house, and a train control house in the vicinity of 2110 Belgrave Avenue.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary because construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify 2110 Belgrave Avenue; therefore, no changes to the property's integrity of location, design, materials, or workmanship will occur. The addition of the project-related visual elements from operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. The property is located in an urban environment adjacent to road and rail ROWs and the proposed visual elements will be similar in scale and massing to the existing rail-related features currently in the vicinity of the property.

Temporary construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of 2110 Belgrave Avenue that qualify it for inclusion in the NRHP, CRHR, or for local designation and will not diminish the property's integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for 2110 Belgrave Avenue.

5.2.2.3 6101 Santa Fe Avenue, Huntington Park

Map Reference No. 10-012

Description and Designation Status of Historic Property

6101 Santa Fe Avenue is a one-story daylight factory building developed by the Sav-A-Day Laundry Company in 1928 (Figure 5-3 and Figure 5-4). An addition completed in 1936 roughly doubled the size of the building while maintaining a design consistent with the original exterior. The building is eligible for listing in the NRHP, CRHR, and the Huntington Park Historic Register under Criteria C/3/3 as a rare, intact example of an architecturally styled, pre-World War II industrial building in Huntington Park. Its period of significance is 1928 to 1936, spanning the years between its original construction and the completion of the addition. Located across the street from the railroad right-of-way and bounded on the south and west by residential properties dating from the 1920s, the subject building retains integrity of location, setting, materials, workmanship, feeling, and association. While the addition completed in 1936 nearly doubled the building's size, it is consistent with the original design and architectural style and contributes to the building's historical significance. Character-defining features include regular massing and large industrial sash windows indicative of the daylight factory type and simple fluted columns that suggest an Art Deco influence.

Figure 5-3. 6101 Santa Fe Avenue



Source: Rincon 2018

Figure 5-4. View of 6101 Santa Fe Avenue and its Current Surroundings and Relationship to the ROW



Source: Rincon 2019

Project Activities in the Vicinity of the Property

In the vicinity of 6101 Santa Fe Avenue, the LPA will be at-grade within the existing La Habra Branch ROW in the median of Randolph Street. The LPA will introduce new permanent visual elements within the ROW, including rail tracks, soundwalls, a grade crossing house, and train control house. The existing grade crossing/separation will be improved at the Santa Fe Avenue and Randolph Street intersection, which will be visible from 6101 Santa Fe Avenue. Additionally, approximately 30 square feet of the property's northeast corner will be permanently acquired to accommodate slight alterations to the ROW and sidewalk necessary due to grade-crossing modifications.

Construction activities will primarily occur within the public and rail ROWs and will introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may temporarily alter the visual character of the surrounding area. However, all construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

A small portion of 6101 Santa Fe Avenue will be permanently acquired to accommodate slight alterations to the ROW and sidewalk. However, the building located on the property will not be physically altered or modified and, therefore, the property's integrity of location, design, materials, or workmanship will not be diminished. The addition of the project-related visual elements in the vicinity of the property, from both construction and operation, will not diminish its integrity of setting, feeling, or association, nor will it detract from the character of the area. As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of 6101 Santa Fe Avenue that qualify it for inclusion in the NRHP, CRHR, or local designation and will not diminish the property's integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for 6101 Santa Fe Avenue.

5.2.2.4 2860 Randolph Street, Huntington Park

Map Reference No. 10-017

Description and Designation Status of Historic Property

The property at 2860 Randolph Street consists of a Tudor Revival-style single-family residence, a detached garage, and an apartment building at the rear of the parcel built with no discernible style (Figure 5-5). The single-family residence and detached garage date from 1926, while the apartment building was built in 1953. The single-family residence is eligible for listing in the NRHP and CRHR at the local level of significance, and for listing in the Huntington Park Historic Register under Criteria C/3/3 as a good example of a Tudor Revival-style residence. Its period of significance is 1926, its year of construction. Located across the street from the railroad right-of-way and flanked by two residences dating from the first quarter of the twentieth century, the single-family residence retains integrity of location, design, workmanship, feeling, and association. Although some of the windows have been replaced, the residence retains the key exterior materials that help convey its significance, and thus retains much of its integrity of materials. The apartment building at the rear of the property is not visible from the street due to the height of the residence's steeply pitched roof. Character-defining features exemplary of the Tudor Revival style include its wing-and-gable form with a steeply pitched, sweeping roofline, false half-timbering, twin dormers with steeply pitched gabled roofs, an arched door with speakeasy at the primary entry, an arched niche containing a lantern on the façade, a gable-wall chimney, and groupings of double-hung windows with wooden casings. The detached garage and apartment building are ineligible for listing because they lack architectural distinction and historical significance.

Figure 5-5. 2860 Randolph Street Primary (North) and East Elevations



Source: Rincon 2018

Project Activities in the Vicinity of the Property

In the vicinity of 2860 Randolph Street, the LPA will be at-grade within the existing La Habra Branch ROW in the median of Randolph Street. The LPA will introduce new permanent rail-related visual elements such as rail tracks, a grade crossing house, soundwalls, and a train control house within the ROW in the property's vicinity. The existing grade crossing at the Miles Avenue and Randolph Street intersection to the west of 2860 Randolph Street will be modified. However, the property will not be subject to any temporary or permanent easements or acquisitions.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify 2860 Randolph Street and, therefore, the property's integrity of location, design, materials, and workmanship will not be diminished. New permanent visual elements introduced by the LPA will be consistent with the existing setting of the property, which consists of urban infrastructure, including an existing rail line. The addition of project-related visual elements from operation will not diminish the property's integrity.

Temporary construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of 2860 Randolph Street that qualify it for inclusion in the NRHP, CRHR, and for local designation. Its integrity of location, design, setting, materials, workmanship, feeling, and association will not be diminished by the LPA. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for 2860 Randolph Street.

5.2.2.5 Huntington Park High School/6020 Miles Avenue, Huntington Park

Map Reference No. 10-021

Located along Miles Avenue between Randolph Street and Belgrave Avenue in the City of Huntington Park, Huntington Park High School includes approximately 13 permanent buildings and several portable classroom buildings across its campus (Figure 5-6). First developed in 1909, several buildings were damaged and removed following the 1933 Long Beach Earthquake. Extant buildings range in date from the 1920s through the 1990s. Largely rebuilt and reconstructed in 1936 following the earthquake, the campus features several buildings built in the Public Works Administration (PWA) Moderne style, reflected the most in the Administration Building fronting Miles Avenue. In support of currently ongoing campus improvements, the property was evaluated for historical significance by the Los Angeles Unified School District and was assigned CHR status code '3S,' indicating the campus "appears eligible for National Register of Historic Places or California Register of Historical Resources through survey evaluation."

Figure 5-6. 6020 Miles Avenue



Source: Rincon 2023

The current study agrees with the findings of the previous survey and evaluation efforts. It is eligible under Criterion C/3/3 for its architectural significance. It is an excellent example of PWA Moderne architecture, as reflected in its Administration Building (1936) and Auditorium (1937). It is also reflected in buildings that were reconstructed with Moderne updates such as the Home Economics and Classroom Building (1924) and the Annex (1925). Other contributing campus buildings include the Cafeteria (1936), Social Arts (1939), and Gymnasium (1923) buildings. Furthermore, the PWA Moderne buildings are good examples of the work of architect George M. Lindsey (1891-1973), who was also responsible for designs for James A. Garfield High School in East Los Angeles and John Marshall High School in Los Feliz. Huntington Park High School's period of significance spans from 1934 to 1939, encompassing its redevelopment following the 1933 Long Beach Earthquake and renovation of extant buildings to reflect the PWA Moderne style.

Project Activities in the Vicinity of the Property

The LPA will be at-grade within the existing La Habra Branch ROW in the median of Randolph Street in the vicinity of 6020 Miles Avenue. New permanent rail-related visual elements such as rail tracks, soundwalls, a grade crossing house, and a train control house will be introduced within the ROW in the property's vicinity. The existing grade crossing, at the Miles Avenue and Randolph Street intersection, will also be modified. To accommodate slight alterations to the ROW and sidewalk, approximately 700 square feet of the property's southwest corner, which is currently occupied with a lawn and paved pathway, will be permanently acquired.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary since construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

Approximately 700 square feet of 6020 Miles Avenue will be acquired to accommodate the LPA. However, the buildings located on the property will not be physically altered or modified by the LPA and, therefore, the property's integrity of location, design, materials, or workmanship will not be diminished. Due to the nature of the already existing urban environment, the addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, nor will it detract from the character of the area. As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of 6020 Miles Avenue that qualify it for inclusion in the NRHP, CRHR, or local designation and will not diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for 6020 Miles Avenue.

5.2.2.6 Randolph Substation/Randolph Street, Huntington Park

Map Reference No. 11-016

Description and Designation Status of Historic Property

The Randolph Substation was completed in 1930. The property contains the standard components of an electrical substation, including banks of transformers and a single building on the west-central portion of the property. The building is identifiable in its relation to Southern California Edison (SCE) as a civic type-library 3 model substation building, of which nine exist. Characteristic of its type, the building was designed in a Stripped Classical Revival style (Figure 5-7). The Randolph Substation building is eligible for listing in the NRHP, the CRHR, and the Huntington Park Historic Register under Criteria C/3/3 as an intact example of a SCE substation building. Its period of significance is 1930, the year it was completed. Situated in an urban area with mixed industrial and residential uses, the building's immediate surroundings are defined by the fenced-in substation property of which it is a part. The building shares the parcel with electrical towers, transformer racks, and transmission racks. Character-defining features include a concrete base, brick walls, symmetrically placed rectangular doors and windows, and a hipped clay tile roof. While much of the substation's original electrical equipment has been replaced due to modernization efforts, the building is intact. It retains integrity of design, materials, workmanship, feeling, and association, as it has been consistently used as a substation building since the time of its construction. The integrity of setting has been compromised due to the replacement of equipment, changes to the surrounding area, and its visual obstruction from a brick wall that surrounds the property.

Figure 5-7. Randolph Substation



Source: SCE 2019

Project Activities in the Vicinity of the Property

In the vicinity of the Randolph Substation, the LPA will be in an aerial viaduct that will parallel the existing La Habra Branch ROW in the median of Randolph Street. No temporary or permanent easements or acquisitions will be required on the property. The LPA will introduce new permanent visual elements within the ROW, including the viaduct structure and associated rail-related features such as tracks and overhead catenary. Additional at-grade features in the vicinity of the historic property/historical resource include a potential laydown area, located in the ROW between Bissell Street and Bissell Place north of the property, within which TPSS Site 13 is proposed. The laydown area will be removed upon the completion of construction.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will result in no physical impacts to the property, and no change to the property's integrity of location, design, materials, or workmanship will occur. Additionally, the LPA will not physically alter the property's substation building, which is set back over 160 feet south of the property line, behind a brick wall. The LPA will be constructed in an aerial viaduct that will be located to the north of the property, within the existing at-grade La Habra Branch ROW, which is in the median of Randolph Street. While the aerial viaduct and TPSS will introduce new permanent structures to the existing urban setting along Randolph Street, these visual elements will not diminish the historic integrity of the historic property/historical resource or negatively affect its historic significance. The historic substation is not visible from Randolph Street, as its primary north elevation is already

obstructed by a tall brick security wall. The introduction of the aerial structure and its associated features is compatible with the surrounding industrial setting, which includes numerous at-grade rail lines and catenary poles and wires, rail crossing gates, utility poles, and industrial and commercial properties.

As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. The LPA will not alter any of the characteristics of the Randolph Substation that qualify it for inclusion in the NRHP, the CRHR, or local designation. Implementation of the LPA will not diminish the integrity of the historic property's location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the Randolph Substation.

5.2.2.7 6300-6302 State Street, Huntington Park

Map Reference No. 11-018

Description and Designation Status of Historic Property

The Spanish Colonial Revival-style bungalow court at 6300 State Street consists of two single-story multi-family residential buildings at the front of the property and a pair of two-story apartment buildings at the rear (Figure 5-8). Built on a symmetrical plan, the buildings flank a central driveway running nearly the entire length of the parcel. The property is eligible for listing in the NRHP, CRHR, and the Huntington Park Historic Register under Criteria C/3/3 at the local level of significance as a good example of a Spanish Colonial Revival-style bungalow court. Its period of significance is 1929, the year it was developed. The property is located in an urban, residential area consisting mostly of one- and two-story properties dating from the 1920s through the 1940s. Sometime between 1980 and 1994, San Antonio Elementary School was constructed immediately to the north of 6300 State Street, diminishing somewhat the resource's integrity of setting and feeling. However, aside from the replacement of windows, there are no visible alterations to the buildings or the property's overall plan, and the property retains its integrity of location, design, materials, workmanship, and association. Character-defining features include stucco wall cladding, pent roofs clad with barrel tile over windows, and tower-like elements at the corners of the façade. In addition, the property's overall plan—featuring two rows of dwellings facing each other across a central courtyard—is characteristic of the double-bar parti-type bungalow court.

Project Activities in the Vicinity of the Property

In the vicinity of 6300 State Street, the LPA will be at-grade along the La Habra Branch ROW in the Randolph Street median. The property is located approximately 650 feet south of the La Habra Branch ROW. The nearest construction activity will occur north of the property within the State Street ROW, which will require modifications to curbing along the ROW to enable construction of the grade crossing at Randolph Street and State Street. The property will not be physically altered by the LPA, nor is it subject to any temporary or permanent easements or acquisitions.

Figure 5-8. 6300-6302 State Street



Source: Rincon 2018

Assessment of Effects/Impacts

The LPA will not physically alter or modify the property, nor is the property subject to any temporary or permanent easements or acquisitions. Therefore, the LPA will not result in a change to the property's integrity of location, design, materials, or workmanship. The rail ROW is located approximately 650 feet north of the property and therefore its setting will not be visually affected by the LPA.

Construction activities will primarily occur within the rail ROW and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary and construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed. The temporary addition of these visual elements will not permanently alter or diminish the property's historic integrity and will not result in an adverse effect/impact to the historic property/historical resource.

The LPA will not alter any of the characteristics of 6300-6302 State Street that qualify it for inclusion in the NRHP, CRHR, or for local designation, nor will it diminish its integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for 6300-6302 State Street.

5.2.2.8 6231 Maywood Avenue, Huntington Park

Map Reference No. 13-001

Description and Designation Status of Historical Resource

6231 Maywood Avenue is a large industrial property that consists of one sprawling warehouse building, which dominates the property, in addition to several ancillary structures (Figure 5-9). The property's primary building was initially developed in 1930 as a single warehouse for use as a paint factory by Superior Paint and Lacquer Company, a Michigan-based manufacturer and distributor of paints and lacquers. The building was significantly expanded in the 1940s, although the design of the addition is consistent with the original portion of the building. The subject property is eligible for listing in the CRHR and the Huntington Park Historic Register under Criteria 3/3 for its architectural merit, as it is a unique example of the Art Deco style as applied to the industrial building property type in Huntington Park. Its character-defining features include smooth stucco-clad exterior wall surfaces, pronounced verticality, and balanced composition expressed in the fluted, engaged piers that symmetrically divide its elevations. Its multi-light steel casement windows and recessed openings are also character-defining. While the property's integrity of materials, workmanship, and design have been impacted by alterations, it retains sufficient integrity to convey its significance as a good example of an Art Deco industrial building. Constructed at two different times, both portions of the building retain their original location and their relationship to one another and the railroad corridor, along which the property is located. Overall, the property additionally retains integrity of location, setting, feeling, and association. Although eligible for local and state designation, the property is ineligible for listing in the NRHP due to reduced integrity, primarily stemming from alterations that include the infill of original window openings and the utilitarian addition at the rear of the building.

Figure 5-9. 6231 Maywood Avenue, East Elevations



Source: Rincon 2018

Project Activities in the Vicinity of the Property

The LPA will be roughly at-grade in the San Pedro Subdivision ROW in the vicinity of 6231 Maywood Avenue. The LPA will introduce new permanent visual elements within the ROW, including additional rail tracks and catenary poles and wires. The property is not subject to any temporary or permanent easements or acquisitions. Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment,

security fencing, and barricades) that may alter the visual character of the surrounding area. These visual changes will be temporary since construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Impacts

6231 Maywood Avenue is eligible for the CRHR and for local designation and is considered a historical resource under CEQA. It is not considered a historic property under Section 106; therefore, effects were not analyzed.

The LPA will not physically alter or modify 6231 Maywood Avenue. Therefore, no change to the property's integrity of location, design, materials, or workmanship will occur. The LPA will be constructed roughly at-grade in the San Pedro Subdivision ROW, which is located to the rear, west of the historical resource. The LPA will introduce new permanent features, including additional tracks and catenary poles and wires to the existing urban setting along the San Pedro Subdivision ROW. These visual elements will not diminish the historic integrity of the historical resource or negatively affect its historic significance. The view from the primary eastern elevation will be unobstructed by the LPA, which will be constructed at the rear elevation of the historical resource. Elements introduced as part of the LPA will be compatible with the surrounding industrial setting, which includes numerous utility poles, rail lines, rail crossing gates, and industrial and commercial properties. The historic building will remain visible from Maywood Avenue, partially obscured from security fencing at the front of the property.

As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent impacts from construction. Implementation of the LPA will not alter any of the characteristics of 6231 Maywood Avenue that qualify it for inclusion in the CRHR or local designation. Implementation of the LPA will not diminish the integrity of the historical resource's location, design, setting, materials, workmanship, feeling, and association and will therefore result in no impact under CEQA for 6231 Maywood Avenue.

5.2.2.9 3477 East Gage Avenue, Huntington Park

Map Reference No. 13-003

Description and Designation Status of Historical Resource

The subject property consists of a bowling center constructed in 1960 and an associated freestanding commercial sign built in ca. 1960. The freestanding sign, which announces "Gage Bowl," features neon lettering and bears many hallmarks of the Googie style (Figure 5-10). The bowling center building is ineligible for listing in the NRHP, the CRHR, and the Huntington Park Historic Register under any significance criteria because it lacks architectural distinction and historical significance. However, the Gage Bowl sign is eligible for listing in the CRHR under Criteria 3 and the Huntington Park Historic Register under Criteria 3 as a good example of a Googie-style commercial sign. Its period of significance is ca. 1960, its estimated year of construction. The sign's character-defining features include the supporting metal pylon, channel letters with neon illumination, bold geometric forms, star-shaped ornaments, and a double-faced reader board. Although some plastic sign and reader board panels have been replaced, the sign retains excellent integrity to its original design. Located on a major thoroughfare and surrounded by mixed uses, including commercial, residential, and industrial properties, the sign also retains integrity of location, setting, feeling, and association. However, due to the replacement of several plastic panels, its integrity of materials and workmanship has been diminished and, therefore, it is ineligible for listing in the NRHP.

Figure 5-10. 3477 East Gage Avenue



Source: Rincon 2018

Project Activities in the Vicinity of Property

In the vicinity of the Gage Bowl sign, the LPA alignment will be at-grade in the existing San Pedro Subdivision ROW, which is adjacent to the Gage Bowl parking lot. The LPA will require modifications to the existing East Gage Avenue ROW, which will result in a minor (approximately 190 square feet) partial permanent acquisition from the southwestern edge of the property on which the sign is located along East Gage Avenue to enable small-scale infrastructure modifications, including construction of curbs and sidewalks.

The LPA will introduce new permanent visual elements within the ROW, including additional rail tracks, fencing, pedestrian crossing gates, grade crossing and trail control houses, and catenary poles and wires. These visual elements will be similar in scale and massing to the existing rail-related features currently within the vicinity of the property.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Impacts

The property is eligible for the CRHR and local designation and is considered a historical resource under CEQA. It is not considered a historic property under Section 106; therefore, effects under Section 106 were not analyzed.

The LPA will not physically alter or modify the Gage Bowl sign. Therefore, no change to its integrity of location, design, materials, or workmanship will occur. While the LPA will require a partial permanent acquisition from the property on which the sign is located, along East Gage Avenue, proposed modifications in this area are small scale (curb/sidewalks) and are consistent with the current urban environment surrounding the sign and will therefore not significantly alter the sign's setting. The LPA will introduce new permanent visual elements within the rail ROW, including additional rail tracks, pedestrian crossing gates, grade crossing and train control houses, and catenary poles and wires. These visual elements will be similar in scale and massing to the existing setting, which includes extant rail-related features and surrounding industrial and institutional properties. The addition of these elements will not diminish the resource's integrity of setting, feeling, or association, and will not detract from the character and quality of the area. Further, the addition of these features will not physically alter the historical resource in any way. The LPA will be located approximately 85 feet west of the historic sign.

Construction activities will primarily occur within the rail ROW and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed. While temporary, the addition of these visual elements will not permanently alter or diminish the sign's historic integrity. Implementation of the LPA will not alter any of the characteristics of the Gage Bowl sign that qualify it for inclusion in the CRHR or local designation. Implementation of the LPA will not diminish the integrity of the historical resource's location, design, setting, materials, workmanship, feeling, and association and will therefore result in no impact under CEQA for the Gage Bowl sign.

5.2.2.10 Cudahy Substation/Salt Lake Avenue, Cudahy

Map Reference No. 15-032

Located between Salt Lake Avenue and Elizabeth Street east of Otis Avenue in Cudahy, the Cudahy Substation contains the standard components of an electrical substation, including banks of transformers throughout (Figure 5-11). One historic-period building, identifiable in its relation to SCE as a civic type-library 2 model substation building, is sited on the southwestern portion of the property. Three civic type-library 2 model substation buildings are known to remain in the region—Cudahy, Santa Fe Springs, and Signal Hill. Characteristic of a civic type-library 2 model substation building, it was designed in a version of the Classical Revival style with a concrete base, brick walls, and a tile-clad roof.

The Cudahy Substation building is recommended eligible for listing in the NRHP and CRHR under Criteria C/3 as an intact example of a SCE substation building. The building was designed and constructed as part of SCE's architecture program before 1949. It is identifiable as a civic type-library 2 model substation building designed in a simplistic version of the Classical Revival style. It retains all seven aspects of integrity and has been consistently used as a substation building since the time of its construction. The substation property includes one additional utilitarian concrete-block building sited to the southeast that was added to the property between 1954 and 1963 and does not contribute to its significance.

Figure 5-11. Cudahy Substation



Source: Rincon 2022

Project Activities in the Vicinity of Property

In the vicinity of the Cudahy Substation, the LPA alignment will be located at-grade in the existing San Pedro Subdivision ROW, which is adjacent to the substation property across Salt Lake Avenue. The LPA will introduce new permanent visual elements within the ROW in the vicinity of the Cudahy Substation, including additional rail tracks, fencing, pedestrian crossing gates, grade crossing and trail control houses, and catenary poles and wires. These visual elements will be similar in scale and massing to the existing rail-related features currently within the vicinity of the property. Additionally, approximately 130 square feet of the property's southwest corner will be permanently acquired to accommodate modifications required for the construction and operation of an at-grade crossing at Otis Avenue.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary since construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Impacts

A small portion of the Cudahy Substation property will be permanently acquired to accommodate slight alterations to the ROW and sidewalk. However, the substation building located on the property will not be physically altered or modified and, therefore, the property's integrity of location, design, materials, or workmanship will not be diminished. In its vicinity, the LPA will be located at-grade in the San Pedro Subdivision ROW, which is located roughly 100 feet west from the substation building itself, across Salt Lake Avenue. The LPA will introduce new permanent visual elements within the rail ROW, including additional rail tracks, pedestrian crossing gates, grade crossing and train control houses, and catenary poles and wires. These visual elements will be similar in scale and massing to

the existing setting, which includes extant rail-related features and a variety of surrounding properties, including residential, light industrial, and institutional. The addition of these elements will not diminish the resource's integrity of setting, feeling, or association, and will not detract from the character and quality of the area. Further, the addition of these features will not physically alter the substation building in any way.

As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent impacts from construction. Implementation of the LPA will not alter any of the characteristics of the substation property that qualify it for inclusion in the NRHP or CRHR. Implementation of the LPA will not diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for the Cudahy Substation.

5.2.2.11 Los Angeles Department of Water and Power Boulder Lines 1 and 2 (P-19-188983)

Map Reference No. 17-005

Description and Designation Status of Historic Property

The Los Angeles Department of Water and Power (LADWP) Boulder Lines 1 and 2 consist of an approximately 270-mile course of 287.5 kilovolt (kV) transmission lines between Hoover Dam and the City of Watts (Figure 5-12). Associated features include towers and lightning protection, conductors and associated hardware, transformer and switching stations, and an access road. Originally constructed in 1936, the lines are listed in the NRHP and CRHR under Criteria A/1 for their association with and the delivery of hydroelectric power generated at Hoover Dam to the greater Los Angeles area, which facilitated development in the area from the mid-1930s through the 1940s. The lines are additionally listed under Criteria C/3 as an exceptional accomplishment in the engineering of electrical transmission lines. Their period of significance begins in 1936, when construction of the lines was completed, and ends in 1953, the year steam-generated power began to supplant hydroelectric power. Within the APE for the LPA, the resource consists solely of power lines and towers. It traverses residential areas in the Cities of South Gate and Downey along the east bank of the LA River before crossing the Rio Hondo near the two rivers' confluence. The property's integrity of setting has been diminished because of constant changes to the areas surrounding its alignment. However, the transmission lines and lattice steel towers are intact and retain integrity of location, design, materials, workmanship, feeling, and association.

Figure 5-12. LADWP Boulder Lines 1 and 2, Taken near their Intersection with Rayo Avenue, West-Facing



Source: Rincon 2018

Project Activities in the Vicinity of the Property

The proposed alignment passes between the property's overhead towers in an at-grade configuration as it crosses Rayo Avenue along the San Pedro Subdivision ROW. The LPA will require modifications to the existing grade crossing at Rayo Avenue, which will include construction of a freight grade crossing house and grade crossing house. The construction activities that will occur near the LADWP Boulder Lines 1 and 2 may include use of a large vibratory roller and compactor; without mitigation, the use of this equipment would exceed damage risk criteria levels for historic buildings. Implementation of Mitigation Measure VIB-6 described in the Noise and Vibration Impact Report will ensure that construction activities near historic structures will be held to a protective vibration damage threshold. Operation of the compactor/ballast tamper, vibratory rollers, and other similar equipment will be restricted to no closer than 25 feet of the LADWP Boulder Lines 1 and 2.

The LPA will require no additional easements or acquisitions, as the utility and rail ROW share an existing easement at their intersection. The LPA will introduce new permanent visual elements within the ROW, including rail-related infrastructure such as tracks, catenary poles and wires, control houses, and a TPSS. Construction activities will occur within the utility and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify the overhead towers to the east and west of the proposed alignment. The LPA alignment in this area will be located at-grade and will require modifications to the existing grade crossing along Rayo Avenue, which intersects with the existing San Pedro

Subdivision ROW and the transmission line corridor. The LPA will introduce new permanent visual elements within the rail ROW, which intersects with the property's corridor, including additional rail tracks, pedestrian crossing gates, grade crossing houses, and catenary poles and wires. However, the proposed visual elements will be similar in scale and massing to the existing industrial setting surrounding the resource, which includes extant rail-related features, industrial properties, and the transmission lines. The LPA will not physically alter the resource. Therefore, no change to the integrity of location, design, materials, or workmanship will occur. Also, the introduction of additional rail-related elements in the ROW will not diminish the property's integrity of setting, feeling, or association, nor will it detract from the character and quality of the area.

Construction activities will primarily occur within the utility and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed. As they will be temporary, the addition of these visual elements will not permanently alter or diminish the property's historic integrity. Additionally, implementation of VIB-6 will ensure that construction activities do not result in damage to the property. Implementation of the LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP or CRHR. Implementation of the LPA will not diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for the LADWP Boulder Lines 1 and 2.

5.2.2.12 Union Pacific Los Angeles River Rail Bridge, South Gate

Map Reference No. 17-006

Description and Designation Status of Historic Property

The Union Pacific LA River Bridge is a subdivided Warren through truss rail bridge constructed in 1932 (Figure 5-13). In the late nineteenth century, the Los Angeles Terminal Railway built a bridge on this line crossing the LA River at or near the site of the subject resource, at a location just north of the river's confluence with the Rio Hondo Channel. The subject bridge was completed around the time the County of Los Angeles and the USACE channelized nearby parts of the river (Bridgehunter.com 2018; Gumprecht 1999; United States Geological Survey 1925; 1936). Although Warren truss bridges are relatively common nationally—especially among bridges built after 1920—the subdivided Warren truss sub-type, of which this bridge is an example, is much rarer (Parsons Brinckerhoff 2004). At an unusual length of seven spans, the bridge is eligible for listing in the NRHP and CRHR under Criteria C/3 and for local designation under City of South Gate Criteria E as an excellent and rare example of a subdivided Warren truss steel bridge. The subject resource's surroundings are primarily characterized by the LA River, over which it passes. The river was channelized in this area in the early-to-mid-1930s and concretized in the early 1950s. In addition to numerous alterations to its setting, research indicates that the present concrete debris walls were added to the bridge piers as part of the Los Angeles River Improvement Project in the early 1950s, along with other likely alterations necessary to facilitate this segment of the river's concretization (USACE 1951; USACE 1992). In recent years, a bicycle path was constructed along its banks. It passes beneath the northwest end of the bridge. Development on both sides of the river includes a mix of industrial and residential properties, most of which date from after World War II. Furthermore, the southeast end of the bridge terminates near an elevated section of the I-710 freeway, which was constructed sometime between 1954 and 1963 (Netronline 2018). Surrounding development and modifications to the river during the mid-to-latter half of the twentieth century

have diminished the subject bridge's integrity of setting. Additionally, its integrity of design was previously diminished due to the addition of debris walls and other likely alterations necessary to facilitate this segment of the river's concretization in the early 1950s. Its character-defining features, primarily its steel trusswork and railroad tracks, and original portions of the concrete piers, remain intact, and it retains integrity of location, materials, workmanship, feeling, and association sufficient to convey its historical significance.

Figure 5-13. Union Pacific LA River Bridge, Taken from the North Side of the Rio Hondo, South-Facing

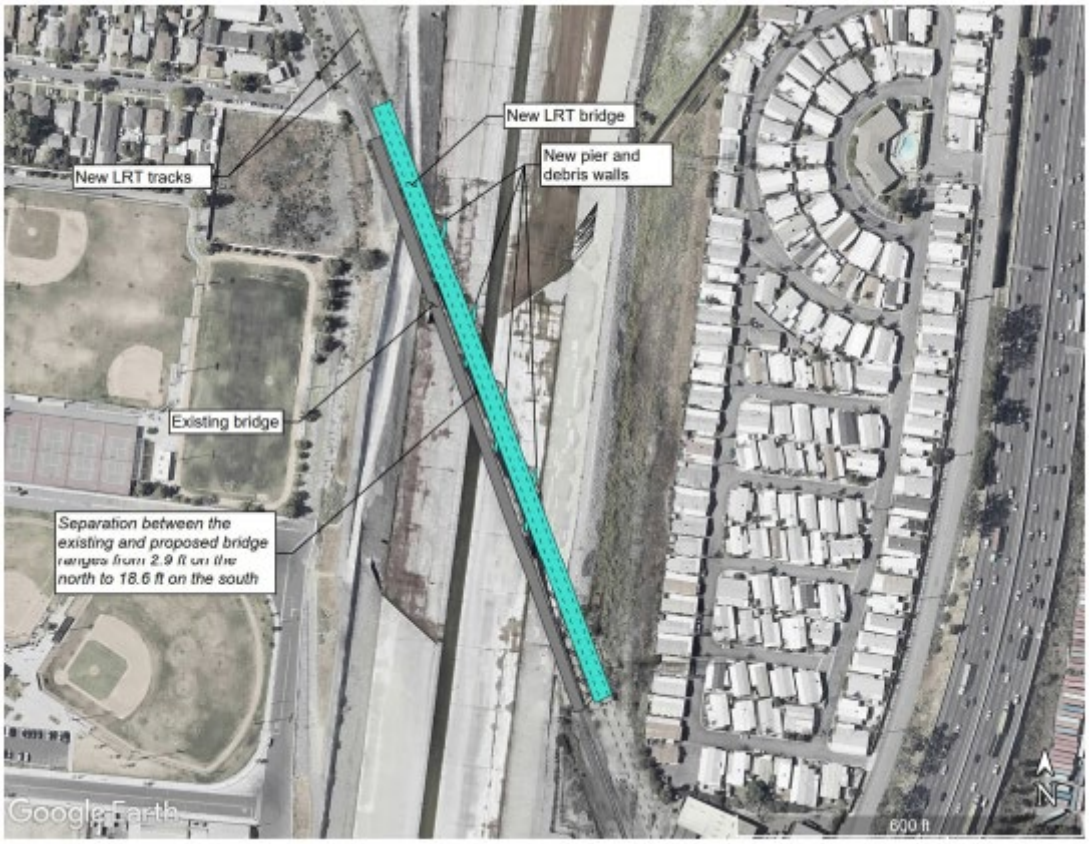


Source: Rincon 2018

Project Activities in the Vicinity of the Property

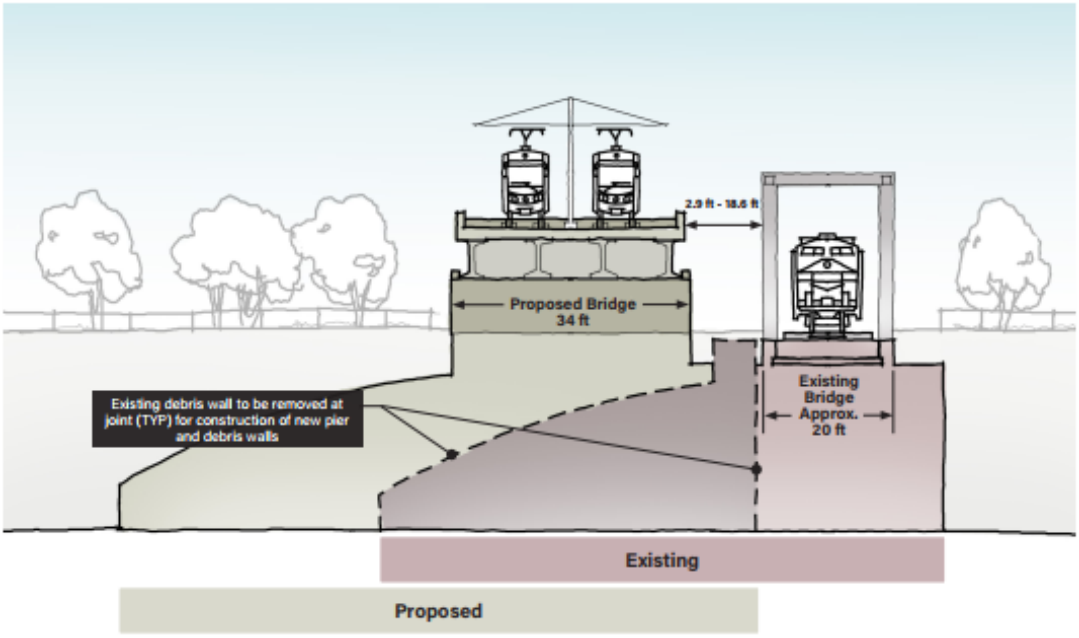
The LPA will require construction of a new LRT bridge crossing over the LA River adjacent and roughly 10 feet to the north, of the Union Pacific LA River Bridge (Figure 5-14 and Figure 5-15). The existing Union Pacific LA River Bridge will remain intact and continue to be used for freight operations. While the bridge superstructure will not be altered by the LPA, four of the existing debris walls, which are non-original, will be extended north to support the new railroad bridge. The LPA will introduce new permanent visual elements adjacent to the bridge, including the new rail bridge, with accompanying rail tracks, soundwalls, and catenary poles and wires. These visual elements will be similar in scale and massing to the existing rail-related features currently within the vicinity of the bridge.

Figure 5-14. Plan View of Existing Union Pacific LA River Bridge and Proposed New LRT Bridge



Source: Metro 2024

Figure 5-15. Cross Section Plan View of Existing Union Pacific LA River Bridge and Proposed New LRT Bridge



Source: Metro 2024

Assessment of Effects/Impacts

The existing bridge will remain intact and continue its historic and current use following implementation of the LPA. While the LPA will not physically alter the deck of the bridge, the bridge's existing non-original concrete debris walls will be extended to the north to support the new LRT bridge constructed for the LPA to cross the LA River. Modifications to the debris walls will be undertaken using materials consistent with the bridge's existing piers, and the scale and massing of extended portions of the debris walls will be consistent with those currently extant. While the bridge's integrity of design, materials, and workmanship will be altered by the LPA, modifications will be undertaken in a manner such that the property/resource will not be adversely affected/significantly impacted. Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the Secretary of the Interior (SOI) Standards for the Treatment of Historic Properties (Standards) and guidelines for Rehabilitation. Accordingly, as it advances, design of the extension of the concrete piers will be reviewed and approved by a professional who meets the Secretary of the SOI Professional Qualifications Standards (PQS) in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation.

New permanent visual elements consisting of a new bridge with soundwalls will be introduced. While the new bridge will partially obstruct views to and from the Union Pacific LA River Bridge, which will be situated south of the new bridge, the introduction of the structure and its associated features is compatible with the bridge's current surrounding industrial setting, which includes numerous transmission lines, rail lines, and industrial and commercial properties. Mid-ground views of the existing bridge, currently available at an angle along Imperial Highway and Firestone Boulevard, will also remain, as will the view from I-710, which at 0.3 mile south of the Union Pacific LA River Bridge, will continue to offer unobstructed views of the bridge. Currently, the only publicly accessible vantage point with direct access to the Union Pacific LA River Bridge is the Los Angeles River Bikeway, where an unobstructed view will remain on the west bank of the river, south of the bridge. The scale and massing of the new bridge will be larger than that of the existing bridge; however, the new bridge will be compatible with the visual character of the concrete-lined flood control channel that it crosses. Due to the existing setting, the addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction. Figures depicting the existing conditions and proposed alterations to the Union Pacific LA River Bridge are included as Figure 5-16, Figure 5-17, Figure 5-18, and Figure 5-19 for reference.

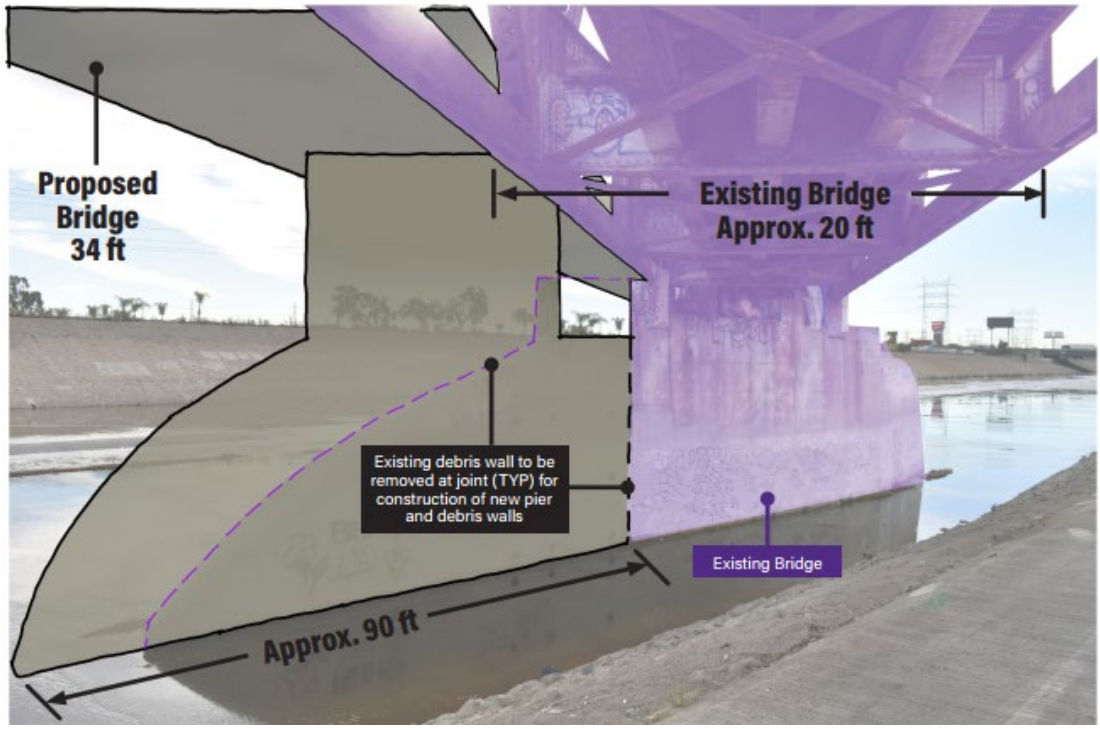
The LPA will not alter any of the characteristics of the Union Pacific LA River Bridge that qualify it for inclusion in the NRHP, CRHR, and for local designation, nor will it diminish the integrity of its location, design, setting, materials, workmanship, feeling, and association such that it would be adversely affected/significantly altered. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the Union Pacific LA River Bridge.

Figure 5-16. Existing East-Facing Ground-Level View of the Union Pacific LA River Bridge



Source: Metro 2024

Figure 5-17. Proposed East-Facing Ground-Level View of the Union Pacific LA River Bridge and New LRT Bridge



Source: Metro 2024

Figure 5-18. Existing South-Facing Ground-Level View of the Union Pacific LA River Bridge



Source: Metro 2024

Figure 5-19. Proposed South-Facing Ground-Level View of the Union Pacific LA River Bridge and the New LRT Bridge



Source: Metro 2024

5.2.2.13 Los Angeles River Channel, South Gate

Map Reference No. 17-007

The APE includes portions of three properties managed under the jurisdiction of the USACE; these include segments of the LA River Channel, San Gabriel River Channel, and the Rio Hondo Channel.

The LA River is a 51-mile-long river, much of which was artificially channelized and lined with concrete as part of the Los Angeles County Drainage Area (LACDA) Project, a comprehensive flood control project for the Los Angeles Basin completed between 1939 and 1969 (USACE 1992). The approximately 2,400-foot-long segment of the LA River Channel within the APE was constructed in 1951. It consists of a roughly trapezoidal cross-section channel with a flat concrete bottom and sloping concrete- and riprap-lined banks (Figure 5-20). It is approximately 100-feet wide at the bottom and 220-feet wide across the top. The USACE oversaw completion of the LACDA Project, which included the construction of a system of channelized streams, debris basins, and other flood control structures, to restrict periodic flooding of the LA River and other waterways in the Los Angeles Basin. Since its implementation, the LACDA Project has protected large swaths of metropolitan Los Angeles from destructive and deadly floods and was instrumental in the region's rapid urbanization in the twentieth century (USACE 1992).

Figure 5-20. Los Angeles River Channel, Taken from the West Bank of the River Channel, Southeast-Facing



Source: Rincon 2022

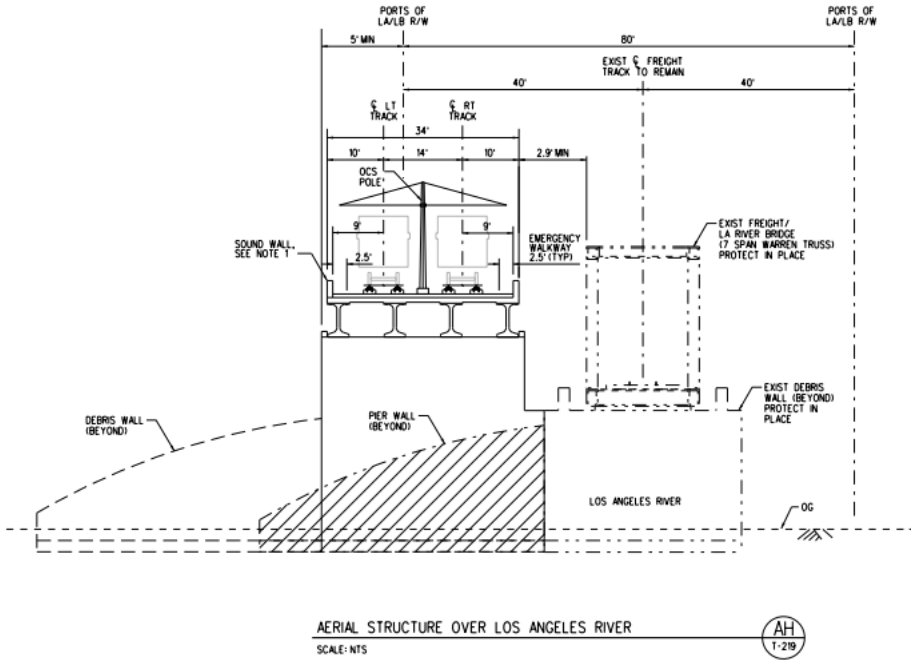
During the public circulation of the Draft EIS/EIR, the USACE provided comments on the Draft EIS/EIR related to the LA River Channel, stating that its NRHP eligibility should be considered by the Project and effects assessed as appropriate. Continued coordination with the USACE indicated that the LA River Channel was determined NRHP-eligible by the USACE in 2022 and SHPO concurred with that determination. The LA River Channel is a contributing segment to a larger resource that encompasses elements of the LACDA Project, including the LA River Flood Control System, and extends well beyond the Project APE. Under NRHP Criterion A, the segment is

significant for its association with the planning and construction of the LACDA Project and the flood control system's role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. The subject segment is additionally significant under NRHP Criterion C for its engineering and design as part of the LACDA Project, the purpose of which is specific to the region's unpredictable cycle of flooding. The period of significance associated with the subject segment of the LA River Channel begins in 1951, when the segment was channelized and paved, and concludes in 1969, the year the first phases of construction of the LACDA Project were completed (USACE 1992; Turhollow 1975). Although surveyed, because of its 2022 determination of eligibility, the portion of the LA River Channel in the APE was not reevaluated for this study.

Project Activities in the Vicinity of the Property

The LPA will require construction of a new LRT bridge to cross over the LA River Channel. North of the LA River Channel, the alignment will be constructed at-grade in the existing San Pedro Subdivision ROW. It will then transition to an aerial configuration to cross over the LA River Channel on a new LRT bridge. The existing Union Pacific LA River Bridge (MRN 17-006), which crosses the channel within the APE, will remain intact and continue to be used for freight operations. To accommodate the proposed alignment, a new LRT bridge will be constructed roughly 10 feet north of the existing Union Pacific LA River Bridge (Figure 5-21; the Union Pacific LA River Bridge is evaluated in Section 5.2.2.12). Following its crossing of the channel, the alignment will transition back to an at-grade configuration to continue south. Four concrete debris walls currently located in the river channel beneath the Union Pacific LA River Bridge will be partially demolished to construct new pier and debris walls for the LRT bridge. Additionally, two concrete abutments, one on each side of the channel, will be constructed to support the new LRT bridge.

Figure 5-21. Engineering Drawing that Depicts Proposed Alterations in the LA River Channel



Source: WSP 2023

Assessment of Effects/Impacts

Much of the 51-mile long LA River was channelized and lined with concrete as part of the LACDA Project between 1939 and 1959. The subject segment represents approximately 2,400 feet or 0.45 mile (less than 1 percent) of the river channel's total length. Approximately 100-feet wide at the bottom and 220-feet across the top, it is roughly trapezoidal in cross-section and features a concrete bottom that is flat excepting a central trench to direct water flow. Angled at approximately 45 degrees, the sloping banks are lined alternately in smooth concrete and concrete-fortified riprap. Additional associated components in the APE include concrete vehicle ramps accessing the riverbed, storm drain discharge portals built into the side of the bank, and a paved bicycle trail at the top of the west bank. Evaluated as an individual resource in Section 5.2.2.12, the Union Pacific LA River Bridge (MRN 17-006) also crosses the river channel within the APE.

The subject segment is generally consistent with the length of the river channel in its design and appearance, and visual observation suggests that that much of what is currently present dates to its original construction. Its character-defining features include its orientation, roughly north-south, in addition to its overall size and shape as described above, which enable it to effectively direct water throughout its length. The river's continued function as a flood control measure is a feature that defines it, inclusive of the portions within the APE. Construction of the LRT bridge will require partial removal of the existing debris walls attached to the Union Pacific LA River Bridge's piers to enable the reconstruction of extended pier walls to also support the new LRT bridge. The demolition and reconstruction with in-kind materials within these portions of the channel will not introduce visual, atmospheric, or audible elements that will diminish the overall integrity of the LA River, which will remain a historic property/historical resource following implementation of the LPA. Further, the channelization of the river was intended to allow for urban development proximate to the channel; implementation of the LPA is consistent with the current purpose and function of the river. Overall, the river's original form, design, and setting will remain intact and replacement materials will be consistent in size, scale, and materials with the existing historic waterway.

The LPA will introduce new permanent visual elements, most notably an LRT bridge, into the LA River Channel, approximately 10 feet to the north of the existing Union Pacific LA River Bridge. The LPA will alter the channel by introducing a new bridge, piers, abutments, and 6-foot and 8-foot-tall soundwalls, and will therefore diminish its integrity of design, materials, and workmanship. However, modifications will not result in adverse effects/significant impacts because the river's character-defining features, notably its concrete-lined trapezoidal shape, will remain intact and new project elements will be compatible with the design, workmanship, and materials found throughout the 51-mile river. The new LRT bridge will not change the historic alignment of the river or result in the removal or substantial alteration of its character-defining features. New additions will be differentiated and will not create a false sense of historic development; they will be unique but compatible with other features found throughout the LA River.

Although the LPA will result in construction within the subject segment, it will not alter the segment's orientation or its overall size or shape and will not impact its ability to function in its historic and current capacity. The new LRT bridge and its associated features, including soundwalls, rail track, and catenary poles and wires are compatible with the subject segment's surrounding urban industrial setting, which includes numerous transmission lines, rail lines, and industrial and commercial properties. Additionally, many bridges dating from various construction periods cross the river channel throughout its 51-mile length. The introduction of an additional bridge within the subject segment is in keeping with the river channel's overall character and represents minimal change when considered in the context of its entire length.

The portion of the LA River Channel in the APE is a resource significant for its association with important events, namely the design and construction of the LACDA Project, and for its role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. Its ability to convey significance lies in its overall design and form as related to its function as part of a larger water conveyance system, rather than in its small-scale detail. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

The project actions are confined to a small portion of the resource and will not alter any of the characteristics of the segment of the LA River Channel in the APE that qualify it for inclusion in the NRHP, CRHR, and for local designation, nor will it diminish its integrity of location, design, setting, materials, workmanship, feeling, and association. Following completion of the LPA, the LA River will continue to be used as it was historically. Further, the actions proposed are small in scale when considered in the context of the 51-mile alignment of the river as a whole. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the LA River Channel.

5.2.2.14 Pueblo del Rio Public Housing Complex Historic District/5024 Holmes Avenue, Los Angeles (P-19-188179)

Map Reference No. 8-013

Description and Designation Status of Historic Property

The Pueblo Del Rio Public Housing Complex Historic District (Pueblo Del Rio) is a 17.5-acre public housing complex composed of 57 two-story, multi-family dwellings (Figure 5-22 through Figure 5-26). Built between 1941 and 1944, the property is designed with International-Style architectural elements and a Garden City-influenced site plan. The property was determined eligible for listing in the NRHP, listed in the CRHR, and eligible as a City of Los Angeles HCM. It is significant under Criteria A/1/1 as an early Los Angeles public housing project and for its associations with mid-twentieth-century city planning practices and welfare policies. It is significant under Criteria C/3/3 as an example of International-Style architecture and Garden City community planning. Furthermore, the complex is notable as the product of collaboration among influential Modernist architects Paul R. Williams, Richard Neutra, Adrian Wilson, Gordon B. Kaufmann, Walter Wurdeman, and Welton Becket, along with landscape architect Ralph D. Cornell. Its period of significance is 1941 to 1944, corresponding to the years of construction for the original complex and its annex. The complex straddles Long Beach Avenue in a densely built urban area characterized by a mix of residential and industrial properties dating from throughout the twentieth century. The resource is substantially intact and retains integrity of location, design, materials, workmanship, feeling, and association. The property's setting has changed substantially since its construction in 1941. Alterations have included industrial and commercial infill, the replacement of original landscaping that lined Long Beach Avenue, and the addition of the Metro A (Blue) Line and associated pedestrian bridge that crosses over the rail ROW at East 53rd Street (Figure 5-25). Character-defining features of the property include minimal ornamentation, metal casement windows, and flat and low-pitched roofs with cantilevered overhangs, while the site plan features superblock planning, landscaped outdoor common areas on secondary elevations and within the interior of the property, and a separation of vehicle and pedestrian traffic.

Figure 5-22. Pueblo Del Rio Public Housing Complex Historic District, Taken from the Southwest Intersection of Long Beach Avenue and East 55th Street, Northwest-Facing



Source: Rincon 2018

Figure 5-23. Pueblo Del Rio Public Housing Complex Historic District, Taken from the West Side of Long Beach Avenue Near the East 53rd Street Intersection; East-Facing



Source: Rincon 2019

Figure 5-24. Pueblo Del Rio Public Housing Complex Historic District in Relationship to Existing Rail ROW; Existing 53rd Street Pedestrian Bridge in Background at Right; Southwest-Facing



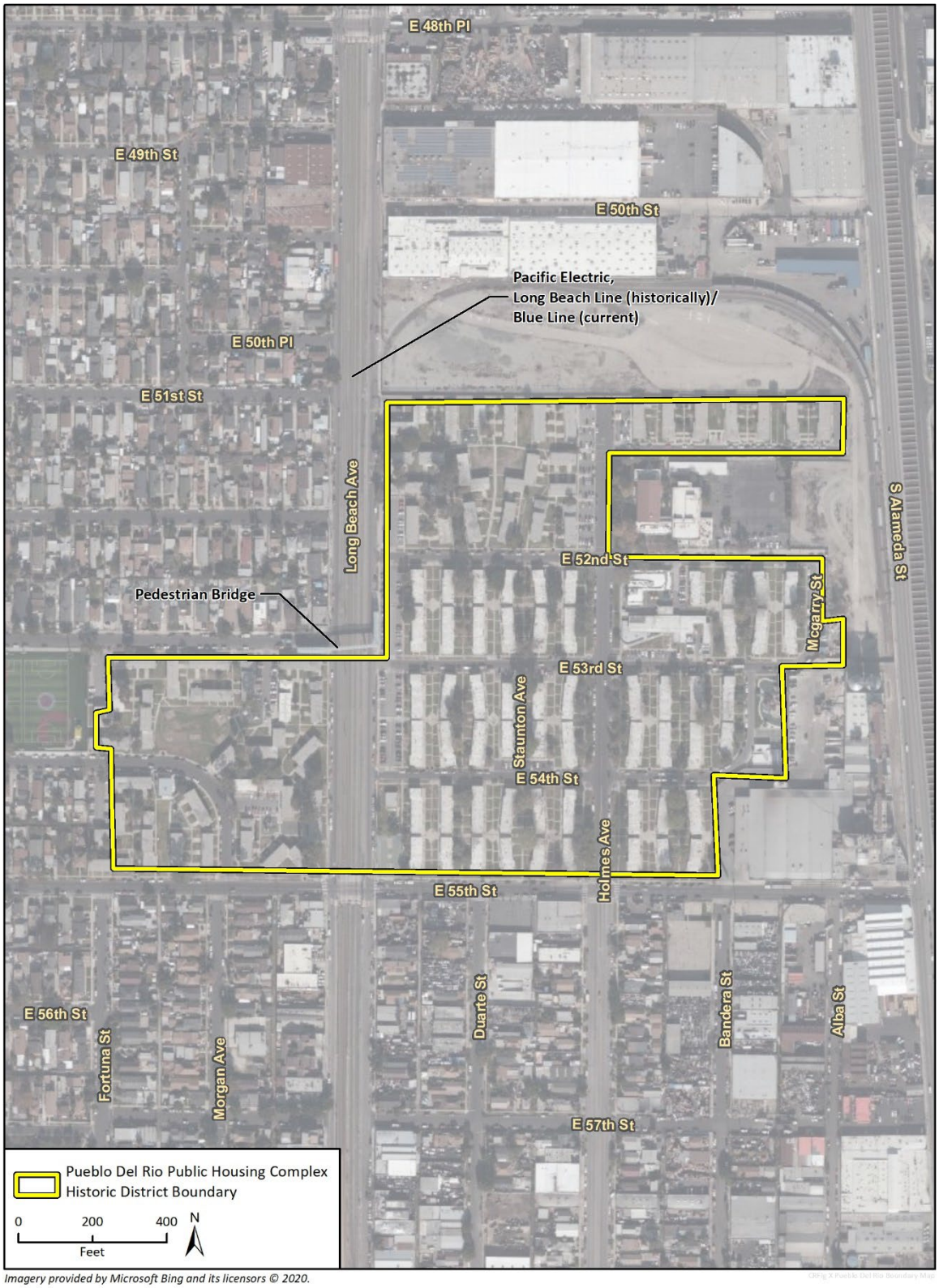
Source: Rincon 2019

Figure 5-25. Existing 53rd Street Pedestrian Bridge Northeast-Facing



Source: Rincon 2019

Figure 5-26. Pueblo Del Rio Public Housing Complex Historic District Boundary



Source: Prepared by Rincon in 2020

Project Activities in the Vicinity of the Property

Pueblo Del Rio is located immediately adjacent to and north of the northern terminus of the LPA. In the vicinity of Pueblo Del Rio, the LPA will be in an aerial viaduct that will parallel the existing ROW along Long Beach Avenue. The Slauson/A Line Station will also be located adjacent to Pueblo Del Rio. No temporary or permanent easements or acquisitions will be required on the property. The LPA will introduce new permanent visual elements within the ROW, including the viaduct structure and structural support elements, soundwalls, and associated rail-related features such as tracks and overhead catenary. Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. These visual changes will be temporary as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify Pueblo Del Rio. Therefore, the property's integrity of location, design, materials, and workmanship will not be diminished. While the LPA will introduce new permanent visual elements consisting of the aerial viaduct, soundwalls, overhead catenary and wires, and aerial Slauson/A Line Station, the introduction of the aerial structure to the south of the property is compatible with the surrounding mixed-use setting, which includes numerous utility poles, rail tracks, rail crossing gates, a pedestrian bridge, and industrial and commercial properties. The four parallel tracks that run along Long Beach Avenue comprise the Pacific Electric Long Beach Line and the Los Angeles Metro A (Blue) Line (1990). The introduction of the aerial structure and its associated features is compatible with the property's existing surrounding mixed-use setting, which includes numerous utility poles, rail lines, rail crossing gates, and industrial and commercial properties. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

Implementation of the LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP or the CRHR nor will it diminish the integrity of the property's location, design, materials, workmanship, feeling, and association such that an adverse effect/significant impact will occur. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for Pueblo Del Rio.

5.2.2.15 Southern California Edison Long Beach-Laguna Bell 60kV and 220 kV Transmission Lines (P-19-192309)

Map Reference No. 18-016

Description and Designation Status of Historic Property

The SCE Long Beach-Laguna Bell 60 kV and 220kV transmission lines comprise two 60kV transmission lines and one 220kV transmission line (Figure 5-27). Suspended from a series of lattice steel towers, the lines initiate at the Long Beach Generation Station Substation on Terminal Island in Long Beach and terminate approximately 9.5 miles north at the Laguna Bell Substation in Los Angeles County. The transmission lines were constructed in 1927 and 1928 to connect the Long Beach Steam Station and the Big Creek Hydroelectric System, establishing the backbone of the SCE 220 to 66kV system. Their construction represents a significant event in the development of SCE's electrical system. The lines were determined eligible for listing in the NRHP in 2017 and are listed in the CRHR under Criteria A/1 as a central element of SCE's 220kV transmission system and under Criteria C/3 as innovatively designed transmission lines and for the design of their crossing at Cerritos Channel, a significant engineering feat. The period of significance for the Long Beach-Laguna Bell 66kV and 220kV Transmission Lines is 1928, the year construction was completed. Within the APE, the resource consists of transmission lines and lattice steel towers following the east bank of the Rio Hondo in South Gate. The power lines' right-of-way is used for parkland and agriculture and is bounded by the Rio Hondo on the west and large industrial properties on the east. While recent development has disrupted the resource's setting, the transmission lines and towers are intact, retaining integrity of location, design, materials, workmanship, feeling, and association.

Figure 5-27. SCE's Long Beach-Laguna Bell 60kV and 220 kV Transmission Lines, Taken near their Intersection with Garfield Avenue, South-Facing



Source: Rincon 2018

Project Activities in the Vicinity of the Property

The LPA is located on the eastern banks of the Rio Hondo Channel where it crosses over the channel in a new LRT bridge and then transitions to an at-grade configuration as it continues south. The alignment will pass between pairs of overhead towers, which are located to the north and south. The pairs of overhead towers are spaced approximately 300 feet apart. Within this space, TPSS 9E is also proposed. The LPA will introduce new permanent rail-related visual elements within the ROW, including the viaduct structure, TPSS, rail tracks, and catenary poles and wires. As the utility and rail ROW share an existing easement at their intersection, the LPA will require two permanent partial acquisitions encompassing approximately 6,370 square feet, a permanent easement for TPSS access, and a temporary construction easement of approximately 1,580 square feet from the transmission line corridor. Construction activities will occur within the utility and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter the property/resource's overhead towers that are north and south of the LPA alignment and TPSS site. The LPA alignment transitions from an aerial viaduct to at-grade within the boundary of the historic property/historical resource. This is also the location of TPSS Site 9E. While the aerial viaduct and TPSS will introduce new permanent structures to the existing setting along the historic transmission line corridor, these visual elements are similar in scale and massing to the existing industrial setting, which includes extant rail-related features, the existing Rio Hondo Bridge, surrounding industrial properties, and the transmission lines. The addition of these visual elements will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character and quality of the area.

The LPA will require two permanent partial acquisitions with a temporary construction easement from the transmission line corridor in which no transmission towers are included. The resource itself is composed of overhead towers with accompanying transmission lines, none of which will be altered by the LPA. Only a small portion of the overall resource, which comprises a wide corridor spanning roughly 9.5 miles, will be modified (acquired) by the LPA; it will therefore not be adversely affected/significantly impacted.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary, and construction equipment, vehicles, barricades, and security fences will be removed once construction is completed. The addition of these visual elements will not permanently alter or diminish the property's historic integrity. The LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP or CRHR, and for local designation, nor will it diminish its integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, implementation of the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the SCE Long Beach-Laguna Bell 60 kV and 220kV transmission lines.

5.2.2.16 Rio Hondo Channel, South Gate

Map Reference No. 18-017

Description and Designation Status of Historic Property

The APE includes portions of three properties managed under the jurisdiction of the USACE: segments of the Rio Hondo Channel, LA River Channel, and the San Gabriel River Channel.

The Rio Hondo Channel is a 16-mile-long, artificially channelized river that was lined with concrete between 1951 and 1958 as part of the LACDA Project. The LACDA Project was a massive system of channelized streams and other flood control structures, the implementation of which was overseen by the USACE throughout the mid-twentieth century to provide protection from periodic flooding throughout the Los Angeles Basin (USACE 1992). The portion of the Rio Hondo Channel within the APE (subject segment) includes approximately 2,900 linear feet of the channel, which is approximately 100 feet wide at the bottom and 220 feet across the top. It is roughly trapezoidal in cross-section with a flat concrete bottom and sloping concrete- and concrete-fortified riprap-lined banks. Straight reinforced concrete parapet walls separate the channel from the paved ROWs that trace each side of the channel (Figure 5-28). However, a fork in the east ROW descends the banks and passes beneath the Rio Hondo Bridge (MRN 18-015), which crosses the channel with the APE. The Rio Hondo Bridge was evaluated as an individual resource in the Survey Report—Rev 2 and found ineligible for historic designation. It is not considered a historic property for the purpose of Section 106 or a historical resource pursuant to CEQA and it is therefore not further discussed in this study.

Figure 5-28. Rio Hondo Channel; Taken from the East Bank of the Channel, Northwest-facing



Source: Rincon 2022

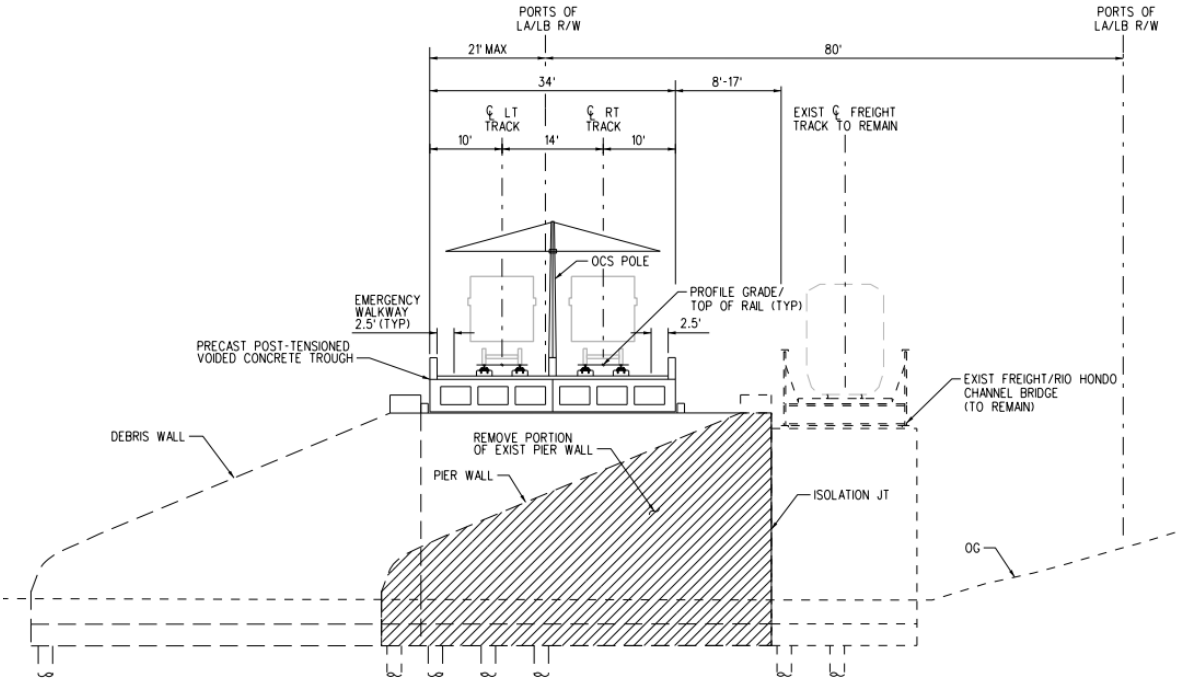
In response to public circulation of the Draft EIS/EIR, the USACE provided comment on the Draft EIS/EIR related to the Rio Hondo Channel, stating that its NRHP eligibility should be considered by the Project and effects assessed as appropriate. Continued coordination with the USACE indicated that the Rio Hondo Channel was determined NRHP-eligible by the USACE in 2022 and SHPO concurred with that determination.

The portion of the Rio Hondo Channel within the APE is a contributing segment to a larger resource that extends well beyond the Project APE to encompass elements of the LACDA Project, including the LA River Flood Control System. Under NRHP Criterion A, the segment is significant for its association with the design and construction of the LACDA Project and the flood control system's role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. The subject segment is additionally significant under NRHP Criterion C for its engineering and design as part of the LACDA Project, the purpose of which is specific to the region's unpredictable cycle of flooding. The period of significance associated with the subject segment of the channel begins in 1951, when the segment was channelized and paved, and concludes in 1969, the year the first phases of construction of the LACDA Project were completed (USACE 1992; Turhollow 1975). Although surveyed, because of its 2022 determination of eligibility, the portion of the Rio Hondo Channel in the APE was not reevaluated for this study.

Project Activities in the Vicinity of the Property

The LPA will require construction of a new LRT bridge to cross over the Rio Hondo Channel. North of the Rio Hondo Channel, the alignment will be constructed at-grade in the existing San Pedro Subdivision ROW. It will then transition to an aerial configuration to cross over the Rio Hondo Channel on a new LRT bridge. The existing freight/Rio Hondo Channel Bridge, which crosses the river within the APE, will remain intact and continue to be used for freight operations. To accommodate the proposed alignment, a new LRT bridge will be constructed roughly 15 feet east of the existing bridge (Figure 5-29). Following its crossing of the river, the alignment will rise to an aerial configuration to continue south. Two concrete debris walls currently located in the river channel beneath the Rio Hondo Bridge will be demolished to construct new pier and debris walls for the new LRT bridge. Additionally, two concrete abutments, one on each side of the river channel, will be constructed to support the new LRT bridge.

Figure 5-29. Engineering Drawing that Depicts Proposed Alterations in the Rio Hondo Channel



Source: WSP 2023

Assessment of Effects/Impacts

Much of the 16-mile-long Rio Hondo Channel was channelized and lined with concrete as part of the LACDA Project between 1951 and 1958. The subject segment represents approximately 2,900 feet or 0.54 mile (less than 4 percent) of the river channel's total length. Approximately 100 feet wide at the bottom and 220 feet across the top, it is roughly trapezoidal in cross-section and features a concrete bottom that is flat excepting a central trench to direct water flow. Angled at approximately 45 degrees, the sloping banks are lined alternately in smooth concrete and concrete-fortified riprap. Additional associated components in the APE include reinforced concrete parapet walls that separate the channel from the paved trails that trace each side of the channel, a storm drain discharge portal on west bank, and the Rio Hondo Bridge (MRN 18-015), which crosses the channel in the APE.

The subject segment is generally consistent with the length of the river channel in its design and appearance, and visual observation suggests that much of what is currently present dates to its original construction. Its character-defining features include its orientation, roughly northeast-to-southwest, which, in addition to its overall size and shape as described above, enable it to effectively direct water through its length. The river's continued function as a flood control measure is a feature that defines it, inclusive of the portions within the APE. Construction of the LRT bridge will require partial removal of the existing debris walls attached to the Rio Hondo Channel Bridge's piers to enable reconstruction of extended pier walls to support the new LRT bridge. The demolition and reconstruction with in-kind materials within these portions of the channel will not introduce visual, atmospheric, or audible elements that will diminish the overall integrity of the Rio Hondo Channel, which will remain a historic property/historical resource following implementation of the LPA. Overall, the river's original form, design, and setting will remain intact, and replacement materials will be consistent in size, scale, and materials with the existing historic waterway. Additionally, the channelization of the river was intended to allow for urban development proximate to the channel, and implementation of the LPA is therefore consistent with its historic and current function and purpose.

The LPA will introduce new permanent visual elements, most notably an LRT bridge, into the Rio Hondo Channel, approximately 15 feet west of the existing Rio Hondo Bridge which is not a historic property/historical resource. The LPA will alter the channel by introducing a new bridge, piers, and abutments and, therefore, will diminish its integrity of design, materials, and workmanship. However, the modifications will not result in adverse effects/significant impacts because the river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout 51-mile river. The new LRT bridge will not change the historic alignment of the river or result in the removal or substantial alteration of its character-defining features. New additions will be differentiated and will not create a false sense of historic development; they will be unique but compatible with other features found throughout the Rio Hondo Channel.

Although the LPA will result in construction within the subject segment, it will not alter the segment's orientation or its overall size or shape and will not impact its ability to function in its historic and current capacity. The new LRT bridge and its associated features, such as sound walls, rail track, and catenary poles and wires, are generally compatible with the subject segment's surrounding setting, which includes the presence of built features such as transmission lines, rail lines, and I-710, in addition to a variety of industrial and commercial properties. Additionally, many bridges dating from various construction periods cross the river channel throughout its 16 mile length. The introduction of an additional bridge within the subject segment is in keeping with the river channel's overall character and represents minimal change when considered in the context of its entire length.

The portion of the Rio Hondo Channel in the APE is a resource significant for its association with important events, namely the design and construction of the LACDA Project, and for its role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. Its ability to convey significance lies in its overall design and form as related to its function as part of a larger water conveyance system, rather than in its small-scale detail. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the surrounding urban area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

The LPA will alter only a small segment of the Rio Hondo Channel and will not modify any of the characteristics of the property that qualify it for inclusion in the NRHP, nor will it diminish the integrity of its location, design, setting, materials, workmanship, feeling, and association. Following completion of the LPA, the Rio Hondo Channel will continue to be used as it was historically. Further, the actions proposed are small in scale when considered in the context of the 16-mile alignment of the river as a whole. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the Rio Hondo Channel.

5.2.2.17 Rancho Los Amigos Medical Center Historic District, Downey (P-19-189330)

Map Reference No. 19-013

Description and Designation Status of Historic Property

The Rancho Los Amigos Medical Center Historic District is a 52-acre public health campus consisting of dozens of contributing buildings, in addition to landscaping elements, internal roadways, and other features, all constructed between 1888 and 1952 (Figure 5-30). The property was determined eligible for listing in the NRHP under Criterion A and is listed in the CRHR under Criterion 1. It is significant as a representation of the facility's evolution from its establishment as the County Poor Farm in the late nineteenth century to its conversion to a public hospital during the early to-mid-twentieth century. Rancho Los Amigos' period of significance begins with its establishment in 1888 and concludes with the 1952 retirement of Superintendent William R. Harriman, who was the institution's most influential superintendent and supervised the facility's transition to a medical hospital. The district's contributing hospital wards, bungalows, support buildings, and train station were designed in a range of architectural styles that include vernacular, Craftsman, and Mediterranean Revival. Also contributing to the district's historical significance are the overall site plan, internal circulation network, and landscaped areas, which give the property a park-like atmosphere. Several buildings, including the Administrative Building, Superintendent's House and Garage, Casa Consuelo, two buildings and a water tower associated with the Power Plant, and a complex consisting of the Dining Room, Staff Room/Commissary, and the Receiving Room, were individually listed in the NRHP and CRHR under Criteria C/3. The property retains a high level of integrity of design, materials, workmanship, location, feeling, setting, and association. Although a portion of the district is located in the APE, this area consists of undeveloped, open land.

Figure 5-30. Rancho Los Amigos Medical Center Historic District; Taken from Interior of Property, Northwest-Facing



Source: Rincon 2018

Project Activities in the Vicinity of the Property

The LPA will be located at-grade within the existing San Pedro Subdivision ROW in the vicinity of the Rancho Los Amigos Medical Center Historic District. Additionally, the Gardendale Station will be located west of the property within the existing San Pedro Subdivision ROW. One of two TPSSs under consideration will be constructed in the vicinity of the historic property/historical resource, either to the west of the ROW on a private property outside the boundary of the Rancho Los Amigos Medical Center Historic District, or east of the ROW within the property boundary. Additionally, a train control and communication house will be constructed within the property boundary.

The LPA will require modifications to the existing grade crossing at the intersection of Gardendale Street. New permanent rail-related visual elements, including additional rail tracks, fencing, pedestrian crossing gates, grade crossing houses, TPSS, and catenary poles and wires, will be introduced in the ROW. However, the visual elements are similar in scale and massing to the existing rail-related features currently in the vicinity of the property.

Construction activities will primarily occur within the public and rail ROWs. A construction laydown area will be located on the west of the property along the ROW. Construction activities will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. To accommodate construction equipment and materials, a construction laydown area will be sited on the property, along Gardendale Street. These visual changes and introduction of a laydown area will be temporary, as

construction equipment, construction vehicles, barricades, and security fences, along with the laydown area itself, will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will have no direct physical impact to any of the district contributors; therefore, their integrity of location, design, materials, and workmanship will not be diminished. The LPA will introduce new permanent visual elements within the rail ROW and on an adjacent property. Project elements include the Gardendale Station, additional rail tracks, pedestrian crossing gates, grade crossing houses, a train control and communication house, and catenary poles and wires. Additionally, a TPSS site will be constructed either west of the ROW outside the boundary of the historic property/historical resource, or east of the ROW within the property/resource's boundary. Proposed visual elements will be similar in scale and massing to the existing setting, which includes extant rail-related features and surrounding industrial and institutional properties. The addition of these elements will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character and quality of the area. Furthermore, the addition of these features will not physically alter the historic property/historical resource in any way. The ROW in which the LPA will be located is approximately 250 feet west of the nearest historic district contributors. The TPSS and train control and communication house that will be constructed on the property will be on the west side of the property, along the ROW and will be significantly separated from district contributors. The addition of this TPSS and train control and communication house will not result in an adverse effect/significant impact, as it will be small in scale when compared with the property overall and simple and unobtrusive in its design so as not to detract from the district.

The LPA will require a temporary easement to accommodate a construction laydown area on the property. Construction activities will primarily occur within the rail ROW and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary since construction equipment, construction vehicles, barricades, security fences, and the laydown itself will be removed once construction is completed. As they will be temporary, the addition of these visual elements will not permanently alter or diminish the property's historic integrity. The LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP, CRHR, and for local designation, nor will it diminish its integrity of location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and a less than significant impact under CEQA for the Rancho Los Amigos Medical Center Historic District.

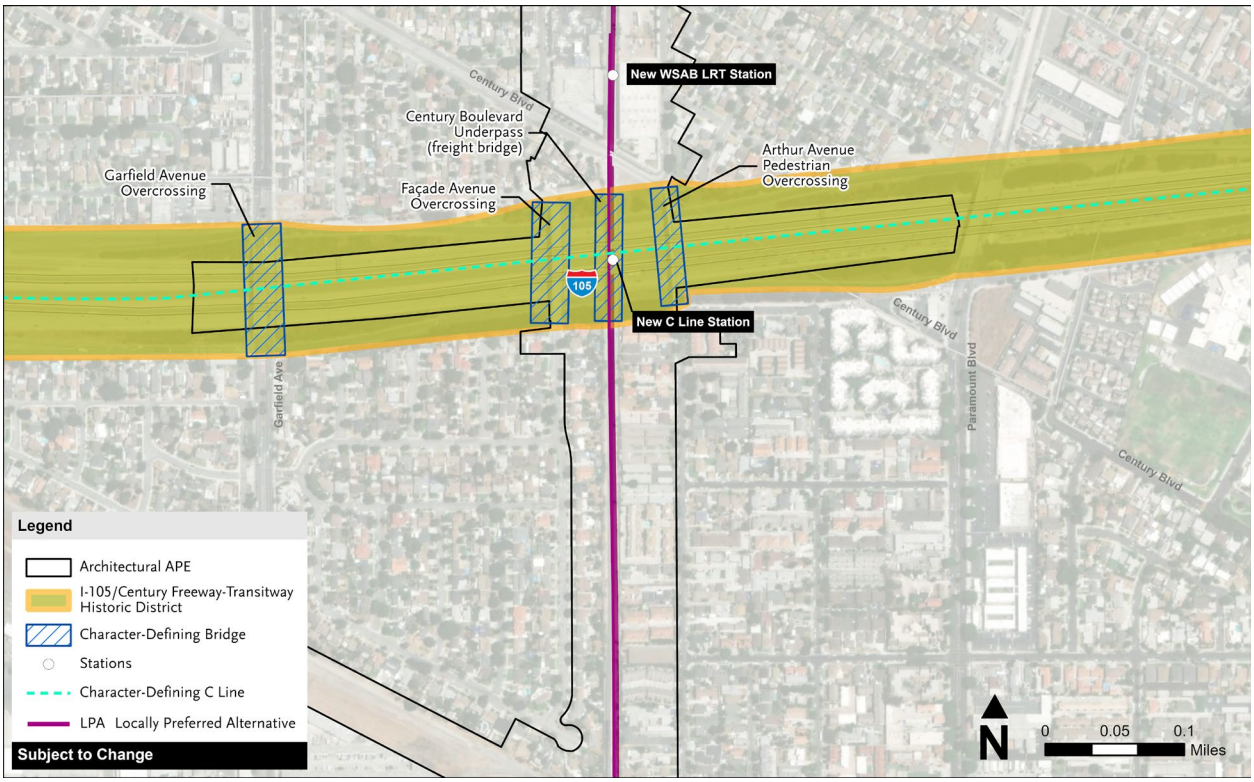
5.2.2.18 Century Freeway-Transitway Historic District

Map Reference No. 21-027

Description and Designation Status of Historic Property

The Century Freeway-Transitway Historic District (historic district or district) is a linear historic district that encompasses roughly 18 miles of I-105 from California Street in El Segundo to Studebaker Road in Norwalk. The boundaries of the district are defined by the California Department of Transportation (Caltrans) ROW. The district includes the Metro C Line (formerly referred to as the Green Line) and 10 freeway-related Metro C Line LRT stations; the bridges and ramps constructed as part of the interstate; and the interchanges that connect I-105 to I-405, I-110, I-710, and I-605. While the district extends well beyond the boundaries of the WSAB APE, the APE includes roughly 0.5 mile of the district inclusive of three overcrossings and one underpass (Figure 5-31 and Figure 5-32).

Figure 5-31. Overview of the APE in Relation to the Century Freeway-Transitway Historic District



Source: Rincon 2023

Figure 5-32. East-Facing View of Century Freeway-Transitway Historic District



Source: Rincon 2020

The historic district was recorded and evaluated by Caltrans on California Department of Parks and Recreation (DPR) 523 Series forms as part of the Historical Resources Survey Report for the I-105 ExpressLanes Project (ExpressLanes Project) (Caltrans 2019) in 2019 and in the Caltrans Condition Assessment Report for the Century Freeway-Transitway Historic District, also in 2019 (Smith and Harper 2019). In December 2019, Caltrans received concurrence from the California SHPO on its determination of NRHP and California Historical Landmark eligibility for the historic district. As a resource determined eligible for listing in the NRHP, the district was automatically listed in the CRHR. The following California Historical Resource Status Code was applied by Caltrans on the resource's DPR forms: 2D2-Contributor to a district determined eligible for the National Register by consensus through the Section 106 process, listed in the California Register.

Under NRHP Criterion A, the district's "associative importance is as the subject of one of the earliest Environmental Justice lawsuits, requiring community and environmental consideration in freeway planning. That significance encompasses the ensuing legal agreement which directly affected displacements, created new housing, changed construction practices, created local jobs and future careers for minorities, the route of the roadway and its intermodal use and as the final inner-city interstate to be constructed" (Smith 2019). Under NRHP Criterion C, the district's "design significance is partially based on the assimilation of then-novel Intelligent Transportation Systems (ITS) features and design components (such as longer ramps) into the design and management of the freeway, the revolutionary integral light rail alignment and stations in its median, and the ambitious, massive, intermodal limited interchanges and as the last, full-length, new urban freeway" (Smith 2019). The district's period of significance spans 1968, when its design was initially prepared by Caltrans engineers, to 1995, when the construction of the Metro C Line in its median was completed (Smith 2019).

The character-defining features of the district were identified by Caltrans in the aforementioned DPR forms and condition assessment report. According to that documentation, the district's most significant character-defining features (assigned between 13 and 15 points in the Caltrans condition assessment report) are its interchanges with I-405, I-110, I-710, and I-605, and its route profile which varies throughout and includes portions at-grade, elevated, in trenches, and on berms. The district's significant character-defining features (assigned between 9 and 12 points in the Caltrans condition assessment report) include the following: multi-lane roadway, alignment of route, Metro C Line LRT system and 10 freeway-related Metro C Line stations, ITS system, 118 original bridges and pedestrian overcrossings, fully landscaped nature, and controlled ramps and their lengths. These features are listed in Table 5.1 and ranked by importance in conveying the district's significance following the points assignment by Caltrans in the condition assessment report. Elements that do and do not contribute to the significance of the historic district are described in its DPR form:

> Character-defining features include the freeway itself, its features including the ITS system, all bridges, ramps and original structures constructed for the I-105, the remaining original landscaping, light rail lines and the ten freeway-related stations. The pavement of the roadway, standard signage, later soundwalls, mast lighting at the Interstate 710 interchange, pump stations between I-710 and 605, the Green Line outside of the median and its stations south of the Aviation/LAX Station and the Green Line Maintenance and Storage Yards beyond the I-105 corridor that were not originally constructed as part of the I-105 do not contribute to its significance (Smith 2019).

Additionally, the DPR form indicates the bridges within the historic district were determined not eligible in 2005 as part of a statewide bridge inventory. Following evaluation of the freeway, Caltrans determined the "I-105 bridges are not significant individually or as engineering achievements but are contributors to the larger historic district."

Project Activities in the Vicinity of the Property

Within the vicinity of the district, the LPA alignment will be located at-grade within the existing UPRR San Pedro Subdivision ROW. Upon approach to I-105 from the north and south, the alignment will transition to an aerial structure to cross over the freeway. The alignment will remain relatively flat as it crosses over I-105 and the Metro C Line on a new LRT bridge, which will be constructed roughly in the location of the existing Century Boulevard Underpass. The Century Boulevard Underpass will be demolished and rebuilt immediately west of its current location to accommodate the LPA alignment. The effects assessment presented in the Preliminary Cultural Resources Effects Report (Metro 2020b; Appendix X of the Draft EIS/EIR) analyzed effects/impacts associated with the demolition and replacement of three of the district's identified character-defining bridges: the Century Boulevard Underpass, the Arthur Avenue Pedestrian Overcrossing, and the Façade Avenue Overcrossing. Since that time, only demolition of one of the district's identified character-defining bridges, the Century Boulevard Underpass, is required reducing the potential of the LPA to adversely affect historic properties since the Draft EIS/EIR. Unchanged from the Draft EIS/EIR, the LPA will not require demolition of the Garfield Avenue Overcrossing, which is also an identified character-defining bridge located in the APE.

The LPA will include construction of a new infill Metro C Line station in the median of I-105 along the existing C Line, which will be located below the Façade Avenue Overcrossing, the new LRT bridge, and replacement freight bridge. The new station platform will be approximately 270 feet long and 25 feet wide. The platform will be punctuated with vertical circulation elements (stairs, escalators, and/or elevators), which will connect at its western end to the existing Façade Avenue Overcrossing and at its eastern end to the new LRT bridge. The vertical circulation elements will provide connections between the new Metro C Line LRT station and a station that will be located along the proposed alignment, north of I-105 and outside the boundaries of the historic district. Construction of the new Metro C Line LRT station will require realignment of approximately 2,500 feet (0.47 mile) of the Metro C Line tracks to accommodate the new station platform. The proposed elements described above are illustrated in Figure 5-33.

Figure 5-33. Proposed Elements Within and in the Immediate Vicinity of the Century Freeway-Transitway Historic District



Source: Prepared on behalf of Metro 2023

Assessment of Effects

The following presents an assessment of the potential for the LPA to affect the historic district in accordance with Section 106; an assessment of the potential for the LPA to impact the historic district pursuant to CEQA is presented in Section 7 of this study.

This analysis integrates information presented in the DPR form prepared as part of the *Historical Resources Survey Report for the ExpressLanes Project* (Caltrans 2019) and the Condition Assessment Report for the Century Freeway-Transitway Historic District (Smith and Harper 2019). Additionally, the ExpressLanes Project proposed modifications to the district that are consistent with those proposed as part of the WSAB Project and included accommodations for implementing the WSAB Project as part of its ExpressLanes design, including consideration of proposed bridge demolition. The analysis and findings presented in the Finding of Effect-Interstate 105 ExpressLanes Project-Cities of El Segundo, Los Angeles, Inglewood, Hawthorne, Lynwood, Paramount, South Gate, Downey and Norwalk and Unincorporated Los Angeles County (Lennox, Athens and Willowbrook)-Los Angeles, County, California (ExpressLanes FOE) (Caltrans 2020) were reviewed to support and supplement this LPA's effects assessments.

The ExpressLanes FOE includes analysis of the potential adverse effects of two build alternatives, both of which result in a Section 106 finding of no adverse effect. Both ExpressLanes Project build alternatives proposed the following activities and modifications in select locations within the district: freeway widening, ramp modifications, interchange modifications, widening of character-defining bridges, demolition and reconstruction of at least one character-defining bridge, removal and replacement of original landscaping, and the installation of retaining walls and soundwalls, among other proposed modifications.

The LPA will directly alter a small portion of the district and include the following actions: demolition and replacement of one character-defining bridge (the Century Boulevard Underpass), construction of a new infill Metro C Line station and associated vertical circulation elements in the median of I-105 below the existing Façade Avenue Overcrossing, realignment of 2,500 feet of existing Metro C Line LRT track to accommodate the infill station platform, and minimal removal and replacement of landscaping.

Due to the stated significance of the Century Freeway-Transitway Historic District as described in the district's DPR forms, condition assessment report, and the ExpressLanes FOE, and in consideration of the alterations proposed by the LPA, the following analysis concludes that the LPA will result in no adverse effect to the district. Implementation of the LPA will not diminish the district's integrity or alter in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in the NRHP. In the sections that follow, components of the LPA are analyzed individually and collectively for their potential to cause effects to the district.

Demolition and Replacement of the Century Boulevard Underpass

The Century Boulevard Underpass currently accommodates the UPRR freight line, which predates construction of I-105 and was relocated to its present location on the Century Boulevard Underpass at the time of I-105's construction. The demolition and replacement of the Century Boulevard Underpass is necessary to accommodate the LPA alignment within the existing railroad ROW while maintaining freight connectivity. As part of the LPA, the existing Century Boulevard Underpass will be demolished, and two new overcrossings will be

constructed, a new LRT bridge and a replacement freight bridge, roughly in its current place. To reduce the displacement of existing residents and businesses adjacent to the railroad ROW, and consistent with the Environmental Justice approach required for I-105's initial construction, the demolition and replacement of the Century Boulevard Underpass is necessary to allow room for the construction of a dedicated LRT bridge structure within the existing railroad ROW and corresponding aerial easement over I-105.

Implementation of the LPA will result in an additional overcrossing within the boundaries of the district. However, the proposed location of the replacement freight bridge immediately west of the new LRT bridge is such that the overall rhythm of overcrossings at this location within the district, which was not identified as character-defining in prior Caltrans' documentation, will not be interrupted. The proposed structures will be placed immediately adjacent to one another, sharing the location of the current Century Boulevard Underpass. Due to the proposed placement and relationship of the structures to one another, the introduction of an additional crossing in this location will represent a minimal modification to the rhythm of crossings. When considered within the context of the entirety of the district, which spans roughly 18 miles, the addition of an overcrossing in the location proposed and in a location previously considered by Caltrans for its ExpressLanes Project will not diminish the district's integrity.

The current Century Boulevard Underpass is a concrete box girder bridge with four spans supported by eight-sided bents. It is roughly 34 feet wide and features standard railings and minimal detailing consisting of simple relief in bents and along its superstructure (similar to the relief shown in Figure 5-34). The new LRT bridge, a two-span structure, will be constructed roughly 3 feet east of the current Century Boulevard Underpass. It will be approximately 46 feet wide and will accommodate a 10-foot-wide pedestrian walkway in addition to the double-track LRT alignment within the LPA. Its deck height above grade will be consistent with the existing Century Boulevard Underpass. Consistent with other character-defining bridges throughout the district, the new LRT bridge will be a cast-in-place, prestressed concrete box girder bridge structure. It will be supported with bents comprised of triple column piers and will feature a relief consistent with that present on character-defining bridges throughout the district. Railings will be designed in accordance with Caltrans bridge barrier standards.

Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the SOI Standards and guidelines for Rehabilitation. Accordingly, the new LRT bridge's design will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances. This approach to work within the I-105 and for its bridges is consistent with Caltrans' approach for its ExpressLanes Project, which stated "The proposed appearance of the new bridge construction will approximate the features of the original bridge which is consistent with the fundamental principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii))."

Figure 5-34. Southeastern-Facing View of the Arthur Avenue Pedestrian Overcrossing with Concrete Relief Visible



Source: Metro 2020

A replacement freight bridge will be constructed to the immediate west of the new LRT bridge. The design of the replacement freight bridge is largely dependent on the requirements of the UPRR, as the design of the bridge is subject to UPRR approval. It will be a four-span, cast-in-place, prestressed concrete box girder structure up to 35 feet wide. The new freight bridge will be 444 feet long with a 9-foot depth of the box girder, with an additional 2 foot, 6 inch depth of the bridge deck to top of the rail. The new freight bridge will have a 24-foot minimal vertical clearance from the bottom of the structure to the roadway below. The total vertical length from the roadway inclusive of bridge deck and box girder will be a minimum of 35 feet, 6 inches. The new freight bridge will have a 22-foot, 2-inch minimum vertical clearance from the bottom of the structure to the C Line below the bridge. The total vertical length from the C Line inclusive of the bridge deck and box girder will be a minimum of 33 feet, 8 inches.

The structure will be consistent in its overall scale and massing with other bridges throughout the district, including the proposed new LRT bridge. Its deck will be situated slightly below that of the adjacent new LRT bridge. Additionally, it will feature a low-relief design to match the relief present on character-defining bridges throughout the district.

Alternative 3 of the ExpressLanes Project proposed the demolition of one of the district's character-defining bridges, the Downey Avenue Overcrossing. Similarly, the WSAB Project will require demolition of one of the district's 118 character-defining bridges/overcrossings. Although demolition of the Century Boulevard Underpass will result in a loss of a contributing element that is not individually significant, its overall effect is minor when considered within the scope of the district's stated significance and comparison to the whole of the district, an 18-mile linear resource. Consistent with Caltrans' analysis in its ExpressLanes FOE, "the demolition of one bridge will constitute fewer than one percent of the total (.84%), so although its removal will reduce the number of contributing bridges to 118, a reduction of such a low percentage will not significantly affect the integrity of the larger historic district" (Caltrans 2020).

The new LRT bridge represents an addition to the district. The new LRT bridge will be 46 feet wide and 362 feet long with a box girder depth of 8 feet 6 inches. The new LRT bridge will have a 25-foot, 6-inch minimal vertical clearance from the bottom of the structure to the roadway below. The total vertical length from the roadway inclusive of bridge deck and box girder will be a minimum of 34 feet. The new LRT bridge will have a 23-foot, 8-inch minimum vertical clearance from the bottom of the structure to the C Line below the bridge. The total vertical length from the C Line inclusive of the bridge deck and box girder will be a minimum of 32 feet, 2 inches. Overhead contact system poles along the LRT bridge will be 20 feet above the track. The new LRT bridge will be similar to other character-defining bridges throughout the district in its overall design, massing, scale, color, and materials and will approximate the features of the original bridge; therefore, its design is consistent with the fundamental principles of the SOI Standards (36 CFR 68) and applicable guidelines. Additionally per Project Measure CR PM-1 (SOI Standards Design Review), the new LRT bridge's design will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances. Similarly, the replacement freight bridge will also represent an addition to the district. It will embody a design in keeping with that of the district and similar to other character-defining bridges. Its overall design, massing, scale, color, and materials will approximate the features of the original bridge by integrating a relief consistent with that present on character-defining bridges throughout the district.

Consistent with the bridge demolition and replacement proposed by Caltrans in Alternative 3 of the ExpressLanes Project, the demolition of the Century Boulevard Underpass and its replacement with new LRT and replacement freight bridges "will most importantly not change the character of the property's original transit-transportation use, but it will alter one of the numerous, nearly identical features in the property's immediate setting that contribute to its historic significance enabling the linear resource's continued use (36 CFR 800.5 (iv))" (Caltrans 2020). In addition, the inclusion of a pedestrian walkway as part of the new LRT bridge, and the provision of a transfer from the LPA to the existing transportation network within the I-105 will support and further the district's intermodal nature, one of the primary reasons for its historical significance.

Based on this analysis, the demolition of the Century Boulevard Underpass and its replacement with a new LRT bridge and replacement freight bridge will not alter any of the characteristics of the district that qualify it for inclusion in the NRHP in a manner that will diminish its integrity of location, design, setting, materials, workmanship, feeling, or association. Therefore, implementation of this element will result in no adverse effect to the Century Freeway-Transitway Historic District.

Construction of a New Infill Metro C Line Station and Vertical Circulation Elements within the I-105 Median

Beneath the new LRT and replacement freight bridges, and extending west toward the Façade Avenue Overcrossing, the WSAB Project will include construction of a new infill Metro C Line station with associated vertical circulation elements in the median of I-105. The new infill station and vertical circulation elements will provide a transfer from the Metro C Line to the LPA.

As previously noted, character-defining features of the district include approximately 18 miles of Metro C Line LRT tracks and 10 associated LRT stations. Stations throughout the district feature various contemporary designs, displaying a variety of features, including multi-story elements, decorative metal canopies, soundwalls, and vertical circulation elements such as concrete stairs, elevators, and escalators.

The new infill Metro C Line station platform will be approximately 270 feet long and 25 feet wide and will be covered with canopies punctuated with vertical circulation elements. Consistent with other stations throughout the district, vertical circulation elements, which will connect to the Façade Avenue Overcrossing and the new LRT bridge, may consist of elevators, stairs and/or escalators. Identical elevators will be situated on both sides of the Metro C Line platform at 8 feet above the bridge deck. To comply with Metro requirements to achieve a noise level of 75 dBA at the station platform (Metro Rail Design Criteria Section 2.8.5), soundwalls will be included along the edges of the station. Proposed soundwalls will be of a consistent scale and massing as those located throughout the district and will feature a partially transparent design. The Caltrans ExpressLanes Project also considered this station as part of its design: "In order to accommodate the proposed WSAB Project, under Alternative 3, the I-105 ExpressLanes Project will provide adequate space in the median to widen the Green Line with a new transfer platform in the future."

A new station will introduce structural elements not currently present at this location within the district. However, I-105 is the only known interstate specifically designed and built to be intermodal, and its historical significance is partially derived from this unique quality. The function of the new infill Metro C Line station is in keeping with the district's original design intent and supports the freeway's continued intermodal network into the future. Additionally, the new infill Metro C Line station, like other Metro stations within the I-105, will be in the median of I-105 and consistent in scale, mass, and design aesthetic with character-defining stations throughout the district. The addition of a station in this location will not result in a change in the character of the district; rather it will enhance and support the character of the property's intermodal use. Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the SOI Standards and guidelines for Rehabilitation. Accordingly, the design of the new infill Metro C Line station will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances.

Soundwalls proposed for construction within the APE are limited to those associated with the new infill Metro C Line station and will be located along the edges of the station. According to the ExpressLanes FOE, "certain soundwalls were constructed as part of the original project, but those have been periodically updated and modified as the need arose, and funding became available. Because of periodic changes and additions to the soundwalls, none is considered a character-defining feature of the larger historic district" (Caltrans 2020). While

soundwalls are not character-defining features of the district due to their regular alteration and modification for maintenance purposes, they are a common and highly visible feature present throughout the district, as they have been added in many locations based on need, including at the character-defining Harbor Freeway Station (Figure 5-35 and Figure 5-36). Soundwalls added to the district in association with the new infill Metro C Line station will be in keeping with those already located throughout the district. Soundwalls will feature a partially transparent design, similar to those at the Harbor Freeway Station, thereby reducing their potential visual effect to the district. All station materials, including soundwalls, will minimize glare and heat gain, and overly reflective and mirror-like surfaces will be avoided to minimize specular reflection. Additionally, lighting fixtures will incorporate directional shielding where needed as indicated in the Metro Rail Design Criteria. Because of their ubiquity, new soundwalls in the APE do not represent a deviation in the district's form or function and will not diminish the district's integrity of setting or other aspects of integrity such that the district will be adversely affected.

Alternatives 2 and 3 of the ExpressLanes Project included alteration of 11 and 21 character-defining bridges, respectively, including bridge widening and installation of new bridge barriers, in addition to the physical destruction of small portions of graded slopes, paved slopes beneath three bridges, and a few associated retaining walls. The analysis presented in the ExpressLanes FOE stated that none of the character-defining bridges proposed for alteration by the ExpressLanes Project "…is separately significant." Rather, the analysis states that "their importance is for the corridor's associative qualities, but the linear historic district is also important for the linked ITS system, the integral high-occupancy vehicle lanes, the concurrently constructed light rail line and ten light rail stations." And that "none of the bridges proposed for alteration is significant for its aesthetic or engineering qualities; that significance lies in their direct association to the larger linear resource" (Caltrans 2020).

The introduction of vertical circulation elements in association with the new infill Metro C Line station is in keeping with the district's original design intent and supports and enhances its intermodal nature and continued future use. Additionally, vertical circulation elements are common throughout the district, and those introduced by the LPA will be consistent in scale, mass, and overall design. To reduce potential visual impact, vertical circulation elements will be situated as close as possible to the Façade Avenue Overcrossing to the west and the new LRT bridge to the east to minimize visibility from other locations within the district. As the Façade Avenue Overcrossing is not significant for its aesthetic or engineering qualities, or individually significant, alterations will not result in diminished integrity such that the bridge will no longer be character-defining; the overcrossing will retain its essential form and function. The alteration of the Façade Avenue Overcrossing with the addition of vertical circulation elements represents a minor change to the district that will not diminish its aspects of its integrity or alter in an adverse manner those physical characteristics that convey its historical significance and justify its inclusion in the NRHP. Based on the analysis presented above, the alteration of the Façade Avenue Overcrossing with the addition of vertical circulation elements will not result in an adverse effect to the Century Freeway-Transitway Historic District in accordance with 36 CFR 800.5.

Figure 5-35. Transparent Soundwall at Harbor Freeway Station Eastbound Platform Looking East



Source: Metro 2022

Figure 5-36. Transparent Soundwall at Harbor Freeway Station Westbound Platform Looking East



Source: Metro 2022

Realignment of 2,500 feet of Metro C Line Track

Construction of the new infill Metro C Line station will require realignment of approximately 2,500 feet (0.47 mile) of Metro C Line LRT track. This realignment will consist of a modest shift not to exceed 7.5 feet. The realignment represents approximately 2.5 percent of the district's approximately 18 miles of Metro C Line track. The light rail in the median of I-105 is identified by the Caltrans condition assessment report as one of the freeway's significant character-defining features; however, similar to the district's bridges, the light rail is significant for its integration into the freeway's design in support of its intermodal nature and not for its design or engineering. The Caltrans ExpressLanes Project also accommodated this realignment of C Line track within the I-105 median as described in the ExpressLanes FOE.

Despite realignment by the WSAB Project, the LRT tracks will remain an integrated component of the interstate located in the median; they will continue to serve a purpose consistent with their historic and current function in support of the district's intermodal nature. Catenary wires will be served by duct banks and cables powered by existing power substations, consistent with current design and operation. Additionally, materials removed to facilitate track realignment will be replaced in-kind, and the overall alignment of the Metro C Line within the I-105 median will remain intact following implementation of the LPA.

Based on the analysis presented above, the minor realignment of approximately 2,500 feet of Metro C Line LRT track within the I-105 median will not result in an adverse effect to the Century Freeway-Transitway Historic District because it will not alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that will diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Minimal Landscaping Removal and Replacement

To enable construction of the LPA elements described above, the removal and replacement of minimal landscaping, including the removal and replacement of up to 15 trees, may be required. The district's original landscaping is one of its character-defining features. To support the current assessment, the following documents and sources were reviewed: Caltrans-provided as-built drawings that depict the district's original landscape plan (as-builts), the *Draft Landscaping Impact Summary – I-105 ExpressLanes Project-Post Mile: R0.5 to R 18.1* (Draft Landscaping Impact Summary) (WSP 2019), and historical and recent aerial imagery of the district. According to a review of the as-builts plans, trees in the APE consist primarily of the following: *Eucalyptus Sideroxylon* (Red Ironbark), *Schinus Molle* (California Pepper Tree), *Xylosma Congestum* (Shiny Xylosma), and *Myoporum Pacifica* (Prostrate Myoporum) (Caltrans 1995). A review of historical and aerial imagery of the district indicates that landscaping on the I-105 north berm within the APE appears to have been planted after 1996 and is not original.

The alternatives analyzed in Caltrans' ExpressLanes FOE variously proposed the removal of between 80 and 177 trees, depending on the alternative, in addition to alteration of other small-scale landscaping. The analysis presented in the ExpressLanes FOE concluded that "under either build alternative a substantial majority of the historic district's trees will remain" and that "the overall intent of the original landscape design is expected to remain visible and intact with replacement of the removed trees" (Caltrans 2020). Further, the analysis indicates that "while the proposed [ExpressLanes Project] will compel physical destruction of nearly eight percent of the historic district's trees, those trees will be replaced as

described (36 CFR 800.5 (i) [in kind]" and that "the proposed tree removal and replacement with the same types, or roughly the same types of trees is consistent with the principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii))" (Caltrans 2020).

Consistent with Caltrans' approach in the ExpressLanes FOE, the current analysis indicates that proposed alterations to the district's landscaping will not alter any of the characteristics that qualify it for inclusion in the NRHP in a way that will reduce its overall integrity, given its roughly 19-mile length. The district's character is partially defined by its landscaped nature. Therefore, the LPA will adhere to the recommendations included in the Draft Landscaping Impact Summary, requiring any trees removed during construction to be replaced in-kind and at a ratio of 1:1. As a result, the district's existing landscape design will be restored following implementation of the LPA. As the LPA will only alter landscaping in a relatively small portion of the district, a substantial majority of the landscaping present throughout the district will remain unaffected by implementation of the LPA.

Therefore, removal and replacement in-kind of minimal landscaping to enable construction will result in no adverse effect because it will not alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that will diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Therefore, removal of minimal landscaping within the portion of the district in the APE to enable construction will not result in the material impairment of the Century Freeway-Transitway Historic District.

Conclusion

The LPA will result in no adverse effect to the Century Freeway-Transitway Historic District.

National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, indicates that for a historic district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished, and the relationships among the district's components must also be substantially unchanged since the period of significance. Implementation of the LPA will result in the physical alteration of a small portion of the district; however, the substantial majority of the district's character-defining features will remain unaltered, and importantly, the district's components (both original and replaced) will retain their relationships to one another through the district's continued multimodal design.

The LPA will require demolition of one character-defining feature of the district (the Century Boulevard Underpass), which constitutes less than 1 percent of the character-defining bridges within the district, 117 of which will remain following implementation of the LPA. Caltrans documentation of the district indicates that while the bridges contribute to the district, they are not individually significant or significant engineering achievements. Rather, the district's overall significance is derived from its association with an Environmental Justice lawsuit and subsequent legal agreement and its intermodal design and integration of then-novel ITS features. The additional elements proposed for construction within the district, including the new LRT bridge, replacement freight bridge, and new Metro C Line station and circulation elements, will be designed in a manner compatible in massing, scale, and overall design with the district such that they will not significantly reduce the district's overall integrity. The new LRT and replacement freight bridges will also feature a concrete relief design consistent with that present on other character-defining bridges within the district.

In addition, Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the SOI Standards and guidelines for Rehabilitation. Accordingly, the designs of the new LRT bridge and new infill Metro C Line station will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as they advance. The LPA will alter only a small portion of the district, and following implementation of the LPA, the district's appearance will continue to reflect the intermodal and aesthetic design it currently employs. The LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP or the CRHR, nor will it diminish its integrity of location, design, setting, materials, workmanship, feeling, and association. As a result of the analysis presented above, the LPA will result in no adverse effect to the Century Freeway-Transitway Historic District under Section 106. Additionally, coordination with Caltrans will continue as the project design progresses.

Table 5.1 presents the character-defining features of the district, listed in their order of importance in conveying the district's significance, as identified in the Caltrans condition assessment report. Also included in the table is the percentage of each character-defining feature that will be affected by the LPA and a Section 106 finding related to each individual feature in consideration of proposed changes. A summary of findings related to each individual component of the LPA and the LPA as a whole, as analyzed above, is include in Table 5.2.

Table 5.1. Character-Defining Features of the Century Freeway-Transitway Historic District

Caltrans Ranking	Character-Defining Feature and Description	Total Points*	Percent of Character-Defining Feature Potentially Affected by the LPA	Section 106 Finding by Component
Most Significant	Limited interchanges (Interstates 405, 110, 710 and 605)	15	0%	No proposed change; No effect to this feature.
Most Significant	Profile of route (at-grade, elevated, in trench, or on berm)	14	0%	No proposed change; No effect to this feature.
Significant	Alignment of route	12	0%	No proposed change; No effect to this feature.
Significant	Metro C Line light rail system and stations in median	12	2.5% (track) 0% (stations)	Shifting 2,500 feet (0.47 mile) of track will be a minor change within a median already dedicated to transit use; No adverse effect to this feature. New infill station will be compatible in scale and massing with existing stations and will be located in the transitway median; no existing stations will be altered; No effect to this feature.

Caltrans Ranking	Character-Defining Feature and Description	Total Points*	Percent of Character-Defining Feature Potentially Affected by the LPA	Section 106 Finding by Component
Significant	ITS system (CCTV, TMS, RMS, ATMS, CMS1)	11	0%	No proposed change; No effect to this feature.
Significant	Original bridges and pedestrian overcrossings	10	Less than 1%	Demolition and replacement of 1 of 118 contributing bridges will be a minor change where bridges are not individually significant and the district's significance is not derived from its bridge engineering; bridge replacements will be consistent in scale and massing with existing; No adverse effect to this feature.
Significant	Landscaped nature	10	Minimal	Trees to be replaced in-kind at a 1:1 ratio; No adverse effect to this feature.
Significant	Controlled ramps and their lengths	9	0%	No proposed change; No effect to this feature.

Source: Smith and Harper 2019 and Rincon 2023
* Features with points between 13 and 15 are identified as most significant; features with points between 9 and 12 are identified as significant; features with points between 5 and 8 are identified as least significant.
Notes: ATMS = Advanced Traffic Monitoring System; Caltrans = California Department of Transportation; CCTV = closed-circuit television; CMS = Changeable Message Signs; ITS = Intelligent Transportation System; LPA = Locally Preferred Alternative; RMS = Ramp Metering System; TMS = Traffic Monitoring Stations

Table 5.2. Summary of Findings

Proposed Component	Summary of Analysis	Section Finding
Demolition and replacement of the Century Boulevard Underpass	Demolition will only impact 1 of 118 (less than 1 %) character-defining bridges/overcrossings. The new LRT and replacement freight bridges will be generally consistent in scale, massing, and materials with other character-defining bridges throughout the district. New LRT and replacement freight bridges will integrate relief consistent with that present on character-defining bridges throughout the district. In compliance with Project Measure CR PM-1 (SOI Standards Design Review), design of the new LRT bridge will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances.	No adverse effect

Proposed Component	Summary of Analysis	Section Finding
Construction of new Metro C Line station and associated vertical circulation elements	Station and vertical circulation elements will support the interstate's intermodal nature into the future. They will be generally consistent in their scale, massing, and materials with other character-defining stations and associated circulation elements throughout the district. The new station will be differentiated from existing stations in its design details, yet compatible with existing stations in terms of scale, massing, materials, and spatial relationships. In compliance with Project Measure CR PM-1 (SOI Standards Design Review), design of the new station will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances.	No adverse effect
Realignment of approximately 2,500 feet (0.47 mile) of Metro C Line track.	Realignment will result in the alteration of just over 2.5% of the Metro C Line track within the district. Materials removed will be replaced in-kind and the overall alignment of Metro C Line track within the district will remain largely intact following implementation of the LPA.	No adverse effect
Minimal landscaping removal and replacement	Landscape removal will be limited. Trees removed will be replaced at a 1 to 1 ratio.	No adverse effect
WSAB Project (LPA)	Presented above.	No adverse effect

Source: Rincon 2023
Notes: LPA = Locally Preferred Alternative; SOI PQS = Secretary of the Interior's Standards for the Treatment of Historic Properties Professional Qualification Standards; LRT = light rail transit; WSAB = West Santa Ana Branch

5.2.2.19 Bellflower Pacific Electric Railway Depot/16336 Bellflower Boulevard, Bellflower (P-19-186111)

Map Reference No. 28-008

Description and Designation Status of Historic Property

The Bellflower Pacific Electric Railway Depot (Bellflower Depot) is a one-story building designed with minimal Classical Revival-style architectural elements (Figure 5-37 through Figure 5-39). Constructed ca. 1905, the building was recently restored in a historically accurate manner; its appearance is consistent with its original design. It is eligible for listing in the NRHP and CRHR under Criteria A/1 for its direct association with the early transportation history of Southern California and Criteria C/3 for its embodiment of the distinctive characteristics of a purpose-built street railway depot. The depot is located in an urban area, adjacent to the intersection of the abandoned PEROW and a major commercial thoroughfare. Its setting has been substantially diminished by recent development, changes to the streetscape, and the construction of a large parking lot. However, the building was restored from original plans in conformance with the Secretary Standards for Rehabilitation and has integrity of location, design, materials, workmanship, feeling, and association. Its character-defining features include a sheltered passenger platform; arched bays, vertical wood-slat gable vents, stucco wall cladding, and an orientation parallel to the adjacent tracks.

Figure 5-37. Bellflower Pacific Electric Railway Depot, South Elevation



Source: Rincon 2019

Figure 5-38. Current View of the PEROW in relationship to the Bellflower Depot



Source: Rincon 2019

Figure 5-39. Current View of the Bellflower Depot and its Surrounding Environment; Primary (west) Elevation; East-Facing View



Source: Rincon 2019

Project Activities in the Vicinity of the Property

In the vicinity of the Bellflower Depot, the LPA alignment will be located at-grade within the existing PEROW. The Bellflower Station will be located to the west of the depot, across Bellflower Boulevard within the PEROW. The LPA will require modifications to the existing grade crossing at the intersection of Bellflower Boulevard. Additional modifications within the vicinity of the historic depot include a potential laydown area and TPSS Site 4, located at the northwest corner of Bellflower Boulevard and the PEROW, within an existing parking lot that will serve as a station parking lot. Soundwalls are proposed on the northern side of the PEROW from the historic depot, and fencing will be located along the north and south sides of the PEROW. The existing bike trail that passes the historic depot along the PEROW will be realigned along the driveway between the depot and the building to its south, the Mayne Events Center, to accommodate the new tracks and station.

The LPA will introduce new permanent rail-related visual elements within the ROW, including additional rail tracks, fencing, pedestrian crossing gates, grade crossing houses, TPSS, and catenary poles and wires. However, these elements will be similar in scale and massing to the existing rail-related features currently within the vicinity of the property.

Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. These visual changes will be temporary, as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

In the area of the Bellflower Depot, the LPA will be located at-grade within the existing PEROW. While the LPA will introduce permanent visual elements in the area of the Bellflower Depot, these elements are consistent in scale and design with the already surrounding urban environment, which is a former light rail corridor. New permanent visual elements include a 12-foot-tall soundwall at-grade along the northern perimeter of the PEROW, catenary poles and wires, and fences. Additionally, the LPA will result in the development of the new Bellflower Station within the center of the PEROW. Parking will be located to the north of the PEROW on the west side of Bellflower Boulevard. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. North-facing views of the original Bellflower Depot will remain available south of the PEROW.

Construction activities will primarily occur within the public and rail ROWs and will introduce features that may temporarily alter the visual character of the surrounding area. Visual changes associated with the Project will be temporary, primarily including construction equipment and vehicles, barricades, and security fences that will be removed once construction is completed. The construction activities that will occur near the Bellflower Depot will necessitate use of a large vibratory roller and compactor; without mitigation, the use of this equipment would exceed damage risk criteria levels for historic buildings. Implementation of VIB-6 will ensure that construction activities near historic structures will be held to a protective vibration damage threshold of 0.20 inch per second peak particle velocity, and equipment with the potential to damage historic buildings will not be used within 25 feet of the Bellflower Depot.

With implementation of VIB-6, the LPA will not alter any of the characteristics of the Bellflower Depot that qualify it for inclusion in the NRHP and CRHR, nor will it diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for the Bellflower Depot.

5.2.2.20 10040 Flora Vista Street, Bellflower

Map Reference No. 28-009

Description and Designation Status of Historic Property

The property at 10040 Flora Vista Street in Bellflower (Figure 5-40 and Figure 5-41) is an irregularly shaped parcel containing a single-family residence and detached garage. Designed in the Storybook style, the residence exhibits a style of architecture that emerged in the Los Angeles region during the 1920s and was inspired in part by fairytales, the Hollywood film industry, and the artistry employed in movie sets. The property is eligible for listing in the NRHP and CRHR under Criteria C/3 because it embodies the distinctive characteristics of Storybook-style residential architecture. Its period of significance is 1931, the year of its construction. The property's surroundings are suburban and largely residential, although it is bounded on the west by a small business park that was constructed in 1988 and on the east by the SCE Cortuna Substation, completed in 1964. Across Flora Vista Street to the north are several residential properties of a similar scale (constructed between 1925 and 1964), while the abandoned PEROW traces the property's rear boundary. Development on adjacent properties is incompatible in scale, function, and style with the residence at 10040 Flora Vista Street and has impaired the property's integrity of design. However, alterations to the property are relatively few and are concentrated at the rear. The residence still has many of its primary character-defining features, including steeply pitched roofs, flared eaves, an asymmetrical façade, irregular massing, stucco exterior, chimney, metal hardware in the form of a speakeasy on the primary entry door, and the original wood-sash multi-paned and narrow vertical windows. As a result, the property retains integrity of location, association, design, setting, materials, workmanship, and feeling.

Figure 5-40. 10040 Flora Vista Street North Elevation



Source: Rincon 2018

Figure 5-41. Current View of 10040 Flora Vista Street and its Surroundings



Source: Rincon 2019

Project Activities in the Vicinity of the Property

In the vicinity of 10040 Flora Vista Street, the LPA alignment will be slightly above grade, transitioning from at-grade into an aerial viaduct within the existing PEROW. The PEROW is located directly to the south of the property, which faces north toward Flora Vista Street. The property is not subject to any temporary or permanent easements or acquisitions. The LPA will introduce new permanent visual elements consisting of a roughly 15-foot-tall retaining/soundwall along the aerial viaduct. Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. These visual changes will be temporary as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Effects/Impacts

The LPA will not physically alter or modify the building. Therefore, the property's integrity of location, design, materials, and workmanship will not be diminished. While the LPA will introduce new permanent visual elements consisting of a 15-foot-tall retaining/soundwall and the ascending aerial viaduct as it transitions from at-grade, the view from the building's primary eastern elevation will be unobstructed by the retaining/sound wall and aerial viaduct, which will be constructed at the rear elevation of the historic property/historical resource. The introduction of the aerial structure and its associated features is compatible with the property's existing surrounding mixed-use setting, which includes numerous utility poles, rail lines, rail crossing gates, and industrial and commercial properties. The historic building

will remain visible from Flora Vista. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

Implementation of the LPA will not alter any of the characteristics of the property that qualify it for inclusion in the NRHP or the CRHR nor will it diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, and association such that an adverse effect/significant impact will occur. Therefore, the LPA will result in no adverse effect under Section 106 and no impact under CEQA for 10040 Flora Vista Street.

5.2.2.21 San Gabriel River Channel, Cerritos

Map Reference No. 29-025

The APE includes portions of three properties managed under the jurisdiction of the USACE; these include portions of the San Gabriel River Channel, LA River Channel, and the Rio Hondo Channel.

The San Gabriel River is a 58-mile-long river, much of which was channelized and paved with concrete between 1947 and 1968 as part of the LACDA Project (Figure 5-42). That project channelized streams, debris basins, and implemented other control measures throughout the mid-twentieth century to safeguard the urbanization of the Los Angeles Basin (USACE 1992). The portion of the San Gabriel River Channel (subject segment) within the APE includes 1,220 linear feet of the 58-mile-long channel which were completed in 1966 as part of the LACDA Project. Within the APE, as over much of its course, the river channel is roughly trapezoidal in cross-section. The paved river bottom is flat, except for a central trench, while the banks are sloped. The subject segment is approximately 150 feet wide across the top and 85 feet wide at the bottom. To accommodate the San Gabriel River Bridge (MRN 29-025), which crosses the channel in the APE, the service road tracing the river's east bank dips into the channel and passes under the bridge along the embankment. The San Gabriel River Bridge was evaluated as an individual resource in the Survey Report—Rev 2 and found ineligible for historic designation. It is not considered a historic property for the purpose of Section 106 or a historical resource pursuant to CEQA.

In response to the public circulation of the Draft EIS/EIR, the USACE provided comment on the Draft EIS/EIR related to the San Gabriel River Channel, stating that its NRHP eligibility should be considered by the Project and effects assessed as appropriate. Continued coordination with the USACE indicated that the San Gabriel River Channel was determined NRHP-eligible by the USACE in 2022 and SHPO concurred with that determination.

Figure 5-42. San Gabriel River Channel; Taken from the East Bank, Northwest-Facing



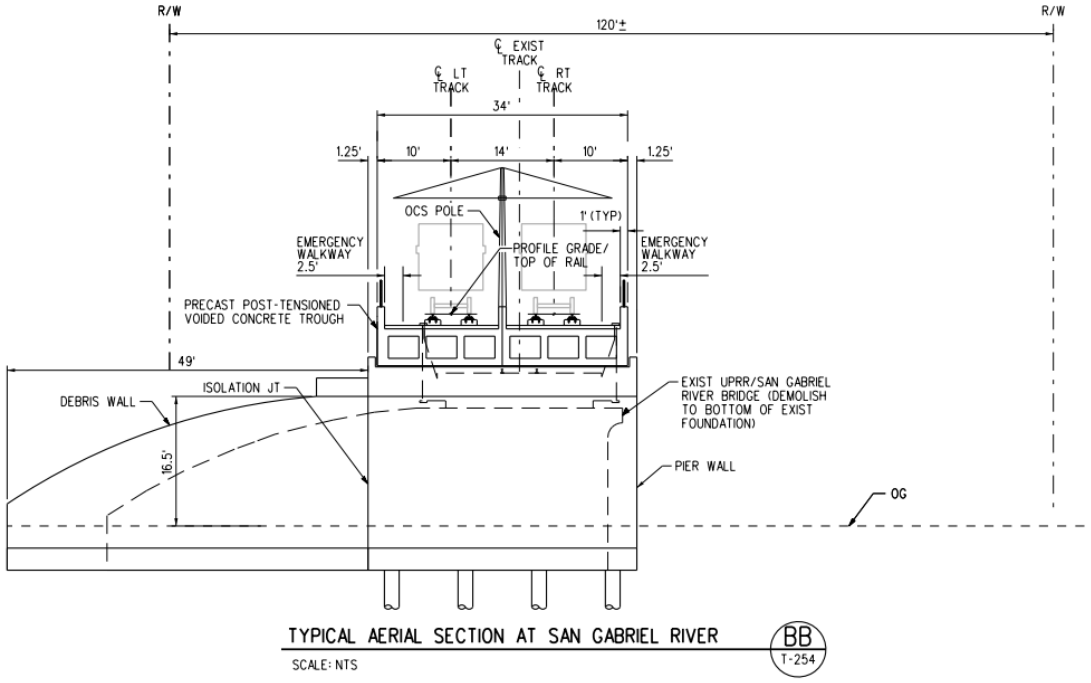
Source: Rincon 2022

The portion of the San Gabriel River Channel within the APE is a contributing segment to a larger resource that extends well beyond the Project APE to encompass elements of the LACDA Project, including the San Gabriel River Flood Control System. Under NRHP Criterion A, the segment is significant for its association with the design and construction of the LACDA Project and the flood control system's role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. The subject segment is additionally significant under NRHP Criterion C for its engineering and design as part of the LACDA Project, the purpose of which is specific to the region's unpredictable cycle of flooding. The period of significance for the subject segment begins in 1966, when the segment was channelized and paved, and concludes in 1969, the year the first phases of construction of the LACDA Project were completed (USACE 1992; Turhollow 1975). Although surveyed, because of its 2022 determination of eligibility, the portion of the San Gabriel River Channel in the APE was not reevaluated for this study.

Project Activities in the Vicinity of the Property

The LPA will require construction of a new LRT bridge to cross over the San Gabriel River Channel. Just northwest of the river channel, the LRT alignment will cross under the SR-91 freeway in an existing underpass. It will then cross over the San Gabriel River on a new LRT bridge what will replace the existing abandoned San Gabriel River Bridge (MRN 29-022). Following the River Channel, it will transition back to an at-grade configuration. To accommodate the LPA alignment, a new LRT bridge will be constructed roughly in the existing location of the San Gabriel River Bridge, which will be demolished by the Project (Figure 5-43). The new LRT bridge will feature a precast post-tensioned voided concrete trough deck supported by two concrete pier walls in the river channel and two concrete abutments, one on each side of the river channel, which will be constructed as part of the Project.

Figure 5-43. Engineering Drawing that Depicts Proposed Alterations in the San Gabriel River Channel



Source: WSP 2023

Assessment of Effects/Impacts

Much of the 58-mile-long San Gabriel River was channelized and lined with concrete as part of the LACDA Project in 1966. The subject segment represents approximately 1,220 feet or 0.23 mile (less than 1 percent) of the river channel's total length. Approximately 150 feet wide across the top and 85 feet at the bottom, it is roughly trapezoidal in cross-section and features a concrete bottom that is flat excepting a central trench to direct water flow. Its concrete-lined banks are angled at approximately 45 degrees. Additional associated components in the APE include drain outlets placed at intervals in the banks, asphalt-paved trails that line the top of both banks, and the San Gabriel River Bridge (MRN 29-022), which crosses the channel in the APE.

The subject segment is generally consistent with the length of the river channel in its design and appearance, and visual observation suggests that that much of what is currently present dates to its original construction. Its character-defining features include its orientation, roughly north-to-south course which, in addition to its overall size and shape as described above, enable it to effectively direct water through its length. The river's continued function as a flood control measure is a feature that defines it, inclusive of the portions within the APE. Overall, the river's original form, design, and setting will remain intact and replacement materials will be consistent in size, scale, and materials with the existing historic waterway.

The LPA will introduce new permanent visual elements, most notably an LRT bridge, into the San Gabriel River Channel. The new LRT bridge will be sited in approximately the location of the existing San Gabriel River Bridge (MRN 29-022), which will be demolished by the Project. The analysis presented in the WSAB Survey Report indicates that the San Gabriel River Bridge (MRN 29-022) is ineligible for historic designation. It is not considered a

historic property for the purpose of Section 106 or a historical resource pursuant to CEQA and it is therefore not further discussed in this study. Although the LPA will introduce a new bridge, piers, and abutments, the river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout the 58-mile-long river. The new LRT bridge will not change the historic alignment of the river or result in the removal or substantial alteration of its character-defining features. New additions will be differentiated and will not create a false sense of historic development; they will be unique but compatible with other features found throughout the San Gabriel River.

Although the LPA will result in construction within the subject segment, it will not alter the segment's orientation or its overall size or shape and will not impact its ability to function in its historic and current capacity. Additionally, while demolition and construction activities may require removal of concrete within the channel, all removed materials will be replaced in kind. The replacement LRT bridge and its associated features, such as the approximately 10-foot-tall soundwalls, rail track, and catenary poles and wires, are generally compatible with the subject segment's surrounding setting, which is highly urbanized and includes the presence of built features such as transmission lines and existing rail lines, in addition to a variety of property types. Additionally, many bridges dating from various periods cross the river channel throughout its 58-mile length. The introduction of an additional bridge within the subject segment is in keeping with the river channel's overall character and represents minimal change when considered in the context of its entire length.

The portion of the San Gabriel River Channel in the APE is a resource significant for its association with important events, namely the design and construction of the LACDA Project, and for its role in safeguarding the development of the Los Angeles metropolitan area in the mid-twentieth century. Its ability to convey significance lies in its overall design and form as related to its function as part of a larger water conveyance system, rather than in its small-scale detail. The addition of the project-related visual elements from both construction and operation will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character of the area. While temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

The alterations proposed as part of the LPA are confined to a small portion of the San Gabriel River. The LPA will not alter any of the characteristics of the portion of the San Gabriel River Channel in the APE that qualify it for inclusion in the NRHP, nor will it diminish the integrity of its location, design, setting, materials, workmanship, feeling, and association. Therefore, implementation of the LPA will result in a Section 106 finding of no adverse effect to historic properties and less than significant impact to historical resources for the purposes of CEQA.

5.2.2.22 The Frampton-Dantema House/81644 Alburtis Avenue, Artesia

Map Reference No. 32-021

Description and Designation Status of Historical Resource

The property at 81644 Alburtis Avenue consists of two buildings situated on a parcel at the corner of Alburtis Avenue and 187th Street in Artesia. The primary building is a Spanish Colonial Revival-style former residence originally constructed in 1929 by Arthur E. and Helen

G. Frampton on Pioneer Boulevard in Artesia (Figure 5-44). It was moved to its current location in 2003 by the Artesia Historical Society and the City of Artesia. The property includes an ancillary building constructed in 2011 that contains restroom facilities. 81644 Alburtis Avenue is one of two properties that contribute to the Artesia Historic District, adopted by ordinance in 2014 (the other contributing property to the Artesia Historic District is located outside the APE). Despite its local designation as a historic district contributor, a formal evaluation for the resource was not identified, and the property has not been previously evaluated for listing in the NRHP and CRHR. The research conducted for this study indicates that while the property remains eligible for local historic designation as a contributing resource to the Artesia Historic District, it is ineligible for listing in the NRHP and CRHR primarily because of its relocation, which resulted in reduced integrity of location, setting, feeling, and association. It does retain some integrity of design, materials, and workmanship. The property does not meet CRHR Special Considerations or NRHP Criteria Consideration B, both which relate to the evaluation of relocated resources. As a good example of a 1920s Spanish Colonial Revival-style home, the Frampton-Dantema House appears to be eligible for inclusion in a Historic District Zone in the City of Artesia as a building that has special architectural significance (City of Artesia Ord. 709, § 7). Therefore, the resource has been assigned a California Historical Resource Status Code 5D1. The ancillary building does not contribute to the resource's historical significance, and the period of significance is the year of the Frampton-Dantema House's construction, 1929. Its character-defining features include its asymmetrical plan, gabled roof clad with barrel tile, exposed rafter tails, stucco exterior, covered porch with wooden posts and carved brackets, chimney, and wooden double-hung and casement windows.

Figure 5-44. Primary Building at 81644 Alburtis Avenue; South and West Elevation



Source: Rincon 2019

Project Activities in the Vicinity of the Property

In the vicinity of 81644 Alburtis Avenue, the LPA alignment will be located at-grade in the existing PEROW, which runs adjacent to the rear of the Frampton-Dantema House (Figure 5-45). The Pioneer Station will be constructed to the east of the property, across 187th Street. The LPA will result in the closure of 187th Street at its intersection with the PEROW. The LPA proposes the permanent closure of 187th Street and the modification of 186th Street with an at-grade crossing. The LPA also includes a design option, under which 186th Street would be permanently closed and 187th Street would remain open with an at-grade crossing.

Figure 5-45. 81644 Alburtis Avenue and its Relationship to the Existing PEROW (North of the Pictured Green Fence)



Source: Rincon 2019

The LPA, both with and without the design option, would introduce new permanent visual elements within the ROW, including the Pioneer Station, soundwalls along the north and south sides of the PEROW (10 feet tall in areas northwest of the resource and 8 feet tall in its immediate vicinity), additional rail tracks, crossing gates, a grade crossing house, and catenary poles and wires. Construction activities will primarily occur within the public and rail ROWs and will only temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. These visual changes will be temporary as construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Assessment of Impacts

The Frampton-Dantema House is eligible for local designation only and is considered a historical resource under CEQA. It is not considered a historic property under Section 106 and, therefore, effects were not analyzed.

The LPA, both with and without the design option, will not physically modify the Frampton-Dantema House. Therefore, it will result in no change to the building's integrity of location, design, materials, or workmanship. The LPA, both with and without the design option, will introduce new permanent visual elements consisting of 8- to 10-foot-tall soundwalls along the north and south sides of the ROW in the vicinity of the resource. New rail tracks, a grade crossing house, and catenary poles and wires will be consistent with the existing setting, which includes rail-related infrastructure (Figure 5-46). Project-related visual elements are consistent for the LPA with and without the design option, although grade crossing equipment and soundwalls would be in slightly different locations under each. However, despite their varied locations, the addition of project-related visual elements from both construction and operation will not significantly diminish its integrity of setting, feeling, and association due to its current surrounding environment. While soundwalls will partially obscure the view shed of the Frampton-Dantema House, they will not impact the resource's setting such that it would be materially impaired. The resource's significance is related to its architecture, and views to and from the building are not character-defining. Additionally, its current setting is such that the addition of soundwalls and grade crossing equipment in its vicinity would not result in material impairment, nor would the closure of 186th Street, or, under the design option, 186th Street.

Figure 5-46. 81644 Alburtis Avenue and Current Surrounding Environment



Source: Rincon 2019

As they will be temporary, the addition of construction-related visual elements will not permanently alter or diminish the property's historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects from construction. The construction activities that will occur near the Frampton-Dantema House may include use of a compactor; without mitigation the use of this equipment would exceed damage risk criteria levels for historic buildings. Implementation of VIB-6 will ensure that construction activities near historic structures will be held to a protective vibration damage threshold. Operation of the compactor/ballast tamper and other similar equipment will be restricted to no closer than 40 feet from the Frampton-Dantema House.

The LPA, with or without the design option, will not alter any of the characteristics of the Frampton-Dantema House that qualify it for local designation. The integrity of the resource's location, design, setting, materials, workmanship, feeling, and association will not be significantly diminished by either. Therefore, the LPA, both with and without the design option, will result in no impact to this historical resource for the purposes of CEQA. Additionally, as the individual resource will not be impacted, the LPA, with or without the design option will result in no impact to historical resources under CEQA for the Artesia Historic District.

5.3 Indirect and Cumulative Effects/Impacts

The Section 106 regulations at 36 CFR 800.5(a)(1) state that "adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative." In accordance with ACHP guidance, "indirect" effects to historic properties are those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to changes in the pattern of land use, population density, or growth rate, and related effects on air and water and other natural systems, including ecosystems. Cumulative effects are those that result from incremental changes from a project when considered in addition to other prior actions that may be unrelated to the current project or that may have been executed by another agency, organization, or individual over a period of time. Similarly, § 15355 of the CEQA Guidelines defines cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative effects/impacts can result from individually minor but collectively substantial actions.

5.3.1 Indirect Construction and Operational Related Effects

Indirect construction-related effects/impacts to historic properties as a result of the LPA may occur as a result of increased activity along the LPA corridor and related development around stations. These changes may cause effects such as traffic-related diversions that could cause temporary access issues to cultural resources. Indirect operational effects/impacts to historic properties as a result of the LPA could occur as a result of increased activity along the LPA corridor and related development around stations. These changes may cause future growth and development in the area, further increasing potential risks to cultural resources. However, activities of this type reduce the need for future roadway expansions, which limits common threats to historic properties. Improved transit also increases access and usage of historic properties, providing opportunities for historic preservation and encouraging private parties to strengthen protective actions.

5.3.2 Cumulative Effects/Impacts

No archaeological historic properties/historical resources are located within the APE for the LPA, and the sensitivity for such resources is low to moderate. During construction of the LPA, the amount of ground disturbance will be greatest for activities such as grading, excavation, and trenching because these activities are likely to extend to depths below five feet below ground surface and have the potential to displace a significant amount of sediment. These activities may physically affect/impact unanticipated archaeological historic properties/historical resources, if present. However, not all archaeological resources are of equal scientific value. While some have the potential to be scientifically important due to their ability to provide new information, not all resources may qualify as historic

properties/historical resources. Therefore, the significance of cumulative effects/impacts to archaeological resources is not determined simply by the encounter itself, but by the nature of that encounter. The mere fact of an encounter does not imply an adverse effect/significant impact. In accordance with Section 106 of the NHPA, cumulative effects to archaeological historic properties will not be adverse and minimization measures are not required. In accordance with CEQA, cumulative impacts to unanticipated discoveries will be minimized through the implementation of mitigation measures, described in Section 6. With implementation of these measures, cumulative impacts will be less than significant.

Cumulative effects/impacts to built environment historic properties/historical resources will be less than significant without mitigation. The resources/properties in the APE for the LPA have been subject to numerous prior improvement projects unrelated to the LPA. Most of the effects/impacts from the LPA to historic properties/historical resources within the APE for the LPA will be temporary and will not result in changes to character-defining features. Additionally, potentially affected/impacted areas will be restored at construction completion.

The APE for the LPA extends 9 miles and includes 23 built environment historic properties/ historical resources, and 3 additional built environment historical resources. There are no known archaeological historic properties/historical resources within the APE for the LPA. Pursuant to Section 106, the LPA will have no adverse effect on any of the properties in its APE that are listed or eligible for listing in the NRHP. Under CEQA, the LPA will have a finding of no impact to 13 historical resources and a less than significant impact to 9 historical resources (Table 5.3). While an unknown number of potential future projects may occur along the LPA alignment and related stations, several known projects have the potential to contribute to cumulative impacts to specific historic properties/historical resources within the APE for the LPA; these are summarized in the sections that follow.

5.3.2.1 LA River Channel and Rio Hondo Channel

The LA River Master Plan is a reasonably foreseeable future and separate undertaking that includes the LA River Channel and the Rio Hondo Channel. The Master Plan developed a comprehensive planning approach covering all 51 miles of the LA River. The plan includes the revitalization of river segments, development of new open spaces, and water quality projects to improve access and use of the river system and its surroundings. In June 2022, the County of Los Angeles Board of Supervisors approved the Los Angeles River Master Plan and certified the Program Environmental Impact Report (PEIR) on behalf of the County and the Los Angeles County Flood Control District. The Los Angeles River Master Plan PEIR noted that its cumulative effects/impacts could be considered significant without mitigation. Because the LA River Channel and Rio Hondo Channel were determined eligible for listing in the NRHP, it is expected that all future projects implemented under the PEIR will be subject to the same or similar regulatory requirements as the LPA, thus requiring project design features to comply with the SOI's Standards for Rehabilitation or other minimization/mitigation measures, as necessary. In general, these projects and associated alterations occur outside the APE for the LPA in areas where the LPA has no potential effects/impacts. The LPA could increase transit access to the LA River and Rio Hondo Channels. However, increased transit in these areas will not result in an adverse effect/impact. The work associated with the LA River Master Plan, when considered cumulatively with the LPA, will not affect the character-defining features of any contributing elements and will not diminish the channel's integrity of location, design, materials, workmanship, or association. Therefore, it will have no adverse effect and a less than significant impact on the LA River and Rio Hondo Channels.

Table 5.3. Summary of Findings for Built Environment Historic Properties/Historical Resources

Property Name/Address	Map Reference No.	Section 106 Finding	CEQA Finding	Minimization/ Mitigation Measure
Pueblo Del Rio/5024 Holmes Avenue, Los Angeles (P-19-188179)	8-013	No adverse effect	Less than significant impact to historical resources	None required
6000 Alameda Street, Huntington Park	9-015	No adverse effect	No impact to historical resources	None required
L & F Machine Company/2110 Belgrave Avenue, Huntington Park	9-034	No adverse effect	No impact to historical resources	None required
6101 Santa Fe Avenue, Huntington Park	10-012	No adverse effect	Less than significant impact to historical resources	None required
2860 Randolph Street, Huntington Park	10-017	No adverse effect	No impact to historical resources	None required
Huntington Park High School/6020 Miles Avenue, Huntington Park	10-021	No adverse effect	Less than significant impact historical resources	None required
Randolph Substation/Randolph Street, Huntington Park (APN: 6319-021-801)	11-016	No adverse effect	No impact to historical resources	None required
6300-6302 State Street, Huntington Park	11-018	No adverse effect	No impact to historical resources	None required
6231 Maywood Avenue, Huntington Park	13-001	Not applicable (6231 Maywood Ave. is not a historic property)	No impact to historical resources	None required
3477 East Gage Avenue, Huntington Park	13-003	Not applicable (3477 East Gage Ave. is not a historic property)	No impact to historical resources	None required
Cudahy Substation/Salt Lake Avenue, Cudahy	15-032	No adverse effect	Less than significant impact to historical resources	None required
No Address; LADWP Boulder Dam-Los Angeles 287.5 kV Transmission Line (P-19-188983)	17-005	No adverse effect	No impact to historical resources	None required
Union Pacific LA River Rail Bridge, South Gate	17-006	No adverse effect	Less than significant impact to historical resources	None required
Los Angeles River Channel, South Gate[4]	17-007	No adverse effect	Less than significant impact to historical resources	None required

Property Name/Address	Map Reference No.	Section 106 Finding	CEQA Finding	Minimization/ Mitigation Measure
No Address; Southern California Edison Long Beach-Laguna Bell 60kV and 220 kV Transmission Lines (P-19-192309)	18-016	No adverse effect	Less than significant impact to historical resources	None required
Rio Hondo Channel, South Gate[4]	18-017	No adverse effect	Less than significant impact to historical resources	None required
7601 East Imperial Highway, Downey (Rancho Los Amigos Medical Center Historic District/P-19-189330)	19-013[1]	No adverse effect	Less than significant impact to historical resources	None required
Century Freeway-Transitway Historic District (portion of)	21-027[2]	No adverse effect	Less than significant impact to historical resources	None required
Bellflower Pacific Electric Railway Depot/16336 Bellflower Boulevard, Bellflower (P-19-186111)	28-008	No adverse effect	No impact to historical resources	None required
10040 Flora Vista Street, Bellflower	28-009	No adverse effect	No impact to historical resources	None required
San Gabriel River Channel, Cerritos[4]	29-025	No adverse effect	Less than significant impact to historical resources	None required
The Frampton-Dantema House/18644 Alburtis Avenue, Artesia	32-021[3]	Not applicable (18644 Alburtis Ave. is not a historic property)	No impact to historical resources	None required

Source: Rincon 2023
Notes: [1] Rancho Los Amigos Medical Center Historic District
[2] Portion of the Century Freeway-Transitway Historic District
[3] Contributor to the Artesia Historic District
[4] Segment of a channelized river that is contributing to a larger historic district encompassing elements of the Los Angeles County Drainage Area Project
CEQA = California Environmental Quality Act; LADWP = Los Angeles Department of Water and Power; Section 106 = Section 106 of the National Historic Preservation Act.
Not applicable = these properties are not eligible for listing in the NRHP and, therefore, are not considered historic properties for the purposes of Section 106; a Section 106 finding for the Project is not applicable to these properties.

5.3.2.2 San Gabriel River Channel

A reasonably foreseeable future and separate undertaking that includes the San Gabriel River is the San Gabriel River Master Plan which covers all 58 miles of the river basin. The plan includes key objectives to preserve and enhance river habitat, encourage and expand open spaces, increase flood protection and water quality, and pursue river-enhancing economic development projects to improve access and use of the river system and its surroundings. In 2006, the County of Los Angeles Board of Supervisors approved the San Gabriel Master Plan and certified the PEIR on behalf of the County and the Los Angeles County Department of Public Works. The San Gabriel River PEIR concluded that incremental effects on historic resources associated with implementation of the San Gabriel River Master Plan would not be cumulatively considerable when combined with other related projects that could impact historical resources, and cumulative impacts were therefore considered less than significant. Because the San Gabriel River Channel was determined eligible for listing in the NRHP, it is a historic property per Section 106 and a historical resource pursuant to CEQA. It is therefore expected that all future projects implemented under the PEIR will be subject to the same or similar regulatory requirements as the LPA, thus requiring project design features to comply with the SOI's Standards for Rehabilitation or other minimization/mitigation measures, as necessary. In general, these projects and associated alterations occur outside the APE in areas where the LPA has no effects/impacts. The LPA could increase transit access to the San Gabriel River Channel. However, this will not result in an adverse effect/impact. The work associated with the San Gabriel River Master Plan, when considered cumulatively with the LPA, will not affect the character-defining features of any contributing elements and will not diminish the channel's integrity of location, design, materials, workmanship, or association. Therefore, it will have no adverse effect and a less than significant impact on the San Gabriel River Channel.

5.3.2.3 Century Freeway-Transitway Historic District

As part of the LPA, the Century Freeway-Transitway Historic District will continue to serve as an active intermodal transportation facility, connecting vital and expanding centers of transit throughout Los Angeles County. It is expected that as growth-inducing projects are completed throughout Los Angeles County, the need for transportation will continue to increase, thus requiring improvements to the existing transportation infrastructure. Seven reasonably foreseeable future projects are located within or proximate to the Century Freeway-Transitway Historic District that were considered for their cumulative effect/impact on the Historic District (Table 5.4). Each of these projects was considered for its potential to affect/impact the Century Freeway-Transitway Historic District.

None of the seven projects identified as within or near the Century Freeway-Transitway Historic District was found to have a cumulative effect/impact to the historic property/historical resource. Two of the noted transit projects (Crenshaw Northern Extension and Airport Metro Connector Extension to Torrance) do not intersect with the Century Freeway-Transitway Historic District; therefore, their potential to cumulatively affect/impact the character-defining features of any contributing elements and diminish the historic district's integrity of location, design, workmanship, setting, materials, feeling, or association are negligible.

Table 5.4. Projects Considered for their Potential to Cumulatively Effect/Impact Century Freeway-Transitway Historic District

Project	Status	Cumulative I-105 Analysis
I-105 ExpressLanes Project	Project Finding of No Adverse Effect finalized in December 2020. Project found to have no direct or cumulative effects/impacts to the Historic District.[1]	The Project will have no adverse cumulative effect/impact on historic properties/historical resources.
I-105/I-405 Tunnel Lighting Project	Project approved in 2021.[2]	The Project will have no adverse cumulative effect/impact on historic properties/historical resources.
Rosa Parks Station Improvement Project	Project completed August 2021.[3]	The Project will have no adverse cumulative effect/impact on historic properties/historical resources.
Vermont Transit Corridor	Environmental Analysis underway.[4] Estimated start of construction, FY 2024.	The Project is not anticipated to have an adverse cumulative effect/impact on historic properties/historical resources based on currently available information.
Crenshaw LAX/Transit Project	Environmental Analysis Completed.[5]	The Project will have no adverse cumulative effect/impact on historic properties/historical resources.
Crenshaw Northern Extension Project	Environmental Analysis underway.[6] Estimated start of construction, FY 2041	The project plans do not intersect with the Historic District. The Project is not anticipated to have an adverse cumulative effect/impact on the Historic District based on currently available information.
Airport Metro Connector Extension to Torrance	Environmental Analysis underway.[7] Estimated start of construction, following 2024	The project plans do not intersect with the Historic District. The Project is not anticipated to have an adverse cumulative effect/impact on the Historic District based on currently available information.

Source: Rincon 2023

Notes:

1. Caltrans, Finding of No Adverse Effect for the ExpressLanes Project
2. Los Angeles World Airports https://www.lawa.org/news-releases/2012/news-release-33
3. Metro https://thesource.metro.net/2021/08/09/willowbrook-rosa-parks-station-improvement-project-is-now-officially-completed/
4. Metro https://www.metro.net/projects/vermont-corridor/
5. Metro https://www.metro.net/projects/crenshaw_corridor/
6. Metro https://www.metro.net/projects/crenshaw-northern-extension/
7. Metro https://www.metro.net/projects/green-line-extension/

FY = fiscal year; LAX = Los Angeles International Airport

The Rosa Parks Substation Project was completed in 2022; the station improvements were necessary to improve and enhance access to one of the busiest stations within the Metro system. The Rosa Parks Substation Project included expanded platforms and mezzanines, at-grade pedestrian crossings, new signage and lighting, new offices and public spaces, bike and vehicle parking, and bus bays. While it is unclear if the station improvements were considered for compliance with the SOI Standards, the improvements were underway when the Century Freeway-Transitway Historic District was evaluated for historic significance and the station was identified as a contributor to the historic district. The DPR form for the historic district notes the Rosa Parks Substation improvements underway as part of the property's noted construction history, which considered its overall integrity and its individual contributing elements and their character-defining features. Given these improvements were previously considered and dismissed as being important to the significance of the historic district, the station improvements will not contribute to a cumulative effect/impact to the overall significance of the Century Freeway-Transitway Historic District. The station improvements did not diminish existing features that contribute to the significance of the historic district, rather they enhanced the intramodality of I-105, which is considered an important element to its significance. Therefore, there will be no potential for cumulative effects/impacts to the Century Freeway-Transitway Historic District. The work associated with the above-noted project will not affect the character-defining features of any contributing elements and will not diminish the district's integrity of location, design, materials, workmanship, or association. Therefore, it will have no adverse effect and a less than significant impact on the Century Freeway-Transitway Historic District.

In October 2021, the California Transportation Commission approved a project to conduct improvements to I-105 near Los Angeles International Airport (LAX) at three connector tunnels with I-405. The project intends to replace existing lighting with Light Emitting Diode lighting and add Transportation Management System (TMS) elements. The addition of new TMS elements and replacement of lighting will not adversely affect/impact the Century Freeway-Transitway Historic District. The current lighting within the district is not identified as a contributing feature. Therefore, its replacement will not diminish the district's character-defining features. The addition of TMS elements will similarly not diminish existing features that contribute to the significance of the historic district, rather they will enhance the intramodal nature and the already existing ITS component of the district, which is considered an important contributor to its significance. Therefore, there will be no potential for cumulative effects/impacts to the Century Freeway-Transitway Historic District. The work associated with the above-noted project will not affect the character-defining features of any contributing elements and will not diminish the district's integrity of location, design, materials, workmanship, or association. Therefore, the project will have no adverse effect and a less than significant impact on the Century Freeway-Transitway Historic District.

The Vermont Transit Corridor Study is currently underway with Metro. The purpose of the study is to improve transit along an approximate 12.4-mile span of Vermont Avenue, between Hollywood Boulevard and 120th Street, which in turn would enhance connections to the regional network. The project is scheduled to begin construction in FY 2024. The study is considering bus rapid transit, heavy rail, and light rail options for the corridor. These options consider a connection with the existing C Line Vermont/Athens Station, which is a contributing feature to the Century Freeway-Transitway Historic District. The Vermont/Athens Station is a below-grade light rail station on the C Line and is located in the median of I-105 below Vermont Avenue. No environmental analysis has been initiated for the Vermont Transit Corridor Project. Because the Century Freeway-Transitway Historic District was determined

eligible for listing in the NRHP and is listed in the CRHR, it is a historic property per Section 106 and a historical resource pursuant to CEQA. Therefore, the Vermont Transit Corridor Study will comply with NEPA, Section 106, and CEQA, thus requiring project design features to comply with the SOI Standards for Rehabilitation or other minimization/mitigation measures, as necessary. Therefore, there will be no potential for cumulative effects/impacts to the Century Freeway-Transitway Historic District as a result of the Vermont Transit Corridor Study. The work associated with the project will not affect the character-defining features of any contributing elements and will not diminish the district's integrity of location, feeling, setting, design, materials, workmanship, or association. Therefore, based on known information, the project is not anticipated to result in an adverse effect/significant impact on the Century Freeway-Transitway Historic District.

The Crenshaw/LAX Transit Project opened on October 7, 2022, extending the E Line at the Expo Crenshaw Station and merging with the C Line at the Aviation/LAX Station, which is a contributing feature to the Century Freeway-Transitway Historic District. The C Line improvements were necessary to enhance access to LAX. The project included modifications to the aerial C Line track to extend the aerial platform to connect with the E Line. No alternations to the existing Aviation/LA Station were made as part of the project. A new multimodal transit station is planned at the intersection of Aviation Boulevard and 96th Street, which is over one mile north of the Century Freeway-Transitway Historic District boundary. While it is unclear if the C Line track modifications and aerial platform extension for the K Line were considered for compliance with the SOI Standards, the improvements were underway when the Century Freeway-Transitway Historic District was evaluated for historic significance and the station was identified as a contributor to the historic district. The historic evaluation for the historic district outlined in the DPR form considered its overall integrity and its individual contributing elements and their character-defining features; the historic district evaluation notes the Crenshaw/LAX Transit Project underway. Given these improvements were previously considered and dismissed as being important to the significance of the historic district, project improvements will not contribute to a cumulative effect/impact to the overall significance of the Century Freeway-Transitway Historic District. The C Line track and platform changes did not diminish existing features that contribute to the significance of the historic district, rather they enhanced the intramodality of I-105, which is considered an important element to its significance. Therefore, there will be no potential for cumulative effects/impacts to the Century Freeway-Transitway Historic District. The work associated with the above-noted project will not affect the character-defining features of any contributing elements and will not diminish the district's integrity of location, design, materials, workmanship, or association. Therefore, it will have no adverse effect and a less than significant impact on the Century Freeway-Transitway Historic District.

The most relevant and recent project to the WSAB Project is the ExpressLanes Project, which proposes to convert high-occupancy vehicle lanes to high-occupancy toll lanes or adding additional high-occupancy toll lanes in each direction. The ExpressLanes Project was developed in consultation with Metro to consider key intermodal enhancing elements of the project, including the construction and operation of a future LRT station within the median of I-105 and associated C Line track shifts. These physical changes that directly support the project were assessed for their effects/impacts to the character-defining features of the Century Freeway-Transitway Historic District as part of the ExpressLanes FOE. The ExpressLanes FOE concluded that the C Line, a contributing feature of the Century Freeway-Transitway Historic District, as well as the historic district as a whole, will remain unimpaired and will continue to convey its historic intermodal significance following implementation of the ExpressLanes Project.

The previously considered components of the ExpressLanes Project, in addition to elements of the LPA that include the demolition and replacement of one overcrossing, construction of a new LRT station and associated vertical circulation elements features, and construction of a new LRT bridge, will have little cumulative effect on the Century Freeway-Transitway Historic District. Both projects when considered together seek to improve and enhance the intermodal functionality of I-105, which is a key component to its historic significance. Further, both project studies concluded that alterations to the Century Freeway-Transitway Historic District will comply with the principles of the SOI Standards, thus reducing the potential for cumulative effects/impacts to negligible.

In examining potential cumulative effects/impacts using Caltrans guidance, the Caltrans Standard Environmental Reference, Guidance for Preparers of Cumulative Impact Analysis Approach and Guidance, provides an eight-step approach for identifying and analyzing cumulative impacts for each resource area. According to the guidance, the cumulative impact analysis should focus only on: 1) those resources significantly impacted by the project; or 2) resources currently in poor or declining health or at risk even if project impacts are relatively small (less than significant) (June 2005). The ExpressLanes Project applied the eight-step approach guidance and found that there was no need to address cumulative effects/impacts from the ExpressLanes Project for cultural resources, as the resource will not be significantly impacted by the project and that the "health" of the resource (i.e., its condition) was found to be good due to its high degree of integrity and intact character-defining features. Therefore, no incremental effects/impacts will be cumulatively considerable for cultural resources. Similar to the ExpressLanes Project, no cumulative effects are anticipated for cultural resources as there will be no adverse effects/impacts; therefore, no incremental effects/impacts will be cumulatively considerable for the LPA.

6 PROJECT/MITIGATION MEASURES

As summarized in Section 5 and in accordance with Section 106 of the NHPA, the study concluded that operation and construction of the LPA will have no adverse effect on known archaeological or built environment historic properties.

However, to support compliance with the SOI Standards and guidelines for Rehabilitation, Project Measure CR PM-1 (SOI Standards Design Review), described in Section 6.1.1, will be implemented as design progresses for the extension of the LA River Bridge's concrete piers (MRN 17-006) and the new LRT bridge and new infill Metro C Line station within the Century Freeway-Transitway Historic District (MRN 21-027). Per this measure, as design of these elements progresses, design will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture.

Additionally, according to the analysis presented in the Noise and Vibration Impact Report prepared in support of the Final EIS/EIR, three built environment historical resources are located in the APE for the LPA (two of which are also historic properties) that have the potential to be affected/impacted by vibration associated with construction of the LPA: the LADWP Boulder Dam-Los Angeles 287.5 kV Transmission Line (MRN 17-005), the Bellflower Pacific Electric Railway Depot (MRN 28-008), and the Frampton-Dantema House (MRN 32-021). With implementation of Mitigation Measure VIB-6 (Construction Vibration Limits for Historic Properties/Historical Resources) (described in the Noise and Vibration Impact Report), vibration associated with compacting will be reduced such that it will not exceed damage risk criteria, thereby resulting in no physical damage and no adverse effects/less than significant impacts to historic properties/historical resources. Additionally, Mitigation Measure VIB-7 (Construction Monitoring for Vibration Near Historic Properties/Historical Resources) (described in the Noise and Vibration Impact Report), requires monitoring construction vibration levels within 200 feet of historic properties/historical resources to ensure the vibration damage thresholds will not be exceeded; this measure will be implemented as a precautionary measure.

In accordance with CEQA, the study concluded that operation and construction of the LPA will have no or less than significant impacts on built environment historical resources and no mitigation measures are required. Results of the CEQA impacts analysis presented in Section 5.1.2 indicate that ground-disturbing activities associated with construction of the LPA may result in significant impacts to unanticipated archaeological resources that may qualify as historical resources. Significant impacts to unknown archaeological historical resources under CEQA will be reduced with implementation of Mitigation Measures CR-1 through CR-4, described in the sections that follow.

6.1 Project Measures

6.1.1 CR PM-1 – SOI Standards Design Review

As the Project progresses through the design phase, associated designs will be reviewed and approved by a professional who meets the Secretary of the Interior's Professional Qualification Standards in architectural history, history, or architecture (36 CFR 61). The goal of the review will be to confirm that designs remain consistent with the fundamental principles of the Secretary of the Interior's Standards for the Treatment of Historic Properties and guidelines for Rehabilitation (36 CFR 68).

6.2 Mitigation Measures

6.2.1 CR-1 – Development of Cultural Resources Monitoring and Discovery Program

Prior to the start of any ground-disturbing activity, an archaeologist that meets the Secretary of Interior's Professional Qualification Standards in Archaeology will prepare and implement a Cultural Resources Monitoring and Discovery Program (CRMDP) for the Project. The CRMDP will include the requirements of Mitigation Measures CR-2 through CR-4 and the following:

- A summary of the results of the West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report—Rev 2 and the West Santa Ana Branch Transit Corridor Project Revised Final Cultural Resources Effects Report.
- Procedures for avoidance of unanticipated discoveries where possible.
- Procedures for preservation in place of unanticipated discoveries where possible.
- Provisions of cultural resources awareness training to construction workers that will be implemented as part of Mitigation Measure CR-2 (Archaeological Work Environmental Awareness Program).
- Provisions for archaeological and Native American monitoring of ground disturbance related to construction of the Project.
- Summary of the treatment procedures for unanticipated discoveries, as specified in Mitigation Measure CR-4 (Treatment of Unanticipated Discoveries). This will include general research questions to be addressed by any studies, field, and laboratory methods for the gathering of data to evaluate sites for the California Register of Historical Resources and/or National Register of Historic Places, and requirements for addressing any sites identified as significant.
- Procedures for Native American coordination and input.
- Procedures for the treatment of human remains, if applicable, as outlined in existing regulations. These procedures will include, but not be limited to, communication protocol for contacting the coroner and preparation of a human remains treatment plan in consultation with the Most Likely Descendant(s).
- Guidelines for the reporting of monitoring and treatment results.

6.2.2 CR-2 – Archaeological Worker Environmental Awareness Program

A Secretary of the Interior qualified archaeologist will be retained to prepare a Worker's Environmental Awareness Program training for archaeological sensitivity. This training will be provided to all construction personnel prior to the commencement of any ground-disturbing activities. Archaeological sensitivity training will include a description of the types of cultural material that may be encountered, cultural sensitivity issues, regulatory issues, and the proper protocol for treatment of the materials in the event of a find.

6.2.3 CR-3 – Archaeological Monitoring

Monitoring pursuant to the Cultural Resources Monitoring and Discovery Program will be supervised by the qualified archaeologist who meets the Secretary of Interior Standards. The duration and timing of the monitoring will be determined by the qualified archaeologist. The archaeological monitor under the direction of a Secretary of the Interior qualified archaeologist will be present during ground-disturbing activities that have the potential to uncover previously known and unknown archaeological resources (i.e., ground-disturbing activities that will extend beyond the limits of prior disturbances). These activities will

include, but will not be limited to, pavement removal, grading, and trenching. Activities such as drilling that do not allow for soil visibility during excavation will be spot-checked but will not require a full-time monitor. Monitoring and spot-checking will be required up to a depth of 20 feet. If the qualified archaeologist determines that full-time monitoring is no longer warranted, he or she may recommend reducing monitoring to periodic spot-checking or cease entirely. Monitoring will be reinstated if any new or unforeseen deeper ground disturbances are required and reduction or suspension will need to be reconsidered by the qualified archaeologist. In the event that an archaeological resource is discovered, the monitor will have the authority to temporarily divert construction equipment around the find with a 50-foot buffer, or other buffer as determined by the archaeologist, to protect the resource until it is assessed for significance and a treatment (e.g., avoidance, testing, data recovery), if necessary, is determined by the Federal Transit Administration in consultation with the State Historic Preservation Officer and consulting parties and executed.

At the conclusion of archaeological monitoring, a final report will be prepared by the Secretary of the Interior qualified archaeologist, or his or her designee, describing the results of the archaeological monitoring efforts associated with the Project. If previously unidentified cultural resources are discovered during construction monitoring, a report will be prepared following the State Historic Preservation Office's Archaeological Resource Management Report Guidelines that document the findings of the field and laboratory analysis and interpret the data within appropriate research context.

6.2.4 CR-4 – Treatment of Unanticipated Discoveries

The contractor or archaeological monitor will notify Metro immediately if potentially significant archaeological resources are exposed during ground-disturbing activities. Archaeological monitors will have the authority to divert or temporarily halt ground-disturbing operations at the discovery. The area will be fenced or flagged as soon as possible following the discovery. Until the boundaries of the resource can be established with testing procedures, a 50-foot buffer zone around the identified deposit will be fenced or flagged off. Subsequent to the identification of site boundaries, the fenced or flagged buffer surrounding the resource could be reduced to a 10- to 15-foot buffer zone at the discretion of the qualified archaeologist. All fencing or flagging of archaeological deposits will be monitored by a qualified archaeologist. Temporary fencing or flagging will remain in place until the resource has been released by the qualified archaeological monitor, in consultation with Metro and FTA. Construction activities may continue in areas beyond the buffer zones. The discovery will be evaluated by the qualified archaeologist in accordance with the methods identified in the Cultural Resources Monitoring and Discovery Program (Mitigation Measure CR-1) to determine if the archaeological resource is eligible for listing on the National Register of Historic Places (NRHP) and/or California Register of Historic Resources (CRHR). If the archaeological resource is determined eligible for the NRHP and/or CRHR, a treatment plan will be prepared in accordance with 36 Code of Federal Regulations § 800.13(a)(2) in consultation with the State Historic Preservation Officer.

7 CEQA DETERMINATION

The cultural resources CEQA determinations presented in the following sections are based on the existing conditions presented in the Survey Report—Rev 1 and Survey Report—Rev 2, the environmental effects/impacts analysis presented in Section 5, and the minimization/mitigation measures presented in Section 6 of this Cultural Resources Effects Report. This section presents the results of the CEQA determination for historical resources that are located with the APE that is associated with the LPA. While the Survey Report—Rev 2 included the entire APE which encompassed the four Build Alternatives evaluated in the Draft EIS/EIR, the Revised Final Cultural Resources Effects Report presents only the portion of the APE that encompasses direct and indirect effects associated with the LPA.

7.1 Would the Project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?[6]

According to the CEQA Section 21084.1, "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." CEQA Section 15064.5(b)(1) and (2) states:

> Substantial adverse change in the significance of an historical resource means 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.
>
> The significance of an historical resource is materially impaired when a project: (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

[6] Substantial adverse change to archaeological resources is discussed in Section 7.2. The analysis in Section 7.1 relates to only to built environment resources.

7.1.1 Operation

7.1.1.1 No Project Alternative

Under the No Project Alternative, the Project would not be constructed. No new infrastructure would be built within the APE. The existing freight tracks within the rail ROWs would remain and the environmental setting would remain in current conditions. Therefore, under the No Project Alternative, there would be no impacts to built environment historical resources.

Mitigation Measures

No impacts to built environment historical resources would occur as a result of the No Project Alternative. Therefore, no minimization/mitigation measures are required.

Impacts Remaining After Mitigation

No impacts would occur.

7.1.1.2 Locally Preferred Alternative

Potential impacts to built environment historical resources in the APE for the LPA as a result of operation of the LPA include those directly related to its operation (e.g., permanent visual effects, permanent property acquisitions and easements). None of these activities are expected to result in a significant impact to built environment historical resources. Potential noise and vibration impacts related to operation of the LPA were evaluated. The analysis considered whether noise and vibration have the potential to materially impair historical resources. This study concluded that no significant noise or vibration impacts to historical resources will result from operation of the LPA. As documented in the Noise and Vibration Impact Report (Metro 2023b), the level of vibration occurring during operation of the LRT is below the architectural or structural damage risk criteria and the damage risk concern to historic buildings is vibration from construction, which is discussed below.

Operation of the LPA will require construction of structures and equipment that will introduce new rail-related visual elements, for example stations, rail tracks, catenary poles and wires, aerial structures, TPSSs, and soundwalls, to the existing built-up, urban landscape surrounding historical resources in the APE for the LPA. Although the LPA will introduce new features proximate to historical resources, the new features will be differentiated from historic-period features by their contemporary design. Further, the entire APE for the LPA is situated within an already urban setting along existing rail ROWs. Due to the nature of the existing setting surrounding historical resources, the introduction of additional rail-related features is consistent with and will not significantly impact, materially impair, or reduce the integrity of historical resources.

Three historical resources in the APE (6101 Santa Fe Avenue [MRN 10-012], 6020 Miles Avenue [MRN 10-021] in Huntington Park, and Cudahy Substation [MRN 15-032] in Cudahy) will be altered by minor, small-scale permanent acquisitions or easements necessary for the construction or modification of infrastructure, such as curbs and sidewalks, which are necessary as a result of grade crossing modifications in support of implementation of the LPA. Additionally, a small portion of the Southern California Edison Long Beach to Laguna Bell Transmission Line [MRN 18-016] corridor will be permanently acquired to enable construction of LRT tracks and a TPSS site within the corridor.

Although these changes represent the physical alteration of these built environment resources, modifications are minor and consistent with the existing surroundings, which consist of a highly urbanized setting encompassing paved roadways, traffic signals, sidewalks, and curbs. The LPA elements are in keeping with the existing setting of these historical resources. Additionally, none of the built environment features within the boundaries of these resources will be altered as a result of modifications. Therefore, the acquisitions and proposed modifications will not significantly impact, materially impair, or reduce the integrity of historical resources in the LPA.

Operation of the LPA will require construction within the boundaries of four linear historical resources within the APE: the LA River Channel (MRN 17-007), the Rio Hondo Channel (MRN 18-017), the San Gabriel River Channel (MRN 29-025), and the Century Freeway-Transitway Historic District (MRN 21-027). Additionally, to facilitate the LPA alignment crossing the LA River, the Union Pacific LA River Bridge (MRN 17-006) will be physically modified. While the three river channels will be altered by implementation of the LPA, alterations are small in scale when considered in the context of these resources, all of which are portions of large-scale water conveyance features that span many miles. These channels were designed as flood control measures/water conveyance systems in an area of anticipated rapid urban development; the purpose of their construction and existence within an urbanized landscape is directly related to their historical significance. Alterations within the boundaries of these resources will occur in small segments of the much larger resources. The new structures proposed within the boundaries of these historical resources will not alter the characteristics that qualify them for historic designation, for example their route, profile, and concrete-lined trapezoidal shape, such that their ability to convey significance will be diminished or they will be materially impaired.

Implementation of the LPA will require the alteration of the Union Pacific LA River Rail Bridge, including the extension of its existing concrete piers to the north to also support a new LRT bridge for the LPA to cross the LA River Channel. The existing bridge will remain intact and continue its historic and current use following implementation of the LPA. While the LPA will not physically alter the deck of the bridge, the bridge's existing concrete piers will be extended to the north to support the new LRT bridge constructed for the LPA to cross the LA River. Modifications to the piers will be undertaken using materials consistent with the existing piers, and the scale and massing of extended portions of the piers will be consistent with those currently extant. While the bridge's integrity of design, materials, and workmanship will be altered by the LPA, modifications will be undertaken in a manner such that the property/resource will not be adversely affected/significantly impacted. Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the SOI Standards and guidelines for Rehabilitation. Accordingly, design of the extension of the Union Pacific LA River Rail Bridge's existing concrete piers will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances.

The following presents an assessment of the Project's potential to impact the Century Freeway-Transitway Historic District (MRN 21-027) in accordance with CEQA.

Century Freeway-Transitway Historic District

The Century Freeway-Transitway Historic District, as described in Section 5.2.2.18, is an 18-mile linear historic district that encompasses the Caltrans ROW from California Street in El Segundo to Studebaker Road in Norwalk. In addition to the roadway itself, the district encompasses approximately 18 miles of the Metro C Line, 10 associated transit stations, and 118 bridges and pedestrian overcrossings that were built as part of or altered to accommodate the freeway's construction. Under NRHP Criterion A, the district's "associative importance is as the subject of one of the earliest Environmental Justice lawsuits, requiring community and environmental consideration in freeway planning. That significance encompasses the ensuing legal agreement which directly affected displacements, created new housing, changed construction practices, created local jobs and future careers for minorities, the route of the roadway and its intermodal use and as the final inner-city interstate to be constructed" (Smith 2019). Under NRHP Criterion C, the district's "design significance is partially based on the assimilation of then-novel ITS features and design components (such as longer ramps) into the design and management of the freeway, the revolutionary integral light rail alignment and stations in its median and the ambitious, massive, intermodal limited interchanges and as the last, full-length, new urban freeway" (Smith 2019).

Character-defining features include the freeway itself; its elements, including the ITS system, all bridges, ramps, and original structures constructed for the I-105; the remaining original landscaping; light rail lines; and the 10 freeway-related stations. The elements that were not originally constructed as part of the I-105 do not contribute to its significance, such as the pavement of the roadway, standard signage, later soundwalls, mast lighting at the I-710 interchange, pump stations between I-710 and 605, the Green Line outside of the median and its stations south of the Aviation/LAX Station, and the Green Line Maintenance and Storage Yards beyond the I-105 corridor (Smith 2019).

The APE for the LPA includes a 0.5-mile segment of this historic district where it will directly alter a small portion of the district through demolition of the Century Boulevard Underpass that carries the UPRR, construction of a new LRT bridge to accommodate the LPA alignment and a replacement freight bridge for the UPRR, construction of a new infill Metro C Line station with associated vertical circulation elements in the median of I-105 below the existing Façade Avenue Overcrossing, minor realignment of 2,500 feet of existing Metro C Line LRT track within the I-105 median to accommodate the infill station platform, and minimal landscaping removal and in-kind replacement.

Construction of the LPA within the boundaries of the historic district was previously discussed in documentation prepared by Caltrans for the ExpressLanes Project. Both the ExpressLanes FOE and the ExpressLanes EIS/EIR indicate design accommodations were made in order to allow WSAB LPA implementation. In particular, the EIS/EIR for that project stated:

> In order accommodate the proposed WSAB project, under Alternative 3, the I-105 ExpressLanes project would provide adequate space in the median to widen the Green Line with a new transfer platform in the future. This scenario includes a 13-foot inside shoulder and a reduced outside shoulder. It would allow the I-105 ExpressLanes project to be independent from the other proposed project in that area, with necessary room for proposed future modifications.

Modifications to the I-105 for the ExpressLanes Project in the vicinity of the LPA include construction of retaining walls that, according to Caltrans' analysis, "will be necessary to accommodate the proposed [WSAB] project, balancing requirements for future transit." Beyond its proposed alterations to the I-105 within the APE for the LPA, both of the ExpressLanes Project's build alternatives proposed numerous changes to the historic district, including freeway widening, ramp modifications, interchange modifications, widening of many character-defining bridges, demolition and reconstruction of at least one character-defining bridge, removal and replacement of landscaping, and the installation of retaining walls and soundwalls. Caltrans determined these activities will not adversely affect the historic district under Section 106. Bridge demolition and replacement were later removed from the proposed ExpressLanes Project in that project's Final EIS/EIR. Caltrans determined that because these changes did not adversely affect the historic district under Section 106, and because the district's significance will not be materially impaired under CEQA, the ExpressLanes Project will not result in a substantial adverse change under CEQA.

Due to the character and scale of the Century Freeway-Transitway Historic District, as described in the district's DPR forms, condition assessment report, and the ExpressLanes FOE, and that of the alterations proposed by the Project, the following analysis concludes that the LPA will not result in alteration of the district such that it will be materially impaired as defined by CEQA Section 15064.5(b)(2) because it will not significantly reduce the district's overall integrity or alter in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in the CRHR. In the sections that follow, for ease of understanding, the above-noted project components are analyzed individually for their potential to result in the district's material impairment per CEQA Section 15064.5(b)(2). Following the assessment of each individual component, an evaluation of the collective whole of the LPA for its potential to result in the district's material impairment per CEQA Section 15064.5(b)(2) is presented, as well as a discussion of avoidance considerations.

Demolition and Replacement of the Century Boulevard Underpass

The Century Boulevard Underpass currently accommodates the UPRR freight line, which predates construction of I-105 and was relocated to its present location on the Century Boulevard Underpass at the time of I-105's construction. The demolition and replacement of the Century Boulevard Underpass is necessary to accommodate the proposed alignment within the existing railroad ROW while maintaining freight connectivity. As part of the LPA, the existing Century Boulevard Underpass will be demolished and two new overcrossings will be constructed—a new LRT bridge and a replacement freight bridge—roughly in its place.

The area surrounding the portion of the historic district within the APE for the LPA includes residences and light industrial businesses that are directly adjacent to the railroad ROW to the north and south of the I-105 freeway crossing. To reduce the displacement of existing residents and businesses adjacent to the railroad ROW, the demolition and replacement of the Century Boulevard Underpass is necessary to allow room for the construction of a dedicated LRT bridge structure within the existing railroad ROW and corresponding aerial easement over I-105.

Implementation of the LPA will result in an additional overcrossing within the boundaries of the district. However, the proposed placement of the replacement freight bridge, immediately west of the new LRT bridge, is such that the overall rhythm of overcrossings throughout the

district will not be significantly altered or interrupted. The proposed structures will be placed immediately adjacent to one another, sharing the location of the current Century Boulevard Underpass. Due to the proposed placement and relationship of the structures to one another, the introduction of an additional crossing in this location will represent a minor modification to the rhythm of crossings within this segment of the district. In particular, when considered within the context of the entirety of the district, which spans roughly 18 miles, the addition of an overcrossing in the location proposed will not change the significance of the historic district such that it will be materially impaired.

The current Century Boulevard Underpass is a concrete box girder bridge with four spans supported by eight-sided bents. It is roughly 34 feet wide and features standard railings and minimal detailing consisting of simple relief in bents and along its superstructure (similar to that shown in Figure 7-1). The design of the replacement Century Boulevard Underpass is largely dependent on the requirements of the UPRR, as the design of the bridge is subject to UPRR approval. It will be a four-span, cast-in-place, prestressed concrete box girder structure up to 35 feet wide. The new underpass will be 444 feet long with a 9 foot depth of the box girder, with an additional 2 foot, 6 inch depth of the bridge deck to top of the rail. The new underpass will have a 24 foot minimal vertical clearance from the bottom of the structure to the roadway below. The total vertical length from the roadway inclusive of bridge deck and box girder will be a minimum of 35 feet, 6 inches. The new underpass will have a 22 foot, 2 inch minimum vertical clearance from the bottom of the structure to the C Line below the bridge. The total vertical length from the C Line inclusive of the bridge deck and box girder will be a minimum of 33 feet, 8 inches.

The new LRT bridge will be 46 feet wide and 362 feet long with a box girder depth of 8 feet 6 inches. The new LRT bridge will have a 25 foot 6 inch minimal vertical clearance from the bottom of the structure to the roadway below. The total vertical length from the roadway inclusive of the bridge deck and box girder will be a minimum of 34 feet. The new LRT bridge will have a 23 foot, 8 inch minimum vertical clearance from the bottom of the structure to the C Line below the bridge. The total vertical length from the C Line inclusive of the bridge deck and box girder will be a minimum of 32 feet, 2 inches. Overhead contact system poles along the LRT bridge will be 20 feet above the track. Its deck height above grade will be similar to the existing Century Boulevard Underpass. Consistent with other character-defining bridges throughout the district, the new LRT bridge will be a cast-in-place, prestressed concrete box girder bridge structure. It will be supported with bents comprised of triple column piers and it will feature a decorative low relief that is present on character-defining bridges throughout the district. Railings will be designed in accordance with Caltrans bridge barrier standards.

Project Measure CR PM-1 (SOI Standards Design Review) will be implemented to support compliance with the SOI Standards and guidelines for Rehabilitation. Accordingly, as it advances, design of the new LRT bridge will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation. According to CEQA Section 15064.5(b)(3), “generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

Figure 7-1. Southeastern-Facing View of the Arthur Avenue Pedestrian Overcrossing with Concrete Relief Visible



Source: Metro 2020

A replacement freight bridge will be constructed to the immediate west of the new LRT bridge. The design of the replacement freight bridge is largely dependent on the requirements of the UPRR, as the design of the bridge is subject to UPRR approval. However, the new bridge will be a four-span, cast-in-place, prestressed concrete box girder structure up to 35 feet wide. The utilitarian structure will be consistent in its overall scale and massing with other bridges throughout the district, including the proposed new LRT bridge. Its deck will be situated slightly below that of the adjacently located new LRT bridge. Additionally, it will feature a decorative relief to match the relief present on character-defining bridges throughout the district.

Alternative 3 of the ExpressLanes Project proposed the demolition of one of the district's character-defining bridges, the Downey Avenue Overcrossing. Similarly, the WSAB Project's LPA will demolish one of the district's 118 character-defining bridges/overcrossings. Although demolition of the Century Boulevard Underpass equates to the loss of historic fabric, it represents a minor loss when considered within the whole of the district, an 18-mile linear resource. According to Caltrans' ExpressLanes FOE, "the demolition of one bridge will constitute fewer than one percent of the total (.84%), so although its removal will reduce the number of contributing bridges to 118, a reduction of such a low percentage will not

significantly affect the integrity of the larger historic district" (Caltrans 2020). Following implementation of the LPA, 117 of the district's character-defining bridges will remain intact.

The new LRT bridge represents an addition to the district. However, consistent with the replacement bridge proposed by Caltrans in Alternative 3 of its ExpressLanes Project and analyzed by Caltrans in its ExpressLanes FOE, the new LRT bridge will be similar to other character-defining bridges throughout the district in its overall design, massing, scale, color, and materials and will approximate the features of the original bridge; therefore, its design is consistent with the fundamental principles of the SOI Standards (36 CFR 68) and applicable guidelines. In compliance with Project Measure CR PM-1 (SOI Standards Design Review) design of the new LRT bridge will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation. The LRT bridge will integrate a relief consistent with that present on character-defining bridges throughout the district to increase overall cohesiveness.

Similarly, the replacement freight bridge will also represent an addition to the district. However, it will embody a simple utilitarian design aesthetic which is in keeping with that of the district overall and will not detract from its design aesthetic. It will also be similar to other character-defining bridges throughout the district in its overall design, massing, scale, color, and materials and will approximate the features of the original bridge by integrating a relief consistent with that present on character-defining bridges throughout the district.

Consistent with the bridge demolition and replacement proposed by Caltrans in Alternative 3 of the ExpressLanes Project, the demolition of the Century Boulevard Underpass and its replacement with new LRT and replacement freight bridges "would most importantly not change the character of the property's original transit-transportation use, but it would alter one of the numerous, nearly identical features in the property's immediate setting that contribute to its historic significance enabling the linear resource's continued use (36 CFR 800.5 (iv))" (Caltrans 2020). In addition, the inclusion of a new pedestrian walkway as part of the new LRT bridge, and the provision of a transfer from the LPA to the existing transportation network will support and further the district's intermodal nature, one of the primary reasons for its historical significance.

Based on this analysis, the demolition of the Century Boulevard Underpass and its replacement with a new LRT bridge and replacement freight bridge will enhance the historic district's intermodal capabilities and will not significantly reduce the district's overall integrity or alter in an adverse manner those physical characteristics that convey its historical significance and justify its inclusion in the CRHR. Therefore, implementation of this project element will not result in the material impairment of the Century Freeway-Transitway Historic District.

Construction of a New Infill Metro C Line Station and Vertical Circulation Elements within the I-105 Median

Beneath the new LRT and replacement freight bridges, and extending west toward the Façade Avenue Overcrossing, the LPA will include construction of a new infill Metro C Line station with associated vertical circulation elements in the median of I-105. The new infill Metro C Line station and associated vertical circulation elements will provide a transfer from the Metro C Line to the LPA. The Façade Avenue Overcrossing will be minimally altered to accommodate these vertical circulation elements and allow for passenger transfer between lines.

As previously noted, character-defining features of the district include approximately 18 miles of Metro C Line LRT tracks and 10 associated LRT stations. Stations throughout the district feature various contemporary designs, displaying a variety of features including multi-story elements, decorative metal canopies, soundwalls, and vertical circulation elements such as concrete stairs, elevators, and escalators.

The new infill Metro C Line station platform will be approximately 270 feet long and 25 feet wide and will be covered with canopies punctuated with vertical circulation elements. Consistent with other stations throughout the district, vertical circulation elements, which will connect to the Façade Avenue Overcrossing and the new LRT bridge, may consist of elevators, stairs, and/or escalators. Identical elevators will be located on both sides of the Metro C Line platform at 8 feet above the bridge deck. To comply with Metro requirements to achieve a noise level of 75 dBA at the station platform (Metro Rail Design Criteria Section 2.8.5), soundwalls will be included along the edges of the station. Proposed soundwalls will be of a consistent scale and massing as those located throughout the district and will feature a partially transparent design.

A new station will introduce structural elements not currently present at this location within the district. However, I-105 is the only known interstate specifically designed and built to be intermodal, and its historical significance is partially derived from this unique quality. The function of the new infill Metro C Line station is in keeping with the district's original design intent and supports the freeway's intermodal capabilities into the future. Additionally, the new infill Metro C Line station will be consistent with its location in the median of I-105 and consistent in scale, mass, and design aesthetic with character-defining stations throughout the district. The addition of a station in this location will not result in a change in the character of the district; rather it will enhance and support the character of the property's intermodal use.

To support compliance with the SOI Standards, Project Measure CR PM-1 (SOI Standards Design Review) will be implemented. Accordingly, as it advances, design of the new infill Metro C Line station will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation. Based on this analysis, the construction of a new infill Metro C Line station and associated vertical circulation elements in the median of I-105 will not result in the material impairment of the Century Freeway-Transitway Historic District.

Soundwalls proposed for construction within the APE are limited to those associated with the new infill Metro C Line station and will be located along the edges of the station. According to the ExpressLanes FOE, "certain soundwalls were constructed as part of the original project, but those have been periodically updated and modified as the need arose, and funding became available. Because of periodic changes and additions to the soundwalls, none is considered a character-defining feature of the larger historic district" (Caltrans 2020). While soundwalls are not character-defining features of the district due to their regular alteration and modification for maintenance purposes, they are a common and highly visible feature present throughout the district, as they have been added in many locations based on need, including at the character-defining Harbor Freeway Station (Figure 7-2 and Figure 7-3).

Figure 7-2. Transparent Soundwall at Harbor Freeway Station Eastbound Platform Looking East



Source: Metro 2022

Figure 7-3. Transparent Soundwall at Harbor Freeway Station Westbound Platform Looking East



Source: Metro 2022

Soundwalls added to the district in association with the new infill Metro C Line station will be generally in keeping with those already located throughout the district. While they will be consistent with existing soundwalls in scale and mass, they will feature a partially transparent design, similar to those at the Harbor Freeway Station, thereby reducing their potential visual effect to the overall district. All station materials, including sound walls, will minimize glare and heat gain, and overly reflective and mirror-like surfaces will be avoided to minimize specular reflection. Additionally, lighting fixtures will incorporate directional shielding where needed as indicated in the Metro Rail Design Criteria. As a transportation-related property, soundwalls are a common feature throughout the district, and their addition in the APE does not represent a deviation in the district's form or function nor will their addition significantly alter the district's setting or diminish its integrity such that it will be materially impaired. The addition of soundwalls in association with the new infill Metro C Line station will not significantly reduce the district's integrity or alter in an adverse manner those physical characteristics that convey its historical significance and that justify its inclusion in the CRHR.

Alternatives 2 and 3 of the ExpressLanes Project encompassed alteration of 11 and 21 character-defining bridges, respectively, including their widening and installation of new bridge barriers in addition to the physical destruction of small portions of graded slopes, paved slopes beneath three bridges, and a few associated retaining walls. The analysis presented in the ExpressLanes FOE stated that none of the character-defining bridges proposed for alteration by the ExpressLanes Project "…is separately significant." Rather, the analysis states that "their importance is for the corridor's associative qualities, but the linear historic district is also important for the linked ITS system, the integral high-occupancy vehicle lanes, the concurrently constructed light rail line and ten light rail stations." And that "none of the bridges proposed for alteration is significant for its aesthetic or engineering qualities; that significance lies in their direct association to the larger linear resource" (Caltrans 2020).

Similarly, the Façade Avenue Overcrossing is not significant for its aesthetic or engineering qualities, nor is it individually significant. While the bridge will be altered by the LPA, the introduction of vertical circulation elements in association with the new infill Metro C Line station is in keeping with the district's original design intent and supports and enhances its intermodal capabilities and continued future use. Additionally, vertical circulation elements are common throughout the district and those introduced by the LPA will be consistent in scale, mass, and overall design with those located within character-defining stations throughout. To reduce potential visual impact, vertical circulation elements will be situated as close as possible to the Façade Avenue Overcrossing to the west and the new LRT bridge to the east to minimize their visibility from other locations within the district. As the Façade Avenue Overcrossing is not significant for its aesthetic or engineering qualities, or individually significant, alterations will not result in diminished integrity such that the bridge will no longer be character-defining, as the overcrossing will retain its essential form and its function. While the addition of vertical circulation elements will require alteration of the Façade Avenue Overcrossing, alterations will not result in diminished integrity such that the bridge will no longer be character-defining, as the overcrossing will retain its essential form and its historic and current function. The alteration of the Façade Avenue Overcrossing with the addition of vertical circulation elements for transit connectivity enhances the historic district's significant intermodal design and represents only a minor change to the district that will not diminish its integrity or alter in an adverse manner those physical characteristics that convey its historical significance and justify its inclusion in the CRHR.

Realignment of 2,500 feet of Metro C Line Track

Construction of the new infill Metro C Line station will require realignment of approximately 2,500 feet (0.47 mile) of Metro C Line LRT track. This realignment will consist of a maximum 7.5-foot shift. The realignment represents approximately 2.5 percent of the district's approximately 18 miles of Metro C Line track. The light rail in the median of I-105 is identified by the Caltrans condition assessment report as one of the freeway's significant character-defining features. However, similar to the district's overcrossings, the light rail is significant for its integration into the freeway's design in support of its intermodality. The light rail is not significant for its design or engineering details, rather the light rail conveys its significance via its location in the median and its general route, which is consistent with that of the I-105 roadway.

Despite realignment by the LPA, the LRT tracks will remain an integrated component of the interstate located in the median; they will continue to serve a purpose consistent with their historic and current function in support of the district's intermodal nature. Catenary wires will be served by duct banks and cables powered by existing power substations, consistent with current design and operation. Additionally, materials removed to facilitate track realignment will be replaced in-kind, and the overall alignment of the Metro C Line within the district will remain largely intact following implementation of the LPA.

Based on the analysis presented above, the realignment of approximately 2,500 feet of Metro C Line LRT track, which was previously considered in Caltrans' ExpressLanes Project, will not result in the material impairment of the Century Freeway-Transitway Historic District. The realignment is required to enhance the historic district's intermodal connectivity and will not significantly reduce the district's overall integrity or alter in an adverse manner those physical characteristics that convey the district's historical significance and justify its inclusion in the CRHR.

Minimal Landscaping Removal and Replacement

To enable construction of the project elements described above, the removal and replacement of some landscaping, including the removal and replacement of up to 15 trees, may be required. The district's landscaped nature is one of its character-defining features. To support the current assessment, the following documents and sources were reviewed: Caltrans-provided as-built drawings that depict the district's original landscape plan (as-builts), the *Draft Landscaping Impact Summary - I-105 ExpressLanes Project-Post Mile: R0.5 to R 18.1* (Draft Landscaping Impact Summary) (WSP 2019), and historical and recent aerial imagery of the district. According to a review of the as-builts, trees in the APE consist primarily of the following: *Eucalyptus Sideroxylon* (Red Ironbark), *Schinus Molle* (California Pepper Tree), *Xylosma Congestum* (Shiny Xylosma), and *Myoporum Pacifica* (Prostrate Myoporum) (Caltrans 1995). However, a review of historical and aerial imagery of the district indicates that much of the landscaping within the district, namely that present on the north berm within the APE which appears to have been planted between 2000 and 2003, does not date to its period of significance.

The alternatives analyzed in Caltrans' ExpressLanes FOE variously proposed the removal of between 80 and 177 trees in addition to alteration of other small-scale landscaping. The analysis presented in the ExpressLanes FOE concluded that "under either build alternative a substantial majority of the historic district's trees will remain" and that "the overall intent of the original landscape design is expected to remain visible and intact with replacement of the

removed trees" (Caltrans 2020). Further, the analysis indicates that "while the proposed [ExpressLanes Project] will compel physical destruction of nearly eight percent of the historic district's trees, those trees will be replaced as described (36 CFR 800.5 (i) [in kind]" and that "the proposed tree removal and replacement with the same types, or roughly the same types of trees is consistent with the principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii))" (Caltrans 2020).

Consistent with the analysis presented in the ExpressLanes FOE, the current analysis indicates that proposed alterations to the district's landscaping will not alter any of the characteristics that qualify it for inclusion in the NRHP in a way that will reduce its overall integrity given its roughly 19-mile length. The district's character is partially defined by its landscaped nature. Therefore, the LPA will adhere to the recommendations included in the Draft Landscaping Impact Summary, and any trees removed during construction will be replaced at a ratio of 1:1. As removed trees will be replaced in kind, the intent of the district's original landscape design will remain intact following implementation of the LPA. Additionally, as the LPA will only alter landscaping in a relatively small portion of the district, a substantial majority of the landscaping present throughout the district will remain in place despite the LPA.

Therefore, removal and replanting of minimal landscaping in-kind within the portion of the district in the APE to enable construction will not result in the material impairment of the Century Freeway-Transitway Historic District.

Conclusion

In accordance with CEQA Section 15064.5(b)(2), implementation of the LPA will not result in the material impairment of the Century Freeway-Transitway Historic District, a historical resource under CEQA. According to the Caltrans guidance, *A Historical Context and Methodology for Evaluating Trails, Roads, and Highways in California* (Caltrans 2016), alterations to any component of a historic road may impact its historic integrity and, therefore, its CRHR eligibility. Although the LPA will demolish a character-defining feature of the district (the Century Boulevard Underpass), removal constitutes less than 1 percent of the character-defining bridges within the district, 117 of which will remain following implementation of the LPA. While implementation of the LPA will result in alterations and the loss of some historic fabric, alterations will not result in a diminished loss of historic fabric such that the historic district will no longer be eligible for inclusion in the CRHR and/or qualify as a historical resource under CEQA. The elements proposed for construction within the district, including the new LRT bridge, replacement freight bridge, and new Metro C Line station, will be designed in a manner compatible in massing, scale, and overall design with the district such that they will not significantly reduce the district's overall integrity. In the case of the new LRT and replacement freight bridges, a concrete relief consistent with that present on character-defining bridges will be integrated into bridge designs. In addition, in accordance with Project Measure CR PM-1 (SOI Standards Design Review), the new LRT bridge and infill Metro C Line station designs will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that they remain consistent with the SOI Standards and guidelines for Rehabilitation.

The LPA will alter a small portion of the district, including the demolition and replacement of the Century Boulevard Underpass with a new LRT bridge to accommodate the project alignment and a replacement freight bridge, construction of a new infill Metro C Line station and associated vertical circulation elements in the median of I-105 below the existing Façade

Avenue Overcrossing, realignment of 2,500 feet of existing Metro C Line LRT track to accommodate the infill station platform, and minimal landscaping removal and replacement. According to National Register Bulletin 15, for a historic district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished, and the relationships among the district's components must also be substantially unchanged since the period of significance.

Following implementation of the LPA, a majority of the district's character-defining features will remain unaltered from their original state and will retain their relationships to one another. Therefore, the district will retain sufficient integrity to convey its historical associations. Proposed alterations within the historic district will enhance and improve its intermodal connectivity, which is one of the primary reasons the historic district is significant. Additionally, Caltrans considered construction of the LPA and accommodated for its new elements as part of its ExpressLanes Project. Thus, proposed alterations required by implementation of the LPA will not materially alter the district in accordance with CEQA Section 15064.5(b)(2), and the district will continue to convey its historical significance and will remain eligible for inclusion in the CRHR.

As a result of the analysis presented above, implementation of the LPA will result in a less than significant impact to historical resources in accordance with CEQA.

Table 7.1 presents the character-defining features of the district, listed in their order of importance in conveying the district's significance, as identified in the Caltrans condition assessment report. Also included in the table is the percentage of each character-defining feature that will be potentially impacted by the LPA and a CEQA finding related to each individual feature in consideration of proposed project changes. A summary of findings related to each individual proposed component and the whole of the LPA, as analyzed above, is included in Table 7.2.

Table 7.1. Character-Defining Features of the Century Freeway-Transitway Historic District

Caltrans Ranking	Character-Defining Feature and Description	Total Points*	Percent of Character-Defining Feature Potentially Impacted by Project LPA	Impact Under CEQA
Most Significant	Limited interchanges (Interstates 405, 110, 710, and 605)	15	0%	No proposed change; No impact to this feature.
Most Significant	Profile of route (at-grade, elevated, in trench, or on berm)	14	0%	No proposed change; No impact to this feature.
Significant	Alignment of route	12	0%	No proposed change; No impact to this feature.

Caltrans Ranking	Character-Defining Feature and Description	Total Points*	Percent of Character-Defining Feature Potentially Impacted by Project LPA	Impact Under CEQA
Significant	Metro C Line light rail system and stations in median	12	2.5% (track) 0% (stations)	Shifting 2,500 feet (0.47 mile) of track will be a minimal change; Less than significant to this feature. New infill station will be compatible in scale and massing with existing stations and will be located in the median; no existing stations will be altered; Less than significant to this feature.
Significant	ITS system (CCTV, TMS, RMS, ATMS, CMS1)	11	0%	No proposed change; No impact to this feature.
Significant	Original bridges and pedestrian overcrossings	10	Less than 1%	Demolition and replacement of 1 of 118 contributing bridges will be a minimal change; Less than significant impact to this feature.
Significant	Landscaped nature	10	Minimal	Trees to be replaced at a 1:1 ratio; Less than significant impact to this feature.
Significant	Controlled ramps and their lengths	9	0%	No proposed change; No impact to this feature.

Source: Source: Smith and Harper 2019 and Rincon 2023
* Features with points between 13 and 15 are identified as most significant and are highlighted with green shading; features with points between 9 and 12 are identified as significant; features with points between 5 and 8 are identified as least significant.
Notes: ATMS = Advanced Traffic Monitoring System; Caltrans = California Department of Transportation; CCTV = closed-circuit television; CEQA = California Environmental Quality Act; CMS = Changeable Message Signs; ITS = Intelligent Transportation System; LPA = Locally Preferred Alternative; RMS = Ramp Metering System; TMS = Traffic Monitoring Stations

Table 7.2. Summary of Findings

Proposed Component	Summary of Analysis	CEQA Finding
Demolition and replacement of the Century Boulevard Underpass	Demolition will only impact 1 of 118 (less than 1%) of the character-defining bridges/overcrossings. The new LRT and replacement freight bridges will be generally consistent in scale, massing, and materials with other character-defining bridges throughout the district. New LRT and replacement freight bridges will integrate relief consistent with that present on character-defining bridges throughout the district. In compliance with Project Measure CR PM-1 (SOI Standards Design Review) design of the new LRT bridge will be reviewed by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation.	Less than significant impact
Construction of new Metro C Line station and associated vertical circulation elements	Station and vertical circulation elements will support the interstate's intermodality into the future. They will be generally consistent in their scale, massing, and materials with other character-defining stations and associated circulation elements throughout the district. The new station will be differentiated from existing stations in its design details, yet compatible with existing stations in terms of scale, massing, materials, and spatial relationships. Project Measure CR PM-1 (SOI Standards Design Review) will be implemented, and design of the new station will be reviewed by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that it remains consistent with the SOI Standards and guidelines for Rehabilitation.	Less than significant impact
Realignment of approximately 2,500 feet (0.47 mile) of Metro C Line track	Realignment will result in the alteration of just over 2.5% of the Metro C Line track within the district. Materials removed will be replaced in-kind and the overall alignment of Metro C Line track within the district will remain largely intact following implementation of the LPA.	Less than significant impact
Minimal landscaping removal and replacement	Landscape removal will be limited. Trees removed will be replaced at a 1 to 1 ratio.	Less than significant impact
WSAB Project (LPA)	Presented above	Less than significant impact

Source: Rincon 2023

Notes: CEQA = California Environmental Quality Act; LPA = Locally Preferred Alternative; LRT = light rail transit; SOI PQS = Secretary of the Interior's Standards for the Treatment of Historic Properties Professional Qualification Standards; WSAB = West Santa Ana Branch

Avoidance Analysis for the Century Freeway-Transitway Historic District

The LPA alignment uses a portion of the UPRR San Pedro Subdivision freight rail ROW from approximately Randolph Street in the north (City of Huntington Park) to Rosecrans Boulevard in the south (City of Paramount). The existing freight rail tracks cross I-105 on a bridge along this route. Residences and light industrial businesses are directly adjacent to the railroad ROW in the areas north and south of the I-105 freeway crossing. To reduce the displacement of existing residents and businesses adjacent to the railroad ROW, the existing freight rail bridge will be demolished and reconstructed immediately to the west to allow room for the construction of a dedicated LRT bridge within the existing railroad ROW and corresponding aerial easement over the I-105 freeway. In addition to a new dedicated LRT bridge, the LPA will also include construction of a Metro C (Green) Line infill station in the median of the I-105 freeway to facilitate transfers between the LPA and C Lines.

Construction of the infill station platform and the construction of two new bridges (for freight rail and LRT) over the freeway in this location directly interfaces with the proposed I-105 ExpressLanes Project, which anticipated and accounted for construction of this infill station as part of its design and environmental compliance processes. The infill station platform will require that the travel lanes on the freeway be reconfigured to use more of the existing freeway ROW and require design exceptions for nonstandard shoulder widths to accommodate the I-105 ExpressLanes modifications.

As stated previously, the existing bridges and C Line alignment are considered contributing elements to the historic district. Thus, the demolition and replacement of the existing freight rail bridge and the construction of a new LRT bridge and new Metro C Line infill station will have implications related to the historic property/historical resource.

The I-105 ExpressLanes Project has obtained Design Exceptions for Nonstandard Outside Shoulder Widths. This allows for the existing four-span Façade Avenue and Arthur Avenue Pedestrian Overcrossings to remain and is a reduction in scope of the WSAB Project since circulation of the Draft EIS/EIR when it was assumed that both the Façade Avenue and Arthur Avenue Pedestrian Overcrossings would require demolition and reconstruction.

Metro explored options to minimize effects to the historic district. Specifically, options to maintain the existing freight rail bridge were considered. An option that would place the proposed LRT tracks on the existing freight rail bridge and construct a new freight rail bridge to the west would require that the LRT tracks be shifted west approximately 5 feet to fit within the existing bridge. This would necessitate that the new freight bridge be constructed farther west to provide sufficient space between the bridges for constructability. These changes would shift the freight alignment approximately 5.5 feet west encroaching into approximately 25 residential properties south of I-105. This would also increase the reverse curves along the freight alignments to the north and south of the freeway, which would not be preferred by UPRR.

An option to maintain freight operations on the existing bridge and construct a new bridge for LRT to the west would have even greater impacts. The LRT double-track alignment requires a wider bridge, which would result in greater ROW impacts to the north and south of the freeway. Additionally, the LRT tracks have been designed to be located to the east of the freight tracks along the San Pedro Subdivision to maintain freight access to industrial properties along the west side. Shifting the LRT to the west of the freight tracks at I-105

would require that the LRT tracks cross over the freight tracks via a bridge structure resulting in increased cost and ROW acquisitions along the narrow UPRR San Pedro Subdivision.

As a result, the LPA alignment within and across I-105 that is evaluated within this report results in the smallest impact to the historical resource and also avoids substantial displacement of nearby residents.

Mitigation Measures

The LPA will result in less than significant impacts to historical resources. In accordance with Project Measure CR PM-1 (SOI Standards Design Review), designs for the following will be reviewed and approved by a professional who meets the SOI PQS in architectural history, history, or architecture to confirm that they remain consistent with the SOI Standards and guidelines for Rehabilitation: extension of the Union Pacific LA River Rail Bridge's existing concrete piers and the new LRT bridge and infill Metro C Line station within the Century Freeway-Transitway Historic District. No additional minimization/mitigation measures are required.

Impacts Remaining After Mitigation

Impacts will be less than significant.

7.1.1.3 Design Option: Close 186th Street

One historical resource is in the vicinity of the design option, the Frampton-Dantema House (MRN 32-021), which is one of two contributors to the Artesia Historic District and is locally significant as a good example of a 1920s Spanish Colonial Revival-style home. Consistent with the LPA without the design option, the LPA with the design option would not physically modify the Frampton-Dantema House. Therefore, it would result in no change to the building's integrity of location, design, materials, or workmanship.

Under the design option, 186th Street would be permanently closed and 187th Street would remain open with an at-grade crossing. Consistent with the LPA without the design option, the LPA with the design option would introduce new permanent visual elements consisting of soundwalls (10 feet tall in areas northwest of the resource and 8 feet tall in its immediate vicinity) and grade-crossing equipment (at the 187th Street at-grade crossing) in the vicinity of the Frampton-Dantema House. While soundwalls and grade-crossing equipment are proposed under the LPA with and without the design option, these elements would be sited closer to the Frampton-Dantema House under the LPA with the design option.

Despite their relative proximity under the LPA with the design option, due to its current surrounding environment, the addition of these visual elements would not significantly diminish the resource's integrity of setting, which includes rail-related infrastructure, feeling, or association. Soundwalls would partially obscure the viewshed of the Frampton-Dantema House. However, the resource's significance is related to its architecture and views to and from the building are not character-defining. Additionally, its current setting is such that the addition of soundwalls and grade-crossing equipment in its vicinity would not result in material impairment, nor would the closure of 186th Street under the design option. Consistent with the LPA without the design option, the LPA with the design option would not alter any of the characteristics of the Frampton-Dantema House that qualify it for local designation. It would not diminish the integrity of the resource's location, design, setting,

materials, workmanship, feeling, and association. Therefore, impacts to historical resources would be less than significant for the purposes of CEQA.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

Impacts would be less than significant.

7.1.1.4 Maintenance and Storage Facility

There are no historical resources within the direct footprint or immediate vicinity of the Bellflower MSF. Therefore, operation of the Bellflower MSF will result in no impact to historical resources.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.1.2 Construction

7.1.2.1 No Project Alternative

Under the No Project Alternative, the Project would not be constructed. The environmental setting would remain in current conditions and no construction-related impacts to historical resources would occur.

Mitigation Measures

No impacts to historical resources would occur as a result of the No Project Alternative. Therefore, no mitigation measures are required.

Impacts Remaining After Mitigation

No impacts would occur.

7.1.2.2 Locally Preferred Alternative

Potential impacts to built environment historical resources during construction of the LPA include those directly related to construction activities, including temporary vibration and visual impacts and temporary property acquisitions and easements. None of these activities are expected to result in a significant impact to historical resources. The construction of the LPA will not physically alter any of the built environment historical resources in the APE for the LPA.

Potential noise impacts related to construction of the LPA were evaluated and presented in the Noise and Vibration Impact Report (2023b) prepared for the Draft EIS/EIR. Similar to noise impacts, potential vibration impacts of the Project were evaluated and presented in the Noise and Vibration Impact Report. The vibration analysis was updated for the LPA and is included in Appendix C of this report. These studies were integrated into the current analysis, which assessed the potential of construction-related noise and vibration to

materially impair historical resources and concluded that no significant impacts will result from the construction of the LPA with mitigation identified pursuant to NEPA (Metro 2023b and Appendix C).

Visual impacts related to construction of the LPA will be temporary, as all construction-related equipment and other related elements will be removed following construction. Similarly, easements necessary to facilitate construction of the LPA will be temporary.

No built environment historical resources will be physically altered by construction of the LPA, and alterations to the setting of historical resources will be temporary. Therefore, construction of the LPA will result in a less than significant impact to built environment historical resources.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

Impacts will be less than significant.

7.1.2.3 Design Option: Close 186th Street

No built environment historical resources are located in the construction footprint associated with the design option. However, one historical resource, the Frampton-Dantema House, is located in its vicinity at 18644 Alburtis Avenue in Artesia. Construction activities associated with the LPA with the design option would be consistent with those described above for the LPA without the design option. While construction may occur closer to the Frampton-Dantema House under the LPA with the design option, potential impacts are consistent for the LPA with and without the design option. Accordingly, Mitigation Measure VIB-6 (Construction Vibration Limits for Historic Properties/Historical Resources) (described in the Noise and Vibration Impact Report) would be implemented during construction to ensure that construction activities near the Frampton-Dantema House would be held to a protective vibration damage threshold and would thereby result in less than significant impacts. Additionally, Mitigation Measure VIB-7 (Construction Monitoring for Vibration Near Historic Properties/Historical Resources) (described in the Noise and Vibration Impact Report), requires monitoring construction vibration levels within 200 feet of historical resources to ensure the vibration damage thresholds would not be exceeded; this measure would be implemented as a precautionary measure. Therefore, construction of the LPA with the design option would result in less than significant impacts to historical resources.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

Impacts would be less than significant.

7.1.2.4 Maintenance and Storage Facility

There are no built environment historical resources within the direct footprint or the general vicinity of the Bellflower MSF. Therefore, construction of the Bellflower MSF will result in no impact to built environment historical resources.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2 Would the Project cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5?

7.2.1 Operation

7.2.1.1 No Project Alternative

Under the No Project Alternative, the Project would not be constructed and no new infrastructure would be built within the direct APE. As there would be no ground disturbance under the No Project Alternative, no impacts to known or unanticipated archaeological resources would occur.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2.1.2 Locally Preferred Alternative

Potential physical impacts related to operation of the LPA will be negligible because there will be minimal, if any, ground disturbance associated with the ongoing maintenance and operation of the LPA. Therefore, there will be no impact to archaeological resources as a result of operation of the LPA.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2.1.3 Design Option: Close 186th Street

Potential physical impacts related to operation of the LPA with the design option would be negligible because there would be minimal, if any, ground disturbance associated with the ongoing maintenance and operation of the design option. Therefore, there would be no impact to archaeological resources as a result of operation of the design option.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2.1.4 Maintenance and Storage Facility

No ground-disturbing activities will occur at the Bellflower MSF site during the operation phase of the LPA. Therefore, no significant impacts to archaeological resources will occur during operation of the MSF.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2.2 Construction

7.2.2.1 No Project Alternative

Under the No Project Alternative, the environmental setting would remain in current conditions and no construction activities associated with the LPA would occur. Therefore, no significant impacts related to archaeological resources would occur under the No Project Alternative.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.2.2.2 Locally Preferred Alternative

No known archaeological resources qualifying as historic properties/historical resources are located within the APE for the LPA. The APE associated with the LPA has a low to moderate sensitivity for archaeological resources. As such, unanticipated archaeological resources may be encountered during ground-disturbing activities associated with construction of the LPA, such as grading, excavation, and trenching. These activities have the potential to physically alter, remove, or destroy buried archaeological resources that may extend into the direct APE. The direct alteration of these unanticipated archaeological resources, if present, could represent a significant direct impact without mitigation.

Mitigation Measures

Implementation of Mitigation Measures CR-1 through CR-4 (described in Section 6) will reduce potential construction-related impacts to unanticipated archaeological resources to a less than significant level.

Impacts Remaining After Mitigation

Impacts will be less than significant with implementation of CR-1 though CR-4.

7.2.2.3 Design Option: Close 186th Street

No known archaeological resources have been documented in the portion of the direct APE where the design option would be located. As such, construction activities associated with the design option would not result in significant impacts to known archaeological resources. It is possible that previously undocumented archaeological resources could be encountered

during construction activities. The direct alteration of unanticipated archaeological resources, if present, could represent a significant direct impact without mitigation.

Mitigation Measures

Implementation of Mitigation Measures CR-1 through CR-4 (described in Section 6) would reduce potential construction-related impacts to unanticipated archaeological resources to a less than significant level.

Impacts Remaining After Mitigation

Impacts would be less than significant with implementation of Mitigation Measures CR-1 though CR-4.

7.2.2.4 Maintenance and Storage Facility

No known archaeological resources have been documented in the portion of the direct APE where the Bellflower MSF site will be located. As such, construction activities associated with the MSF site will not result in significant impacts to known archaeological resources. It is possible that previously undocumented archaeological resources could be encountered during construction activities. The direct alteration of unanticipated archaeological resources, if present, could represent a significant direct impact without mitigation.

Mitigation Measures

Implementation of Mitigation Measures CR-1 through CR-4 (described in Section 6) will reduce potential construction-related impacts to a level of less than significant.

Impacts Remaining After Mitigation

Impacts will be less than significant with implementation of CR-1 though CR-4.

7.3 Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?[7]

7.3.1 Operation

7.3.1.1 No Project Alternative

Under the No Project Alternative, the Project would not be constructed and no new infrastructure would be built within the direct APE. Therefore, no significant impacts to human remains would occur.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

[7] For findings related to traditional cultural property and tribal cultural resources (TCRs), refer to the *WSAB Final Traditional Cultural Properties and Tribal Cultural Resources Impact Analysis Report* (Metro 2023c).

7.3.1.2 Locally Preferred Alternative

Potential physical impacts related to operation of the LPA will be negligible because there will be minimal, if any, ground disturbance associated with the ongoing maintenance and operation of the LPA. Therefore, no impacts to human remains will occur as a result of operation of the LPA.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.3.1.3 Design Option: Close 186th Street

Potential physical impacts related to operation of the LPA with the design option would be negligible because there would be minimal, if any, ground disturbance associated with the ongoing maintenance and operation of the LPA with the design option. Therefore, no impacts to human remains would occur as a result of operation of the LPA with the design option.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts would occur.

7.3.1.4 Maintenance and Storage Facility

No ground-disturbing activities will occur at the Bellflower MSF site during operation of the LPA. Therefore, no impact will occur to human remains during operation of the MSF site.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.3.2 Construction

7.3.2.1 No Project Alternative

Under the No Project Alternative, the environmental setting would remain in current conditions. No ground disturbance would occur. Therefore, no significant impacts to human remains would occur under the No Project Alternative.

Mitigation Measures

No mitigation measures are required.

Impacts Remaining After Mitigation

No impacts will occur.

7.3.2.2 Locally Preferred Alternative

The Survey Report—Rev 1 and Survey Report—Rev 2 did not identity known human remains or historic or prehistoric cemeteries in the direct APE. However, unanticipated human remains located outside of a dedicated cemetery may be unearthed in the direct APE during ground-disturbing activities, including grading, excavation, and trenching. These activities have the potential to physically alter, remove, or destroy buried human remains, if present in the direct APE.

If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the Los Angeles County Coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner is required to notify the Native American Heritage Commission, which will determine and notify a Most Likely Descendant who must complete the inspection of the site within 48 hours of notification and provide recommendations for treatment to the landowner within 48 hours of being granted access. Archaeological and Native American monitors will be present during all ground-disturbing activities with the potential to encounter human remains. Incidental discoveries will be treated in accordance with existing regulation.[8]

Mitigation Measures

Construction of the LPA will result in less than significant impacts to human remains, if present, with adherence to existing state regulations concerning the discovery of human remains, and no mitigation measures are required.

Impacts Remaining After Mitigation

Impacts will be less than significant.

7.3.2.3 Design Option: Close 186th Street

No human remains or cemeteries have been documented in the portion of the direct APE where the design option would be located. As such, construction activities associated with the design option would not result in any significant effects to known human remains or cemeteries. It is possible that previously undocumented human remains could be encountered during construction activities. Adherence to existing State of California Health and Safety Code Section 7050.5 and PRC Section 5097.98 regulations would mitigate potential significant effects associated with construction of the design option on human remains.

Mitigation Measures

Construction of the design option would result in less than significant impacts to human remains, if present, with adherence to existing state regulations concerning the discovery of human remains, and no mitigation measures are required.

[8] The *West Santa Ana Branch Transit Corridor Project Final Traditional Cultural Properties and Tribal Cultural Resources Impact Analysis Report* (Metro 2023c) additionally requires implementation of Mitigation Measures TCR-1 and TCR-2 to reduce impacts to TCRs to less than significant.

Impacts Remaining After Mitigation

Impacts would be less than significant.

7.3.2.4 Maintenance and Storage Facility

No human remains or cemeteries have been documented in the portion of the direct APE where the Bellflower MSF site will be located. As such, construction activities associated with the MSF site will not result in any significant effects to known human remains or cemeteries. It is possible that previously undocumented human remains could be encountered during construction activities. Adherence to existing State of California Health and Safety Code Section 7050.5 and PRC Section 5097.98 regulations will mitigate potential significant effects associated with construction of the Bellflower MSF site on human remains.

Mitigation Measures

Construction of the Bellflower MSF will result in less than significant impacts to human remains, if present, with adherence to existing state regulations concerning the discovery of human remains and no mitigation measures are required.

Impacts Remaining After Mitigation

Impacts will be less than significant.

8 SECTION 106 AND CULTURAL RESOURCES CONSULTATION SUMMARY

As previously noted, the Survey Report—Rev 1 and the Preliminary Cultural Resources Effects Report were circulated with the Draft EIS/EIR. Following circulation of the Draft EIS/EIR, the Survey Report—Rev 1 was updated as described in Section 1.1.2.2. A summary of the consultation that occurred in support of the cultural resources effects assessment, including consultation following release of the Draft EIS/EIR that resulted in updates to the Preliminary Cultural Resources Effects Report, presented in the Final Cultural Resources Effects Report and this Revised Final Cultural Resources Effects Report, is provided in the sections that follow with associated documentation included in Appendix B of this report.

8.1 California Office of Historic Preservation

The following sections summarize the consultation that occurred between FTA and California OHP following circulation of the Draft EIS/EIR.

8.1.1 September 9, 2020 Meeting

On September 9, 2020, representatives from FTA and Metro met with representatives from the SHPO's office to present the preliminary assessment of effects of the Project on the Century Freeway-Transitway Historic District. A PowerPoint presentation was provided by FTA and Metro, which included information about the historic district, described potential changes to character-defining features proposed by the Project, and presented a preliminary Section 106 finding of no adverse effect to the historic district. In response, the representative from the SHPO's office indicated familiarity with the district and noted that there was no objection to the proposed finding of no adverse effect to historic properties. The representative stated that activities can occur within the district that would maintain the premise of why the district is eligible, in particular given that LRT in the median of I-105, high-occupancy vehicle lanes, and the traffic control systems were important and innovative components of the district but are innately dynamic.

8.1.2 Cultural Resources Survey Report—Rev 2 and Subsequent May 22, 2023 Meeting

The Survey Report—Rev 2 was submitted to SHPO on May 11, 2023. On May 22, 2023, representatives from FTA and Metro met with representatives from the SHPO's office to provide updates on the Project. A PowerPoint presentation by FTA and Metro provided updates related to the following: identification of the LPA; updates to the Cultural Resources Survey Report since circulation of the Draft EIS/EIR, including expansion of the APE; and the cultural resources effects assessment with a focus on the anticipated findings for the Century Freeway-Transitway Historic District.

It was noted that the assessment presented to representatives from the SHPO's office during a consultation meeting on September 9, 2020 (summarized in Section 8.1.1 of this document and in the Draft EIS/EIR) preliminarily determined that the Project would have an adverse effect related to archaeological resources. However, it was noted that additional research completed since the Draft EIS/EIR determined that there are no known archaeological resources within the APE associated with the LPA. The Metro team then summarized the updated effects assessment for the Century Freeway-Transitway Historic District, noting that since Metro last met with representatives from the SHPO's office on September 9, 2020,

project effects in the district have been minimized. Specifically, in September 2020, the Project proposed demolition and reconstruction of three bridges within the historic district, whereas now, only one bridge requires demolition and replacement. The Metro team also summarized refinements made to project design and the effects assessment resulting from coordination with Caltrans. These changes include the following:

- Modification to the design of the replacement freight bridge from two spans to four spans, consistent with existing appearance
- SOI Standards design review of the LRT bridge and infill C Line station
- Evaluation of landscaping that will temporarily be removed during construction with a commitment to replace trees at a 1:1 ratio
- Addition of a more robust cumulative impacts assessment

The presentation also summarized consultation with Caltrans that occurred for the Project, which began in December 2021 and at the time of the meeting remained ongoing, and noted the project benefits. The Metro team summarized the conclusion of the updated effects assessment for the Century Freeway-Transitway Historic District, stating that FTA intends to make a finding of no adverse effects to historic properties and indicated that a Memorandum of Agreement will not be required as previously anticipated.

Following the presentation, attendees generally discussed the no adverse effects finding for the Century Freeway-Transitway Historic District. Representatives from the SHPO's office indicated that the effects analysis should focus on why the district was determined eligible for listing in the NRHP under Criteria A and C and additionally noted the following:

- Based on the rationale for eligibility, there should be flexibility regarding what can occur within the district without resulting in an adverse effect determination.
- The Metro C Line in the median of I-105 is important to the district and the modifications to the station proposed are not of concern because the connectivity and presence of transit would be maintained.
- The proposed modifications would add to the functionality of the district and the proposed station modifications are complementary with the context of the district rather than detracting from it.
- Proposed modifications are in keeping with the spirit of why the freeway was developed as it was.

Meeting attendees additionally discussed that, as previously noted in Section 1.1.2.2, one archaeological resource was identified in the Survey Report—Rev 1, but following circulation of the Draft EIS/EIR was determined to no longer be extant, as documented in the Survey Report—Rev 2. Representatives from Metro noted that more than one federal agency is involved in the Project and that FTA is coordinating with USACE for Section 106 and NEPA. It was further noted that FTA is the lead agency for Section 106, and USACE will rely on the FTA process to fulfill the collective responsibilities under Section 106 and support the USACE permits related to the Project.

On June 14, 2023, representatives from the California OHP reached out to FTA via email stating that their review was in process and that clarification was needed regarding the addresses of four properties that were recommended ineligible for listing in the NRHP. FTA provided clarification as requested by representatives from the SHPO's office via email on June 23, 2023. In a letter to FTA dated June 29, 2023, SHPO provided concurrence with

FTA's documentation and delineation of the APE and on FTA's determination of NRHP eligibility of three properties and NRHP ineligibility of 27 properties not included in the Survey Report—Rev 1 but included in the Survey Report—Rev 2 due to the previously described APE expansion. Associated documentation is included in Appendix B.

8.1.3 Cultural Resources Effects Report, January 3, 2024 Meeting and January 4, 2024 Letter

The Final Cultural Resources Effects Report was submitted by FTA to the California OHP on November 17, 2023. On December 14, 2023, FTA was notified by a representative from the SHPO's office that review of the Project was underway and that a response letter could be expected by December 21, 2023. On December 28, 2023, a representative from the SHPO's office requested a meeting with FTA to discuss the Project. The email request indicated that the project reviewer had comments and requests regarding documentation for visual effects that may be helpful to discuss with the FTA/Metro team.

On January 3, 2024, representatives from FTA and Metro met with a representative from the SHPO's office. The purpose of the meeting was to discuss the reviewers' questions related to the potential visual effects of the LPA, as expressed in the above-described email sent on December 28, 2023. The primary focus of the meeting was the potential effect of the LPA on the Union Pacific LA River Bridge (MRN 17-006). During the meeting, the FTA/Metro team shared images of the existing conditions of the bridge and its setting in addition to engineering drawings depicting changes to the debris walls associated with the bridge as a result of implementation of the LPA. Along with the images, the team discussed the bridge's existing conditions, current setting, and developmental history.

The SHPO representative asked whether the bridge's existing debris walls were original to its construction; additional research completed following the meeting indicates that they are not original and were added in circa 1951 as part of the USACE's Los Angeles River Improvement Project (USACE 1951; USACE 1992). This information has been added to the bridge's impacts/effects assessment included in Section 5.2.2.12. During the meeting, participants additionally discussed the SHPO representative's request for a visual aid to depict the existing bridge and the new LRT bridge to compare their scale, mass, and proximity. The potential effects of the LPA on the Rio Hondo Bridge (MRN 18-015) and the San Gabriel River Bridge (MRN 29-022) were also briefly discussed; the FTA/Metro team clarified that neither of these bridges is historic.

The FTA/Metro team also briefly discussed potential visual effects to Pueblo Del Rio (MRN 8-013). After the FTA/Metro team shared photographs of the existing setting surrounding Pueblo Del Rio, the SHPO representative stated that there were no concerns regarding potential visual impacts to the historic property/historical resource and that visual aids were not necessary.

On January 4, 2024, FTA received a letter from the SHPO via email. The letter provided a summary of consultation that had occurred between FTA and SHPO in support of the WSAB Project and the FTA's findings as presented in the Final Cultural Resources Effects Report. The letter requested that FTA submit a revised APE map that denotes APE revisions, in

particular those related to the depth of the geotechnical boring, and additionally made the following comments on the Final Cultural Resources Effects Report:

- "Section 5.2.2.12 Union Pacific Los Angeles River Rail Bridge, South Gate. It is requested that the FTA provide a photo simulation or artistic rendering that illustrates what the new light rail bridge will look like next to the existing historic bridge.
- Section 6.2.1 Development of Cultural Resources Mitigation and Monitoring Program. Because the FTA has presented a finding of no adverse effect for the undertaking, it is recommended that the term mitigation be removed from the report title. Mitigation is more applicable to resolve adverse effects; thus, it may be more appropriate to rename the report to Cultural Resources Monitoring and Discovery Program or something similar.
- Section 6.2.4 Treatment of Unanticipated Discoveries. It appears that the FTA is proposing to develop and implement the Cultural Resources Mitigation and Monitoring Program in accordance with 36 CFR § 800.13(a)(2). As such, the SHPO requests the opportunity to review and comment on the draft Cultural Resources Mitigation and Monitoring Program prior to its implementation. This review would give the SHPO an opportunity to provide comment on FTA's proposed measures to identify and treat post-review discoveries should they occur during construction activities."

In response to the January 4, 2023, letter, the following changes have been made to this Revised Final Cultural Resources Effects Report.

- APE Map: The APE map included in Appendix A of this Revised Final Cultural Resources Effects Report now includes the following footnote: "Note: The vertical extent of the APE for the LPA extends from 150 feet below grade to 90 feet above grade."
- Section 5.2.2.12 Union Pacific Los Angeles River Rail Bridge, South Gate: As requested, several visual aids (one plan view on an aerial image depicting the existing and proposed bridges [Figure 5-14], one rendering depicting a cross section of the existing and proposed bridges [Figure 5-15], two photographs showing current ground-level views of the existing bridge, with associated renderings showing proposed future ground-level views of the existing and proposed bridges [Figure 5-16, Figure 5-17, Figure 5-18, and Figure 5-19] have been added to Section 5.2.2.12 of the Revised Final Cultural Resources Effects Report to illustrate the new LPA bridge adjacent to the existing historic bridge. Additionally, minor text clarifications have been added throughout the analysis included in this section to note that the current debris walls are not original to the bridge.
- Section 6.2.1 Development of Cultural Resources Mitigation and Monitoring Program (CRMMP): As requested, the title of the program required by Mitigation Measure CR-1 has been updated from CRMMP to CRMDP and no longer includes the term "mitigation."

Section 6.2.4 Treatment of Unanticipated Discoveries: Mitigation Measure CR-4 has been updated to indicate that, if the preparation of a treatment plan is required, it will be prepared in accordance with 36 Code of Federal Regulations § 800.13(a)(2) in consultation with the SHPO.

8.2 United States Army Corps of Engineers

The following sections summarize the consultation that occurred among FTA, Metro, and the USACE following circulation of the Draft EIS/EIR.

8.2.1 USACE Comments on the Draft EIS/EIR

The Project crosses three river channels under the jurisdiction of the USACE (i.e., LA River Channel, Rio Hondo Channel, and San Gabriel River Channel). Therefore, the USACE provided comments on the Draft EIS/EIR in a letter dated October 6, 2021, and submitted to FTA and Metro during the circulation period for the Draft EIS/EIR. In the letter, USACE designated FTA the lead federal agency under Section 106 [36 CFR 800.2(a)(2)], delegating its Section 106 responsibilities to FTA. Additionally, the USACE provided comments related to the three river channels within the APE—the LA River Channel (portion), the Rio Hondo Channel (portion), and the San Gabriel River Channel (portion)—stating that their NRHP eligibility should be considered by the Project and effects assessed as appropriate. In particular, the USACE provided the following comment:

> The LA River channel (as-builts dated 1950, last modified in 1952), Rio Hondo channel (as-builts dated 1950, last modified in 1952), and San Gabriel River channel (possibly constructed in 1964) are considered elements of the built environment. It does not appear that these were evaluated for eligibility to be listed in the National Register of Historical Places. These channels should be described and evaluated for eligibility in the Cultural Resources Survey Report (Appendix W) and the Cultural Resources Effects Report (Appendix X) pursuant to 36 CFR 60.4. If any of these channels are determined to be eligible, the effects should be described in the Cultural Resources Effects Report as well as in Section 4.14 of the Draft EIS.

USACE additionally requested clarification related to the eligibility of the UPRR Bridge (MRN 17-006) and SCE's Long Beach-Laguna Bell 66kV and 220 kV transmission lines (MRN 18-016).

8.2.2 Update of Survey Report—Rev 2 and Effects Report

Continued communication and coordination with the USACE since submission of its comment letter indicated that the LA River Channel, Rio Hondo Channel, and San Gabriel River Channel were determined eligible for listing in the NRHP and received SHPO concurrence in 2022; they are therefore considered historic properties for the purposes of Section 106 and historical resources per CEQA. As a result, the Survey Report—Rev 2 was updated to address the historical significance of the LA River Channel (MRN 17-007), the Rio Hondo Channel (MRN 18-017), and the San Gabriel River Channel (MRN 29-025) and to note their determination of eligibility. USACE was provided the opportunity to review and comment on the Survey Report—Rev 2, which included identification of the three river channels as historic properties/historical resources. Accordingly, this Effects Report includes an effects assessment of the LPA on each of these river channels in the following sections: LA River Channel in Section 5.2.2.13, Rio Hondo Channel in Section 5.2.2.16, and San Gabriel River Channel in Section 5.2.2.21.

8.2.3 USACE Comments on the Effects Report

Following integration of the above-noted effects assessments, USACE reviewed an updated version of the Effects Report. In response to their review, the USACE provided minor comments and requests for clarification, in addition to the following recommendations:

- Recommended eliminating the direct and architectural APE and combining into one APE
- Clarify that no "known" subsurface archaeological resources have been identified, rather than no archaeological resources throughout the report

Regarding the first comment, Metro contacted USACE and explained that the APEs for the Project were originally delineated prior to recent ACHP guidance (ACHP 2019) and that despite differences in terminology, potential effects were adequately assessed. Additionally, Metro noted that the APE delineation methodology was developed in coordination with FTA and California OHP. After the discussion, the representative from USACE confirmed that if SHPO concurred on the APE delineation, then no changes were needed.

In response to the second comment, the report has been updated to clarify that no known archaeological resources have been identified within the APE. References to the potential for unanticipated discoveries have also been clarified as applicable. Responses to the comments were provided to USACE on July 6, 2023. On July 19, 2023, USACE informed Metro that they have no further comments on the Effects Report. Appendix B includes the comments received from USACE and responses.

8.3 California Department of Transportation

The following sections summarize the consultation that occurred among FTA, Metro, and Caltrans following circulation of the Draft EIS/EIR.

8.3.1 Caltrans Comments on the Draft EIS/EIR

Caltrans provided comments on the Draft EIS/EIR in a letter dated September 28, 2021, which was submitted to FTA and Metro during the circulation period for the Draft EIS/EIR. In the letter, Caltrans requested consulting party status for the Project under Section 106, pursuant to 36 CFR Section 800.2(a)(2), 800.2(c)(5), and 800.3(f)(3) based on consideration of the Century Freeway-Transitway Historic District (MRN 21-027). The comment letter also included several detailed comments related to the Project's potential to affect/impact the Century Freeway-Transitway Historic District which are included below for reference.

> "In Section 5, Effects/Impacts Analysis section of the technical report, please elaborate on the effects or impacts caused by the proposed project to the Century Freeway-Transitway Historic District. Caltrans disagrees that "The construction and operation of Alternatives 1, 2, 3, and 4 would result in no adverse effect/less than significant impacts to this historic property/historical resource and no minimization/mitigation measures are required" (page 5-166), given the proposed demolition of three contributing bridges and landscape and changes to the contributing light rail or to the mainline of the freeway lanes, which are each historic fabric of and were identified as contributing features to the Century Freeway-Transitway Historic District."
>
> "Caltrans finds that the effects and impacts expected to be caused by the proposed project were not adequately discussed, and no build alternatives were analyzed that would avoid or

lessen the effects and impacts that would be caused to the Century Freeway-Transitway Historic District. If the effects on to the Century Freeway-Transitway Historic District had been more thoroughly analyzed, the proposed project build alternatives would likely have been found to cause an adverse effect or impact to the historic district. Please revise the documents to adequately analyze the impacts of the project on the Century Freeway-Transitway Historic District."

"The term "reconstruction" is misused in the technical document and is potentially misleading in the context of historic preservation practice and actual project plans and measures. The National Park Service directs "Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location" (The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, 2017). Reconstruction as a treatment is not applicable to extant contributing features that are proposed for demolition and would subsequently be constructed in different configurations. "Rehabilitation" is likely the appropriate treatment to be used in designing the proposed new bridges. Each of the three bridges, Façade Avenue Overcrossing, Century Boulevard UP and Arthur Avenue Pedestrian and Utility Overcrossing unless specified otherwise, can be expected to be replaced by bridges that possess different characteristics than the existing bridges including visual qualities, including overall appearances, widths, distances among them, immediate and surrounding settings, materials, workmanship and in some cases, uses of the existing bridges."

In response to the above-noted comments, meetings among Caltrans, FTA and/or Metro were held on December 7, 2021, April 21, 2022, February 9, 2023, and March 2, 2023, to discuss Caltrans' comments related to the Project's potential to impact/effect the historic district. These meetings, along with written correspondence between Metro and Caltrans, are summarized in the sections that follow.

8.3.2 December 7, 2021 Meeting

The December 7, 2021, meeting was attended by representatives from Caltrans, including a PQS Architectural Historian, FTA, and Metro, including Metro's PQS Architectural Historians. The purpose of the meeting was to provide Caltrans with an overview of the Project and discuss their comments related to the historic district. In the meeting, Caltrans staff stated that the comments in the letter they sent to FTA and Metro were related to CEQA and not directed at Section 106 compliance. Additionally, the following are the primary comments raised by Caltrans in the meeting:

- Potential for a substantial adverse change and material impairment to occur as a result of bridge demolition proposed by the Project
- Lack of information in analysis related to the design of the new bridges proposed by the Project
- Lack of Secretary of the Interior qualified design review
- Lack of discussion of landscaping
- Potential for cumulative impacts to occur as a result of the Project and future projects combined

Caltrans provided the following recommendations aimed at addressing their comments:

- Use the CEQA checklist as a guideline
- Address potential impacts to landscaping
- Integrate the Project's alternative analysis into the cultural resources assessment
- Further consider substantial adverse change
- Review the finding of effect for the I-105 ExpressLanes project for guidance

8.3.3 April 21, 2022 Meeting

The April 21, 2022, meeting was attended by representatives from Caltrans, including a PQS Architectural Historian, FTA, and Metro, including Metro's PQS Architectural Historians. The purpose of the meeting was to provide Caltrans an overview of the Project and an update of the analysis that had occurred since the December 7, 2021, meeting. Metro and FTA gave a PowerPoint presentation that described the Project, in particular as it relates to the historic district, and presented the WSAB project team's preliminary impact assessment, noting that the team's preliminary findings were that the Project would not result in a substantial adverse change in the significance of the Century Freeway-Transitway Historic District or in its material impairment. Following the presentation, several topics, most notable the following, were discussed by the team.

- The proposed station's design
- Details of the 1:1 replacement ratio (for trees and shrubs) that will be implemented by the Project
- The potential applicability of PRC 5024 due to the fact that the district is a state-owned resource
- The status of the Project's design, including details relating to the proposed replacement freight bridge and involvement of UPRR in the design

8.3.4 January 24, 2023 Memorandum and February 9, 2023 Meeting

Caltrans provided Metro with a memorandum on January 24, 2023, following review of an updated, draft CEQA evaluation for the Century Freeway-Transitway Historic District. Metro held a meeting with Caltrans on February 9, 2023, to discuss the memorandum and its contents and discuss a path forward. The meeting included discussion of the CEQA Guidelines and their interpretation. Caltrans cultural resources staff provided hypotheticals and examples to illustrate application of the CEQA Guidelines; however, interpretation of the CEQA Guidelines differed between Metro and Caltrans. Caltrans stated that any demolition, alteration, or relocation of resources and changes to the setting of I-105 would result in a substantial adverse change, and Caltrans could not identify any potential mitigation that would reduce the impacts to less than significant.

Caltrans requested the following:

- Details on alternatives that would avoid demolition of the freight bridge
- Metro change its findings to note that the Project would have a significant impact under CEQA
- Changes to the design to consider the number of bent piers and bridge spans, glare of soundwalls, overall aesthetics, and freight bridge design
- Improved landscaping analysis to provide the specific number of trees and species to be impacted

8.3.5 March 2, 2023 Meeting

A follow-up meeting with Caltrans and Metro, which included Metro outside legal counsel, was held on March 2, 2023. The purpose of the meeting was to have Metro counsel respond to Caltrans' comments regarding their interpretation of the CEQA Guidelines. Caltrans cultural resources staff disagreed with Metro's attorneys' interpretation of the law and restated its position from the February 9, 2023, meeting. Metro agreed to add additional detail to the CEQA analysis previously requested by Caltrans; however, parties still differed on CEQA interpretation.

8.3.6 Communication Related to 12508 Center Street (MRN 21-008)

Following the March 2, 2023, meeting, a representative from Caltrans contacted Metro via email to request an updated version of the Survey Report—Rev 2. In the email, the Caltrans representative additionally stated "In reviewing the June 2023 project Cultural Resources Effects report, it was noted that the property at 12508 Center Street, in South Gate which is proposed for demolition for the new Park and Ride station was not evaluated for historic significance in our previous editions of the WSAB survey." In response, Metro sent Caltrans an email on July 18, 2023, explaining that 12508 Center Street in South Gate (MRN 21-008) was recorded, evaluated, and determined ineligible for listing in the NRHP with SHPO concurrence in 2006. Metro then explained that in accordance with the WSAB methods for the assessment of previously recorded properties, the property was field checked during the built environment survey completed for the Project in 2018 and an updated DPR form was prepared. Metro included a summary of the information included on the DPR form and attached a copy of the DPR update prepared for the Project, along with the 2006 DPR form, which are also included in Appendix F of the Survey Reports Rev 1 and Rev 2.

Caltrans responded via email on July 18, 2023, stating that the versions of the Survey Report they were provided did not include an MRN associated with 12508 Center Street. The email noted the property's location "immediately adjacent" to the Century Freeway-Transitway and expressed that the property is part of the historic district's larger setting. Metro responded via email on July 20, 2023, stating that the property at 12508 Center Street was identified and referred to in all reports and correspondence prepared in support of the Project as MRN 21-008 and provided a Dropbox link that included the following documents for Caltrans: Survey Report—Rev 1, Preliminary Effects Report, Survey Report—Rev 2, letter from FTA to SHPO seeking concurrence on Survey Report—Rev 2, and the concurrence letter received from SHPO on the Survey Report—Rev 2. The email additionally provided several bullet points related to the larger setting of the Century Freeway-Transitway Historic District, including information summarized from the DPR form prepared for the Century Freeway-Transitway regarding the setting and viewsheds.

8.3.7 Updates Based on Caltrans Consultation

In response to the above-noted comments and meetings, the Survey Report—Rev 2 was updated to provide a more thorough description of the historic district, relying on information and previous documentation compiled by Caltrans. Additionally, this Effects Report includes a more robust effects/impacts assessment of the LPA on the Century Freeway-Transitway Historic District (refer to Section 5.2.2.18 for the effects assessment and Section 7.1.1.2 for the

impacts assessment), integrating the recommendations of Caltrans. Based on Caltrans's input, the following revisions were made to the analysis included in this report:

- The replacement freight bridge will be four spans and concrete, consistent with the current bridge (previously, a two-span bridge was proposed).
- The potential effects of the LPA on the I-105 are more thoroughly analyzed.
- The term "reconstruction" has been removed from the analysis.
- The design of proposed bridges is described in further detail.
- The analysis now indicates that designs for the proposed new LRT bridge and Metro C Line station will undergo SOI Standards design review in accordance with Project Measure CR PM-1 (SOI Standards Design Review).
- The analysis now indicates that landscaping removed by the LPA will be replaced at a 1:1 ratio and the number of trees potentially effected has been quantified.
- Potential cumulative impacts of the LPA and future projects are more thoroughly discussed in Section 5.3.
- The potential for substantial adverse change on the district as a result of the LPA has been more thoroughly considered, relaying on the CEQA Guidelines and several documents compiled by Caltrans, including the ExpressLanes FOE, for guidance.

8.3.8 August 24, 2023 Letter

On August 2, 2023, Metro provided Caltrans a copy of the draft Effects Report for review. Caltrans provided comments to Metro in a letter dated August 24, 2023; a representative from California OHP was copied on the letter. In the letter, Caltrans stated that it is the opinion of Caltrans District 7 that the project does not meet the SOI Standards for the Treatment of Historic Properties and will therefore cause an adverse effect under Section 106 and a significant impact under CEQA. Additionally, Caltrans noted that the boundaries of the district were not accurately depicted.

In response to the letter, the boundaries of the historic district shown on Figure 5-31 were revised to encompass the character-defining North Somerset Ranch Road and South Somerset Ranch Road ramps, as well as bridge approaches and abutments, landscaping, and graded slopes. While these areas were not previously depicted as within the boundaries of the historic district due to a discrepancy in aerial imagery overlay, all portions of the historic district where potential effects/impacts could occur were included in the APE delineated for the Project and were accounted for in the analysis in the Effects Report.

8.3.9 September 27, 2023 Meeting

Metro met with representatives of Caltrans on September 27, 2023, to discuss the August 2023 letter. Metro provided a presentation and summarized changes made to the Project and cultural resources analysis as a result of consultation with Caltrans. Notable changes included: avoiding the demolition of two bridges within the historic district, review for the LRT bridge and infill station to SOI standards, modifying the design of the replacement freight bridge from 2 span to 4 span consistent with the existing bridge, replacing trees removed during construction at a 1:1 ratio, and providing a more robust analysis including for cumulative impacts. Metro also summarized consultation with SHPO. The presentation also compared effects of the WSAB Project and ExpressLanes Project and highlighted that the WSAB conclusions were consistent with those for the ExpressLanes Project. The presentation slides were provided to Caltrans following the meeting.

8.3.10 October 6, 2023 Letter

On October 6, 2023, Metro received a letter from Caltrans, with a representative from the California OHP office copied. The letter stated that "based on conversations between the project team and Caltrans, Metro has incorporated design changes that we feel meet the Secretary of the Interior's Standards for Rehabilitation." It enumerated the following changes:

- The demolition of only one bridge versus three as earlier proposed.
- The replacement Century Boulevard freight bridge will be 4 spans instead of 2 spans. Its overall design, massing, scale, color, and materials will approximate the features of the original bridge by integrating a relief consistent with that present on character-defining bridges throughout the district.
- The new LRT bridge will be designed in conformance with the SOI Standards.
- The design of the infill station in the median of the I-105 design will be approved by a SOI qualified professional as design advances.
- Trees removed as a result of the project will be replaced at a 1:1 ratio.

Further, the letter stated the following: "Caltrans appreciates the collaboration with Metro and does not object to your Finding of No Adverse Effect for the project, particularly with regard the Century Freeway-Transitway Historic District. As Caltrans has responsibilities for historical resources in their right of way under PRC 5024, we do request review of a Secretary of the Interior's Standards (SOIS) Action Plan as design of the project advances. A copy of the final Plan will be required before Caltrans can approve an encroachment permit for the project. In addition, Caltrans does not object to the conclusion in the Updated Report's CEQA section that the proposed project would not alter the historic district such that it would be materially impaired."

Coordination with Caltrans will continue as the project design progresses.

9 CONCLUSION

The cultural resources effects/impacts analysis was completed to assess the potential adverse effects/significant impacts of the WSAB Transit Corridor Project on the archaeological and built environment historic properties and historical resources identified in *Survey Report–Rev 2*. The study summarized in this report included an assessment of effects/impacts of a No Build Alternative and the LPA, including station locations, and an MSF site. The Survey Report—Rev 2 identified the following in the APE for the LPA:

- Zero known archaeological historic properties/historical resources
- Eight built environment historic properties/historical resources previously listed in or determined eligible for listing in the NRHP
- Eleven built environment historic properties/historical resources that were determined eligible for listing in the NRHP
- Three built environment historical resources that do not qualify as historic properties under Section 106 due to their ineligibility for NRHP listing and are only considered resources for the purposes of CEQA

Potential effects to these identified historic properties were assessed using the standards for federal undertakings as described in Section 106 of the NHPA and its implementing regulations, 36 CFR Part 800. As a result of this study, the LPA was found to have no adverse effect on built environment historic properties. Further, given that no known archaeological resources were identified in the APE, the LPA was found to have a finding of no historic properties affected for archaeological historic properties.

In accordance with CEQA, the LPA will not result in potentially significant impacts to known archaeological resources or the identified built environment historical resources in the APE. The LPA will therefore have a CEQA finding of a less than significant impact on historical resources. Implementation of Mitigation Measures CR-1 through CR-4 (described in Section 6) will reduce potential construction-related impacts to unknown archaeological historical resources to a level of less than significant.

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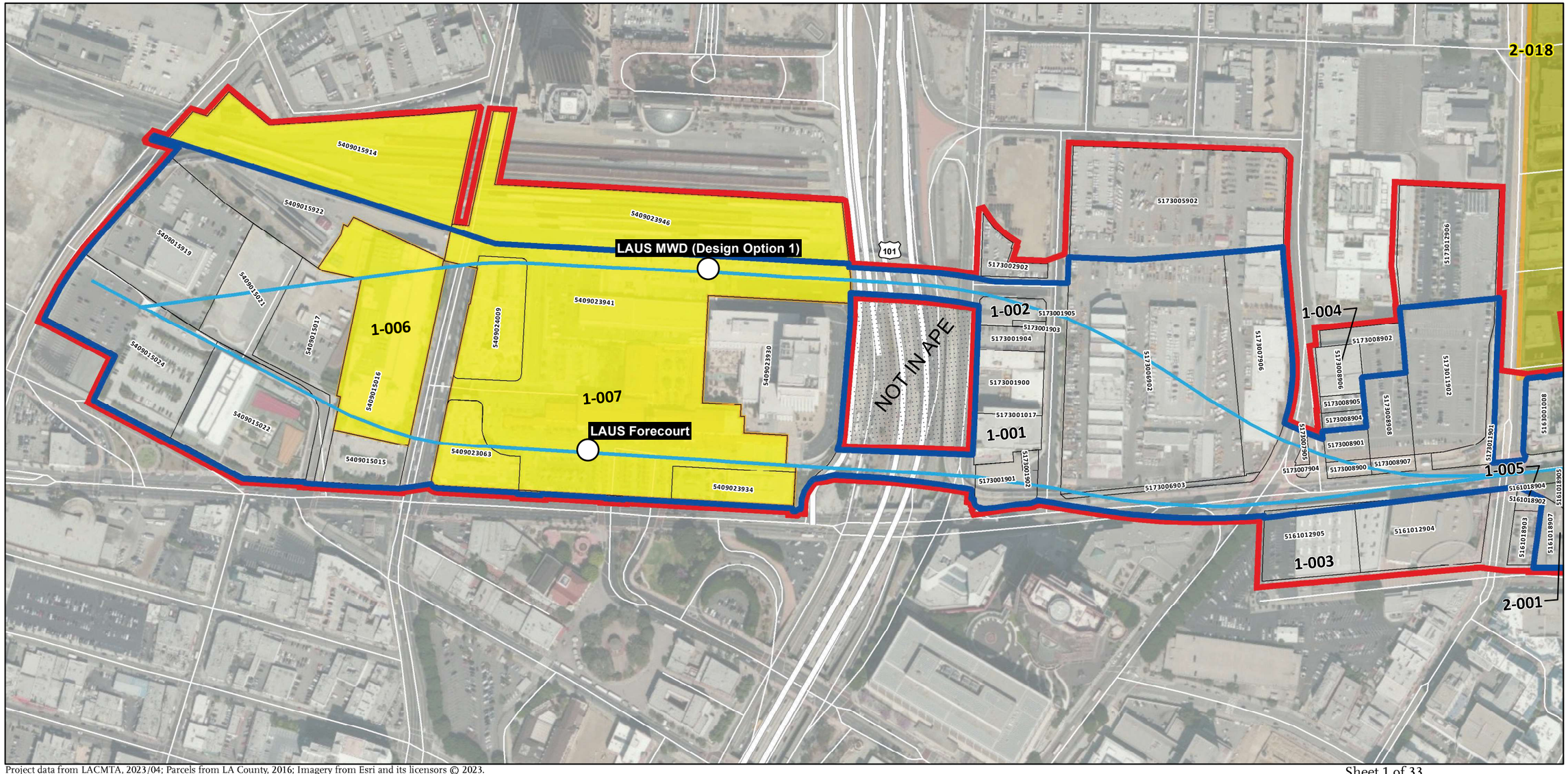
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APPENDIX A – CULTURAL RESOURCES APE MAP



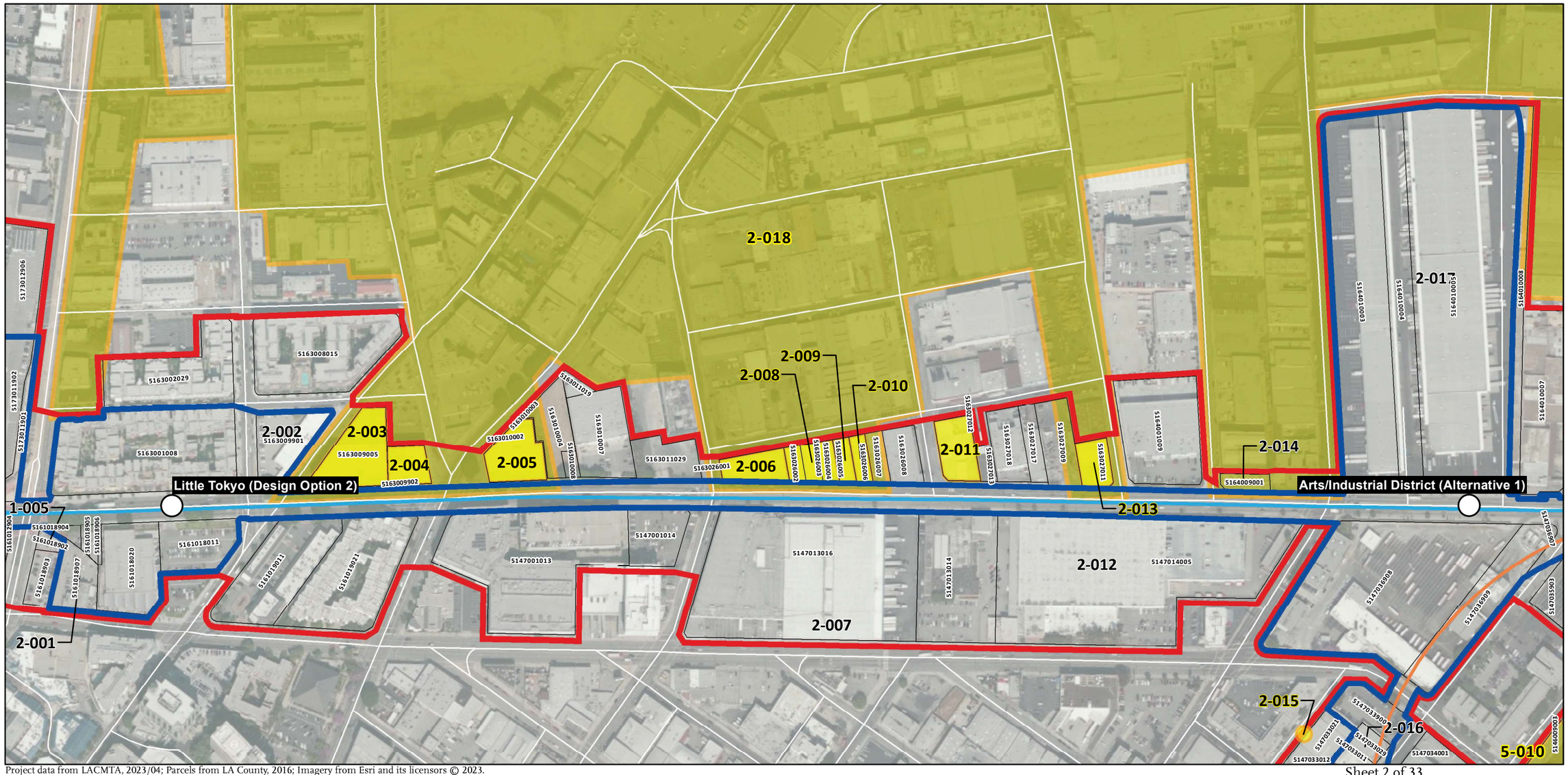
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- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP
- Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP

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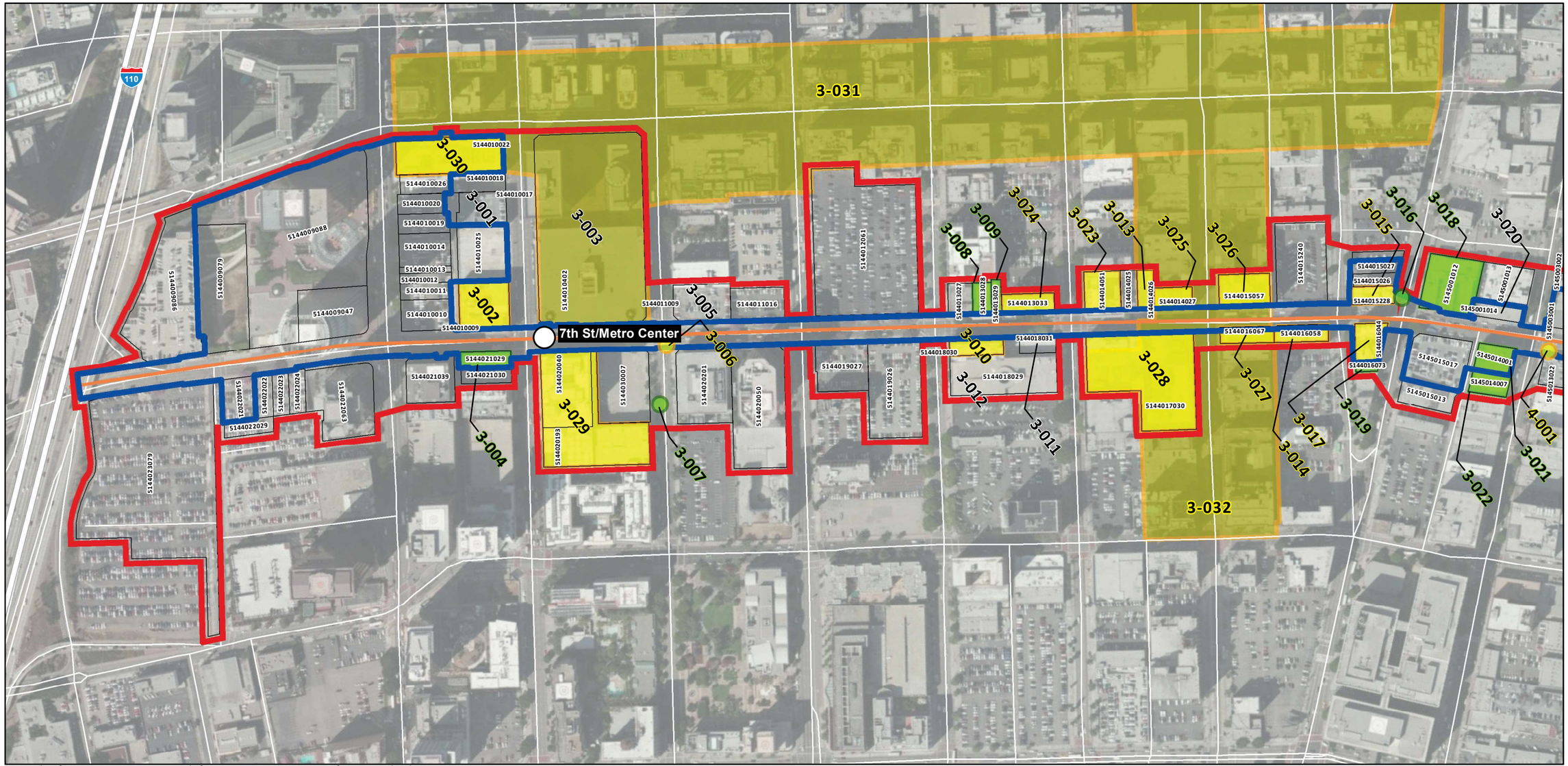
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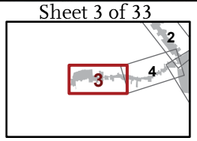
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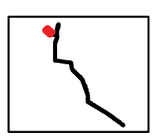
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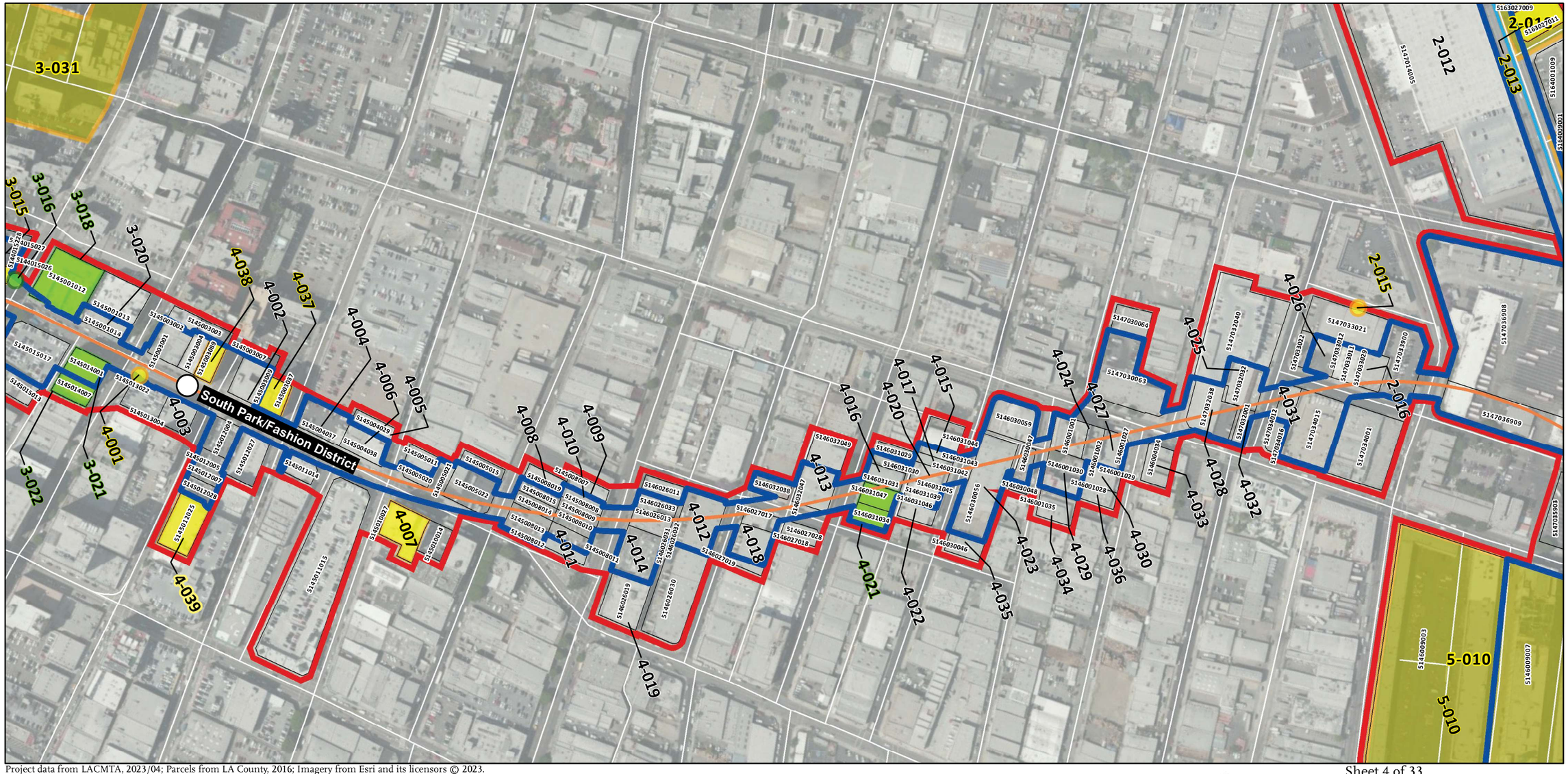
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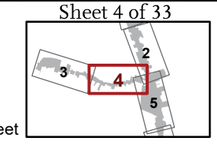
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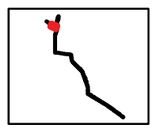
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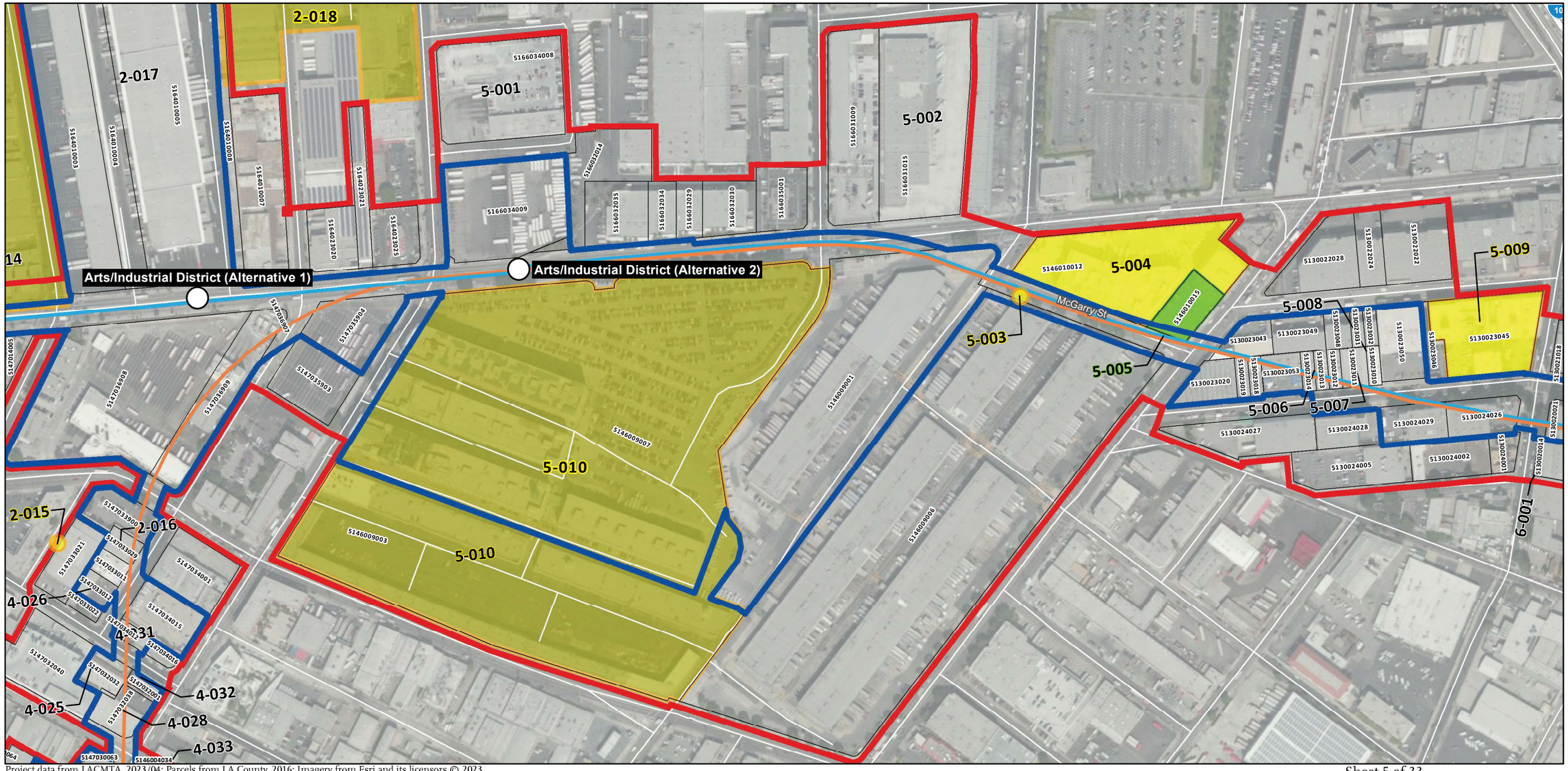
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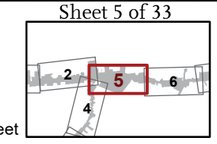


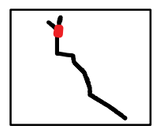
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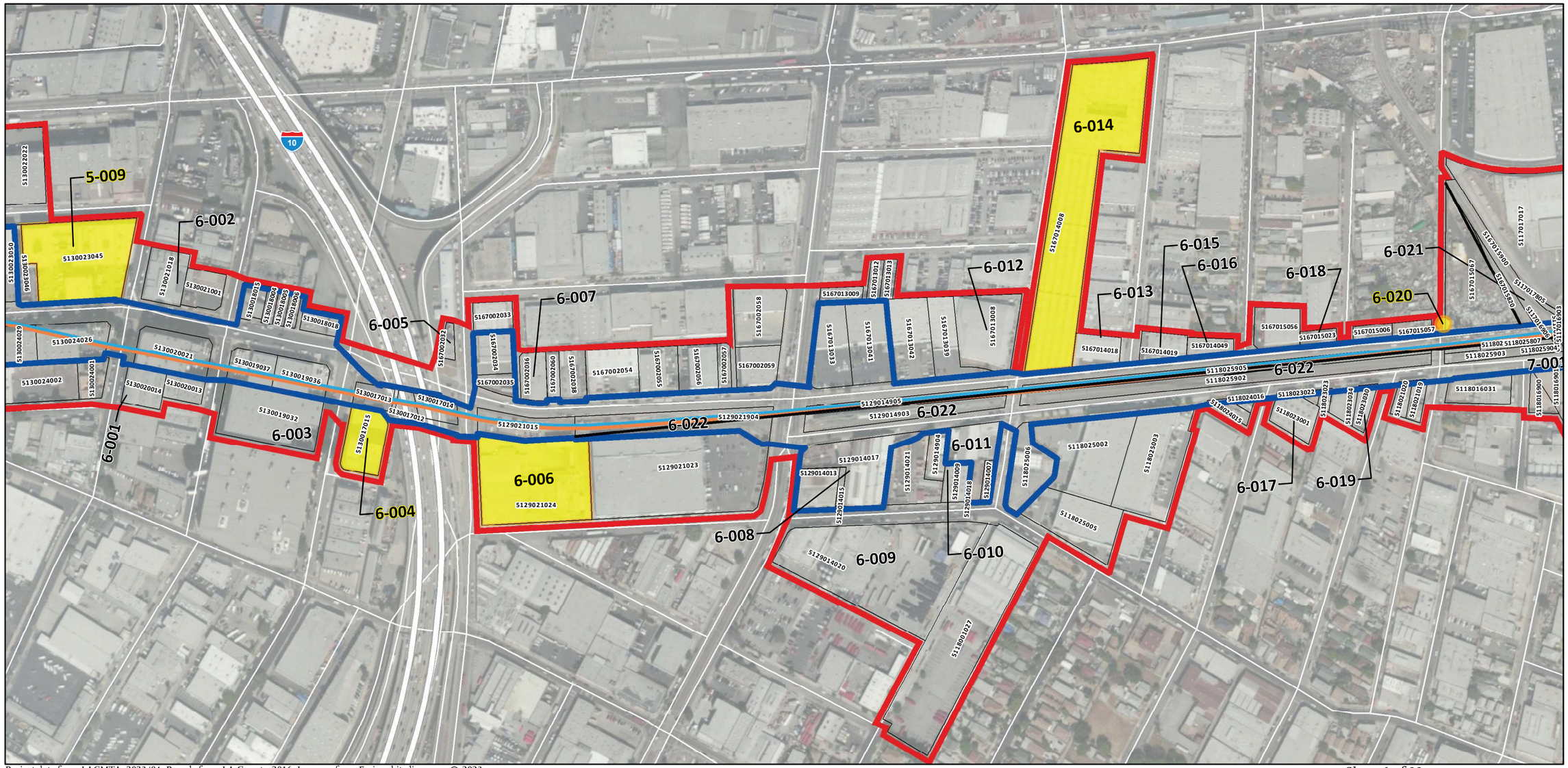
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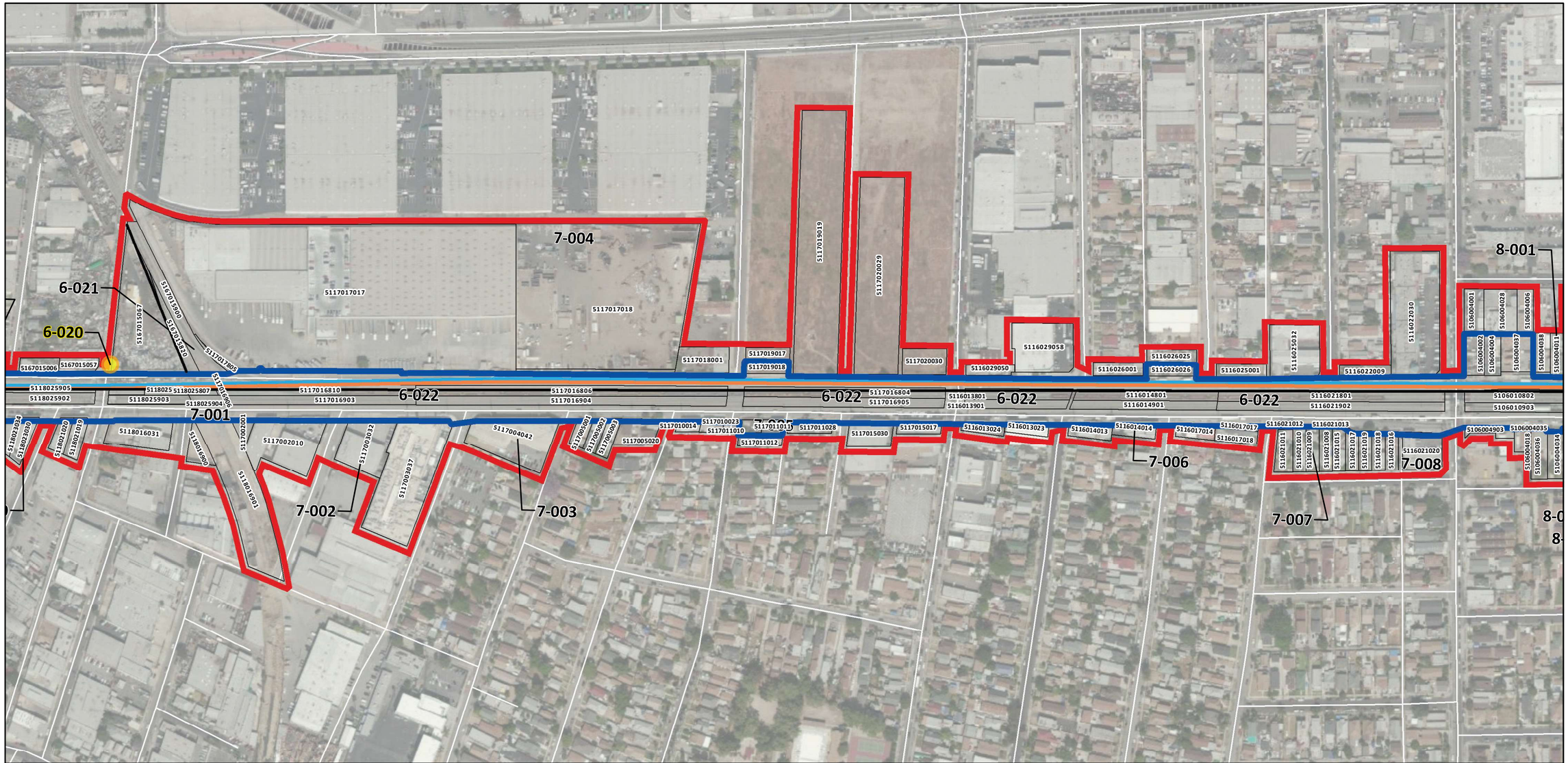
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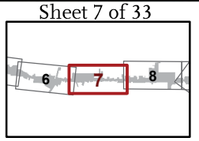
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

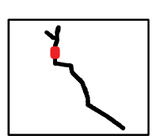
Direct APE
Architectural APE
Parcels
Alternative 1: Union Station to Pioneer
Alternative 2: 7th St/Metro Center to Pioneer
Non-Parcel Resource Listed in and/or eligible for listing in the NRHP

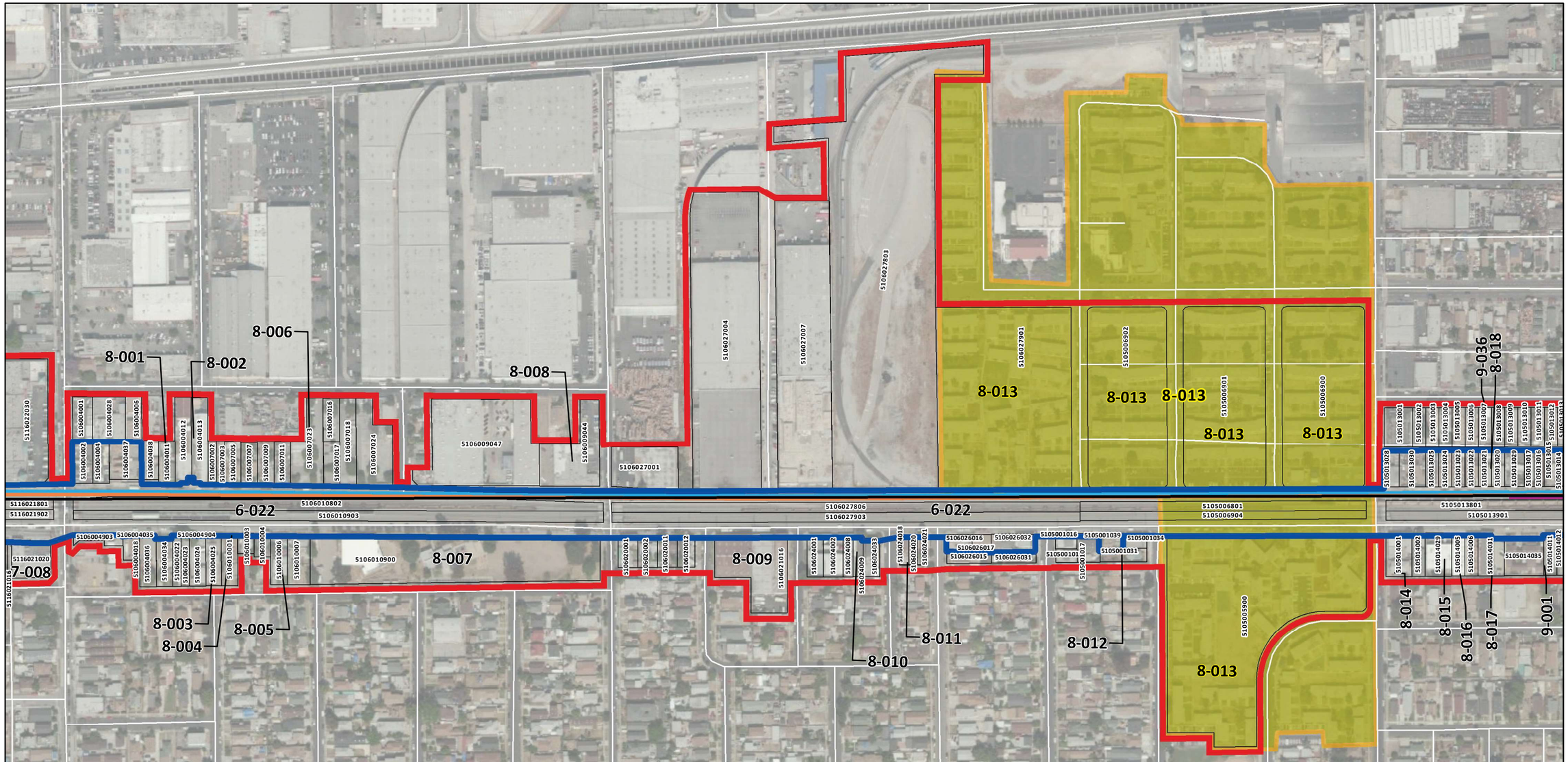
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Sheet 7 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

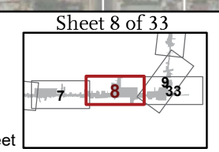
- Direct APE
- Architectural APE
- Parcels
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP

Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

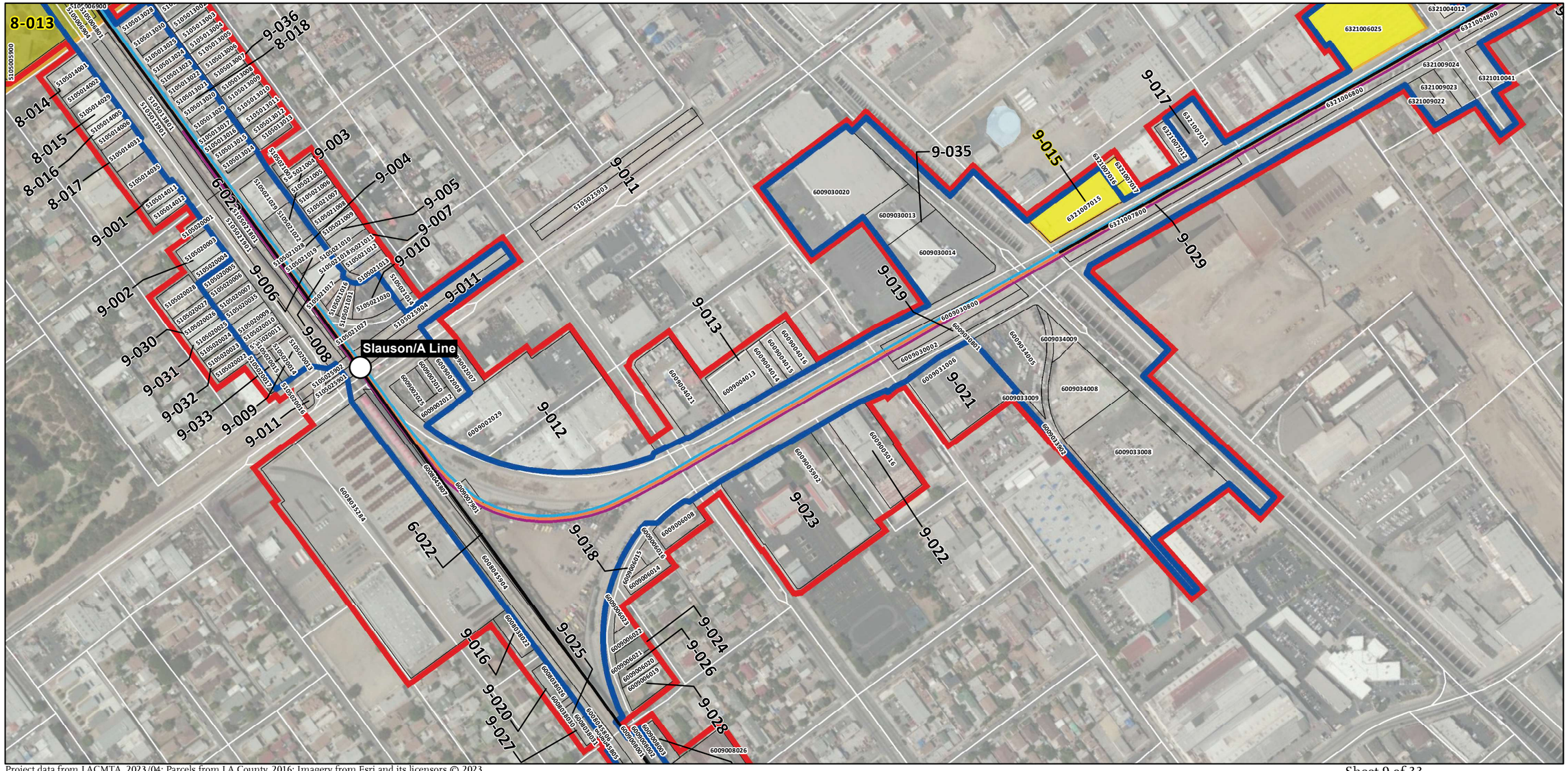
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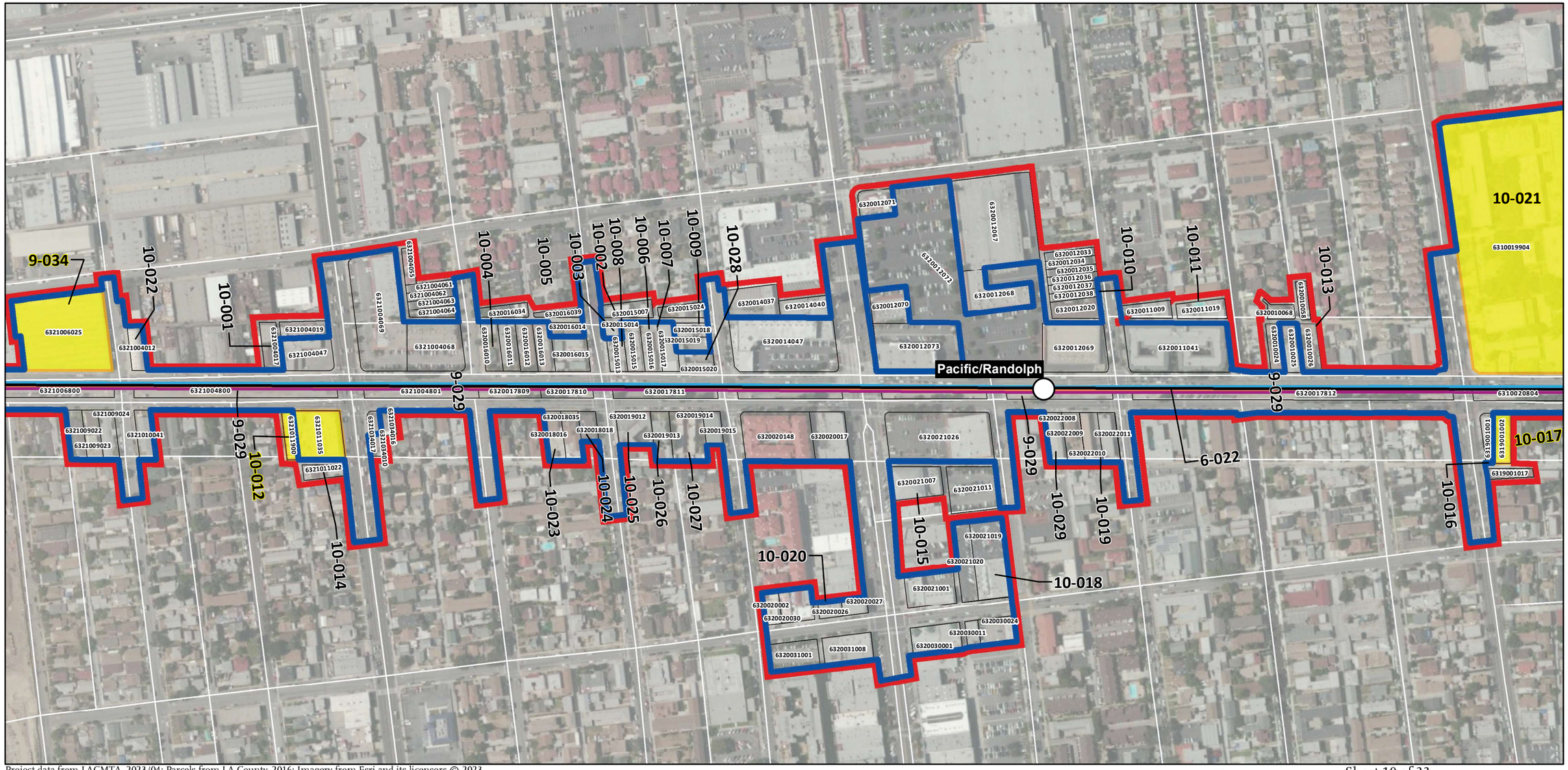
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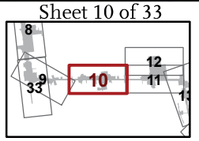
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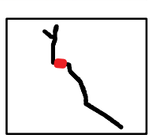
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP

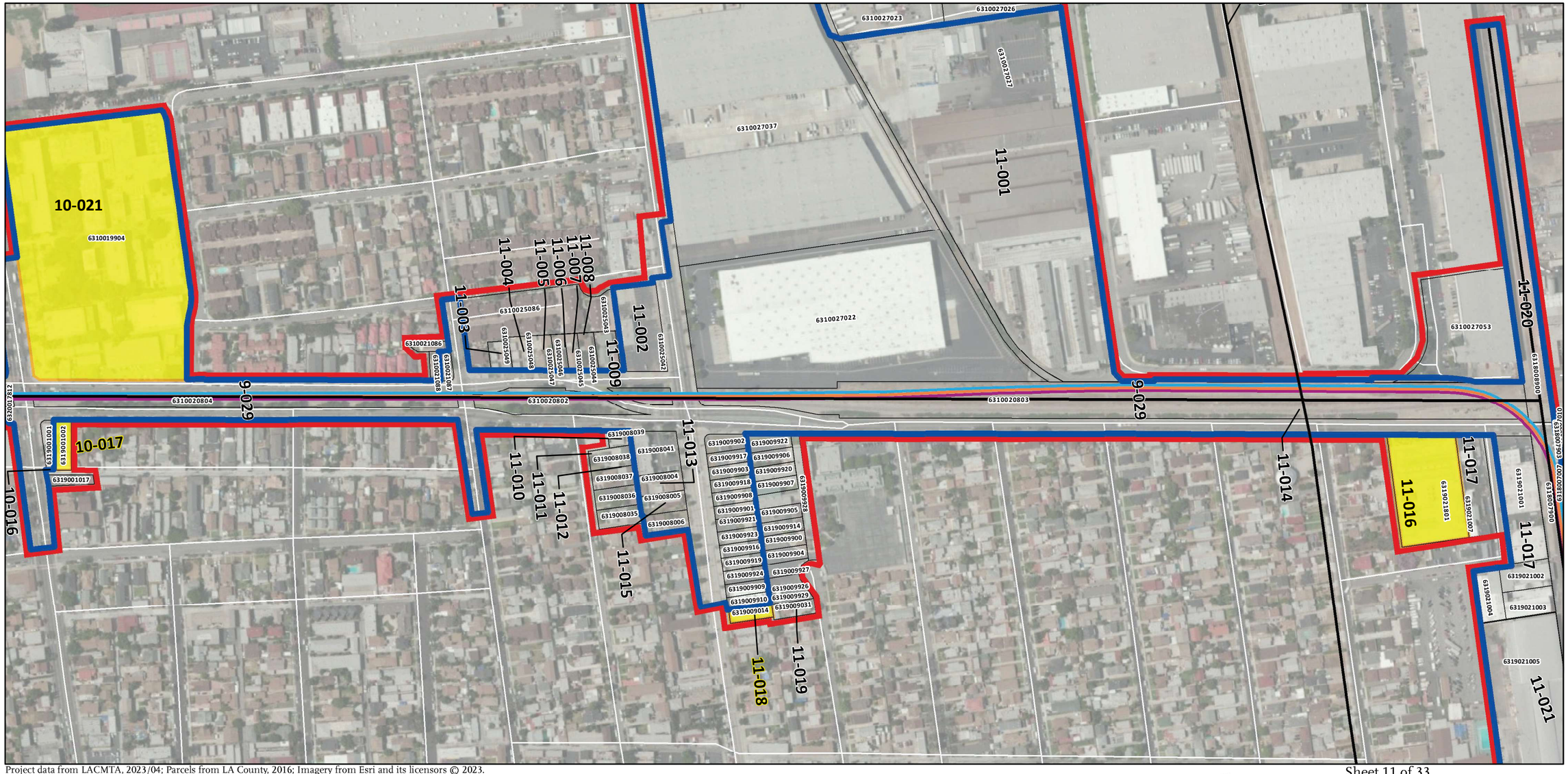
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

N

0 100 200 300 Feet







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

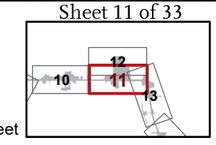
- Direct APE
- Architectural APE
- Parcels
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP

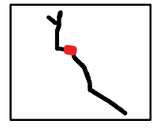
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

N

0 100 200 300 Feet

Sheet 11 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Direct APE

Architectural APE

Parcels

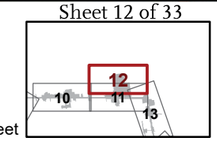
Property Listed and/or Eligible for Listing in the NRHP

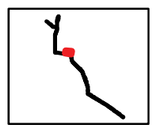
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

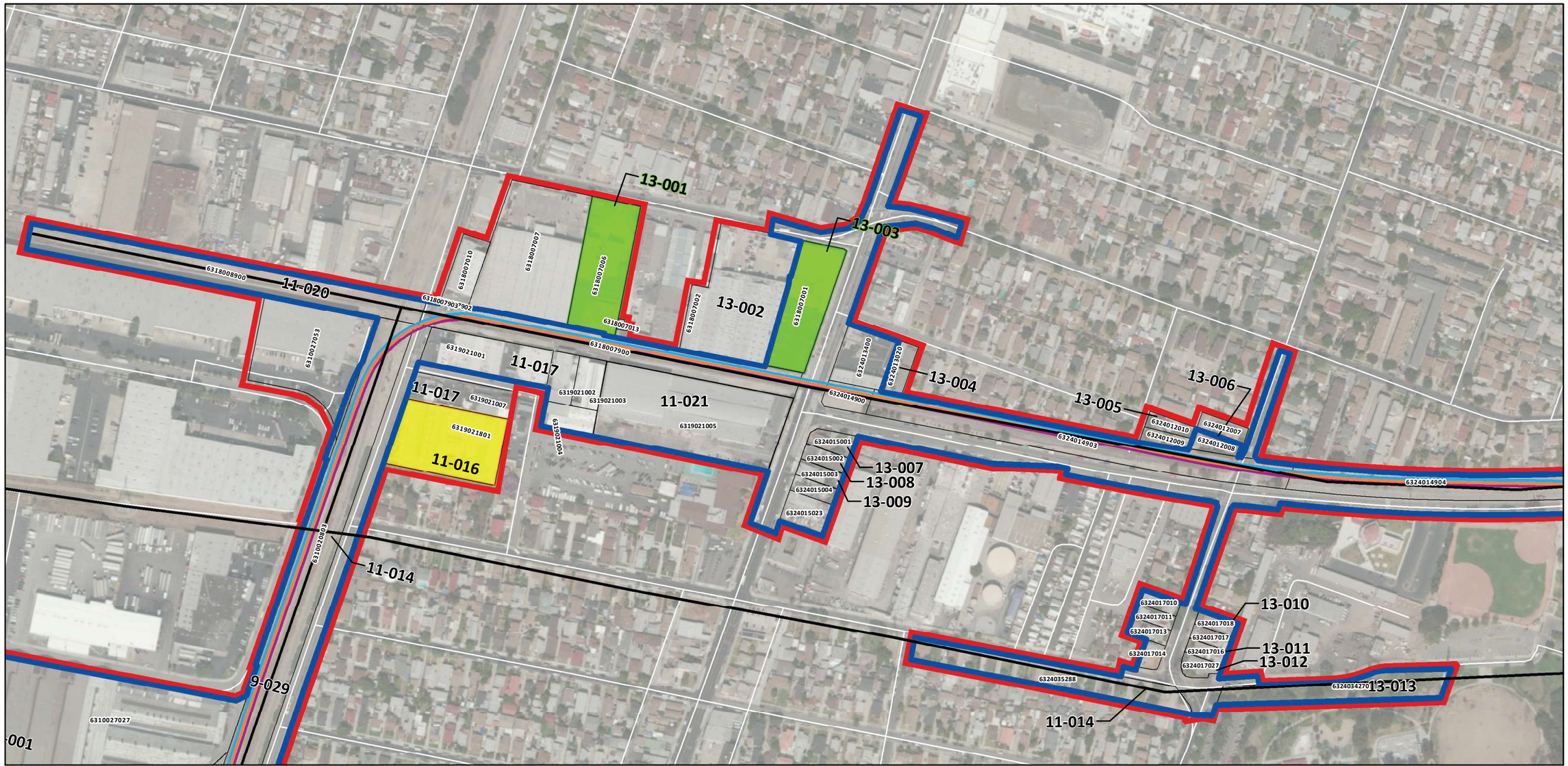
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0 100 200 300 Feet

Sheet 12 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

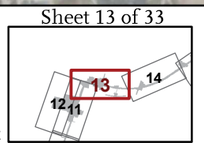
- Direct APE
- Architectural APE
- Parcels
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP
- Property Listed and/or Eligible for Listing in the CRHR and/or for Local Listing

Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

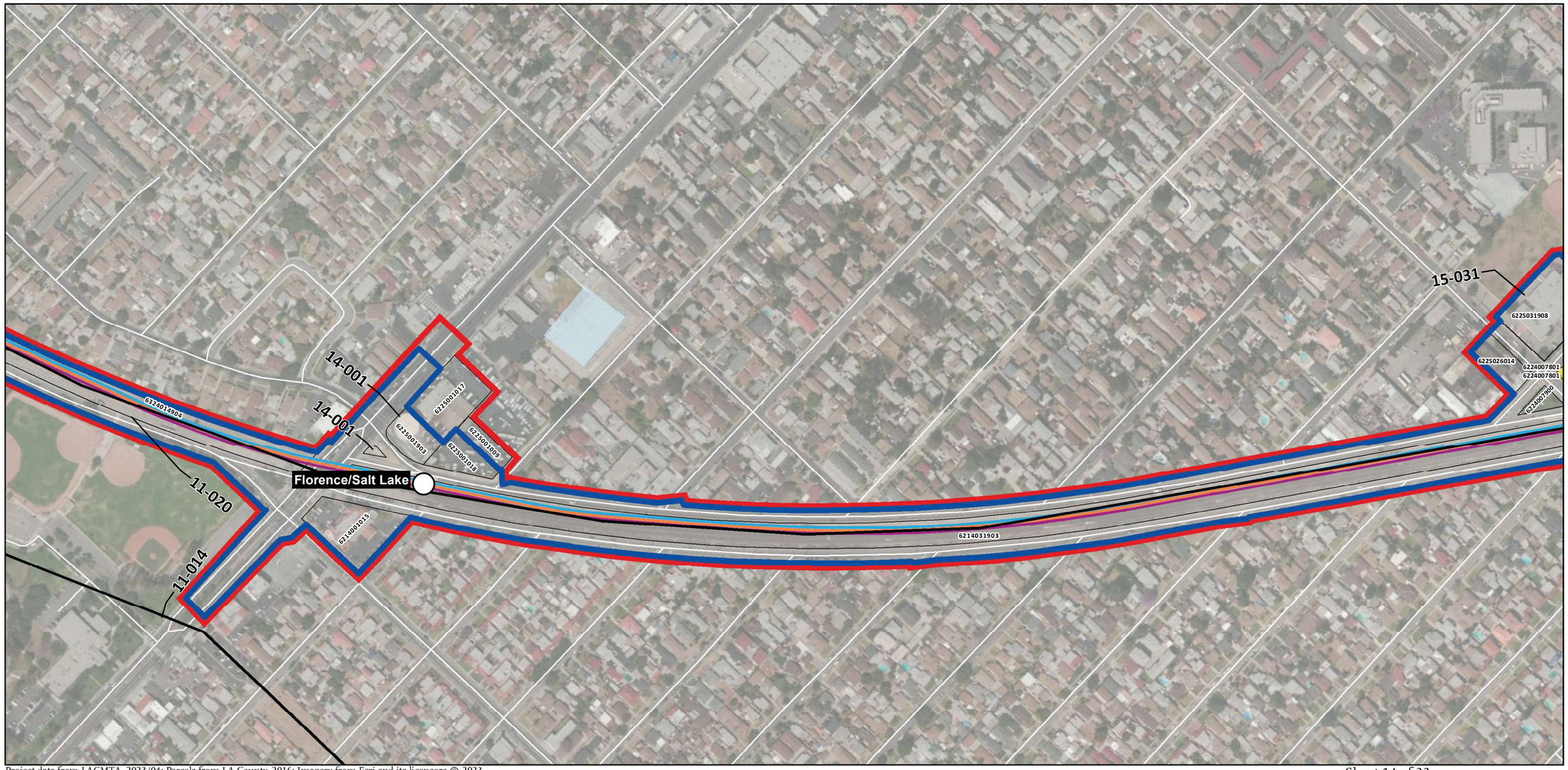
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0 100 200 300 Feet

Sheet 13 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

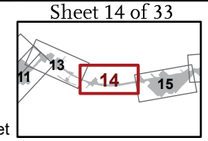
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP

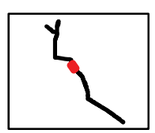
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

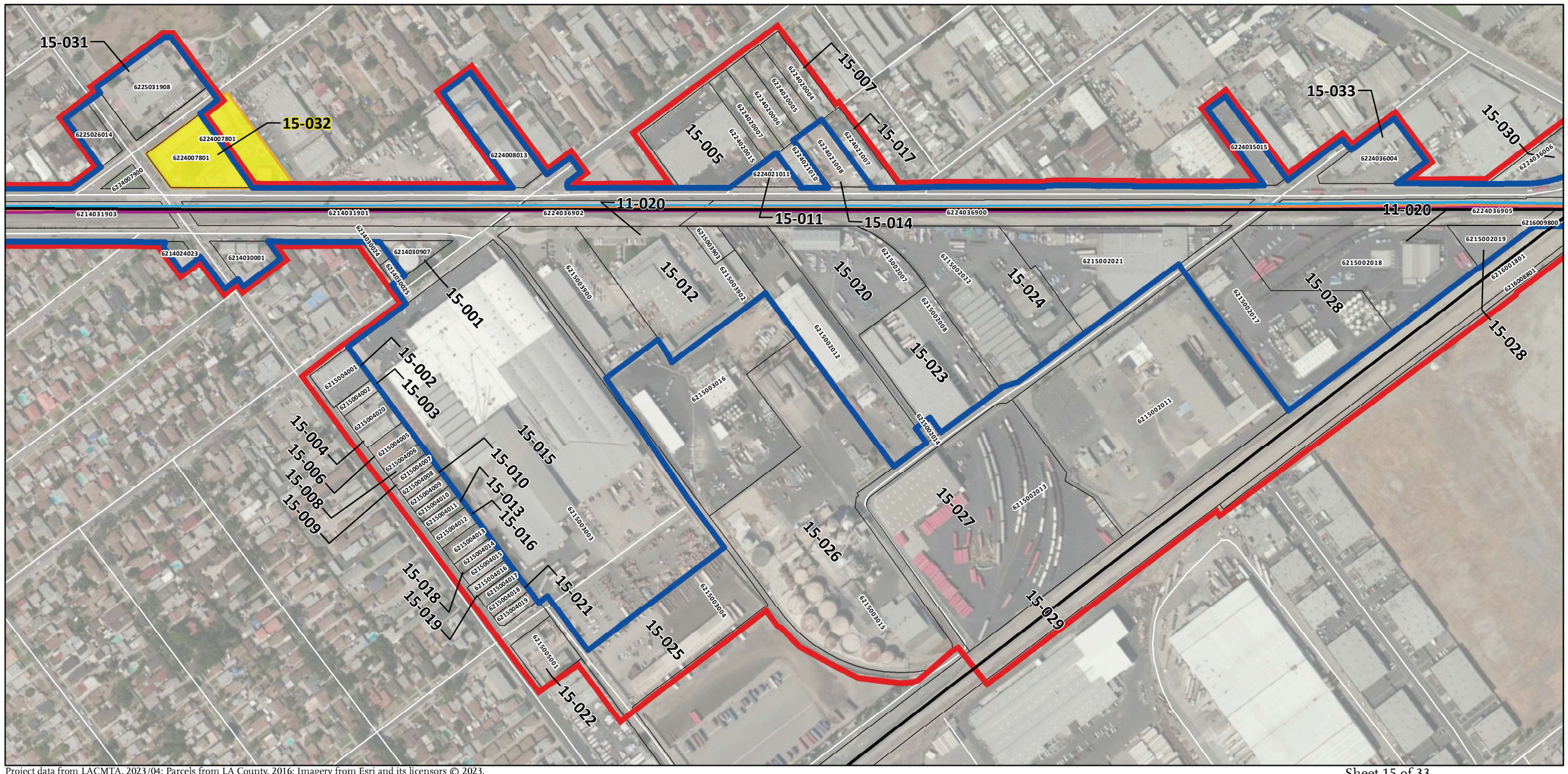
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0 100 200 300 Feet

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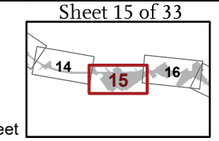
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

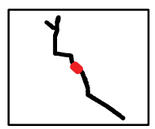
Direct APE
Architectural APE
Parcels

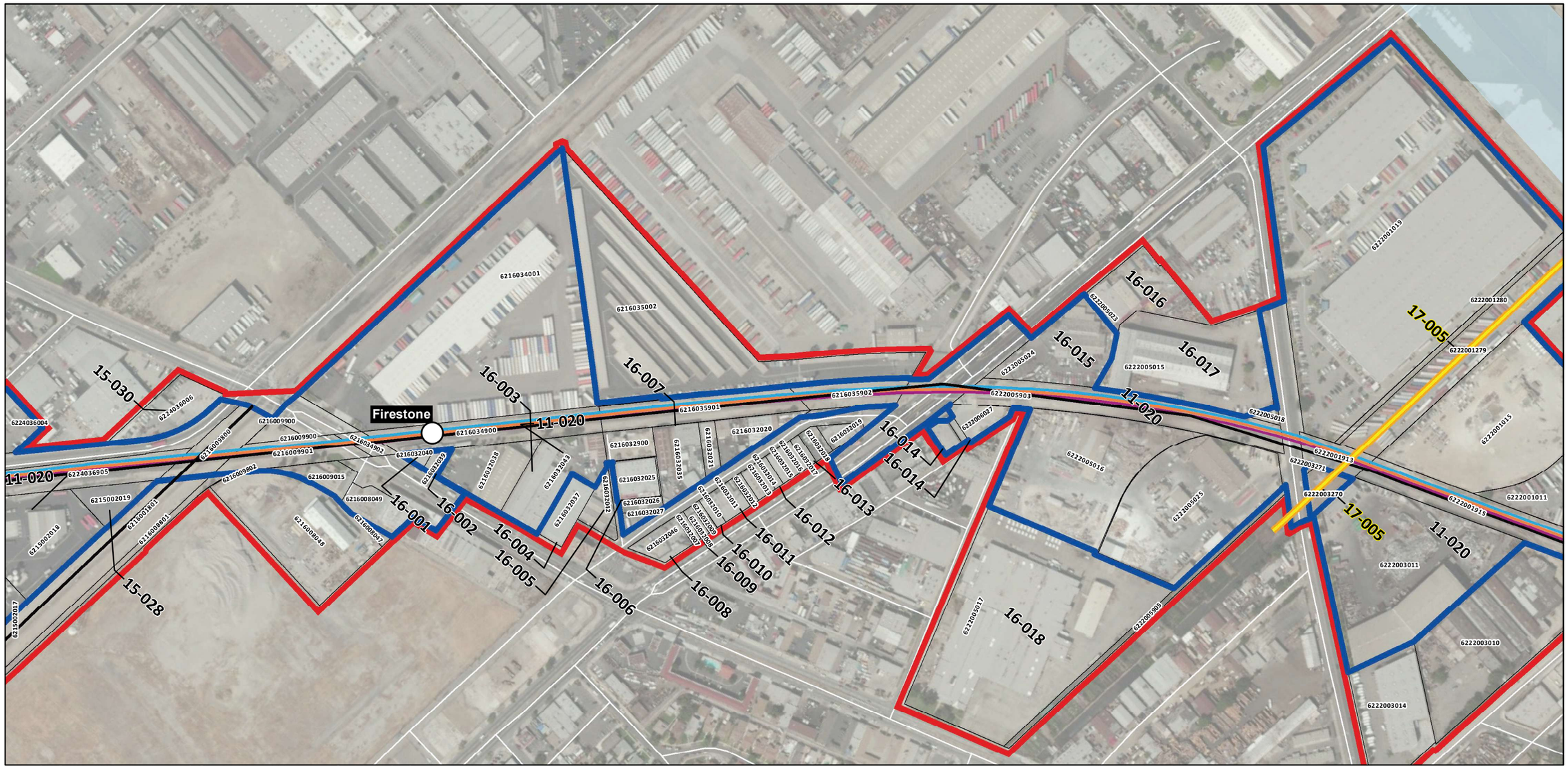
Alternative 1: Union Station to Pioneer
Alternative 2: 7th St/Metro Center to Pioneer
Alternative 3: Slauson/A Line (Blue) to Pioneer
Property Listed and/or Eligible for Listing in the NRHP

Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

0 100 200 300 Feet







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

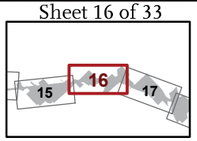
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Linear Non-Parcel Resource Listed in and/or eligible for listing in the NRHP

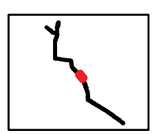
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

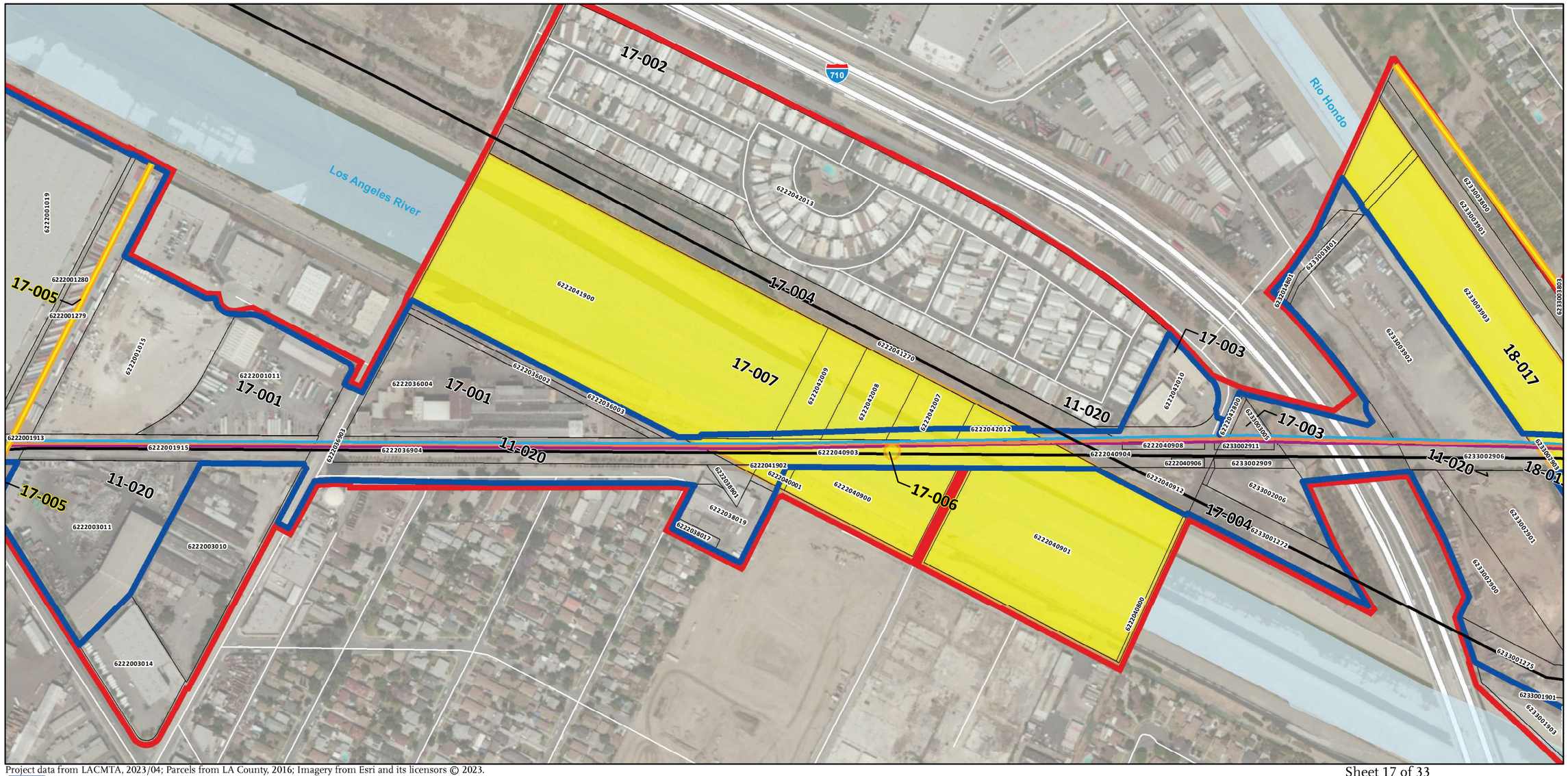
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0 100 200 300 Feet

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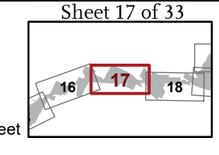
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

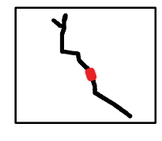
- Direct APE
- Architectural APE
- Parcels
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Linear Non-Parcel Resource Listed in and/or eligible for listing in the NRHP
- Non-Parcel Resource Listed in and/or eligible for listing in the NRHP
- Property Listed and/or Eligible for Listing in the NRHP

N

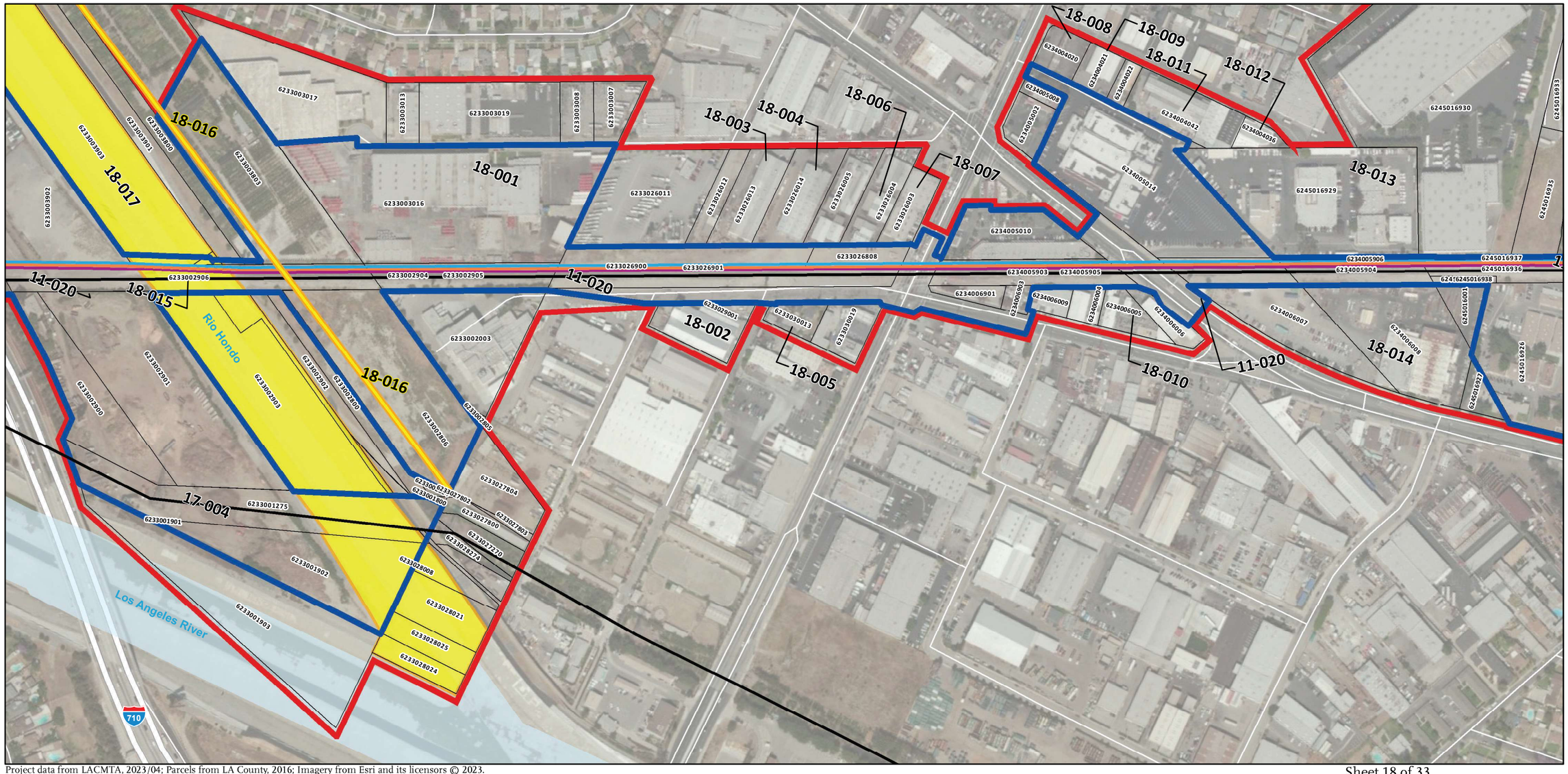
0 100 200 300 Feet

Sheet 17 of 33





Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.



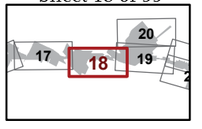
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

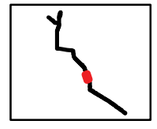
- Direct APE
- Architectural APE
- Parcels
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Linear Non-Parcel Resource Listed in and/or eligible for listing in the NRHP
- Property Listed and/or Eligible for Listing in the NRHP

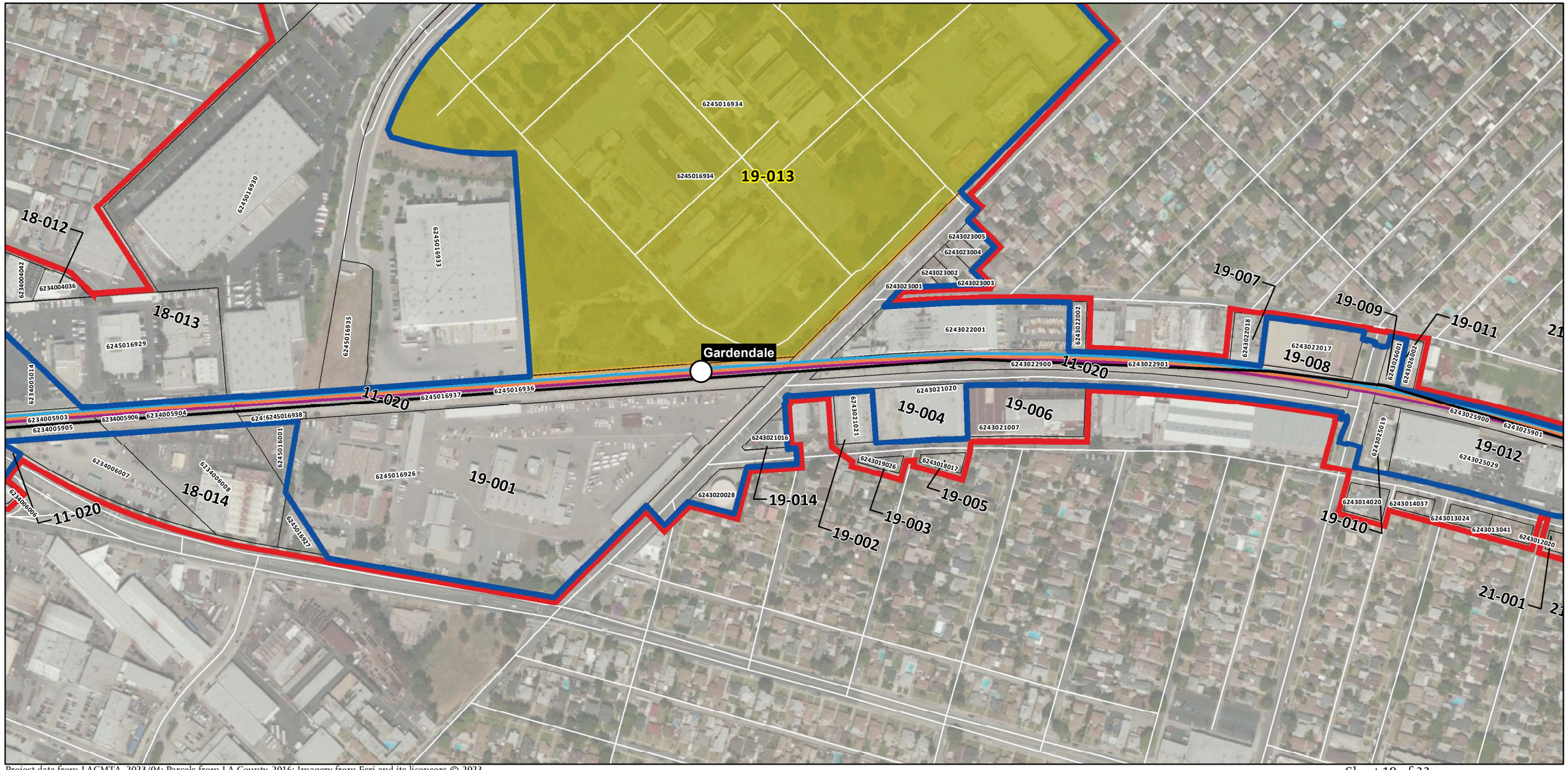
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

N

0 100 200 300 Feet







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

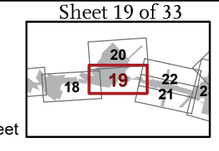
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP

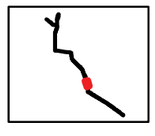
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

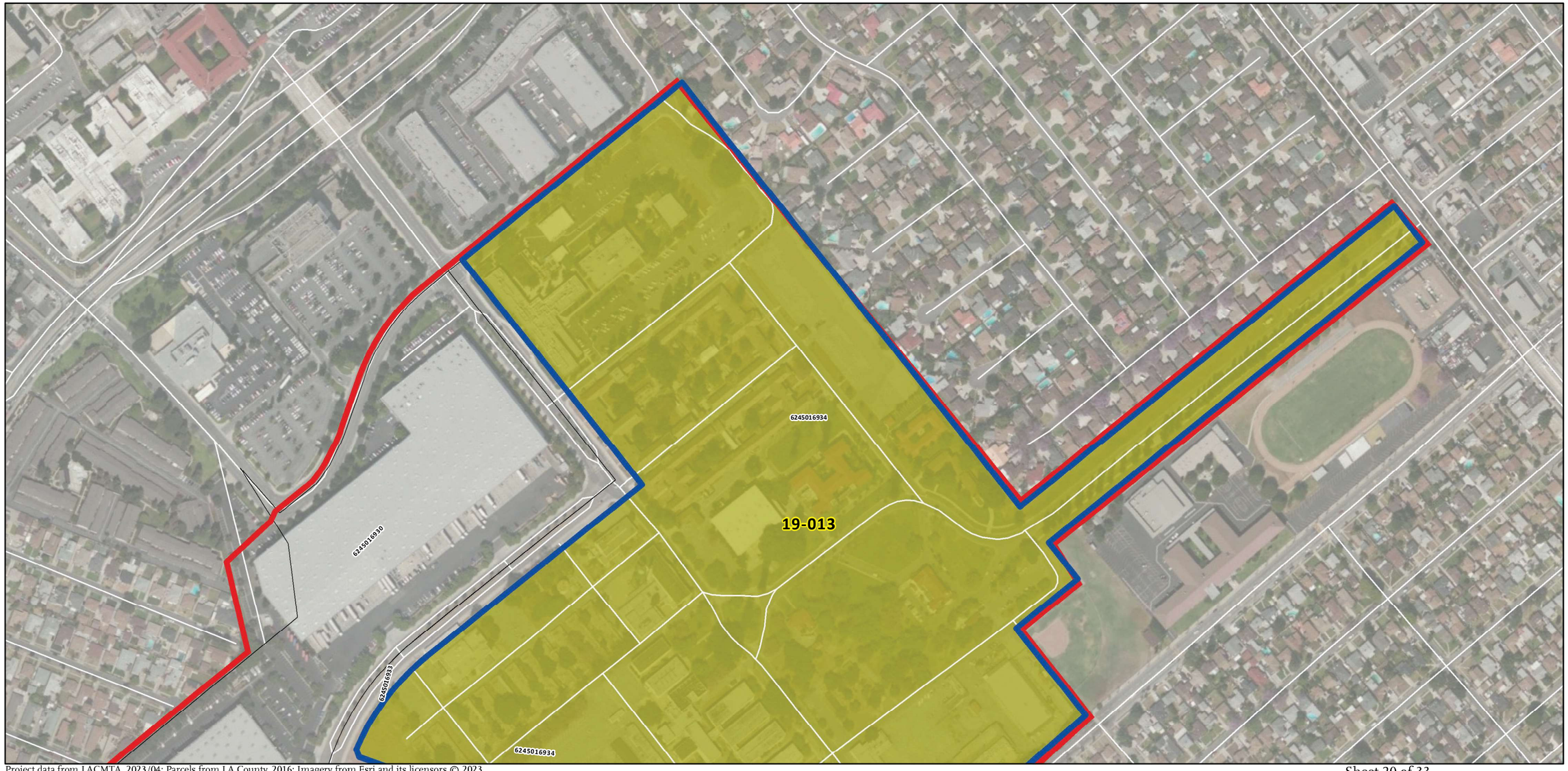
N

0 100 200 300 Feet

Sheet 19 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

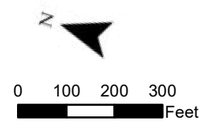
Direct APE

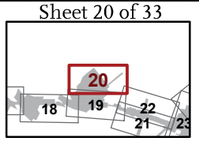
Architectural APE

Parcels

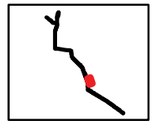
Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP

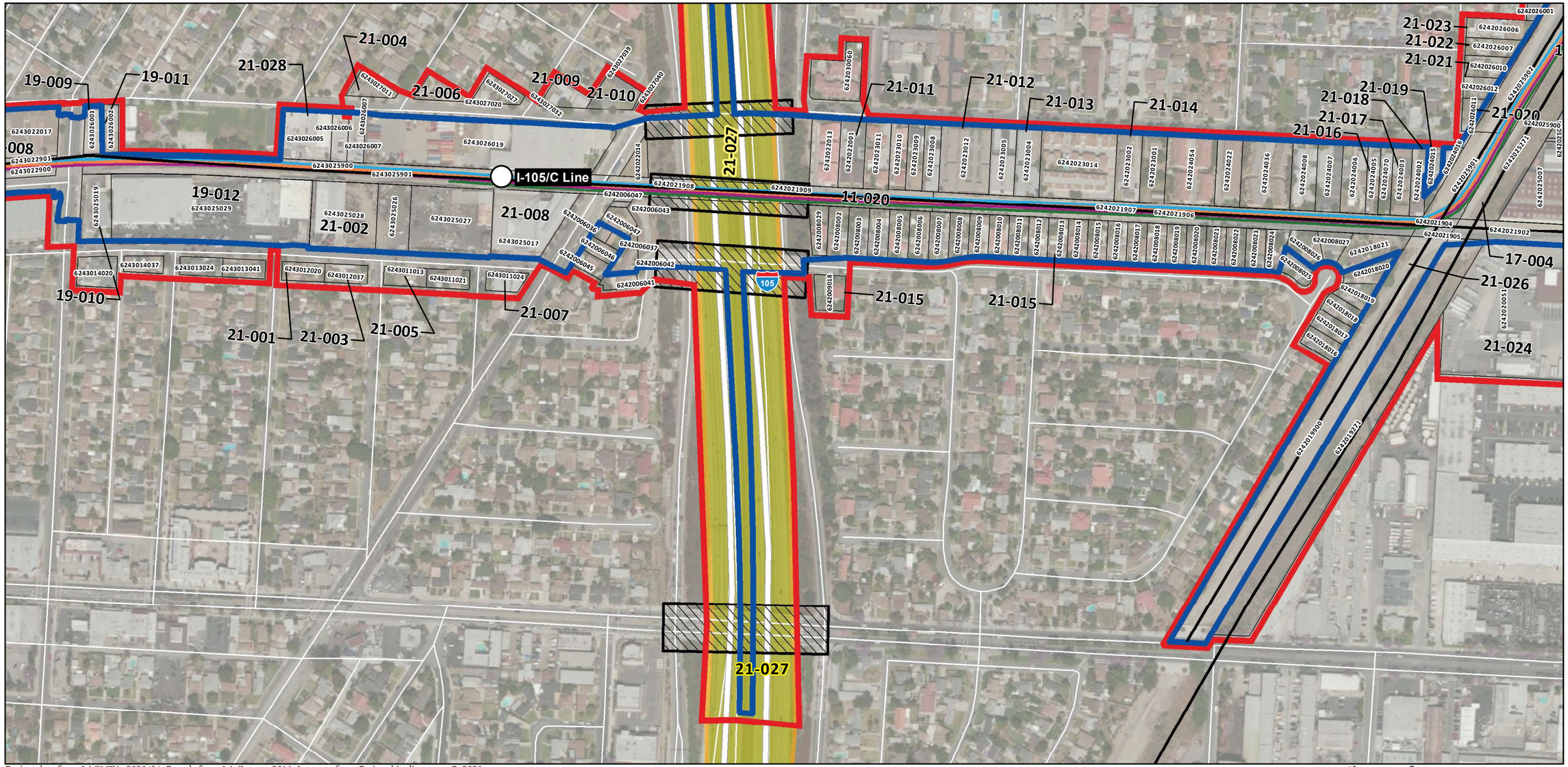
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.





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Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

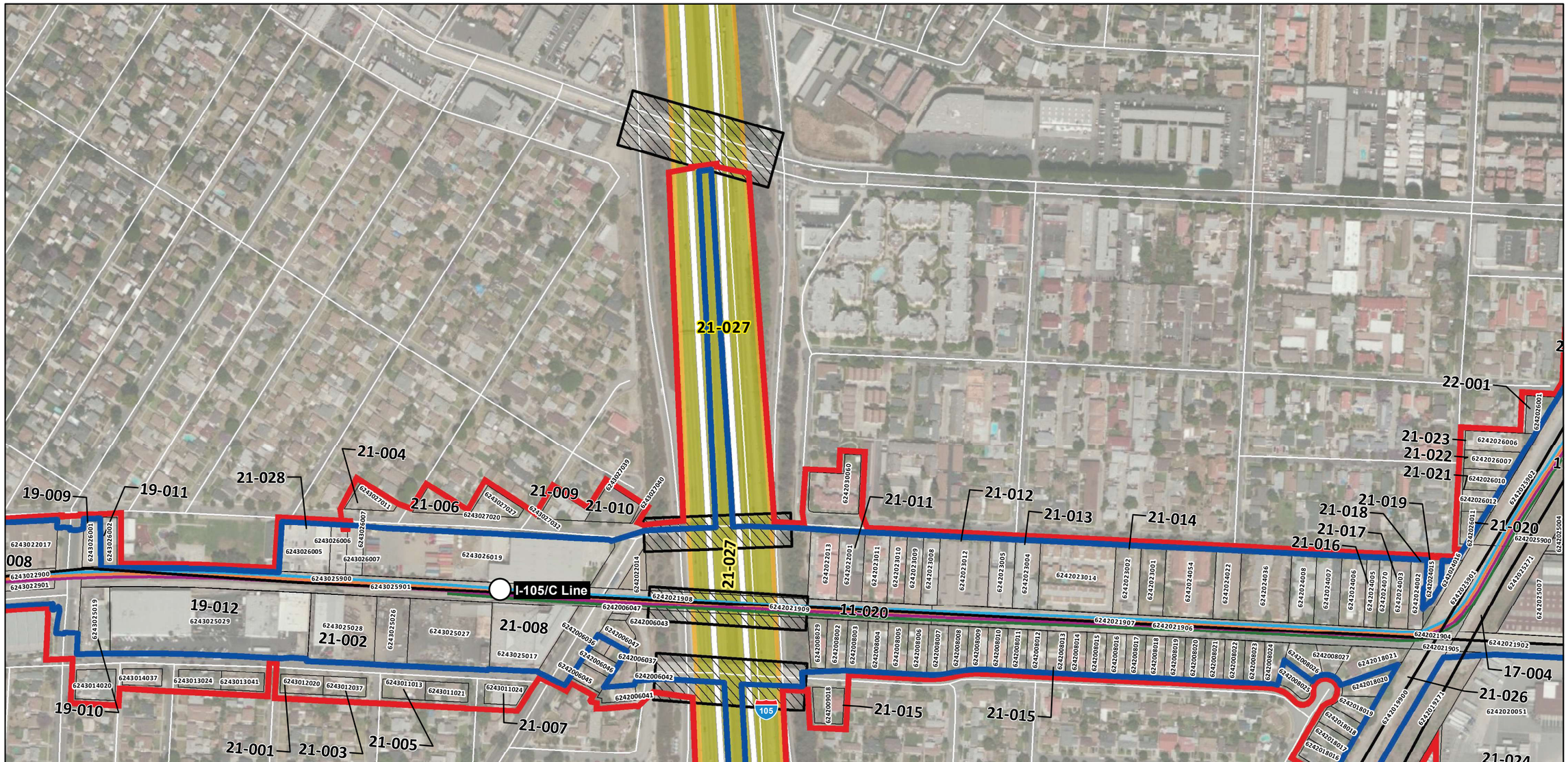
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Alternative 4: I-105/C Line (Green) to Pioneer
- Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP
- Contributing Bridges to the Century Freeway-Transitway Historic District

N

0 100 200 300 Feet

Sheet 21 of 33

Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.



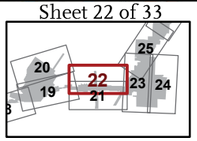
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

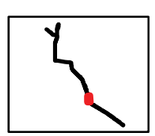
- Direct APE
- Architectural APE
- Parcels
- Station
- Alternative 1: Union Station to Pioneer
- Alternative 2: 7th St/Metro Center to Pioneer
- Alternative 3: Slauson/A Line (Blue) to Pioneer
- Alternative 4: I-105/C Line (Green) to Pioneer
- Historic District Listed, Eligible or Assumed Eligible for Listing in the NRHP
- Contributing Bridges to the Century Freeway-Transitway Historic District

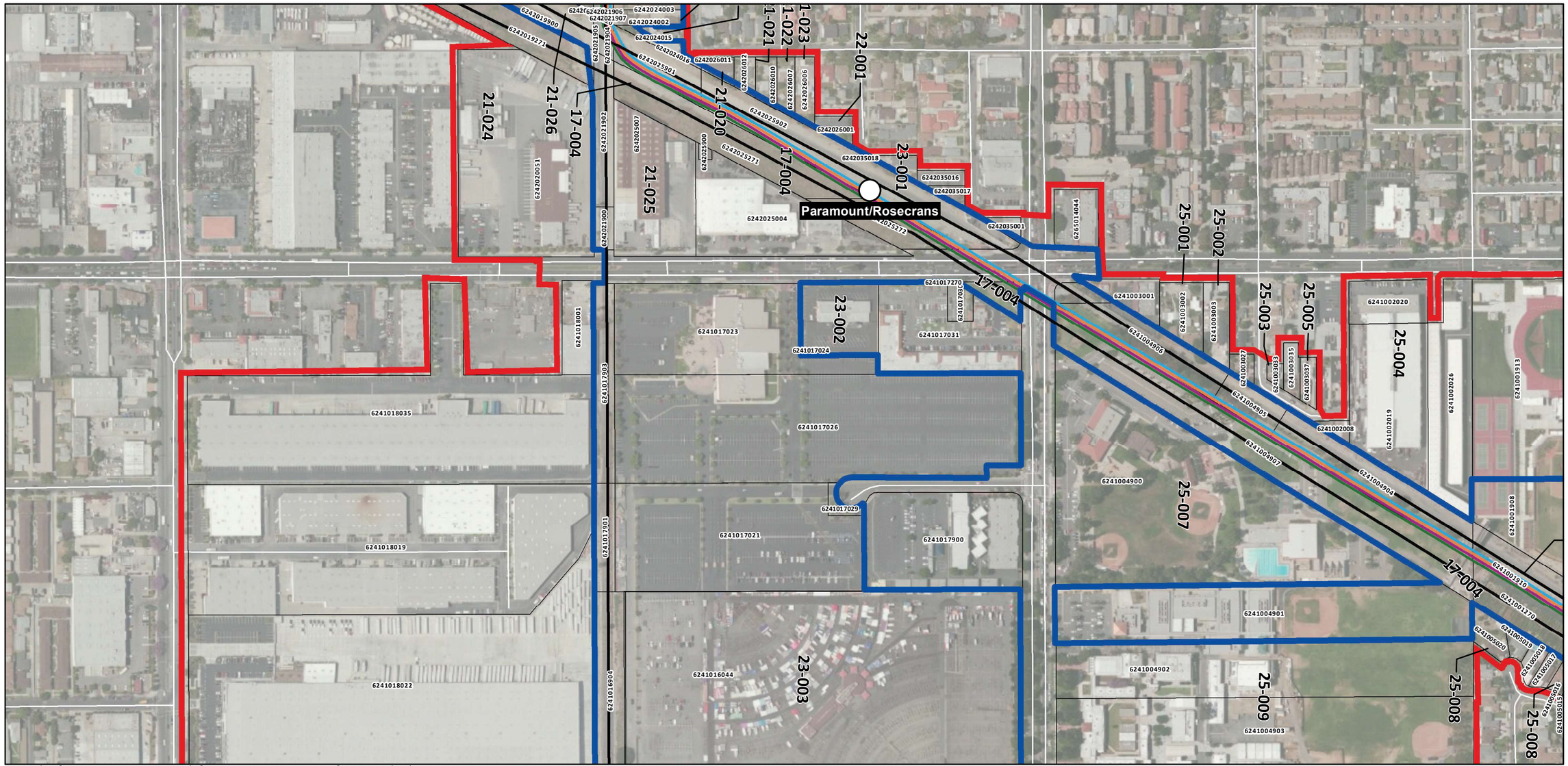
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

0 100 200 300 Feet

Sheet 22 of 33







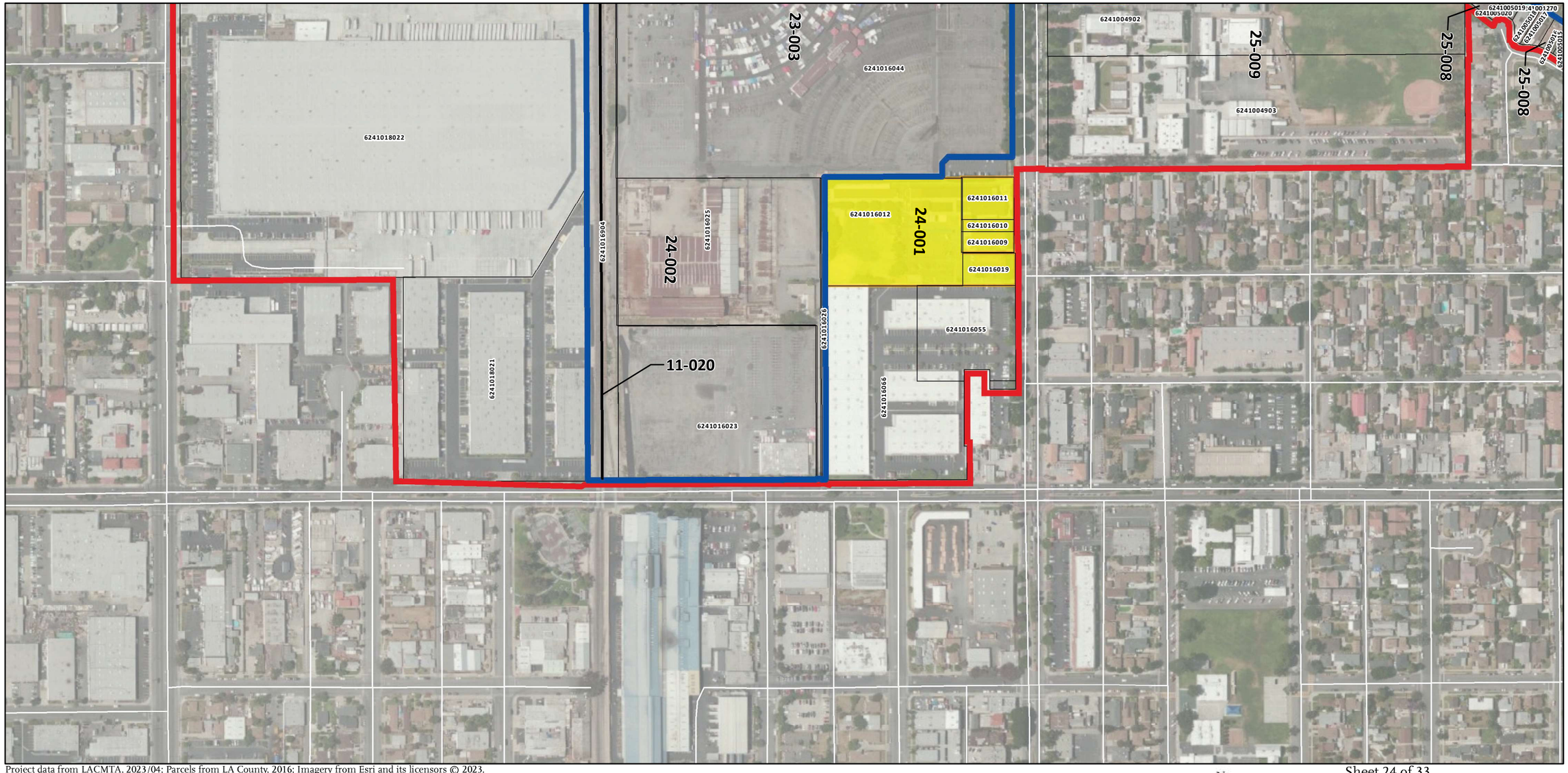
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Direct APE
Architectural APE
Parcels
Station
Alternative 1: Union Station to Pioneer
Alternative 2: 7th St/Metro Center to Pioneer
Alternative 3: Slauson/A Line (Blue) to Pioneer
Alternative 4: I-105/C Line (Green) to Pioneer

Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

N
0 100 200 300 Feet

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Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Direct APE

Architectural APE

Parcels

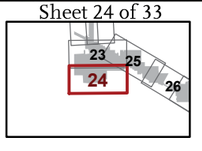
Property Listed and/or Eligible for Listing in the NRHP

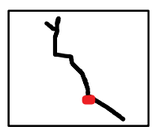
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

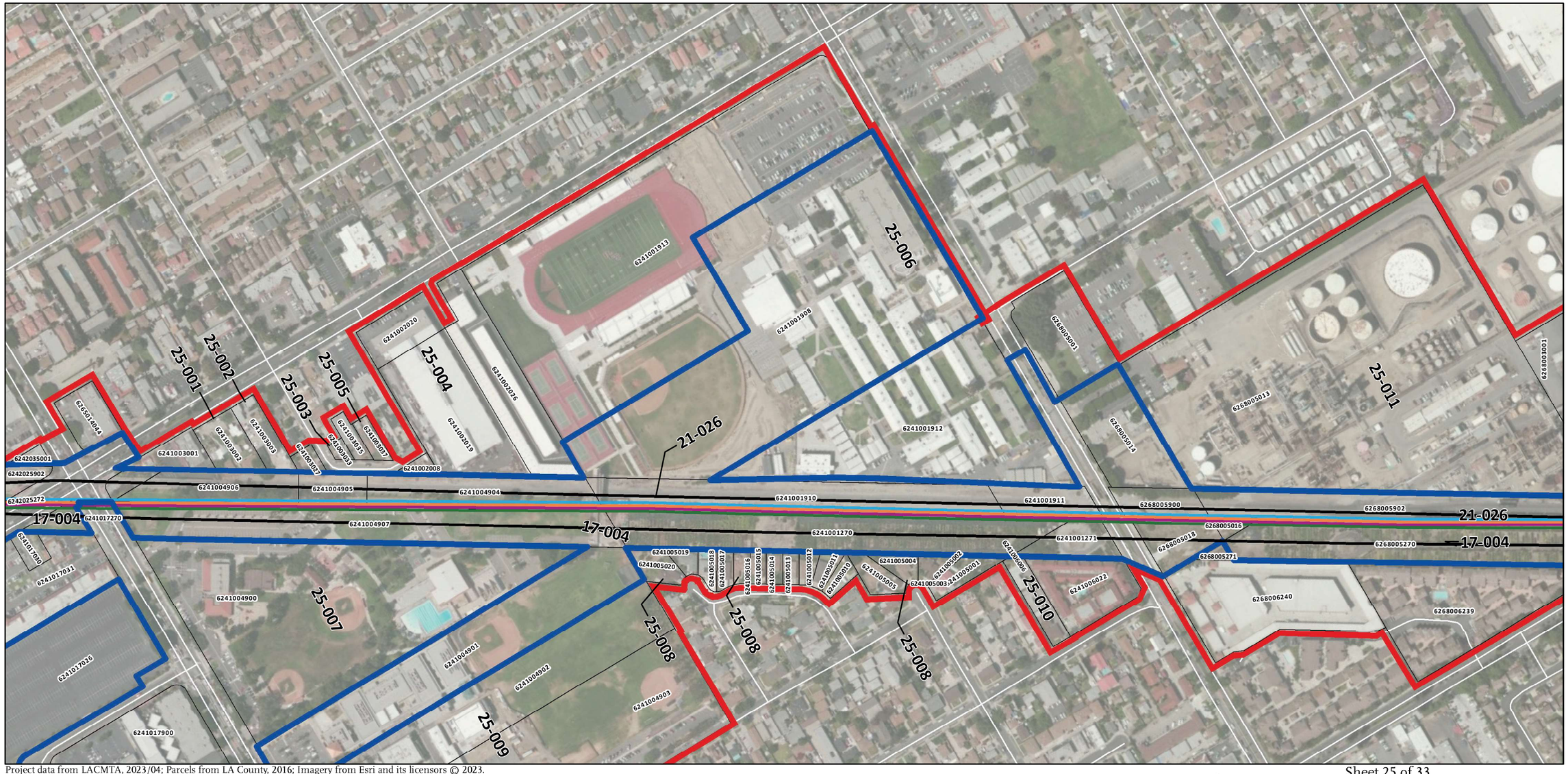
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0 100 200 300 Feet

Sheet 24 of 33







Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Direct APE
Architectural APE
Parcels

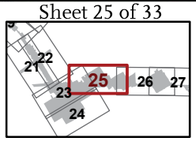
Alternative 1: Union Station to Pioneer
Alternative 2: 7th St/Metro Center to Pioneer
Alternative 3: Slauson/A Line (Blue) to Pioneer
Alternative 4: I-105/C Line (Green) to Pioneer

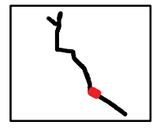
Note: The vertical extent of the APE associated with the LPA extends from 150 feet below grade to 90 feet above grade.

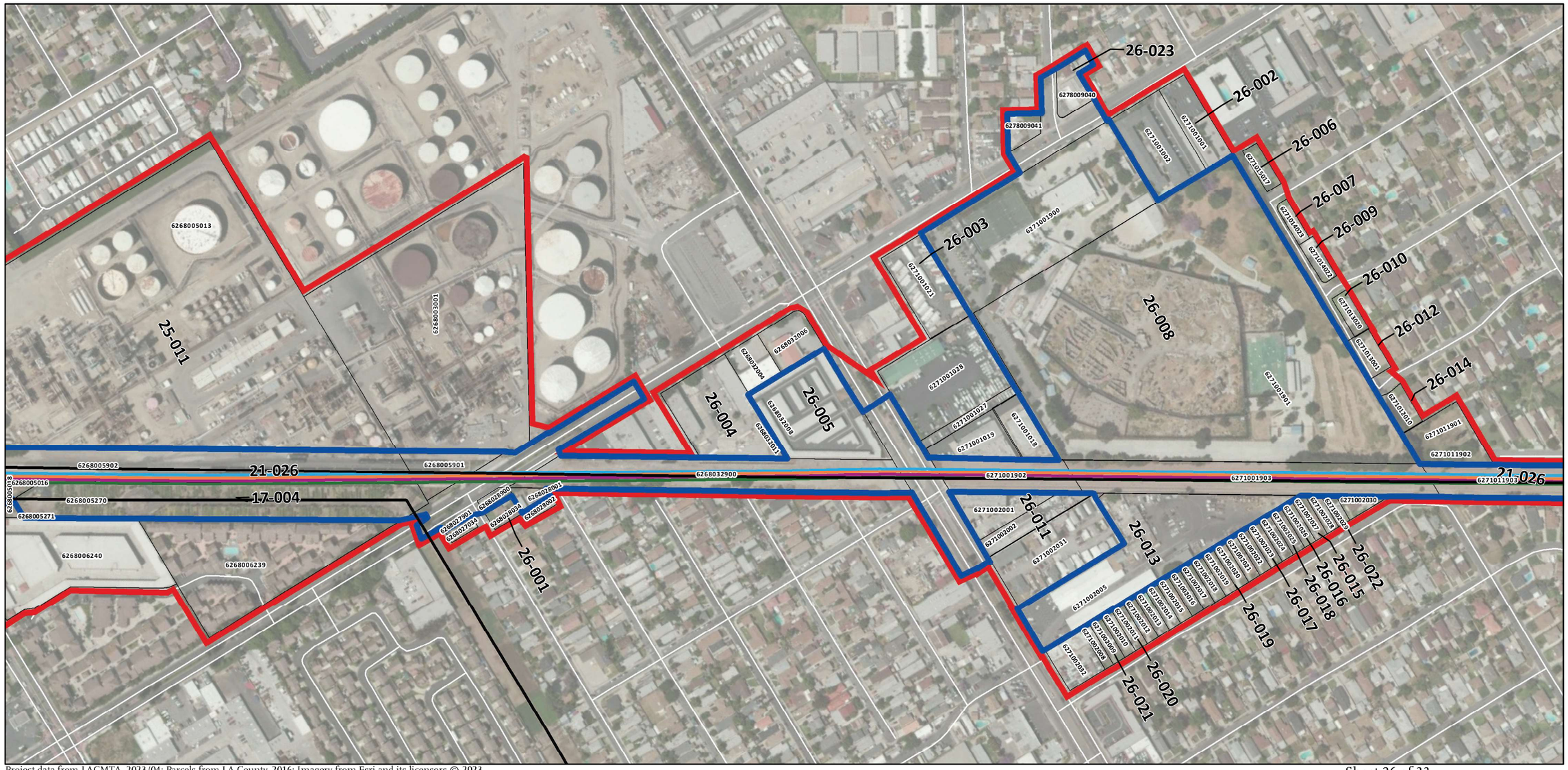
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Sheet 25 of 33







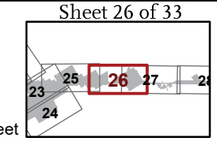
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

Direct APE
Architectural APE
Parcels

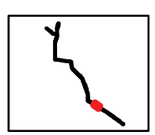
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Alternative 2: 7th St/Metro Center to Pioneer
Alternative 3: Slauson/A Line (Blue) to Pioneer
Alternative 4: I-105/C Line (Green) to Pioneer

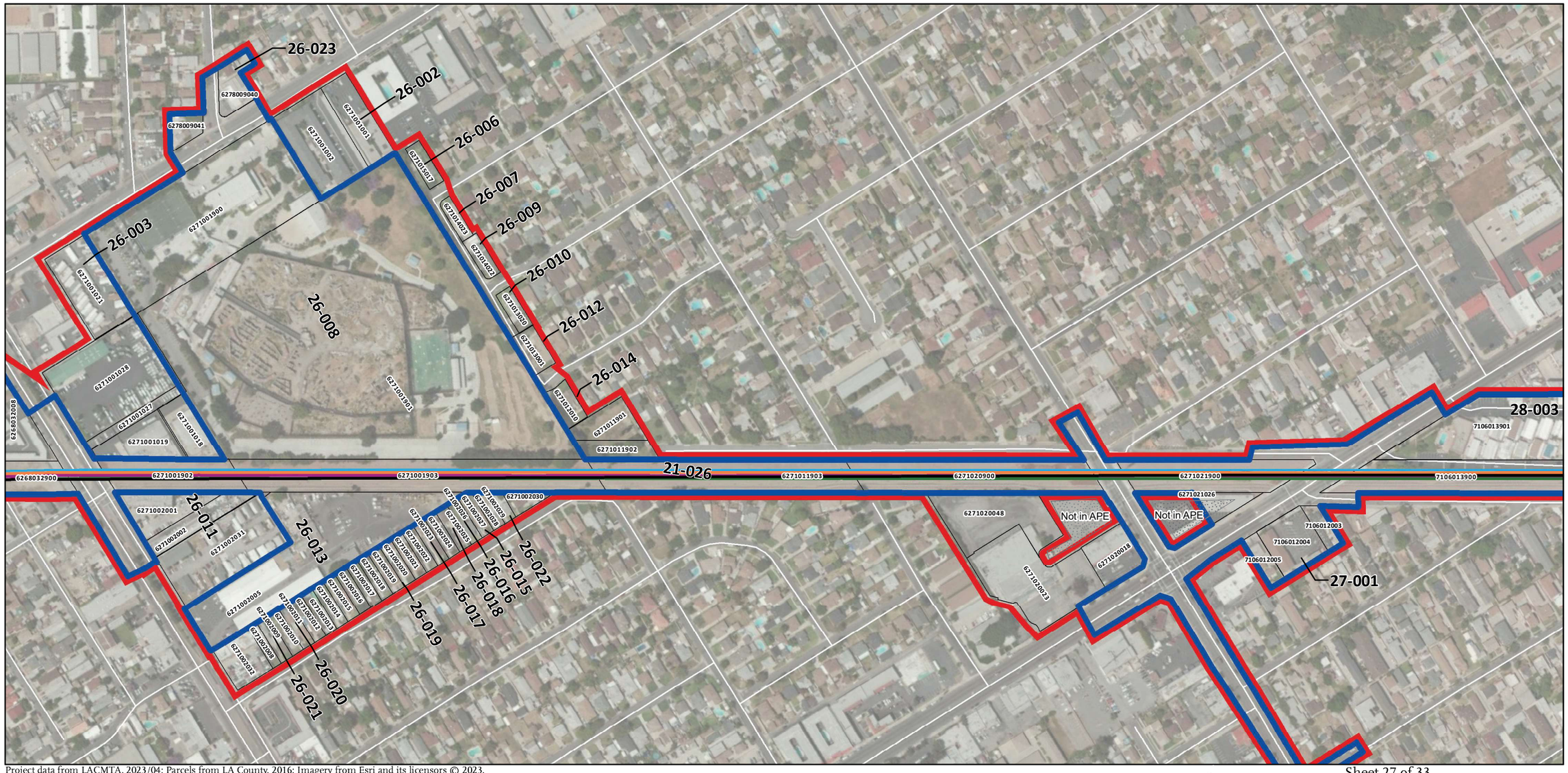
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Direct APE
Architectural APE
Parcels

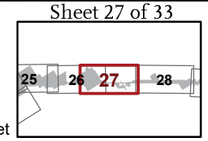
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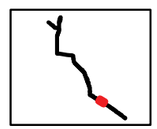
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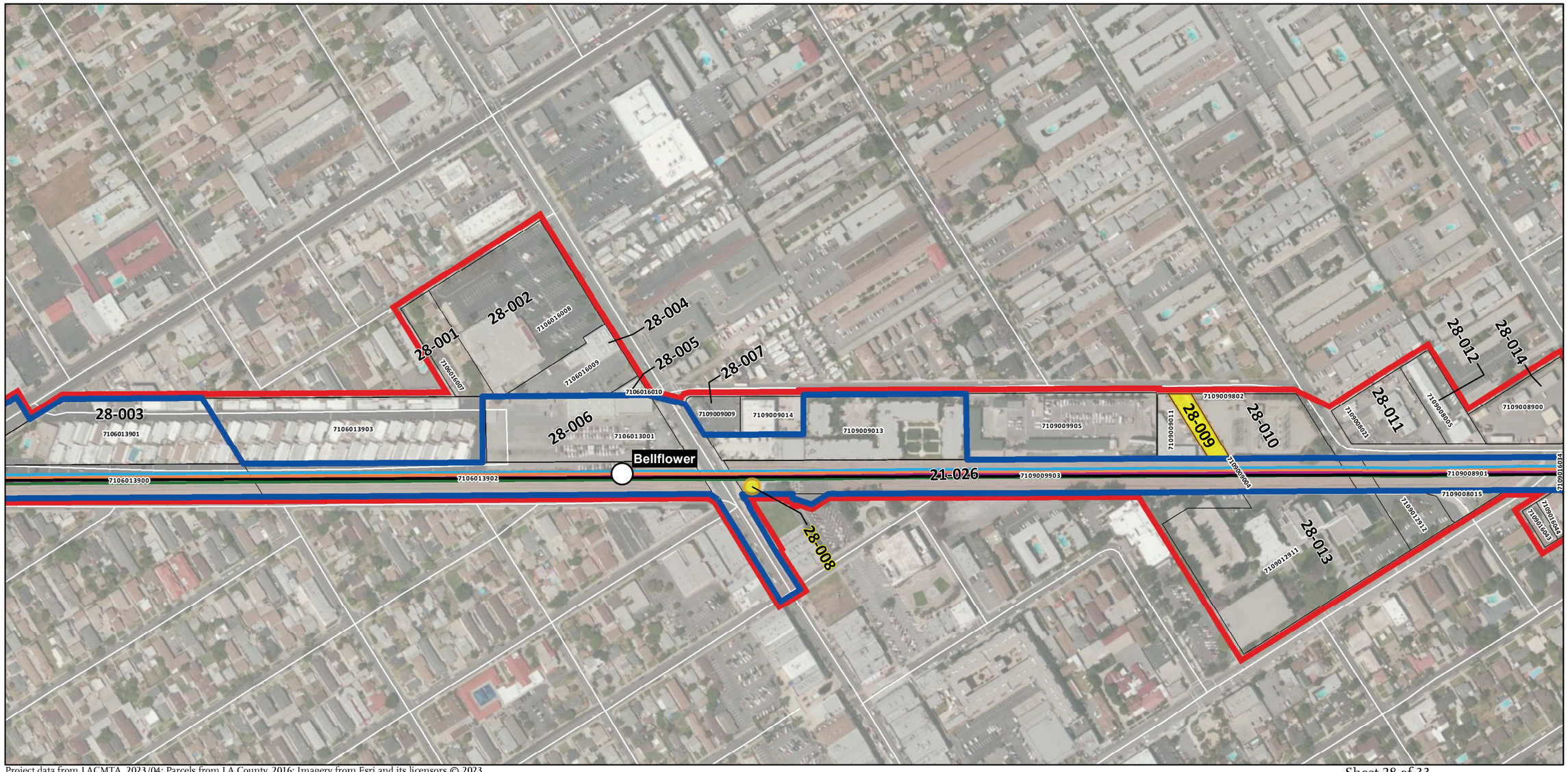
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Sheet 27 of 33







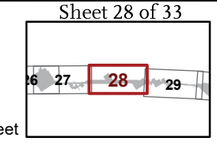
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

- Direct APE
- Architectural APE
- Parcels
- Station
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- Alternative 4: I-105/C Line (Green) to Pioneer
- Property Listed and/or Eligible for Listing in the NRHP
- Non-Parcel Resource Listed in and/or eligible for listing in the NRHP

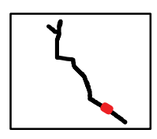
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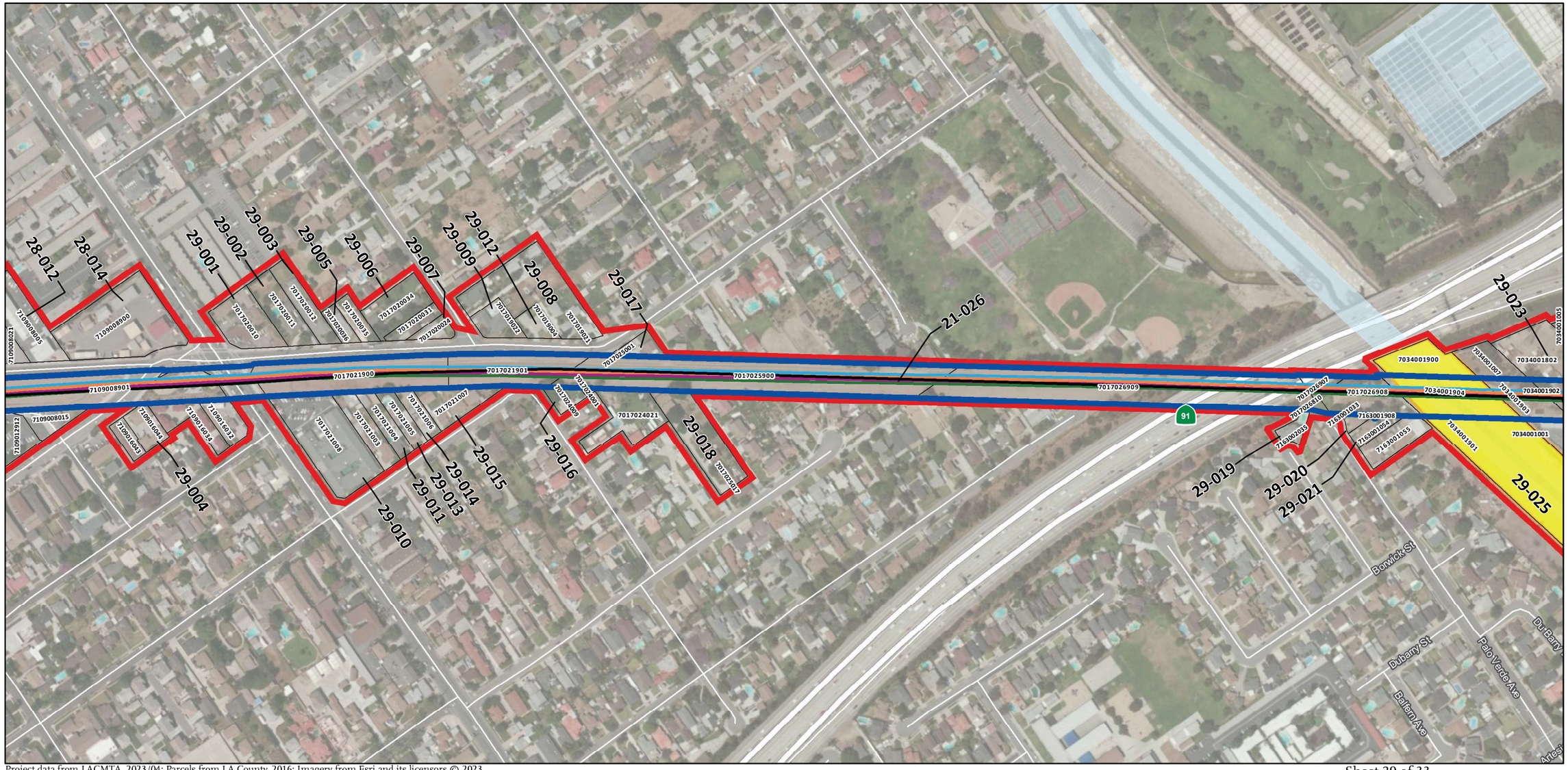
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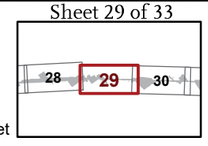
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

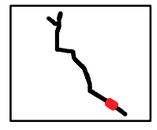
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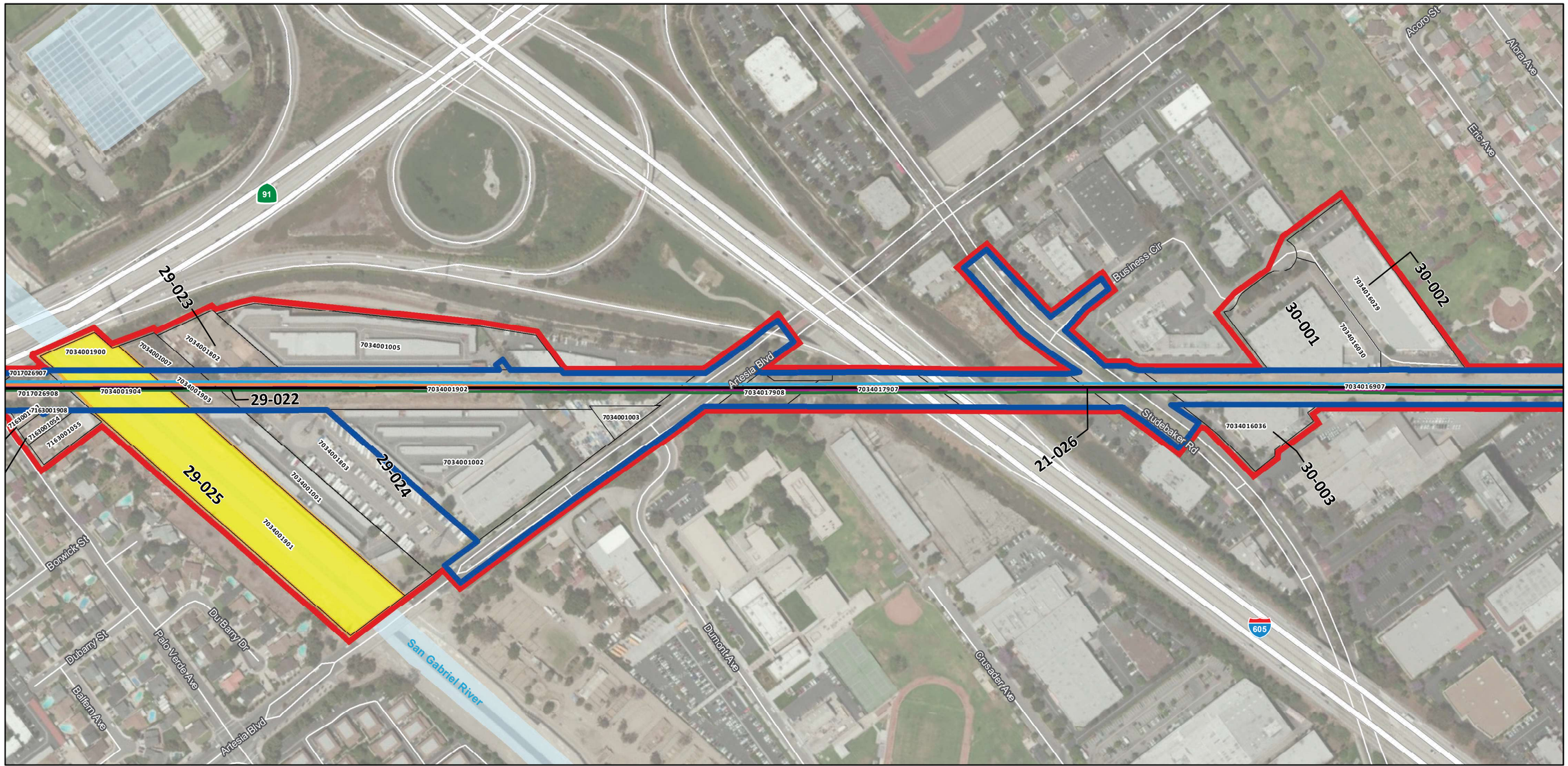
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Sheet 29 of 33







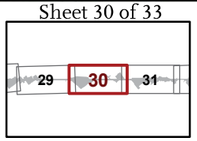
Project data from LACMTA, 2023/04; Parcels from LA County, 2016; Imagery from Esri and its licensors © 2023.

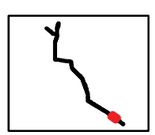
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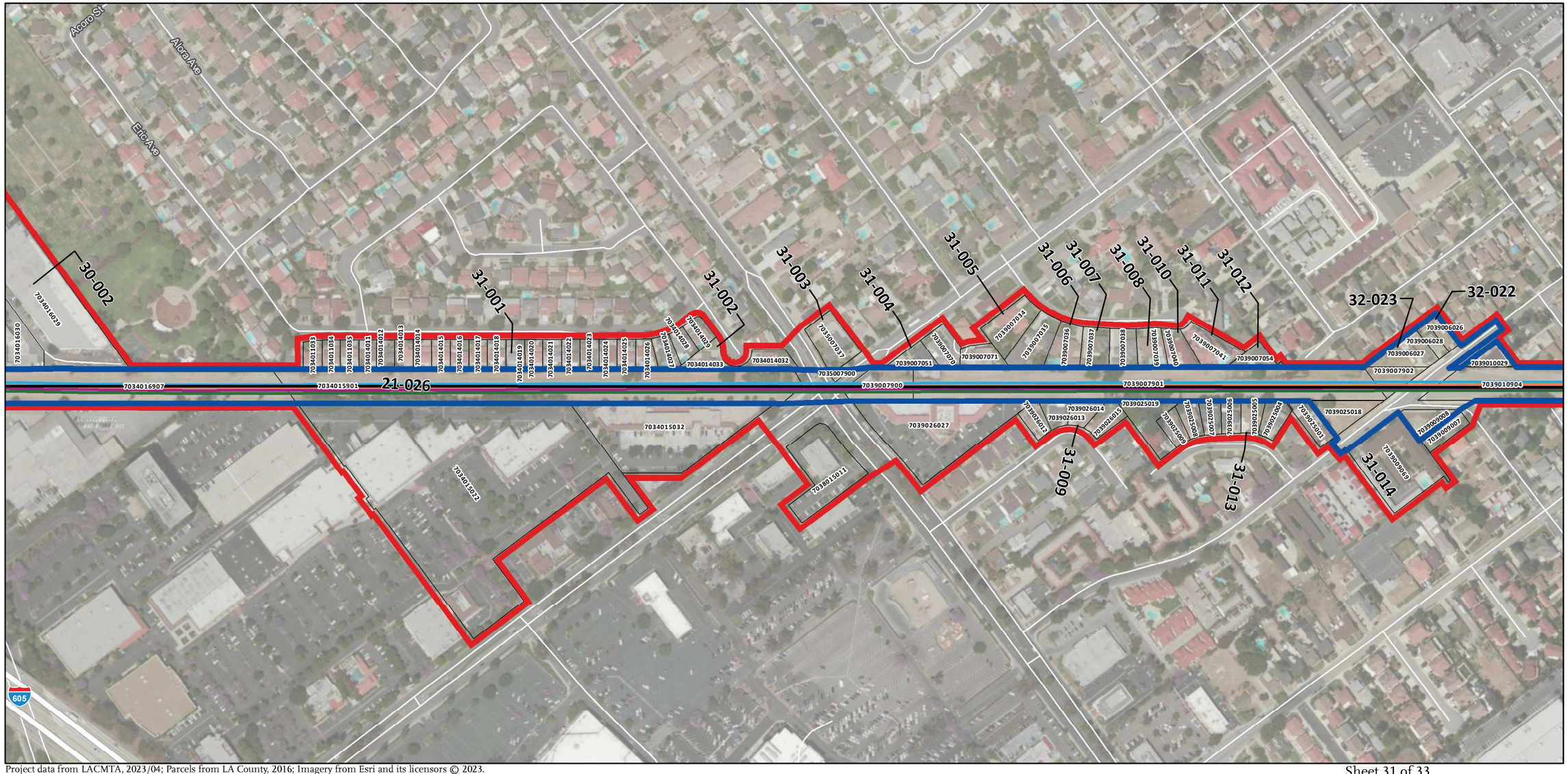
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Sheet 30 of 33







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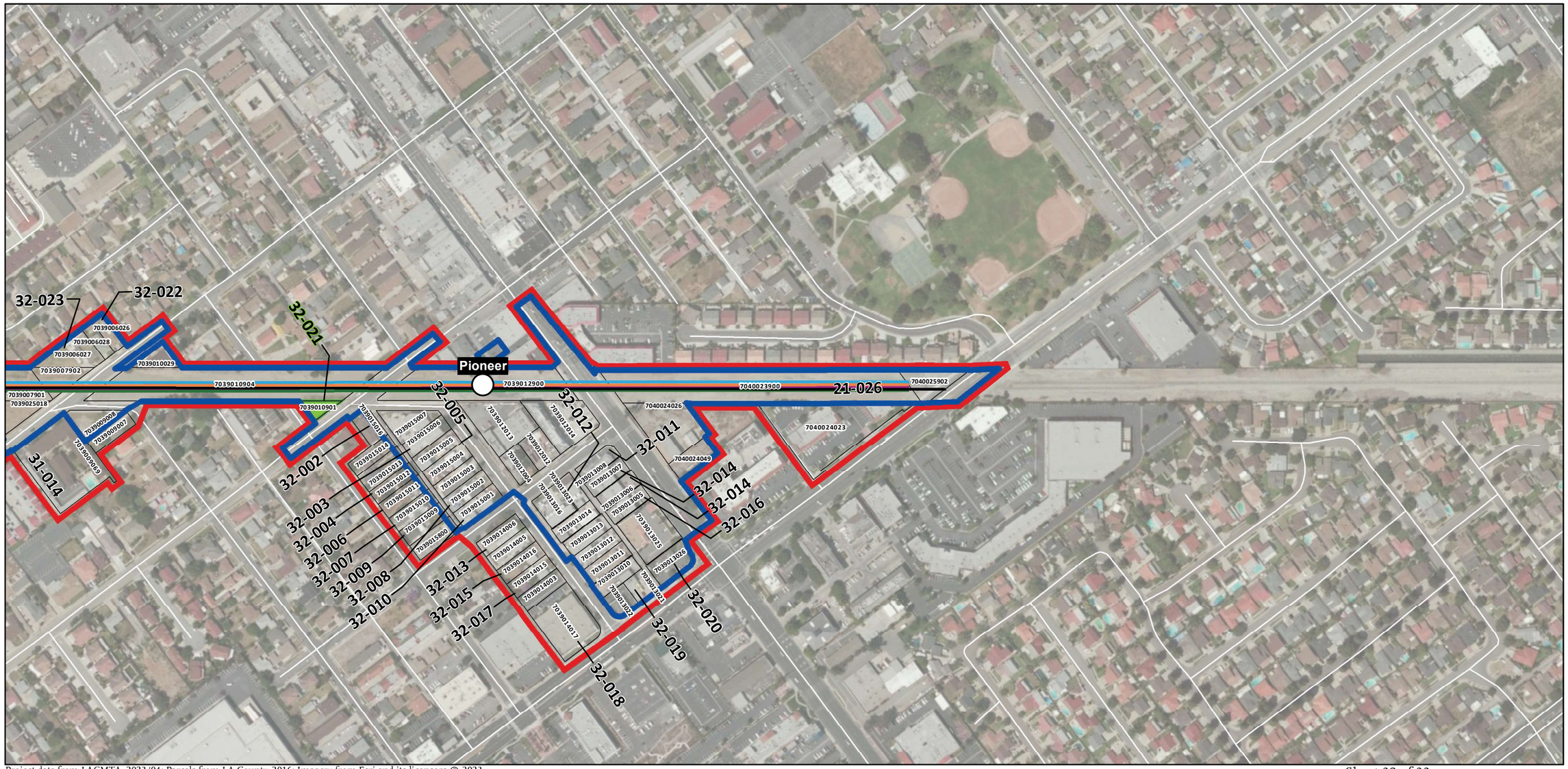
Direct APE
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Sheet 31 of 33



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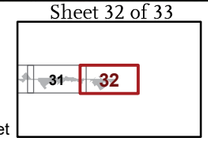
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- Alternative 1: Union Station to Pioneer
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- Alternative 4: I-105/C Line (Green) to Pioneer
- Property Listed and/or Eligible for Listing in the CRHR and/or for Local Listing

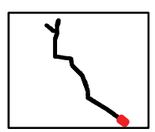
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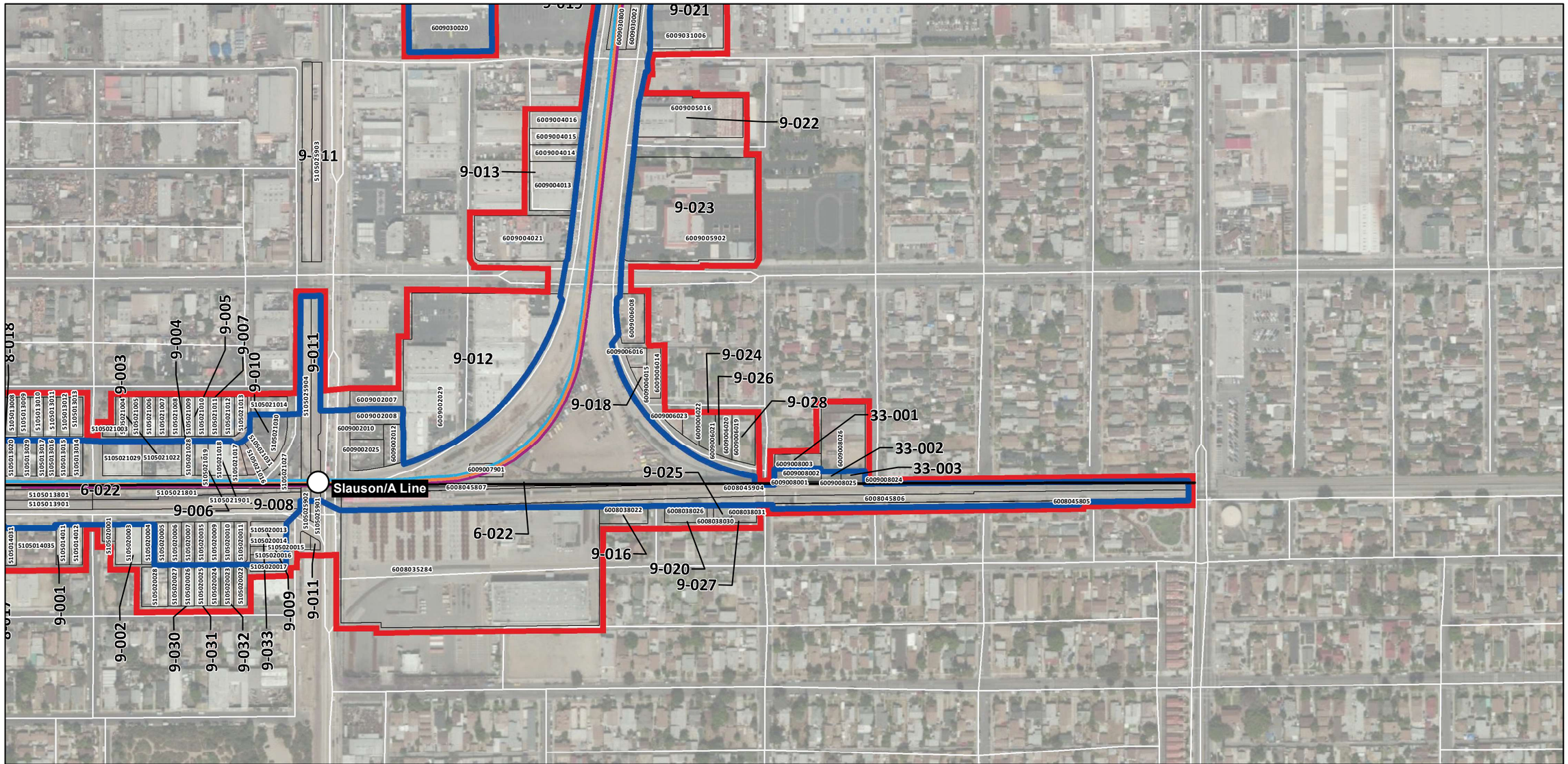
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Sheet 32 of 33







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Direct APE
Architectural APE
Parcels
Station
Alternative 1: Union Station to Pioneer
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Sheet 33 of 33

APPENDIX B – SUMMARY OF CONSULTATION

Appendix B-Section 1: SHPO Consultation

Meeting with Office of Historic Preservation

Date	Time
Wednesday, September 9, 2020	2:00 – 3:00 PM
Location	**Conference Call Information**
Conference Call	Microsoft Teams Meeting

A. Attendee List

Name	Agency / Company	Email	Contact Number
Brenda Perez	FTA	brenda.perez@dot.gov	213-629-8603
Mary Nguyen	FTA	Mary.Nguyen@dot.gov	213-202-3960
Jeanne Ogar	In support of FTA	jeanne@gpaconsulting-us.com	310-792-2690
Brianna Pilkinton	In support of FTA	bmpilkinton@burnsmcd.com	858-320-2953
Natalie Lindquist	OHP	Natalie.Lindquist@parks.ca.gov	
Alicia Perez	OHP	Alicia.Perez@parks.ca.gov	
Meghna Khanna	Metro	KhannaM@metro.net	213-922-3931
Sharon Kelly	WSP	Sharon.Kelly@wsp.com	503-478-2835
Gina Escalante	WSP	Gina.Escalante@wsp.com	213-896-5666
Kristin Carlson	WSP	Kristin.Carlson@wsp.com	619-321-4180
Nathan Maack	WSP	Nathan.Maack@wsp.com	213-443-7455
Stephanie Foell	WSP	Stephanie.Foell@wsp.com	410-752-9627
Shannon Carmack	Rincon	scarmack@rinconconsultants.com	501-239-5860
Rachel Perzel	Rincon	rperzel@rinconconsultants.com	732-233-3997

Meeting with Office of Historic Preservation

Name	Agency / Company	Email	Contact Number
Christopher Duran	Rincon	cduran@rinconconsultants.com	501-239-5860

B. Summary

Meeting attendees provided introductions and FTA and Metro staff provided an overview of the meeting agenda and description of the West Santa Ana Branch (WSAB) Project. This project is a Metro priority project and a 28 by '28 project in support of the 2028 Olympic Games.

Regarding the Cultural Resources Survey Report, Ms. Lindquist stated that comments on the report would be provided to FTA/Metro during the week of September 7 or 14, 2020, dependent on conditions related to wildfires. She stated that the comments pertained to clarifications. She asked if pedestrian archaeological surveys were completed for the areas of expanded Area of Potential Effects (APE). Ms. Carmack stated that the areas in the expanded APE are built out/paved and surveys were not required. The areas were in the previously conducted record search, which encompassed a 1-mile radius from the project.

The purpose of the meeting is to focus on the I-105/Century Freeway-Transitway Historic District (historic district) and the proposed effects assessment conducted for this district. Effects to archaeological resources are dependent on which alternative is selected as the Locally Preferred Alternative. Not all of the alternatives would result in an adverse affect to archeological resources. For example, only Alternative 1 would terminate at Los Angeles Union Station and potentially affect historic resources at that location. Consultation with OHP regarding effects and any necessary treatment for archeological resources will be updated when a Locally Preferred Alternative is identified. This may occur mid-2021.

In comparison, all four alternatives under consideration would require modification of the character-defining features associated with the historic district. Therefore, the purpose of this meeting is discuss approach to the evaluation of effects to the historic district. Ms. Carmack presented a PowerPoint with information about the historic district, proposed changes to the character-defining features, and a discussion of the proposed effects assessment of No Adverse Effect to the historic district. The presentation is attached to this meeting summary.

Attendees discussed the following points:

- Ms. Lindquist stated that she was the Office of Historic Preservation reviewer when the I-105/Century Freeway-Transitway Historic District was submitted by Caltrans for concurrence on the eligibility determination so she is familiar with this unique historic property.

- Ms. Lindquist did not have an objection to the proposed effects assessment of No Adverse Effect. She stated that activities can occur within the district that would maintain the premise of why the district is eligible. In particular, light rail transit in the median of I-105, high occupancy vehicle lanes, and the traffic control system were important and innovative components of the district. However, these elements are dynamic.
- Effects to archaeological resources will inform the overall Finding of Effect for the project. The Metro Board will select the Locally Preferred Alternative, which will determine the determine the northern terminus of the project. The archaeological concerns are largely associated with Los Angeles Union Station. FTA/Metro anticipate providing the Effects Report with the finding of effect to OHP for concurrence in early 2022.

C. Action Items

- OHP to send comments on APE/Survey Report week of September 7 or 14, contingent on potential effects from wildfires
- FTA to send OHP link to Dropbox with Survey Report and the archaeology excerpt from Survey Report
- FTA to provide meeting summary

Next stop: new rail to southeast LA County.

WEST SANTA ANA BRANCH TRANSIT CORRIDOR



State Historic Preservation Officer

September 9, 2020

Meeting Agenda

1. Introductions
2. West Santa Ana Branch Transit Corridor (WSAB) Project Overview
3. Summary of Previous SHPO Correspondence and WSAB Survey Report Findings
4. Discussion of Historic Properties and Effects
    a) I-105/Century Freeway-Transitway Historic District (Historic District) NRHP Eligibility and Character-Defining Features
    b) Proposed Project Components at I-105
    c) Preliminary Effects Analysis
5. Project Benefits
6. Project Schedule
7. Conclusion

WSAB Project Overview



- 19 miles
- 12 new stations

Four Build Alternatives

Alternative 1: Los Angeles Union Station to Pioneer Station

Design Option 1 (Alternative 1)
Northern terminus behind MWD Building on east side of LAUS, not at LAUS Forecourt

Design Option 2 (Alternative 1)
Adds the Little Tokyo Station

Alternative 2: 7th St/Metro Center to Pioneer Station

Alternative 3: Slauson/A Line (Blue) to Pioneer Station

Alternative 4: I-105/C Line (Green) to Pioneer Station

Metro

SHPO Correspondence to Date

Previous SHPO Correspondence

- **December 2018:** Consultation initiated; APE submitted to SHPO.
- **January 18, 2019:** Questions received from SHPO regarding APE and survey methods.
- **April 26, 2019:** FTA provided a revised APE and responses.
- **May 29, 2019:** Following requested modifications, APE received concurrence from SHPO.
- **March 30, 2020:** Survey Report and updated APE submitted to SHPO.

WSAB Survey Report Findings (Awaiting SHPO Response)

- Identification of 8 archaeological sites in the direct APE.
- Identification of 54 built environment resources in the APE.
- The I-105/Century Freeway-Transitway is one of the previously identified historic properties noted in the WSAB Survey Report.

Discussion of Historic Properties and Effects

- Preliminary effects assessment for the WSAB Project:
  - No adverse effect to built environment historic properties
  - Potential adverse effects to five archeological resources
- **Focus:** Preliminary effects assessment for I-105/Century Freeway Historic District (Historic District).
  - Historic District intersects WSAB Project APE in South Gate
  - Project includes modification of small portion of Historic District
- Proposed Project elements preliminarily evaluated for adverse effects:
  - Bridge Modification (Demolition and Reconstruction)
  - C (Green) Line Track Reconfiguration and I-105 Lane Realignment
  - Construction of Infill LRT Station and Vertical Circulation Elements

I-105/Century Freeway-Transitway Historic District

- District boundaries encompass the Caltrans right-of-way from California Street in El Segundo to Studebaker Road in Norwalk.
- Meets Criteria Consideration G, with a period of significance of 1968 through 1995.
- Determined eligible for the NRHP under Criteria A and C at the state level of significance in the areas of engineering, transportation, and social history.

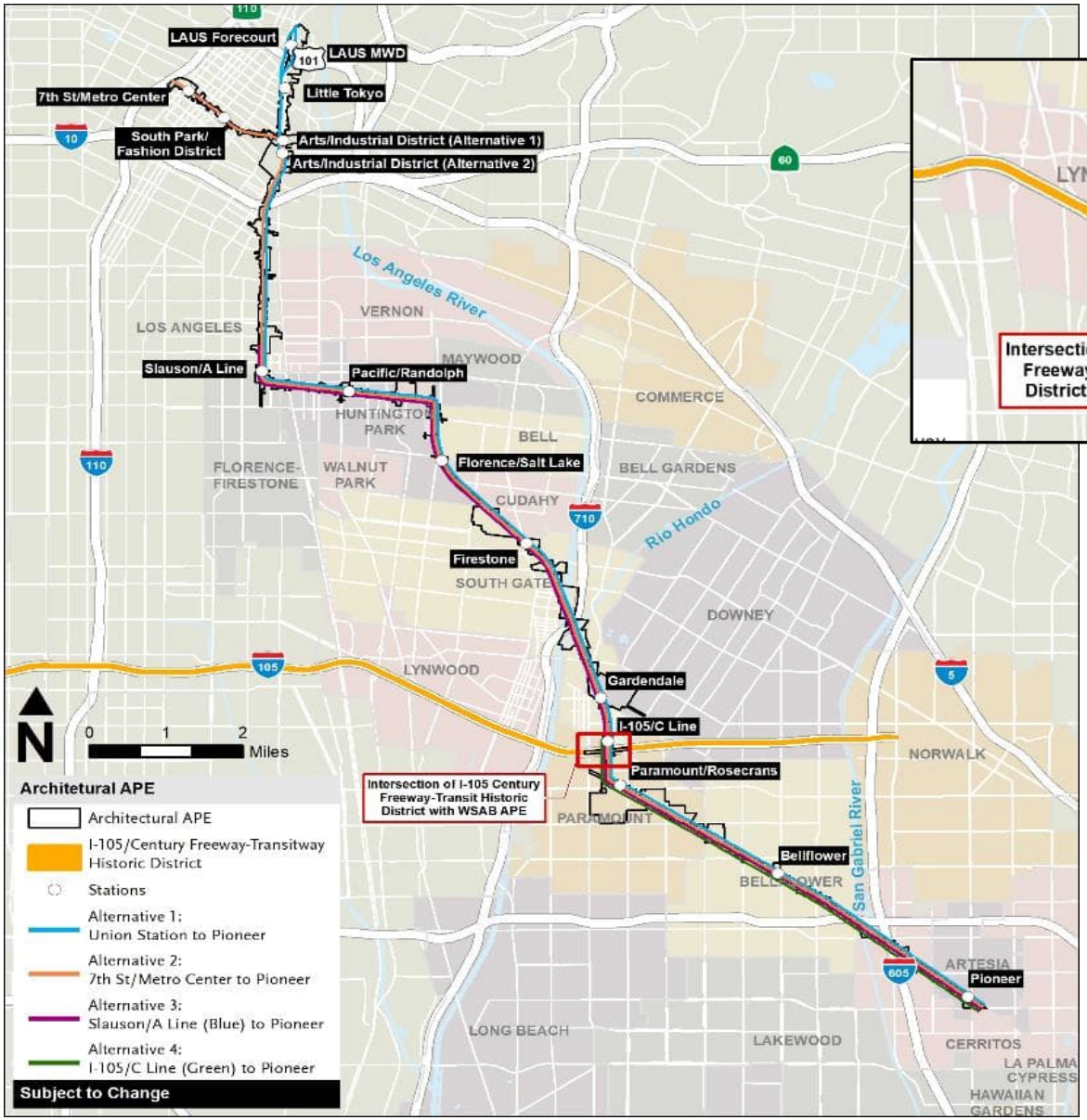


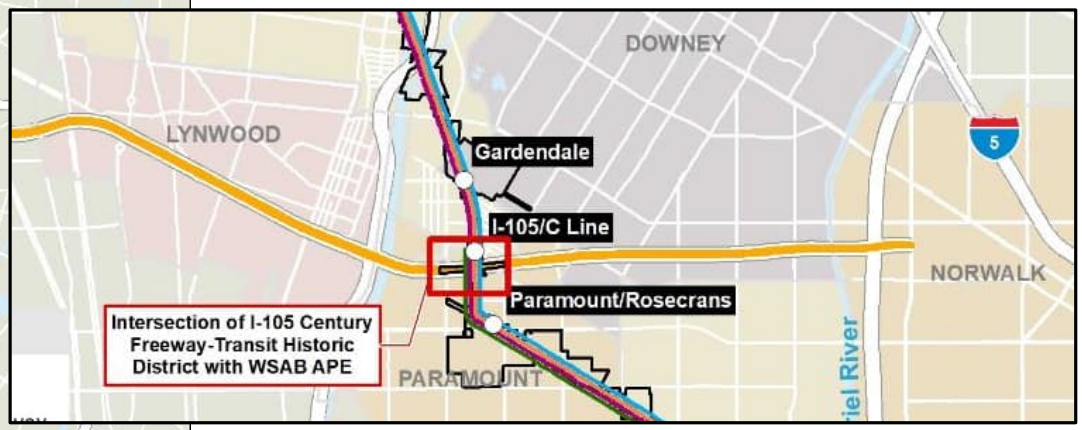


Photograph Credit: Smith and Harper 2019
Note: areas depicted in photographs are not within the Project APE

Metro

I-105/Century Freeway-Transitway Historic District





- The APE encompasses roughly 1.65 miles, or just under 10 % of the over 18.1-mile-long linear District.
- The District is located in all four Project Alternatives.
- Intersects with the Project APE in South Gate.
- Potential effects: three bridges and the Caltrans right-of-way.

Metro

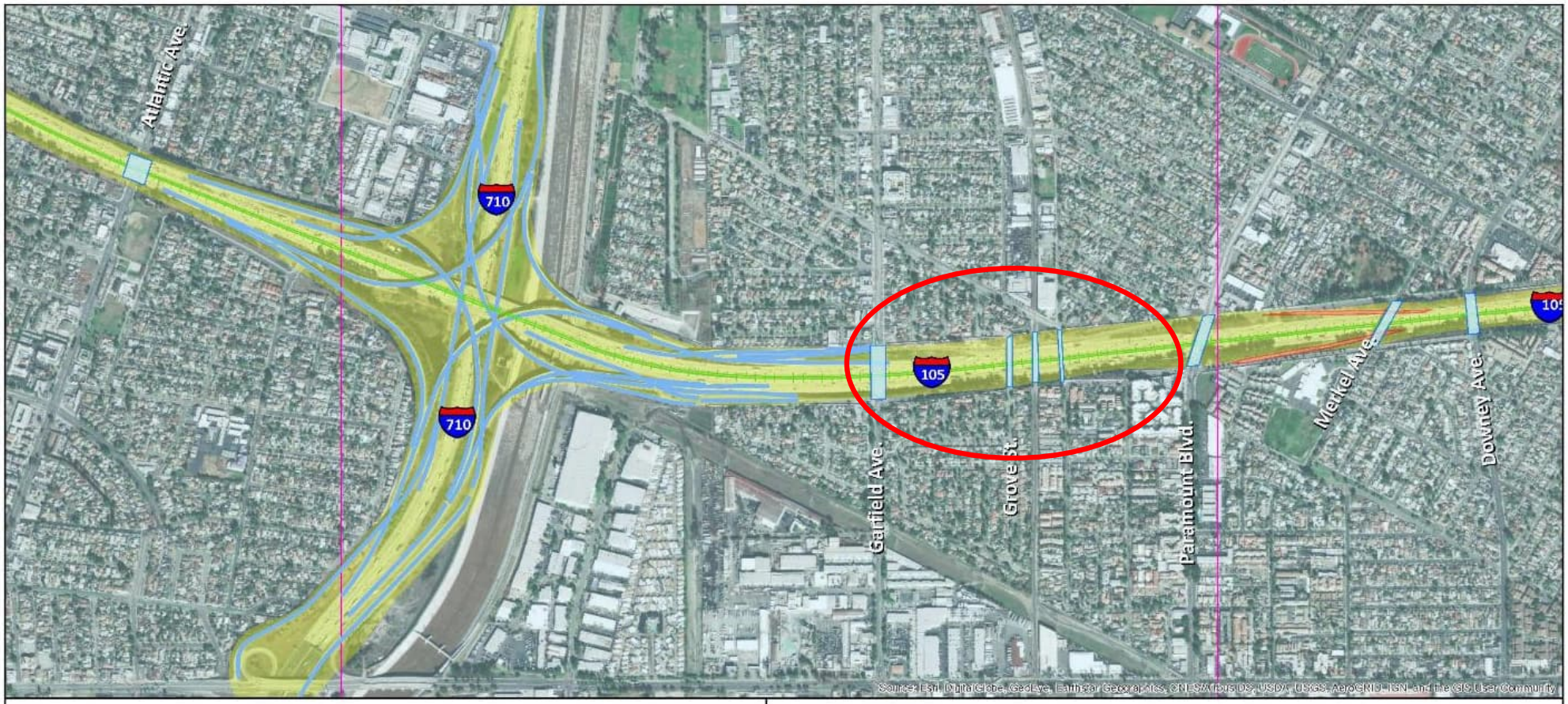
I-105/Century Freeway-Transitway Historic District Character-Defining Features

Ranking	CDF #	Feature and Description	A	B	C	D	E	Total Points
Most Significant	1	Limited interchanges (Interstates 405, 110, 710 and 605)	3	3	3	3	3	15
Most Significant	2	Profile of route (at-grade, elevated, in trench or on berm)	2	3	3	3	3	14
Significant	3	Multi-lane roadway	1	3	2	3	3	12
Significant	4	Alignment of route	1	2	3	3	3	12
Significant	5	Green Line light rail system and stations in median	2	2	3	2	3	12
Significant	6	ITS system (CCTV, TMS, RMS, ATMS, CMS1)	2	2	3	2	2	11
Significant	7	Original bridges and pedestrian overcrossings	1	1	2	3	3	10
Significant	8	Fully landscaped	1	1	2	3	3	10
Significant	9	Controlled ramps and their lengths	1	1	2	2	3	9

Note: Non-character-defining features of the district include: roadway standard pavement and curb, striping and pavement markers in roadway, standard drainage facilities, standard signage and streetlight standards, sound walls, mast lighting at the I-710 interchange, pump stations, the C Line (Green) outside of the median and its stations southwest of the Aviation/LAX Station and additional C Line (Green) Maintenance and Storage Yards beyond the I-105 corridor that were not originally constructed as part of the I-105.

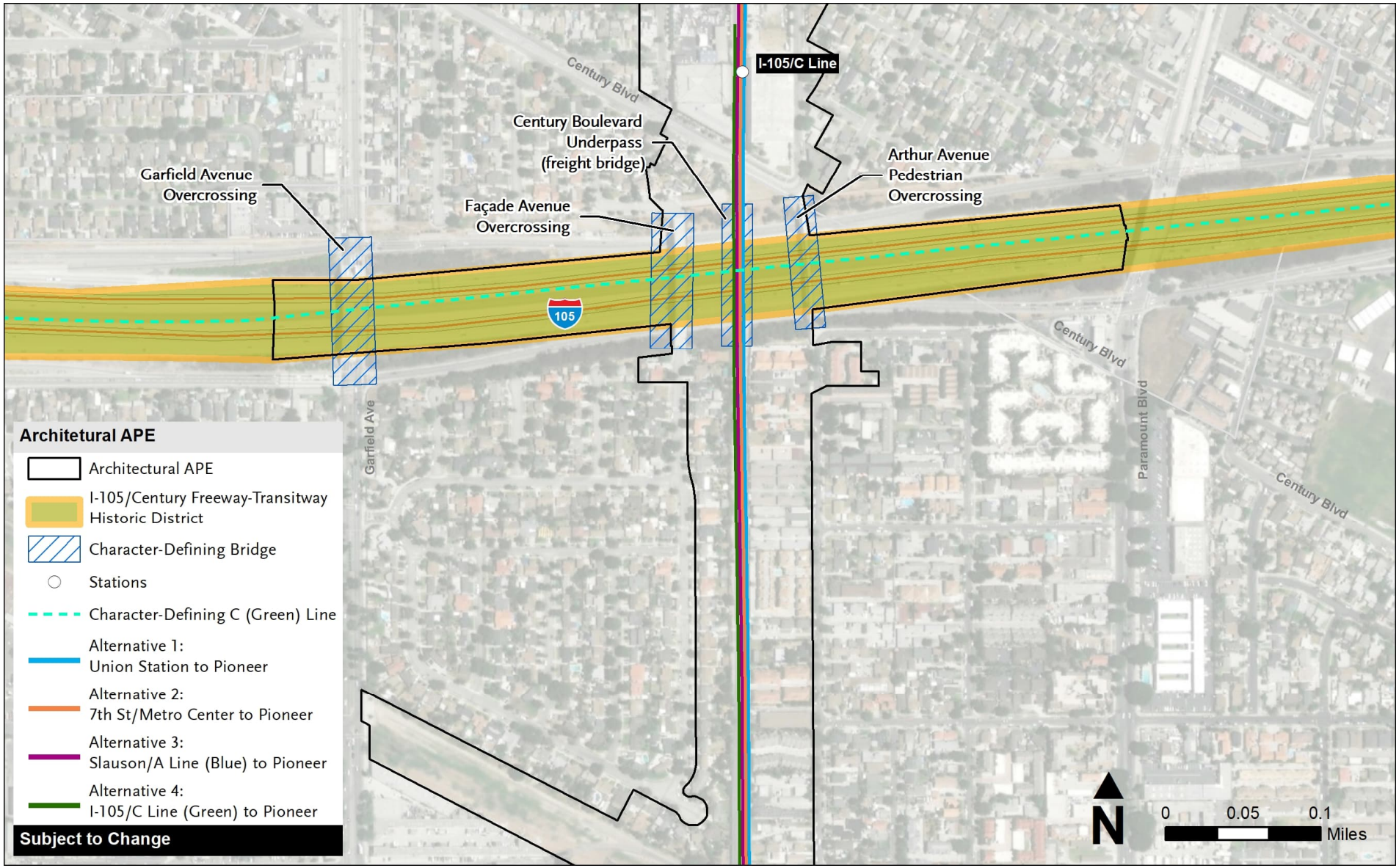
Metro

I-105/Century Freeway-Transitway Historic District & The WSAB Project



Metro

I-105/Century Freeway-Transitway Historic District &WSAB Architectural APE



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Proposed Project Components at I-105



Proposed Project Components at I-105

The following is a list of the activities proposed within the boundaries of I-105 Historic District

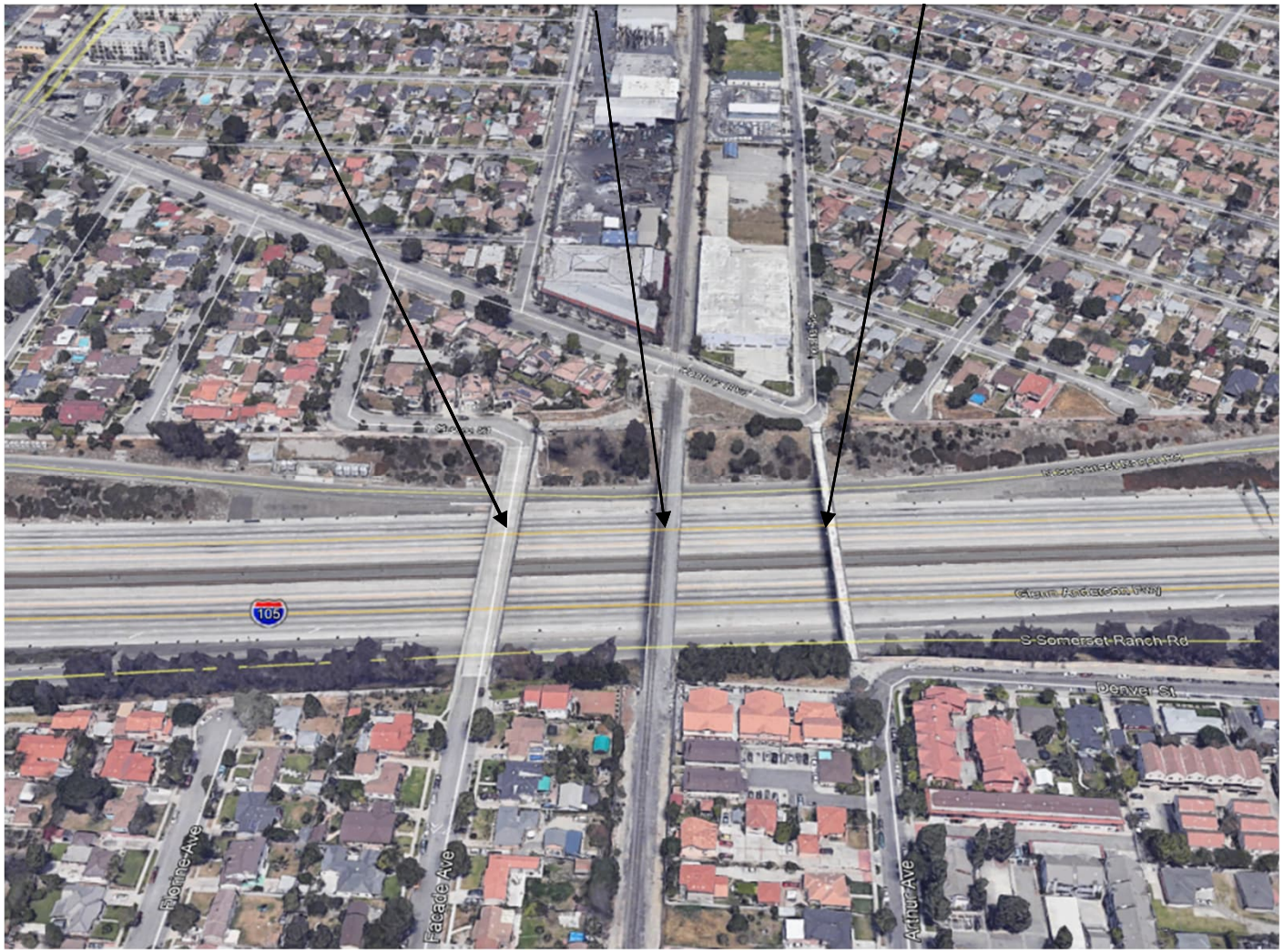
1. **Bridge Modifications (Demolition and Reconstruction)**
   - Façade Avenue Overcrossing (Bridge No. 53 2424)
   - Century Boulevard Underpass (Bridge No. 53 2427) (freight bridge)
   - Arthur Avenue Pedestrian Overcrossing (Bridge No. 53 2426)
   - Construction of new bridge to accommodate WSAB Alignment
2. **C (Green) Line Track and I-105 Lane Realignment**
   - Realignment of the approximately 2,500 feet of existing Metro C (Green) Line tracks
   - Reconfiguration of approximately 2,500 feet of I-105 lanes
3. **Construction of Infill LRT Station and Vertical Circulation Elements**
   - Infill station constructed in the middle of I-105
   - Vertical circulation elements (elevator and stairs)

Proposed Project Components at I-105
1. Bridge Modification (Demolition and Reconstruction)

Façade Avenue Overcrossing

Century Boulevard Underpass (freight bridge)

Arthur Avenue Pedestrian Overcrossing



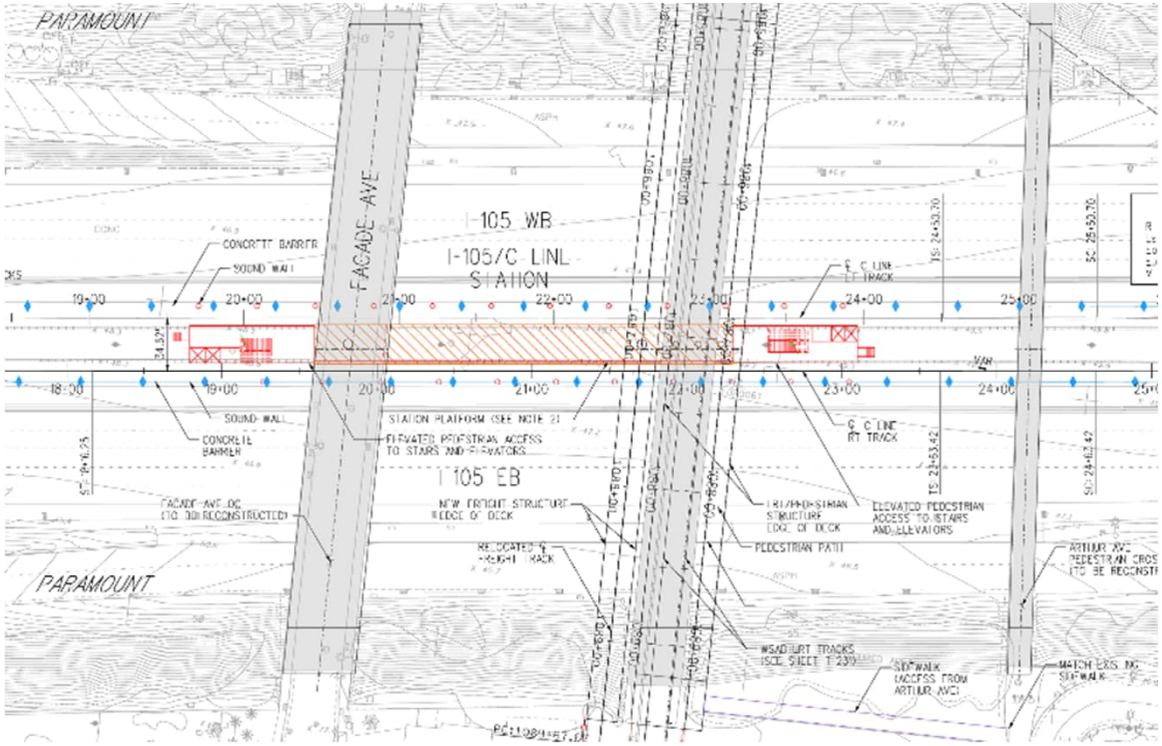

Existing Façade Avenue Overcrossing


Existing Century Boulevard Underpass (freight bridge)


Existing Arthur Avenue Pedestrian Overcrossing

Metro

Proposed Project Components at I-105
2. C (Green) Line Track and I-105 Lane Realignment







Metro

Proposed Project Components at I-105
3. Infill Station and Vertical Circulation Elements



Metro Conceptual Systemwide Station Design Rendering

Metro

Preliminary Effects Assessment

Component	CDF(s)	Ranking	Preliminary Effects Analysis
1. Bridge Modification (Demolition/ Reconstruction)	Original bridges/ pedestrian overcrossings (3)	10; significant	• Constructed in 1988 of contemporary materials. • Would be reconstructed to maintain the rhythm of bridges that occurs throughout district. • Not identified as eligible for architecture or engineering. • Would affect less than 3% of the district's original bridges. • Would be designed in a consistent scale and massing with character-defining bridges. • No adverse effect to the Historic District would occur.

Preliminary Effects Assessment

Component	CDF(s)	Ranking	Preliminary Effects Analysis
2. C (Green) Line Track and I-105 Lane Realignment	multi-lane roadway alignment of route C (Green) Line light rail system and stations in median	12; significant	• Project would modify less than 10% of the C (Green) Line track and I-105 lanes. • LRT alignment would maintain its original purpose and function. • The freeway's alignment and profile would not be altered. • The intermodal nature of the freeway would be increased with a connection to WSAB. • No adverse effect to the Historic District would occur.

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Preliminary Effects Assessment

Component	CDF(s)	Ranking	Preliminary Effects Analysis
3. Construction of Infill Station/ Vertical Circulation Elements	multi-lane roadway alignment of route C (Green) Line light rail system and stations in median	12; significant	• Station and circulation elements are consistent with the overall form and function of the district. • District includes ten other light rail stations located in median. • The infill station would be consistent in its placement (in median), scale and function with other stations throughout the district. • No adverse effect to the Historic District would occur.

Preliminary Effects Assessment
1. Bridge Modifications (Demolition and Reconstruction)

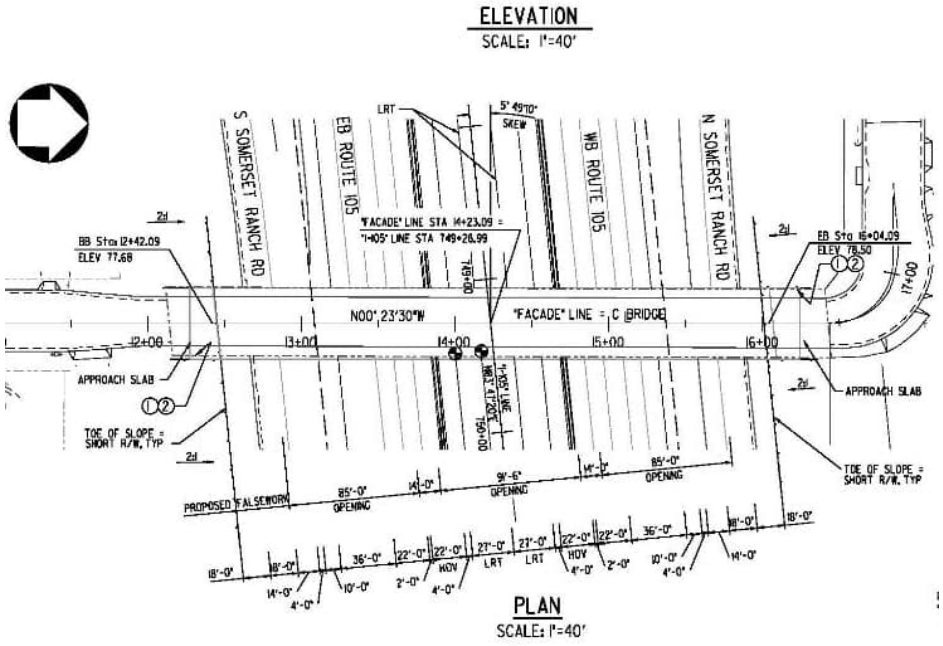
- Bridges constructed in 1988, not architecturally significant.
- The bridges are historically significant for function/public benefit and visual presence.
- Three of the district's 118 bridges (or less than 3%) would be demolished and reconstructed by the Project.
- Proposed bridges would be visually compatible with the existing setting and would maintain current function.
- No adverse effect to the Historic District would occur.

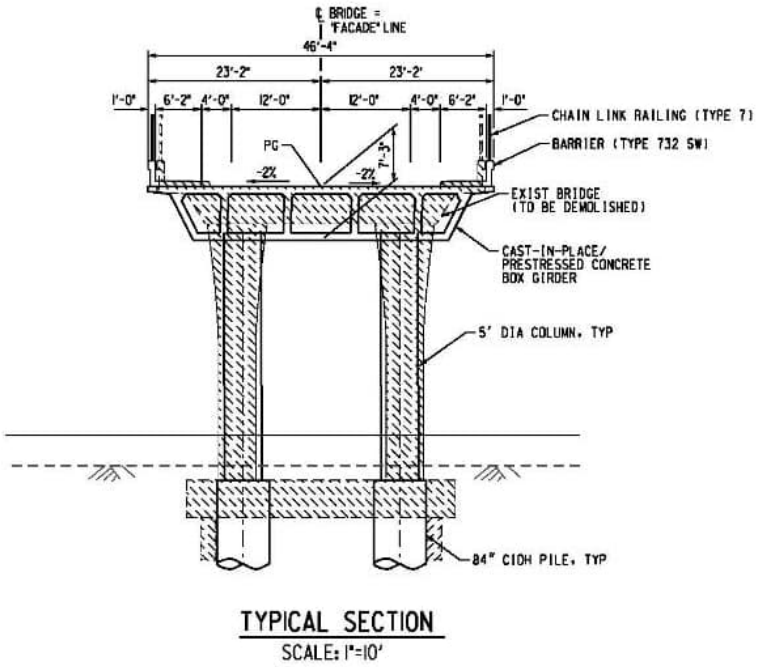
Preliminary Effects Assessment
1. Bridge Modifications (Demolition and Reconstruction)

Existing Façade Avenue Overcrossing



Proposed Façade Avenue Overcrossing





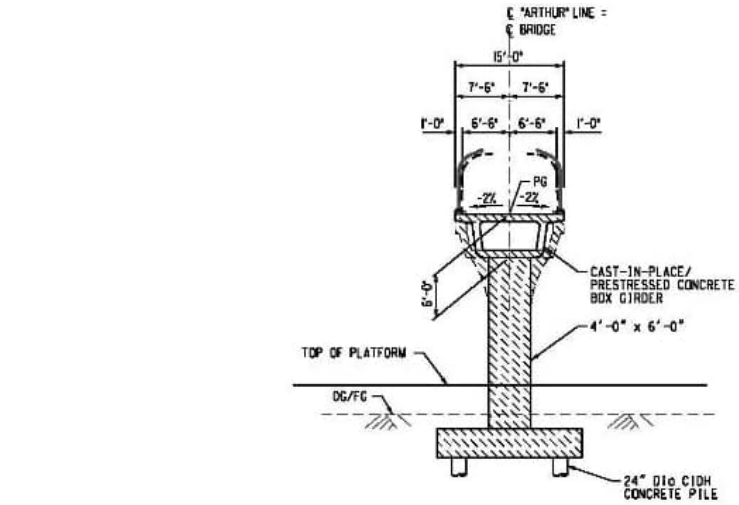
Metro

Preliminary Effects Assessment
1. Bridge Modifications (Demolition and Reconstruction)

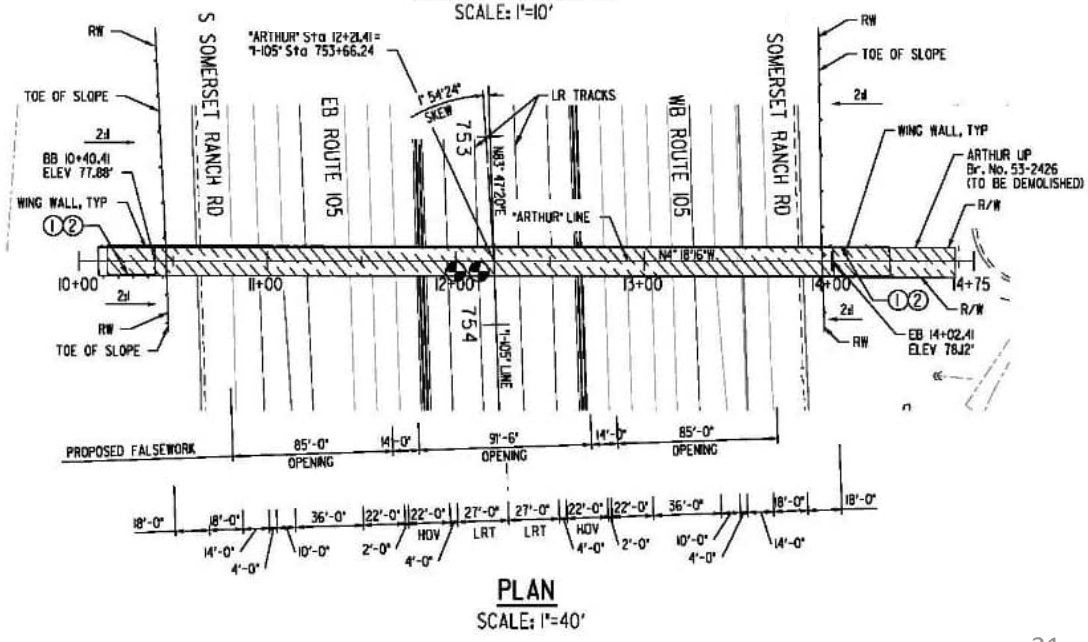
Existing Arthur Avenue Pedestrian Overcrossing



Proposed Arthur Avenue Pedestrian Overcrossing



TYPICAL SECTION
SCALE: 1"=10'

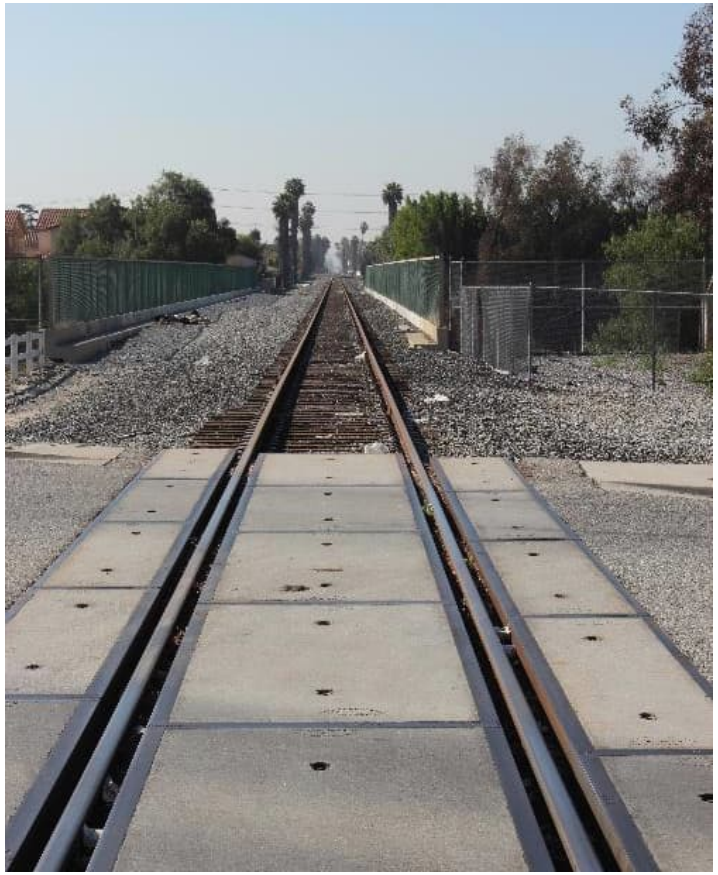


PLAN
SCALE: 1"=40'

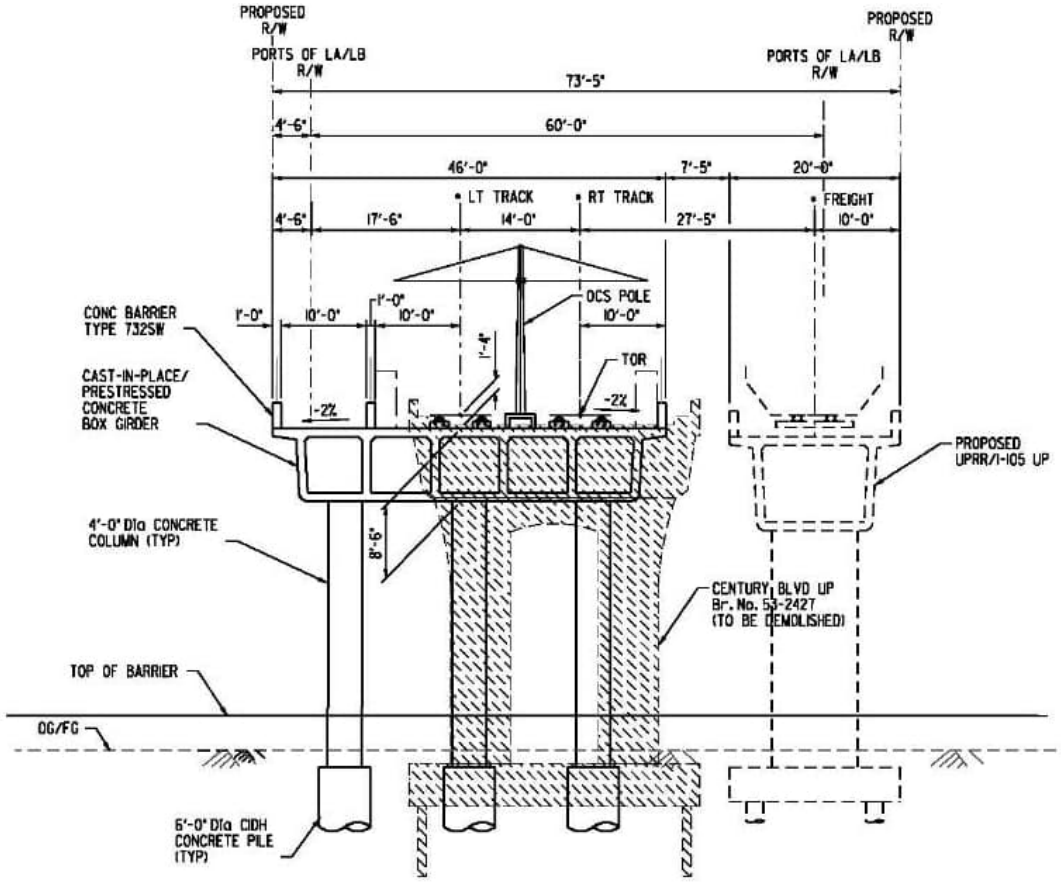
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Preliminary Effects Assessment
1. Bridge Modifications (Demolition and Reconstruction)

Existing Century Boulevard Underpass (freight bridge)



Proposed Century Boulevard Underpass (freight bridge) and WSAB LRT Bridge



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Preliminary Effects Assessment
2. C (Green) Line Track and I-105 Lane Realignment

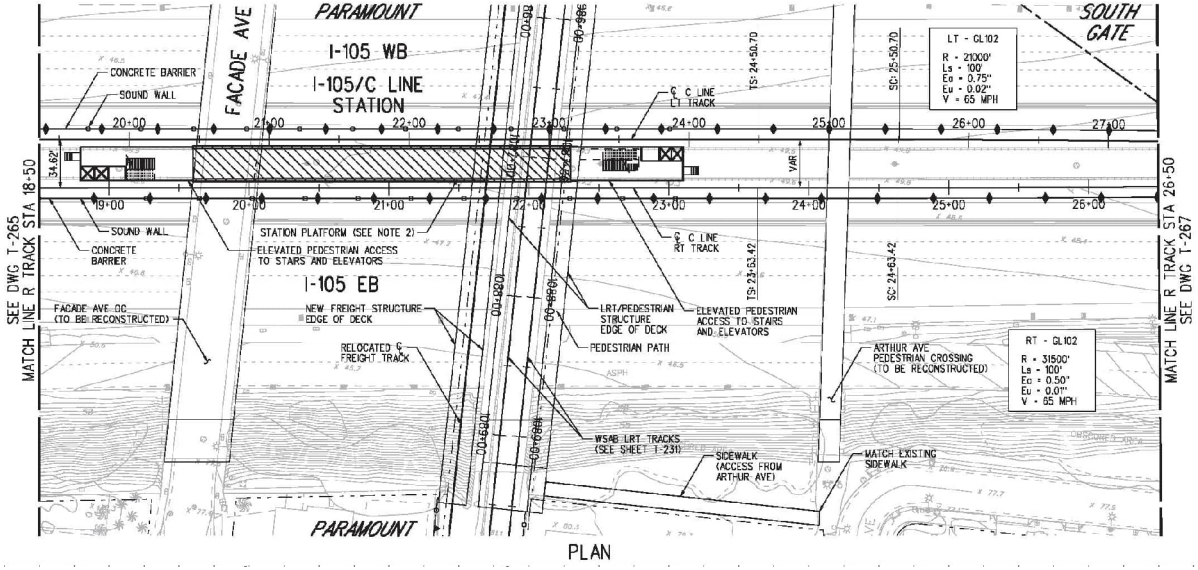
- Relocation of 2,500 feet of track and lanes is less than 10% of the historic features.
- Track and lane shift by 7.5 feet maximum is minor and would occur within the existing historic right-of-way envelope.
- Realignment would not alter the Historic District's significant character.
- No adverse effect to the Historic District would occur.

Preliminary Effects Assessment
2. C (Green) Line Track and I-105 Lane Realignment

Existing Conditions Simulation



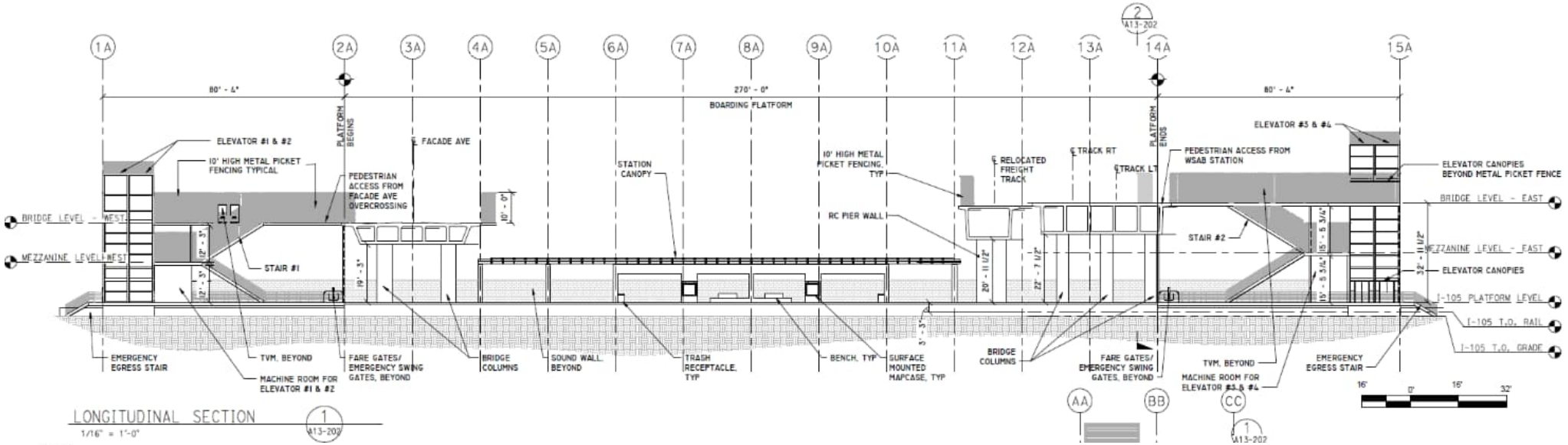
Proposed Realignment



Preliminary Effects Assessment
3. Infill Station and Vertical Circulation Elements

- New station and circulation elements are consistent with the function of the historic district.
- New station would be similar in scale but would be constructed in a contemporary style to differentiate it from the character-defining stations.
- The station and connectivity elements would not introduce elements that would diminish the integrity of the historic district's significant historic features.
- Station would add a consistent element that exists within the Historic District.
- No adverse effect to the Historic District would occur.

Proposed Conceptual Design for Infill Station



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WSAB Project Benefits

- New LRT station within freeway along C (Green) Line would support and enhance the intermodal function of the Historic District.
- The new LRT rail bridge would include sidewalks which would increase pedestrian access across I-105.

WSAB Project Schedule

- **March 30, 2020:** Following minor modifications Survey Report and updated APE submitted to SHPO; currently awaiting comment.
- **June 2021:** Release of Draft EIS/EIR and public comment period.
- **September 2021:** Selection of Locally Preferred Alternative.
- **Early-2022:** Record of Decision.

Conclusion

- **Preliminary Effects Assessment:** WSAB would result in no adverse effect to the I-105/Century Freeway-Transitway Historic District.

Stay Connected

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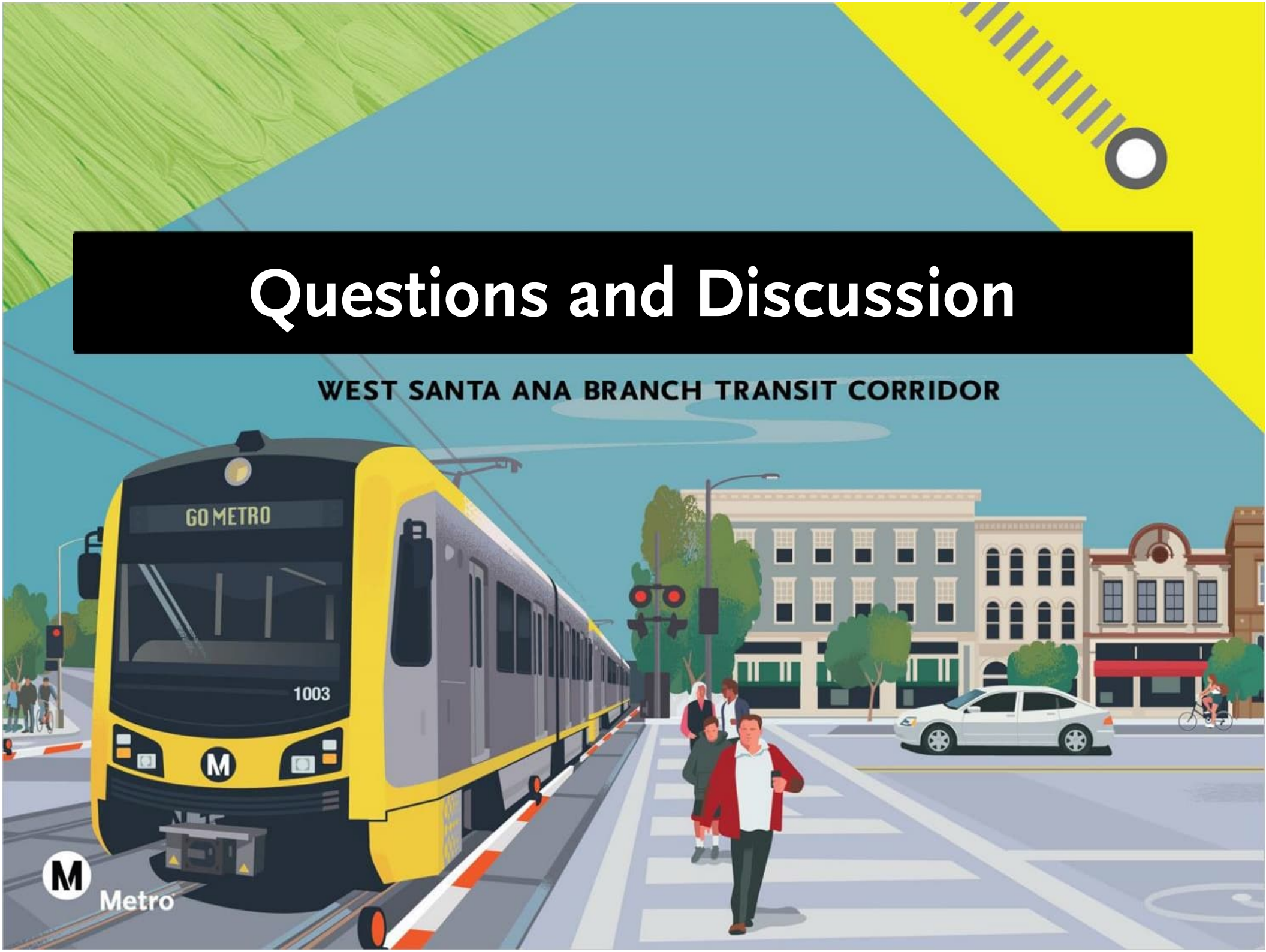
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Please visit the project website and use the comment form to provide your feedback.



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Questions and Discussion



SHPO Coordination

Meeting with Office of Historic Preservation

Date	Time
May 22, 2023	2:00 – 3:00 pm
Location	**Conference Call Information**
Microsoft Teams Meeting	

A. Attendee List

Name	Agency / Company	Email
Rusty Whisman	FTA	Russell.whisman@dot.gov
Mary Nguyen	FTA	Mary.Nguyen@dot.gov
Kathleen (KC) Kelly	FTA	kathleen.kelly@dot.gov
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Natalie Lindquist	OHP	Natalie.Lindquist@parks.ca.gov
Alicia Perez	OHP	Alicia.Perez@parks.ca.gov
Meghna Khanna	Metro	KhannaM@metro.net
Ivan Gonzalez	Metro	GonzalezIv@metro.net
Kristin Carlson	WSP	Kristin.Carlson@wsp.com
Shannon Carmack	Rincon	scarmack@rinconconsultants.com
Rachel Perzel	Rincon	rperzel@rinconconsultants.com

B. Meeting Summary

Meeting attendees provided introductions and representatives from the Federal Transit Administration (FTA) provided an overview of the meeting agenda. The Metro team provided a presentation that included updates regarding the West Santa Ana Branch (WSAB) Project and identification of the Locally Preferred Alternative (LPA); updates to the Cultural Resources Survey Report since circulation of the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), updates to the to the cultural resources effects assessment with a focus on the I-105 Century Freeway-Transitway Historic District (Historic District), and Section 106 consultation (the presentation is attached to this meeting summary). Ms. Khanna noted that WSAB is a Metro priority project that is currently in the New Starts Project Development phase and has support from various stakeholders.

The Project was preliminarily determined to have an adverse effect related to archeological resources in the previous consultation in 2020. Ms. Carmack noted that there are no archaeological resources within the Area of Potential Effects for the LPA. She summarized the effects assessment for the Historic District, noting that since Metro last met with SHPO in September 2020, project effects in the district have been minimized. Specifically, in September 2020, the Project proposed demolition and reconstruction of three bridges within the Historic District, whereas now, only one bridge requires demolition and reconstruction. She also summarized updates made to project design and the effects assessment resulting from coordination with the California Department of Transportation (Caltrans). These changes include a change in the design of the replacement freight bridge from 2 spans to 4 spans (consistent with existing design), the design of the light rail transit and C Line station will undergo Secretary of the Interior Standards design review, evaluation of landscaping removed with a commitment to replace trees at a 1:1 ratio, and a more robust cumulative impacts assessment. Ms. Carmack also summarized consultation with Caltrans, beginning in December 2021 and continuing through early 2023. Ms. Carmack also summarized project benefits. In conclusion, with the refined design of the LPA and the avoidance of demolition of two bridges in the Historic District, the Project will result in no adverse effect to historic properties, including the Historic District, and a Memorandum of Agreement will not be required.

After the presentation, Ms. Lindquist asked if Caltrans was okay with the “no adverse effect” finding for the Historic District. Ms. Nguyen responded that the focus of consultation with Caltrans has been on the cultural resources analysis pursuant to the California Environmental Quality Act. She noted Caltrans has not pushed back on the Section 106 assessment. She noted that for Section 106, in response to Caltrans comments, the team applied the same approach that Caltrans took on recent projects, namely the I-105 ExpressLanes Project. The team has been coordinating and will continue to consult with Caltrans on the landscaping and design of the bridge at the I-105.

Ms. Nguyen asked Ms. Lindquist and Ms. Perez for their thoughts on the approach and findings presented during the meeting. Ms. Lindquist recommended that the effect analysis focus on why the Historic District was determined eligible for the National Register of Historic Places under Criteria A and C. Ms. Lindquist noted that based on the rationale for eligibility, there should be flexibility in the project actions that can occur within the Historic District without resulting in an adverse effect determination. She noted that the C Line in the median of I-105 is important to the district and the modifications to the station proposed are not of concern because the connectivity and presence of transit would be maintained.

Ms. Lindquist noted the modifications would add to the functionality of the Historic District and that the proposed station modifications are complementary with the context of the district rather than detracting from it. She noted the project modifications are in keeping with the spirit of why the freeway was developed as it was. Ms. Nguyen re-iterated that the project proposes to maintain connectivity, setting, and feel of the Historic District and that the number of bridges that require demolition have been reduced since the Draft EIS/EIR was circulated.

Meeting attendees discussed the archaeological resource that was determined to no longer be extant since the Draft EIS/EIR. Ms. Perez noted that she would review the materials currently with OHP (i.e., Cultural Resources Survey Report – Rev 2). Attendees discussed that based on the updated assessment, a Memorandum of Agreement is not anticipated.

Ms. Nguyen noted that more than one federal agency is involved in the undertaking. FTA is coordinating with US Army Corps of Engineers (USACE) for Section 106 and NEPA. FTA is lead agency for Section 106 and USACE will rely on the FTA process to fulfill the collective responsibilities under Section 106 and support the USACE permits related to this project.

Next stop: new rail to southeast LA County.

WEST SANTA ANA BRANCH TRANSIT CORRIDOR



State Historic Preservation Officer
May 22, 2023

West Santa Ana Branch Transit Corridor Project Meeting Agenda

1. Introductions
2. SHPO Consultation Summary
3. Project Overview
    - Locally Preferred Alternative
4. Survey Report – Revision 2
    - Revised APE and Survey Report – Revision 2
    - Updated Survey Results
5. Effects Update
6. I-105 Century Freeway-Transitway Historic District
    - Historic District and APE
    - Analysis Update
    - Current Design Elements in the Historic District
7. Consultation
    - Tribal and Interested Party
    - Caltrans
8. Project Benefits
9. Conclusion and Next Steps

SHPO Consultation Summary

- **December 21, 2018:** FTA initiated SHPO consultation
- **2018-2019**: Developed/approved APE, survey, and identification methodology
- **May 29, 2019**: SHPO concurred with APE and survey methods
- **March 30, 2020**: FTA sent Cultural Resources Survey Report – Rev 1 to SHPO for review and concurrence
- **September 9, 2020**: Meeting with FTA and SHPO to discuss preliminary determination of No Adverse Effect on I-105 Historic District (SHPO did not raise objection with this approach)
- **May 11, 2023**: Survey Report – Rev 2 submitted to SHPO

WSAB Project Overview



Draft EIS/EIR: 19 miles

Four Build Alternatives

- **Alt 1**: Los Angeles Union Station to Pioneer Station
- **Alt 2**: 7th St/Metro Center to Pioneer Station
- **Alt 3**: Slauson/A Line (Blue) to Pioneer Station
- **Alt 4**: I-105/C Line (Green) to Pioneer Station

Locally Preferred Alternative



- In January 2022, Metro board selected Slauson/A Line to Pioneer (14.8-mile with 9 WSAB & 1 new C Line Stations) as the Locally Preferred Alternative (LPA) and focus of Final EIS/EIR.
- The LPA was evaluated in the Survey Report – Rev 1 and the Draft EIS/EIR as Alternative 3
- LPA refined to address stakeholder coordination and comments on the Draft EIS/EIR

Component	Quantity
Alignment length	14.8 miles
Length of at-grade and aerial	12.2 miles at-grade; 2.6 miles aerial
Station configurations	9 along WSAB alignment, 1 at-grade infill station along C Line 3 aerial; 6 at-grade
Parking facilities	5 total: 4 surface lots and 1 parking structure (approx. 2,800 spaces)
At-grade crossings	31
Elevated street crossings	15
Freight crossings	9
Freeway crossings	4 (1 aerial/overcrossing at I-105; 3 freeway undercrossings at I-710, I-605, SR 91)
Freight realignment	Approx. 8 miles
River crossings	3 (Rio Hondo, LA River and San Gabriel)
TPSS facilities	17
Maintenance and storage facility site	1 (City of Bellflower)

Revised APE and Survey Report – Revision 2

- APE expanded for TCEs, traffic mitigation, and minor project modifications
  - Expansion of the APE primarily followed the previous methodology
  - For small-scale, low-lying modifications (e.g., curb and sidewalk modification) on parcels adjacent to road ROW, the direct APE encompasses the construction footprint, and the architectural APE includes the parcel adjacent to the ROW
  - Where the direct APE coincides with existing road ROW; methodology for expansion assumed up to a 10-foot buffer on adjacent parcels to account for roadway modifications (e.g., regrading driveways); architectural APE coincides with direct APE

- Project construction completion date extended from 2028 to 2034
  - Properties constructed between 1979 and 1989 (50 years from the revised project completion date plus a 5-year buffer) were surveyed, photographed, and researched
  - DPR Forms substituted with an appendix table depicting a photograph of each parcel, as these properties do not meet Criterion Consideration G

- Report resource summary updated to include three USACE river channels previously determined eligible for NRHP-listing and remove one archaeological site determined to be no longer extant

Updated Survey Results

Survey Report – Rev 1	Survey Report – Rev 2 Updates
7 previously recorded NRHP eligible archaeological resources	**1 archaeological resource** (P-19-002849) previously identified in the APE for the LPA *Additional research found the archaeological resources was* ***no longer extant****; it was removed from the Survey Report*
18 previously listed in or determined eligible built environment resources	**3 additional built environment** resources previously determined eligible (consultation with USACE) ○ Los Angeles River Channel, ○ Rio Hondo River Channel ○ San Gabriel River Channel
36 built environment resources determined eligible for listing in the NRHP as a result of the WSAB Project	**3 additional built environment resources** recommended NRHP eligible as a result of the WSAB Project

Effects Update

Preliminary Finding of Effects	Finding of Effects Updates
Potential adverse effects to previously recorded NRHP eligible archaeological resources requiring a Memorandum of Agreement (MOA)	No archaeological resources in the APE for the LPA; **No MOA required**
No adverse effect to 18 previously listed in or determined eligible built environment resources	**No adverse effect** to 3 additional built environment resources previously determined eligible ○ Los Angeles River Channel, ○ Rio Hondo River Channel ○ San Gabriel River Channel
No adverse effect to 36 built environment resources determined eligible for listing in the NRHP as a result of the WSAB Project	**No adverse effect** 3 additional built environment resources recommended NRHP eligible as a result of the WSAB Project
No adverse effect to the I-105/Century Freeway-Transitway Historic District	**No adverse effect** to the I-105/Century Freeway-Transitway Historic District

I-105/Century Freeway-Transitway Historic District

- District boundaries encompass the Caltrans right-of-way from California Street in El Segundo to Studebaker Road in Norwalk.
- Meets Criteria Consideration G, with a period of significance of 1968 through 1995.
- Determined eligible for the NRHP under Criteria A and C at the state level of significance in the areas of engineering, transportation, and social history.
- Character Defining Features include limited interchanges, route profile, multi-lane roadway, alignment, C Line LRT system, ITS System, bridges and overcrossings, landscaping, and ramps.



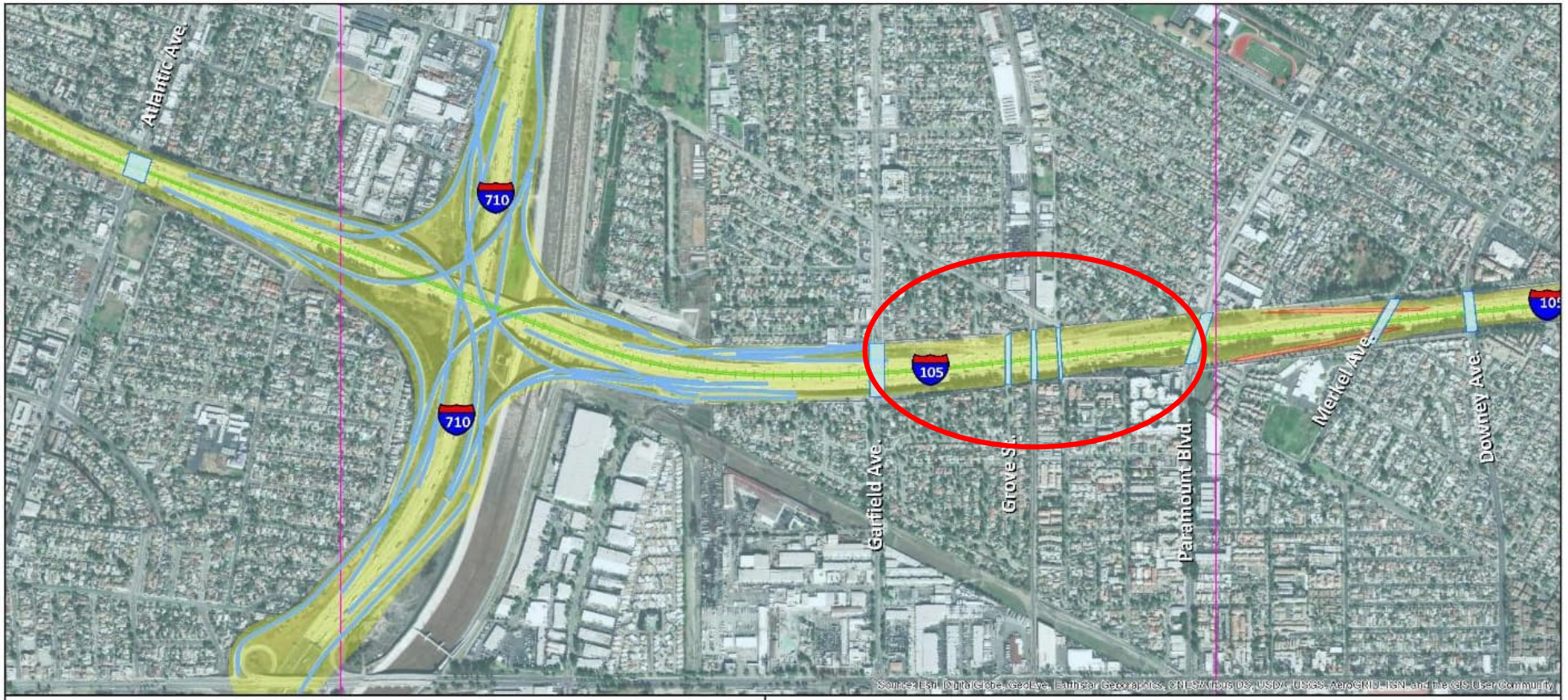
View of C Line in I-105 Median



Overview of the Portion of the Historic District in the APE

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I-105/Century Freeway-Transitway Historic District



Legend

- Historic District Boundaries
- Bridges (CDF*)
- Ramps (CDF)
- Light Rail Line (CDF)
- Light Rail Stations (CDF)
- Interchanges (CDF)
- Match Line

* CDF - Character Defining Feature as defined in National Registrar guidance

0 0.1 0.2 0.3 0.4 0.5 Miles

N

CENTURY FREEWAY - TRANSITWAY HISTORIC DISTRICT

Historic District Boundaries
Character Defining Features
January 2020

Caltrans

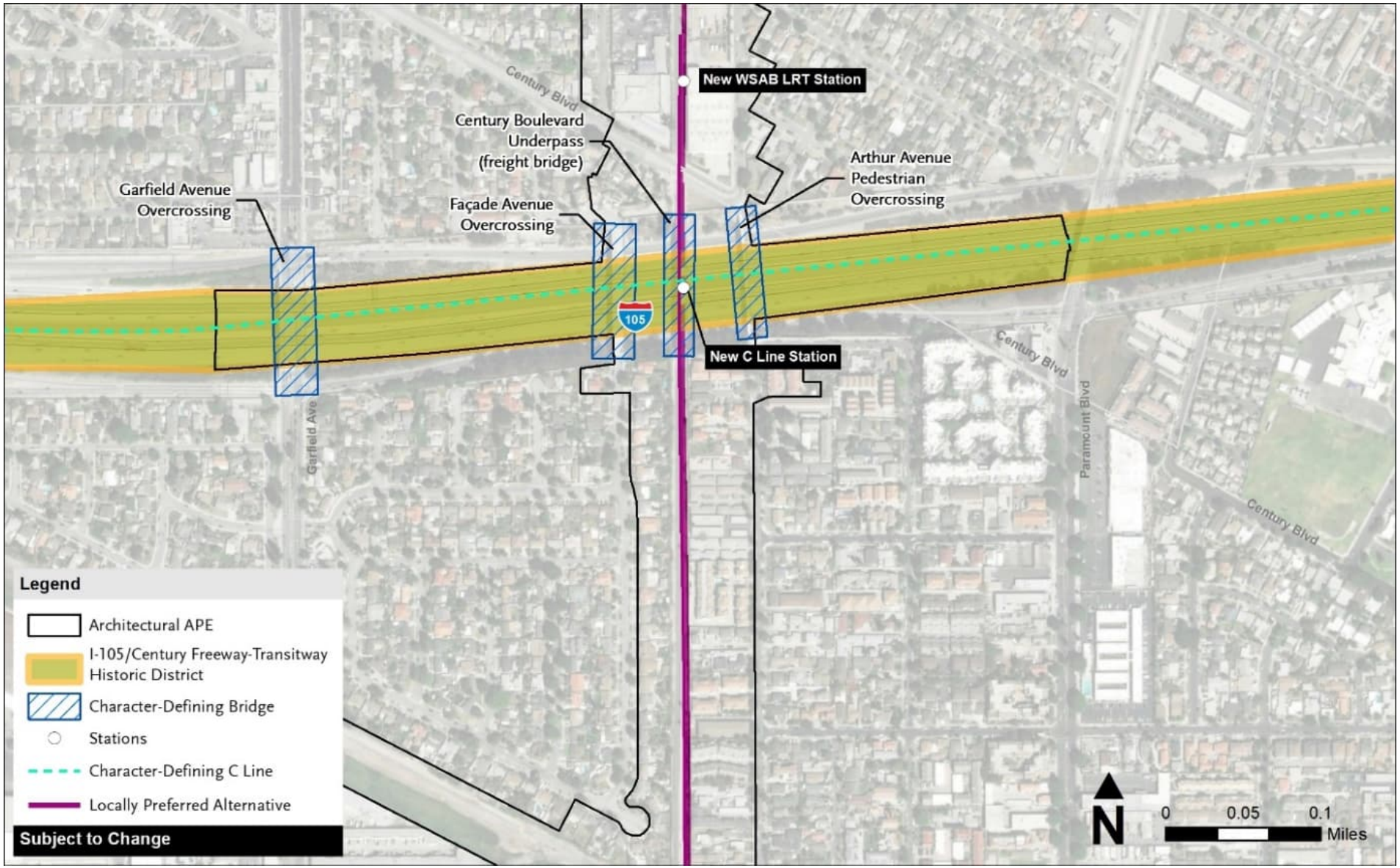
Map created by Joshua Miller
Caltrans Division of Environmental Planning

Sheet 10 of 13

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Historic District and WSAB APE



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Effects Analysis Update

Project Element 2020	Preliminary Assessment 2020	Updated Project Element 2023	Updated Assessment 2023
Demolition and reconstruction of three bridges	No adverse effect	Demolition and reconstruction reduced to one bridge	No adverse effect
New LRT bridge	No adverse effect	New LRT bridge to be designed in conformance with the Secretary of the Interior Standards	No adverse effect
Replacement Century Boulevard freight bridge – 2 span, concrete	No adverse effect	Replacement Century Boulevard freight bridge will be 4 span (consistent with existing), concrete and will feature a design in keeping with that of the district	No adverse effect
New station in I-105 median	No adverse effect	Station design will be reviewed and approved by a SOI qualified professional as design advances	No adverse effect
C Line track realignment	No adverse effect	No change	No adverse effect
Initial analysis did not provide detailed information on landscaping	No adverse effect	1:1 in-kind replacement of all trees removed from the APE (max 15)	No adverse effect

Tribal and Interested Party Consultation

- Consultation for 4 Build Alternatives
- Tribal Consultation
  - Consultation initiation letters sent to eight tribes listed on NAHC contact list
  - Consulted with the Kizh Nation via teleconference
  - Consulted with Gabrieleño/Tongva San Gabriel Band of Mission Indians via email - expanded records search radius from .5 to 1 mile as a result of a request
  - No specific TCPs identified
- Local Interested Party Consultation
  - Consultation initiation letters sent to 23 local government, local historic preservation advocacy, and history advocacy groups
  - Correspondence with 15 parties occurred via email
  - No historic properties not already considered were identified
- United States Army Corps of Engineers
  - Project had previously addressed eligibility and potential effects to river bridges within the APE
  - As a result of coordination with USACE, LA River, Rio Hondo River, San Gabriel River channels are now evaluated

Caltrans Consultation

- Caltrans provided comments on the Draft EIS/EIR on September 28, 2021
- Meetings held among Caltrans, FTA and/or Metro on December 7, 2021, April 21, 2022, February 9, 2023, and March 2, 2023
  - Comments related to the I-105 Historic District as a historical resource under CEQA and did not apply to Section 106 of the NHPA
  - Concerns included demolition of bridge(s), new LRT bridge construction, new station and VCEs, soundwalls, track realignment, removal of landscaping, cumulative impacts
- The Survey Report – Rev 2 was updated:
  - Effects assessment was significantly expanded, and project design changes were implemented to reduce potential effects/impacts
  - Integrated the recommendations of Caltrans and Caltrans ExpressLanes documents

Analysis Update

Based on Caltrans input, the following revisions were made to the analysis included in the updated Effects Report and Final EIS/EIR

- The potential effects of the LPA on the I-105 are more thoroughly analyzed
- As requested by Caltrans:
  - The term “reconstruction” has been removed from the analysis and replaced with “demolition”
  - The design of proposed bridges is described in further detail
  - The analysis considers that designs for the new LRT bridge and Metro C Line station will undergo SOI Standards design review
  - The freight bridge replacement changed from 2 span to 4 span, consistent with existing freight bridge
  - The analysis considers that landscaping removed will be replaced at a 1:1 ratio and the number of trees potentially effected has been quantified
  - Potential cumulative impacts of the LPA and future projects are more thoroughly discussed
- The effects analysis on the District draws on the approach of the ExpressLanes Project.

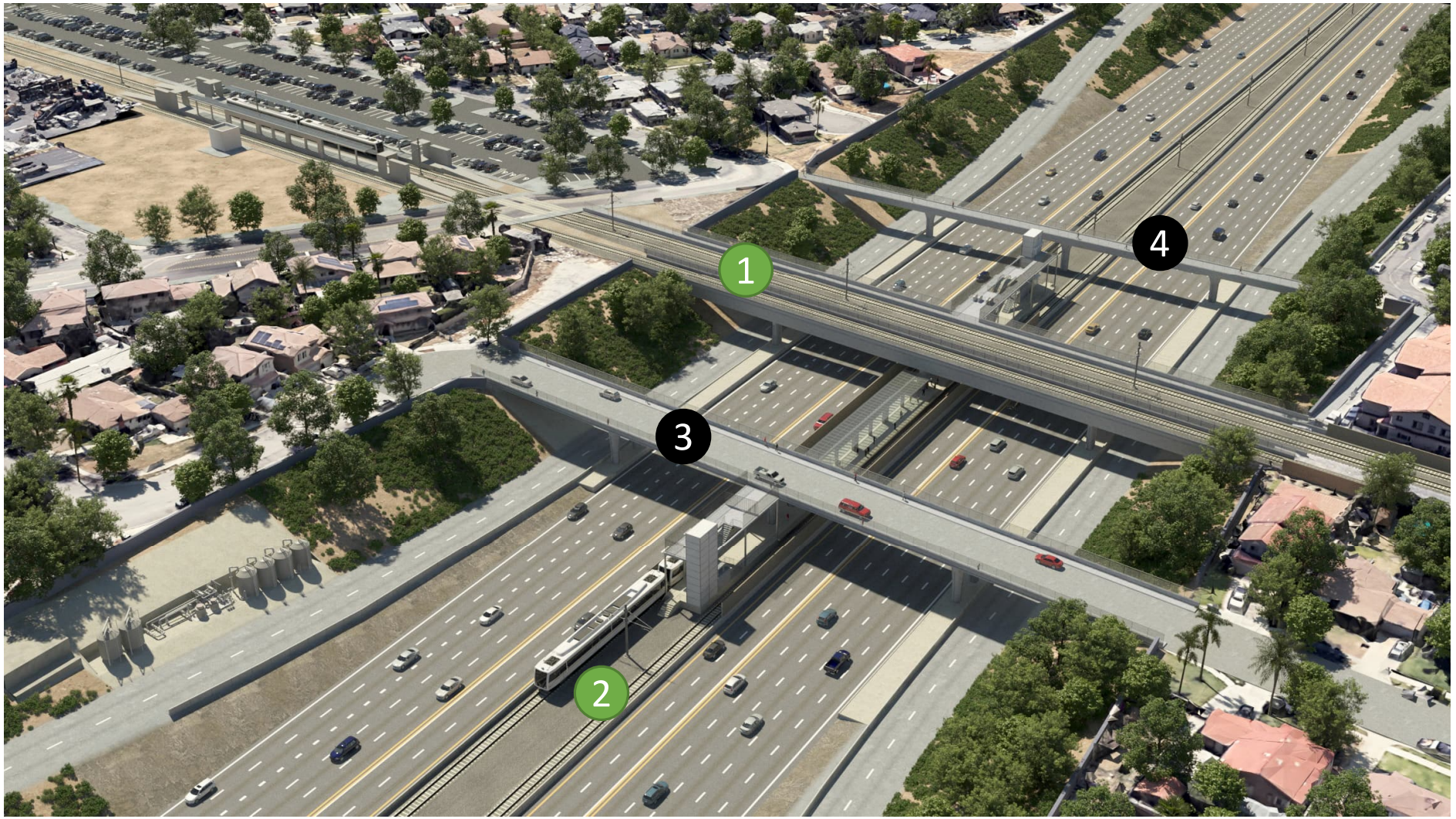
Current Design Elements in the Historic District

3 Façade Avenue Overcrossing (remain intact with VCEs added)

1 Proposed New LRT and Replacement Freight Bridges

2 Proposed Infill Station and Vertical Circulation Elements

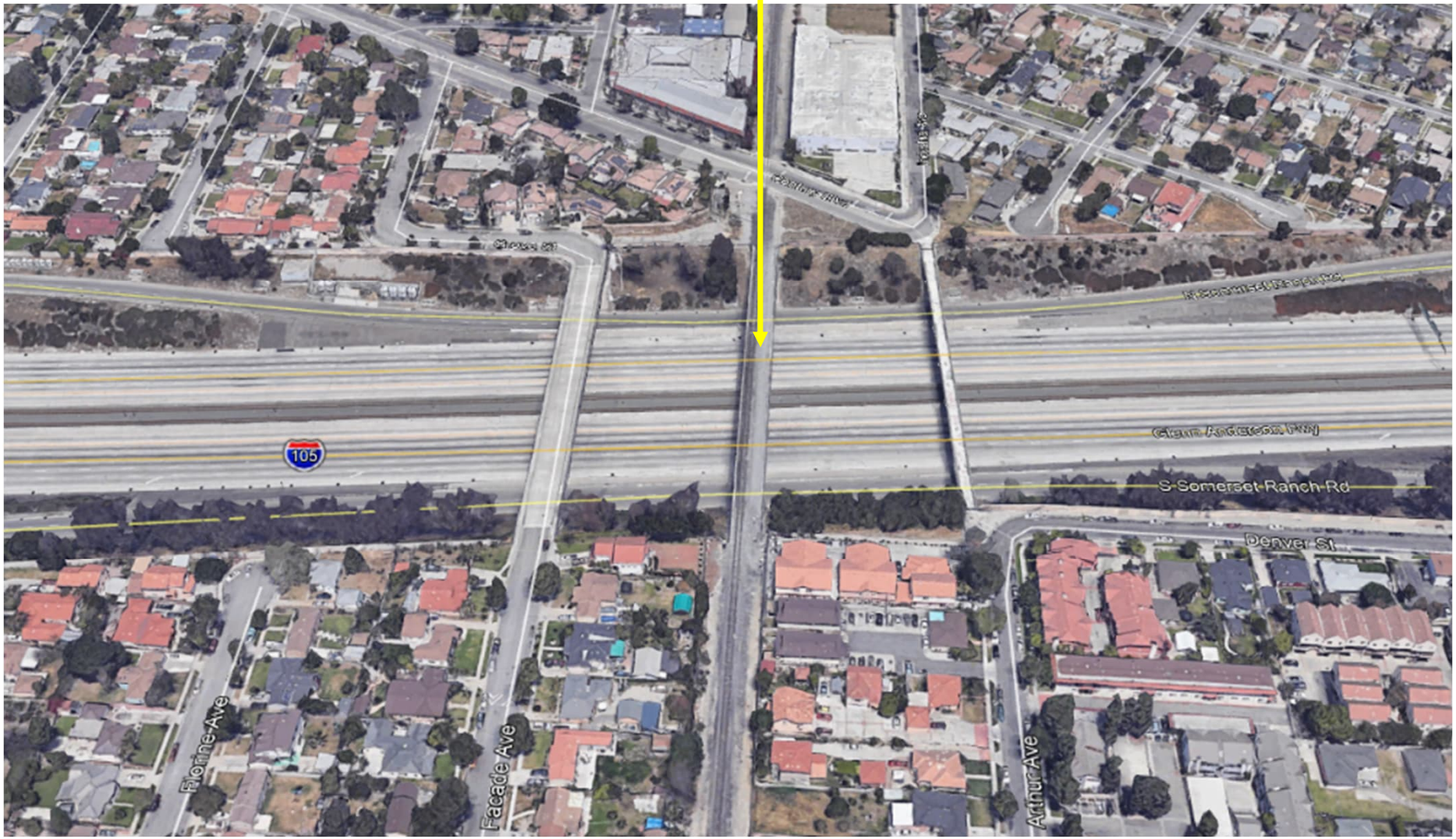
4 Arthur Avenue Overcrossing (remain intact)



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1. Demolition and Replacement of Century Boulevard Underpass

Century Boulevard Underpass
(to be demolished and replaced with two bridge structures – freight and LRT – in roughly same location)



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2. Infill C Line Station and Vertical Circulation Elements

- Infill station and vertical circulation elements (VCEs) will provide a transfer from the Metro C Line to the LPA
- Stations and VCEs are common throughout the district
- Soundwalls present throughout the district, including at existing stations
- Infill station and VCEs support and enhance intermodal nature and continued future use of the Historic District
- To reduce potential visual impacts, VCEs will be situated as close as possible to the Façade Avenue Overcrossing and the new LRT bridge to minimize visibility from other locations within the Historic District
- Design will be reviewed and approved by a SOI PQS qualified professional as design advances



Rendering Depicting Location of VCEs



C Line Harbor Freeway Station

3.Realignment of 2,500 feet of Metro C Line Track

- Realignment: approx. 2.5% of 18 miles of track within the Historic District
- Median C Line will remain an integrated component
- Median C Line will continue to support the I-105's historic intermodal function
- Catenary wires will be served by duct banks and cables powered by existing power substations
- Materials removed to facilitate track realignment will be replaced in-kind, and the overall alignment of the Metro C Line within the I-105 median will remain intact following implementation of the Project



Existing Conditions



Future Conditions

Metro

4. Landscaping Removal and Replacement

- Landscaping on south berm appears to be original; original landscaping identified as a contributing element to the Historic District.
- Landscaping on north berm appears to have been planted after 1996 and is not original. It is not identified as a contributing element to the Historic District.
- Approx. 15 trees will be removed and replaced:
  - Pepper, Eucalyptus, Shiny Xylosma, and Prostrate Myoporum
- Trees will be replaced in-kind and at a ratio of 1:1, restoring landscape design within the APE following implementation of the Project
- The Project will be consistent with the recommendations included in the ExpressLanes Project



Existing Conditions



Proposed Landscaping Removal/Replacement in Green

Before and After View



WSAB Project Benefits

- Updated effects analysis includes minimization measures to reduce effects to the Historic District:
  - Avoids demolition and reconstruction of 2 bridges within Historic District
  - Review for LRT bridge and infill station to SOI standards
  - Modified design of replacement freight bridge from 2 span to 4 span, consistent with existing bridge
  - 1:1 tree replacement

- WSAB Project would maintain the transportation corridors of the Historic District, one of its character-defining features and the primary reasons for its historical significance

- New LRT bridge would include sidewalks which would increase pedestrian access across I-105

- Minimal disruption to adjacent communities for project implementation

- Project serves Environmental Justice communities

Conclusion and Next Steps

Conclusion:

WSAB Project will result in **no adverse effect** to historic properties

- No built environment historic properties will be adversely affected and there are no archaeological historic properties within the APE
- No adverse effect to the I-105/Century Freeway-Transitway Historic District

Next Steps:

- SHPO Review of Cultural Resources Effect Report and Finding of Effect anticipated September 2023
- Final EIR Certification Q2 2024
- Record of Decision Q3 2024

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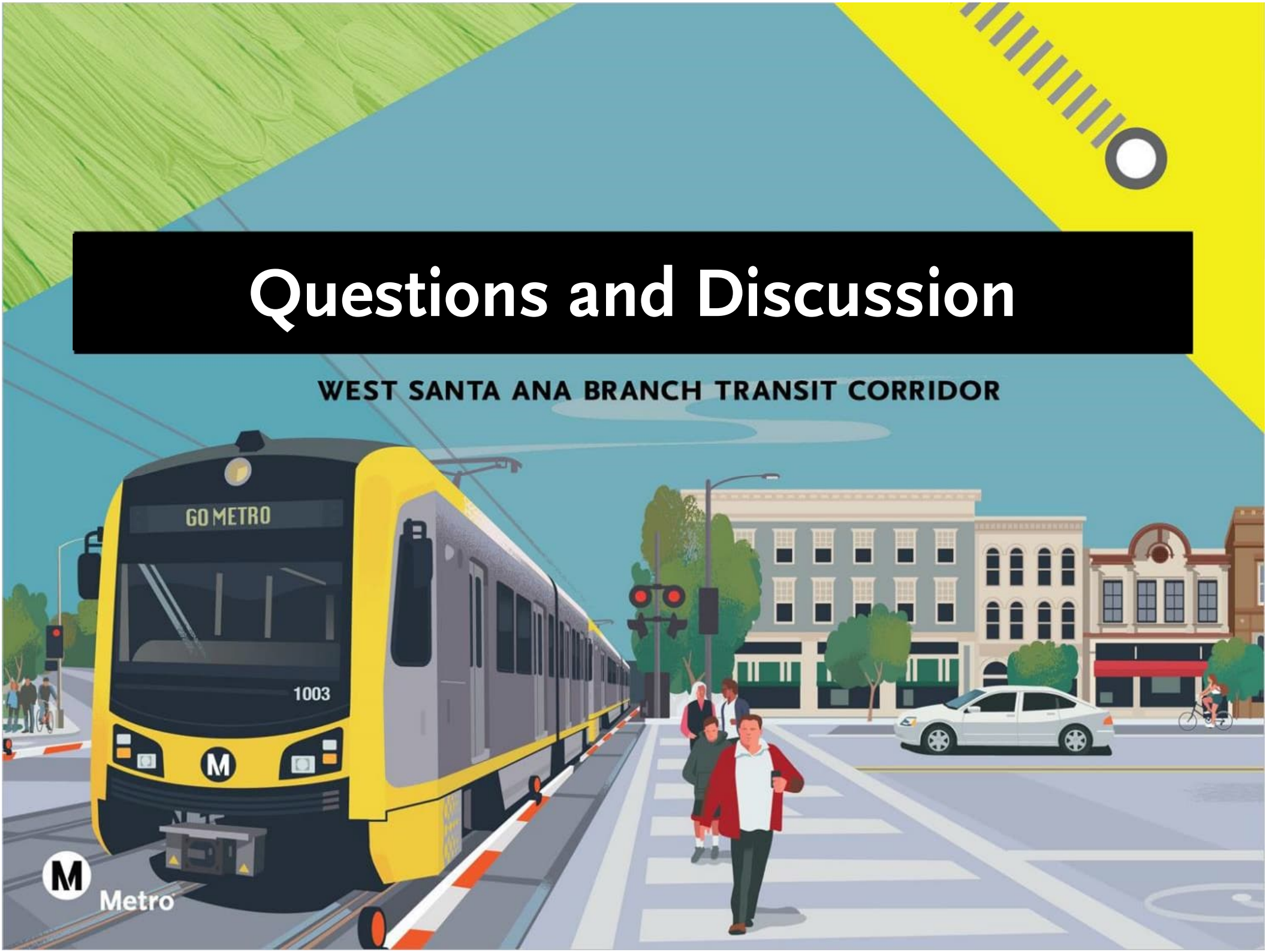
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Please visit the project website and use the comment form to provide your feedback.



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Questions and Discussion



Rachel Perzel

From: Carlson, Kristin <Kristin.Carlson@wsp.com>
Sent: Monday, May 15, 2023 10:44 AM
To: Shannon Carmack; Rachel Perzel; Blanchard, Guy V.
Subject: [EXT] FW: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)
Attachments: FTA Letter to SHPO Revised APE and Eligibility Determinations LACMTA West Santa Ana Project.pdf

CAUTION: This email originated from outside of Rincon Consultants. Be cautious before clicking on any links, or opening any attachments, until you are confident that the content is safe .

FYI

Kristin Carlson, AICP
Vice President, Transportation and Environmental Planner

T+ 1 619-321-4180
M+ 1 973-270-4794

wsp.com

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Monday, May 15, 2023 10:12 AM
To: Carlson, Kristin <Kristin.Carlson@wsp.com>; Martinez, Victor J. <victor.martinez@wsp.com>
Cc: Gonzalez, Ivan D. <GonzalezIv@metro.net>; Lam, Brian <LamB@metro.net>; Alvarez, Brandy <AlvarezBr@metro.net>
Subject: FW: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

FYI -

From: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Sent: Thursday, May 11, 2023 4:49 PM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <KhannaM@metro.net>
Subject: RE: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

Thanks Natalie,

For reference, I'm resending the cover letter. Here's a dropbox link with the Cultural Resources Survey Report and Appendices. APE map is also included as Appendix A of the Survey Report.
https://www.dropbox.com/scl/fo/dydxjpm6v1ih5tggnn327/h?dl=0&rlkey=ugieogcllkddu12vevgug1lxh

Let us know if you're unable to download the files.

Regards,

Mary Nguyen | Environmental Protection Specialist
Federal Transit Administration, Region 9
Los Angeles Office
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467
tel: 213.202.3960
fax: 213.202.3961
www.fta.dot.gov

From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Thursday, May 11, 2023 4:46 PM
To: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <khannam@metro.net>
Subject: RE: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Mary,

Just wanted to let you know I was able to download the documents in the Dropbox link. However I think there might have been other documents in your original email that I did not get.

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014

From: Lindquist, Natalie@Parks
Sent: Thursday, May 11, 2023 4:36 PM
To: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <khannam@metro.net>
Subject: RE: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

Hi Mary,

I do not see the Thursday, May 11, 2023 10:54 AM email in my Inbox.

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014

From: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Sent: Thursday, May 11, 2023 4:33 PM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <khannam@metro.net>
Subject: RE: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

Natalie, Alicia,

I wanted to verify if OHP was able to receive and open the files for the consultation below.

Also, for clarification, consistent with 36 CFR 800.2(a)(2), there is more than one Federal agency Federal agency is involved in an undertaking (FTA and U.S. Army Corps of Engineers (USACE)). FTA is designated a lead Federal agency, fulfilling collective responsibilities under section 106. As noted in the cover letter, the FTA consultation includes support for USACE permits for this Project related to these river crossings.

Let us know if you have any questions.

Thanks,
Mary

Mary Nguyen | Environmental Protection Specialist
Federal Transit Administration, Region 9
Los Angeles Office
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467
tel: 213.202.3960
fax: 213.202.3961
www.fta.dot.gov

From: Nguyen, Mary (FTA)
Sent: Thursday, May 11, 2023 10:54 AM
To: 'calshpo.ohp@parks.ca.gov' <calshpo.ohp@parks.ca.gov>; Lindquist, Natalie (Natalie.Lindquist@parks.ca.gov) <natalie.lindquist@parks.ca.gov>; Perez, Alicia@Parks <alicia.perez@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <khannam@metro.net>
Subject: e106: West Santa Ana Branch Revised APE and Updated Survey Report (Los Angeles, CA)

Dear Office of Historic Preservation,

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (Metro), is continuing consultation with the California State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations [CFR] 800) for the West Santa Ana Branch (WSAB) Transit Corridor Project (Project). This letter requests your comments on revisions to the Area of Potential Effects (APE), as well as concurrence on the determinations of eligibility pursuant to 36 CFR 800.4.

Following concurrence on the APE delineation in May 2019, project modifications resulted in expansion of the APE. The APE was expanded, subsequent to circulation of the Draft EIS/EIR, to account for design modifications, traffic mitigation measures, and temporary construction easements. The APE map with highlighted revisions is included in Enclosure A.

The construction completion date for the Project was updated from 2028 to 2034. As a result, built environment resources constructed between 1979 and 1989 (50 years from the revised project completion date plus a 5- year buffer) in the APE corresponding to Alternative 3 were surveyed, photographed, and researched to determine if they possess an association with a developed historical context. No additional historic properties eligible for the NRHP in the APE were identified as part of the surveys. An updated version of the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2 (Survey Report—Rev 2)* is included as Enclosure B.

The compressed (reduced file size) documents are attached. The full size/full resolution files and the appendix to the Survey Report may be downloaded from the link below. As the files are large in size, please verify if you are able to download and open the files.

Here's a dropbox link with the Cultural Resources Survey Report and Appendices. APE map is also included as Appendix A of the Survey Report.
https://www.dropbox.com/scl/fo/dydxjpm6v1ih5tggnn327/h?dl=0&rlkey=ugieogcllkddu12vevgug1lxh

If you have any questions, contact Rusty Whisman or me.

Regards,

Mary Nguyen | Environmental Protection Specialist
Federal Transit Administration, Region 9
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888 South Figueroa Street, Suite 440
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tel: 213.202.3960
fax: 213.202.3961
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U.S. Department of Transportation
Federal Transit Administration

REGION IX
Arizona, California, Hawaii, Nevada, Guam, American Samoa, Northern Mariana Islands

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May 12, 2023

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ms. Natalie Lindquist, State Historian

Re: Revised APE and Eligibility Determinations for West Santa Ana Branch Transit Corridor Project (FTA_2018_1224_001)

Dear Ms. Polanco:

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (Metro), is continuing consultation with the California State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations [CFR] 800) for the West Santa Ana Branch (WSAB) Transit Corridor Project (Project). This letter requests your comments on revisions to the Area of Potential Effects (APE), as well as concurrence on the determinations of eligibility pursuant to 36 CFR 800.4. The APE map with highlighted revisions is included in Enclosure A. An updated version of the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2 (Survey Report—Rev 2)* is included as Enclosure B.

Background

The Project is a proposed light rail transit line that would extend through Southeast Los Angeles County. The WSAB Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) studied four Build Alternatives: Alternatives 1, 2, 3, and 4. The Draft EIS/EIR was released in July 2021, and the public comment period ended on September 28, 2021. On January 27, 2022, the Metro Board of Directors identified Alternative 3 as the Locally Preferred Alternative (LPA).

Alternatives 1 and 2 from the Draft EIS/EIR differed in the Project's northern section but shared a common alignment from the Arts/Industrial District Station to the southern terminus at the proposed Pioneer Station in the City of Artesia. Both Alternatives 1 and 2 would total approximately 19.3 miles in length. Alternative 3 extends 14.8 miles and would begin at the Slauson/A Line Station, following along the same alignment as Alternatives 1 and 2 to the southern terminus at the proposed Pioneer Station. Alternatives 1, 2, and 3 would include elevated crossings of the Los Angeles (LA) River and the Rio Hondo Channel.

Alternative 4 would extend 6.6 miles, beginning at the I-105/C Line Station and terminating at the proposed Pioneer Station. All four alternatives from the Draft EIS/EIR include the following components: station configurations, parking facilities, elevated crossing of the San Gabriel River, street crossings (at-grade, freeway, elevated street, and elevated rail), traction power substations, and a maintenance and storage facility.

On December 21, 2018, FTA initiated Section 106 consultation with your office regarding the APE and the proposed approach to the survey, identification, and evaluation of cultural resources. In a letter dated January 18, 2019, the SHPO responded with comments on the APE and proposed a built environment screening methodology. In a letter dated April 26, 2019, FTA provided additional information to address SHPO's questions. In a letter dated May 29, 2019, SHPO indicated that there were no further comments on the APE and concurred with the proposed screening methodology. In a letter dated March 30, 2020, FTA requested comments on the revised APE and concurrence on the determinations of the National Register of Historic Places (NRHP) eligibility for 36 architectural properties, the assumed NRHP eligibility of 7 archaeological sites, and the NRHP ineligibility of 400 properties. The FTA did not receive a response from SHPO.

Revisions to the Area of Potential Effects

The APE was delineated to consider potential direct and indirect effects, including potential noise, vibration, and/or visual effects to historic properties. The APE is described as being composed of two components, a "direct APE" and an "architectural APE."

For considerations of direct APE, the APE includes areas of direct effects and ground disturbance, such as the alignment right-of-way (ROW), stations, laydown yards, maintenance facility, and parking lots, in addition to streets or parcels directly above proposed tunnel areas. The APE extends from the existing ground surface to approximately 90 feet above the existing ground surface and approximately 115 feet below the existing ground surface. The "architectural APE" was delineated in consideration of areas where built environment resources may be subject to potential direct and indirect effects and generally includes a one parcel buffer (except where the alignment is at-grade and project work is limited within the existing ROW) and the width of a highway in areas where construction activities cross highways. Following concurrence on the APE delineation in May 2019, project modifications resulted in expansion of the APE. In these instances, the APE was expanded in accordance with the SHPO-approved methodology outlined above and were reflected in the *Survey Report—Rev 1* attached to the above-referenced March 30, 2020, letter to your office.

Since 2022, the APE was expanded, subsequent to circulation of the Draft EIS/EIR, to account for design modifications, traffic mitigation measures, and temporary construction easements. Several parcels where these modifications are proposed were originally included in the architectural APE but are now included in the direct APE to account for direct impacts from ground disturbance. In areas where small-scale, low-lying modifications consistent with the existing urban environment are proposed on parcels adjacent to road ROWs (for example, curb construction and sidewalk realignment) or where acquisitions may be needed to facilitate such modifications, the direct APE was expanded to encompass the construction footprint associated with those changes. In these locations, the architectural APE was limited to the parcel on which such improvements are proposed because the associated potential effects would be minor, visually unobtrusive, and would cause little change to the existing setting in a highly developed area.

Additionally, portions of the direct APE coincide with existing roadway ROW. In these locations, the direct APE considers ground disturbance associated with construction of roadway modifications, for example changes to lane geometry or addition of traffic signals or at-grade crossing equipment. The methodology employed in expanding the APE in these areas assumes that in these locations, the direct APE extends up to 10 feet on adjacent parcels to account for potential ground disturbance associated with driveway regrading and curb and/or sidewalk reconstruction. The modifications proposed in these areas are consistent with existing conditions and their introduction does not have the potential to affect adjacent parcels as a whole; therefore, the architectural APE coincides with the direct APE in these areas.

Updates to the Survey Report

In the revised APE, 29 previously unrecorded properties, including three recommended as eligible for the NRHP and 26 recommended as ineligible for the NRHP, are as identified below.

Recommended Eligible for Listing in the NRHP

- Map Reference Number (MRN) 15-032/Cudahy Substation
- MRN 9-034/ L & F Machine Company-2110 Belgrave Avenue
- MRN 10-021/Huntington Park High School-6020 Miles Avenue

Recommended Ineligible for Listing in the NRHP

1. MRN 9-035/5925 South Alameda Street
2. MRN 10-018/ 2629 Clarendon Avenue
3. MRN 10-019/2672-2680 Randolph Street
4. MRN 10-020/2569 Clarendon Avenue
5. MRN 10-022/2205 Randolph Street
6. MRN 10-023/2468 Randolph Street
7. MRN 10-024/6101 Malabar Street
8. MRN 10-025/2502 Randolph Street
9. MRN 10-026/2512 Randolph Street
10. MRN 10-027/2518 Randolph Street
11. MRN 10-028/2664 Randolph Street
12. MRN 11-021/3383 East Gage Avenue
13. MRN 13-007/3382 East Gage Avenue
14. MRN 13-008/3376 East Gage Avenue
15. MRN 13-009/3372 East Gage Avenue
16. MRN 13-010/3418 Bell Avenue
17. MRN 13-011/3412 Bell Avenue
18. MRN 13-012/3410 Bell Avenue
19. MRN 15-031/7810 Otis Avenue
20. MRN15-033/4620 Ardine Street
21. MRN 19-014/11518 Center Street
22. MRN 21-028/12305 Industrial Avenue
23. MRN 26-023/9135 Somerset Boulevard
24. MRN 27-001/9438 Alondra Boulevard
25. MRN 32-022/11609 186th Street
26. MRN 32-023/11601 186th Street

Following identification of the LPA (Alternative 3) in January 2022, the construction completion date for the Project was updated from 2028 to 2034. As a result, built environment resources constructed between 1979 and 1989 (50 years from the revised project completion date plus a 5-year buffer) in the APE corresponding to Alternative 3 were surveyed, photographed, and researched to determine if they possess an association with a developed historical context. No additional historic properties eligible for the NRHP in the APE were identified. A table depicting a photograph of each parcel is included in Appendix K of the *Survey Report—Rev 2*.

The Project would cross the following river channels and are evaluated in the *Survey Report—Rev 2*:

- MRN 17-002/2,400 feet of the Los Angeles River Channel between Southern Avenue and the Interstate 710 crossing in South Gate
- MRN 18-017/2,900 feet of the Rio Hondo Channel between the Los Angeles River Channel and the Garfield Avenue Crossing in South Gate
- MRN 29-025/1,220 feet of the San Gabriel River Channel between State Route 91 and Artesia Boulevard in Cerritos

These river channels have been determined NRHP-eligible by the United States Army Corps of Engineers (USACE) and received SHPO concurrence in 2022; therefore, they are considered historic properties for the purposes of Section 106. This FTA consultation includes support for USACE permits for this Project related to these river crossings.

Additional research was conducted for archaeological site (P-19-002849/CA-LAN-002849H), which was identified during construction of the Alameda Corridor Project. The *Trail to Rails: Transformation of A Landscape-History and Historical Archaeology of the Alameda Corridor–Volume1 of Treatment of Historic Properties Discovered During the Alameda Corridor Project* (Livingstone 2006) documents the discovery of P-19-002849/CA-LAN-002849H during the construction of the Alameda Corridor Project. The report states that it was removed in its entirety during construction of the Alameda Corridor Project. Given that P-19-002849/CA-LAN-002849H was removed as part of a previous project, it no longer exists within the APE.

Request for Comments/Concurrence
Pursuant to 36 CFR 800.4, the FTA requests comments on the revised APE and concurrence on the determination of NRHP eligibility ofMRN 15-032-Cudahy Substation, MRN 9-034-L & F Machine Company/2110 Belgrave Avenue, and MRN 10-021-Huntington Park High School/6020 Miles Avenue and the determination of NRHP ineligibility of 26 properties above.

The FTA will assess effects on historic properties and continue consultation with your office on potential effects following completion of the Cultural Resources Effects Report.

If you have any questions, please contact Ms. Mary Nguyen, Environmental Protection Specialist, at (213) 202-3960, or by email at mary.nguyen@dot.gov.

Sincerely,

Ray Tellis
Regional Administrator

Enclosures
Enclosure A: Revised Area of Potential Effects Map
Enclosure B: *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report – Rev 2* (April 2023)

Carlson, Kristin

Subject: FW: West Santa Ana question
Attachments: FTA Letter to SHPO West Santa Ana Branch - Revised APE and Eligibility Determinations.pdf

From: Whisman, Rusty (FTA)
Sent: Friday, June 23, 2023 3:39 PM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Cc: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Subject: RE: West Santa Ana question

Hi Natalie,

Please see the updated letter (attached), which has been revised to clarify the properties for which we are seeking eligibility determination concurrence.

The team has updated the survey report with a June 19, 2023 date reflected (only appendices A, E, and F required updates), and the files can be found here:
https://www.dropbox.com/sh/dln0vaasiicdc1h/AAAcT_zg3UoQO94GFdCk-hfTa?dl=0

The responses are as follows:

1. I'm currently reviewing this project and have a quick question for you. In your letter MR 10-028 is associated with the address 2664 Randolph Street. In the Appendices, MR 10-028 is associated with the address 6049 Rugby Ave and MR 10-029 is associated with 2664 Randolph Street.
   Response: MRN 10-029 corresponds to 2664 Randolph Street; MRN 10-028 corresponds to 6049 Rugby Avenue
   The total number of ineligible resources in the letter was revised from 26 to 27, adding 10-029 to the list and amending the address for 10-028. Appendices A and E were updated.
2. The DPR for the following property uses the following name - 3382 E. Gage Avenue / 6411 Salt Lake Avenue (Map Reference No. 13-007). Your letter only lists 3382 E. Gage Ave. In the DPR 523 the two separate addresses are distinct buildings. If FTA needs both to be found not eligible, the FTA letter will have to be modified to reflect that.
   Response: The DPR form for MRN 13-007 is correct; there are two houses with two addresses which share one APN (6324015001) and were therefore recorded together
   The letter was revised to include the following address for MRN 13-007: 3382 E. Gage Avenue / 6411 Salt Lake Avenue. No changes were needed to Appendix E.
3. In your letter MRN 27-001 is listed as 9438 Alondra Blvd. The DPR 523 lists the address as 9348 Alondra Blvd. If the DPR address is correct, the FTA letter will need to be modified to reflect the correct address.
   Response: The correct address associated with MRN 27-001 is 9438 Alondra.
   The letter is correct and does not need to be revised. The DPR form was updated in Appendix F. No changes were needed to Appendix E.

Please let us know if you have any additional questions or comments.

Thank you.

Rusty
Rusty Whisman

Transportation Program Specialist
Federal Transit Administration, Region 9
Los Angeles Office
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467
office: 213.202.3956
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From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Wednesday, June 14, 2023 4:10 PM
To: Whisman, Rusty (FTA) <russell.whisman@dot.gov>
Cc: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Subject: RE: West Santa Ana question

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Mary and Rusty,

Sorry I have a couple of additional clarifications:

1. The DPR for the following property uses the following name - 3382 E. Gage Avenue / 6411 Salt Lake Avenue (Map Reference No. 13-007). Your letter only lists 3382 E. Gage Ave. In the DPR 523 the two separate addresses are distinct buildings. If FTA needs both to be found not eligible, the FTA letter will have to be modified to reflect that.
2. In your letter MRN 27-001 is listed as 9438 Alondra Blvd. The DPR 523 lists the address as 9348 Alondra Blvd. If the DPR address is correct, the FTA letter will need to be modified to reflect the correct address.

Thank you,

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014

From: Lindquist, Natalie@Parks
Sent: Wednesday, June 14, 2023 3:31 PM
To: Whisman, Rusty (FTA) <russell.whisman@dot.gov>
Cc: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Subject: FW: West Santa Ana question

Hi Rusty,

I see that Mary is out of the office. I thought I would forward my question to you in the hopes of being able to get a letter out to you sooner.

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II

California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014

From: Lindquist, Natalie@Parks
Sent: Wednesday, June 14, 2023 3:00 PM
To: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Subject: West Santa Ana question

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I'm just wondering if you need a determination of eligibility for 6049 Rugby Avenue as well as 2664 Randolph St?

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014

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REGION IX
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June 23, 2023

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ms. Natalie Lindquist, State Historian

Re: Revised APE and Eligibility Determinations for West Santa Ana Branch Transit Corridor Project (FTA_2018_1224_001)

Dear Ms. Polanco:

The Federal Transit Administration (FTA) in coordination with the Los Angeles County Metropolitan Transportation Authority (LACMTA) is continuing consultation with the California State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (36 Code of Federal Regulations [CFR] 800) for the West Santa Ana Branch (WSAB) Transit Corridor Project (Project). This letter requests your comments on revisions to the Area of Potential Effects (APE), as well as concurrence on the determinations of eligibility pursuant to 36 CFR 800.4. The APE map with highlighted revisions is included in Enclosure A. An updated version of the *West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report—Rev 2 (Survey Report—Rev 2)* is included as Enclosure B.

Background

The Project is a proposed light rail transit line that would extend through Southeast Los Angeles County. The WSAB Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) studied four Build Alternatives: Alternatives 1, 2, 3, and 4. The Draft EIS/EIR was released in July 2021, and the public comment period ended on September 28, 2021. On January 27, 2022, the LACMTA Board of Directors identified Alternative 3 as the Locally Preferred Alternative (LPA).

Alternatives 1 and 2 from the Draft EIS/EIR differed in the Project's northern section but shared a common alignment from the Arts/Industrial District Station to the southern terminus at the proposed Pioneer Station in the City of Artesia. Both Alternatives 1 and 2 would total approximately 19.3 miles in length. Alternative 3 extends 14.5 miles and would begin at the Slauson/A Line Station, following along the same alignment as Alternatives 1 and 2 to the southern terminus at the proposed Pioneer Station. Alternatives 1, 2, and 3 would include elevated crossings of the Los Angeles (LA) River and the Rio Hondo Channel.

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On December 21, 2018, FTA initiated Section 106 consultation with your office regarding the APE and the proposed approach to the survey, identification, and evaluation of cultural resources. In a letter dated January 18, 2019, the SHPO responded with comments on the APE and proposed a built environment screening methodology. In a letter dated April 26, 2019, FTA provided additional information to address SHPO's questions. In a letter dated May 29, 2019, SHPO indicated that there were no further comments on the APE and concurred with the proposed screening methodology. In a letter dated March 30, 2020, FTA requested comments on the revised APE and concurrence on the determinations of the National Register of Historic Places (NRHP) eligibility for 36 architectural properties, the assumed NRHP eligibility of 7 archaeological sites, and the NRHP ineligibility of 400 properties. The FTA did not receive a response from SHPO.

Revisions to the Area of Potential Effects

The APE was delineated to consider potential direct and indirect effects, including potential noise, vibration, and/or visual effects to historic properties. The APE is described as being composed of two components, a "direct APE" and an "architectural APE."

For considerations of direct APE, the APE includes areas of direct effects and ground disturbance, such as the alignment right-of-way (ROW), stations, laydown yards, maintenance facility, and parking lots, in addition to streets or parcels directly above proposed tunnel areas. The APE extends from the existing ground surface to approximately 90 feet above the existing ground surface and approximately 115 feet below the existing ground surface. The "architectural APE" was delineated in consideration of areas where built environment resources may be subject to potential direct and indirect effects and generally includes a one parcel buffer (except where the alignment is at-grade and project work is limited within the existing ROW) and the width of a highway in areas where construction activities cross highways. Following concurrence on the APE delineation in May 2019, project modifications resulted in expansion of the APE. In these instances, the APE was expanded in accordance with the SHPO-approved methodology outlined above and were reflected in the *Survey Report—Rev 1* attached to the above-referenced March 30, 2020, letter to your office.

Since 2022, the APE was expanded, subsequent to circulation of the Draft EIS/EIR, to account for design modifications, traffic mitigation measures, and temporary construction easements. Several parcels where these modifications are proposed were originally included in the architectural APE but are now included in the direct APE to account for direct impacts from ground disturbance. In areas where small-scale, low-lying modifications consistent with the existing urban environment are proposed on parcels adjacent to road ROWs (for example, curb construction and sidewalk realignment) or where acquisitions may be needed to facilitate such modifications, the direct APE was expanded to encompass the construction footprint associated with those changes. In these locations, the architectural APE was limited to the parcel on which such improvements are proposed because the associated potential effects would be minor, visually unobtrusive, and would cause little change to the existing setting in a highly developed area.

Additionally, portions of the direct APE coincide with existing roadway ROW. In these locations, the direct APE considers ground disturbance associated with construction of roadway modifications, for example changes to lane geometry or addition of traffic signals or at-grade crossing equipment. The methodology employed in expanding the APE in these areas assumes that in these locations, the direct APE extends up to 10 feet on adjacent parcels to account for potential ground disturbance associated with driveway regrading and curb and/or sidewalk reconstruction. The modifications proposed in these areas are consistent with existing conditions and their introduction does not have the potential to affect adjacent parcels as a whole; therefore, the architectural APE coincides with the direct APE in these areas.

Updates to the Survey Report

In the revised APE, 30 previously unrecorded properties, including three recommended as eligible for the NRHP and 27 recommended as ineligible for the NRHP, are as identified below.

Recommended Eligible for Listing in the NRHP

- Map Reference Number (MRN) 15-032/Cudahy Substation
- MRN 9-034/ L & F Machine Company-2110 Belgrave Avenue
- MRN 10-021/Huntington Park High School-6020 Miles Avenue

Recommended Ineligible for Listing in the NRHP

1. MRN 9-035/5925 South Alameda Street
2. MRN 10-018/ 2629 Clarendon Avenue
3. MRN 10-019/2672-2680 Randolph Street
4. MRN 10-020/2569 Clarendon Avenue
5. MRN 10-022/2205 Randolph Street
6. MRN 10-023/2468 Randolph Street
7. MRN 10-024/6101 Malabar Street
8. MRN 10-025/2502 Randolph Street
9. MRN 10-026/2512 Randolph Street
10. MRN 10-027/2518 Randolph Street
11. MRN 10-028/6049 Rugby Avenue
12. MRN 10-029/2664 Randolph Street
13. MRN 11-021/3383 East Gage Avenue
14. MRN 13-007/3382 East Gage Avenue-/6411 Salt Lake Avenue
15. MRN 13-008/3376 East Gage Avenue
16. MRN 13-009/3372 East Gage Avenue
17. MRN 13-010/3418 Bell Avenue
18. MRN 13-011/3412 Bell Avenue
19. MRN 13-012/3410 Bell Avenue
20. MRN 15-031/7810 Otis Avenue
21. MRN15-033/4620 Ardine Street
22. MRN 19-014/11518 Center Street
23. MRN 21-028/12305 Industrial Avenue
24. MRN 26-023/9135 Somerset Boulevard
25. MRN 27-001/9438 Alondra Boulevard
26. MRN 32-022/11609 186th Street
27. MRN 32-023/11601 186th Street

Following identification of the LPA (Alternative 3) in January 2022, the construction completion date for the Project was updated from 2028 to 2034. As a result, built environment resources constructed between 1979 and 1989 (50 years from the revised project completion date plus a 5-year buffer) in the APE corresponding to Alternative 3 were surveyed, photographed, and researched to determine if they possess an association with a developed historical context. No additional historic properties eligible for the NRHP in the APE were identified. A table depicting a photograph of each parcel is included in Appendix K of the *Survey Report—Rev 2*.

The Project would cross the following river channels and are evaluated in the *Survey Report—Rev 2*:

- MRN 17-007/2,400 feet of the Los Angeles River Channel between Southern Avenue and the Interstate 710 crossing in South Gate
- MRN 18-017/2,900 feet of the Rio Hondo Channel between the Los Angeles River Channel and the Garfield Avenue Crossing in South Gate
- MRN 29-025/1,220 feet of the San Gabriel River Channel between State Route 91 and Artesia Boulevard in Cerritos

These river channels have been determined NRHP-eligible by the United States Army Corps of Engineers (USACE) and received SHPO concurrence in 2022; therefore, they are considered historic properties for the purposes of Section 106. This FTA consultation includes support for USACE permits for this Project related to these river crossings.

Additional research was conducted for archaeological site (P-19-002849/CA-LAN-002849H), which was identified during construction of the Alameda Corridor Project. The *Trail to Rails: Transformation of A Landscape-History and Historical Archaeology of the Alameda Corridor–Volume1 of Treatment of Historic Properties Discovered During the Alameda Corridor Project* (Livingstone 2006) documents the discovery of P-19-002849/CA-LAN-002849H during the construction of the Alameda Corridor Project. The report states that it was removed in its entirety during construction of the Alameda Corridor Project. Given that P-19-002849/CA-LAN-002849H was removed as part of a previous project, it no longer exists within the APE.

Request for Comments/Concurrence
Pursuant to 36 CFR 800.4, the FTA requests comments on the revised APE and concurrence on the determination of NRHP eligibility of MRN 15-032-Cudahy Substation, MRN 9-034-L & F Machine Company/2110 Belgrave Avenue, and MRN 10-021-Huntington Park High School/6020 Miles Avenue and the determination of NRHP ineligibility of 27 properties above.

The FTA will assess effects on historic properties and continue consultation with your office on potential effects following completion of the Cultural Resources Effects Report.

If you have any questions, please contact Ms. Mary Nguyen, Environmental Protection Specialist, at (213) 202-3960, or by email at mary.nguyen@dot.gov.

Sincerely,

Ray Tellis
Regional Administrator

Enclosures
Enclosure A: Revised Area of Potential Effects Map
Enclosure B: *West Santa Ana Branch Transit Corridor Project Final Cultural Resources Survey Report – Rev 2* (June 2023)

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Armando Quintero, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

June 29, 2023

VIA EMAIL

In reply refer to: FTA_2018_1224_001

Mr. Ray Tellis, Regional Administrator
Federal Transit Administration
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467

RE: Supplemental Section 106 Consultation for the Proposed West Santa Ana Branch Transit Corridor, Los Angeles County, CA

Dear Ms. Lorenzo:

The Federal Transit Administration (FTA). in coordination with Los Angeles County Metropolitan Transportation Authority, is continuing consultation under Section 106 of the National Historic Preservation Act, as amended (36 CFR 800) for above project. As part of the submitted documentation the FTA provided a Cultural Resources Survey Report – Rev 2 for the project area.

The Project is a proposed light rail transit line that would extend through Southeast Los Angeles County.

On December 21, 2018, FTA initiated Section 106 consultation with the State Historic Preservation Officer (SHPO) regarding the area of potential effect (APE) and the proposed approach to the survey, identification, and evaluation of cultural resources. In a letter dated January 18, 2019, the SHPO responded with comments on the APE and proposed a built environment screening methodology. In a letter dated April 26, 2019, FTA provided additional information to address SHPO's questions. In a letter dated May 29, 2019, SHPO indicated that there were no further comments on the APE and concurred with the proposed screening methodology. In a letter dated March 30, 2020, FTA requested comments on the revised APE and concurrence on the determinations of the National Register of Historic Places (NRHP) eligibility for 36 architectural properties, the assumed NRHP eligibility of 7 archaeological sites, and the NRHP ineligibility of 400 properties. The FTA did not receive a response from SHPO.

Since 2022, the APE was expanded to account for design modifications, traffic mitigation measures, and temporary construction easements. Several parcels where these modifications are proposed were originally included in the architectural APE but are now included in the direct APE to account for direct impacts from ground disturbance. In areas where small-scale, low-lying modifications consistent with the existing urban environment are proposed on parcels adjacent to road ROWs (for example, curb construction and sidewalk realignment) or where acquisitions may be needed to facilitate such modifications, the direct APE was expanded to

encompass the construction footprint associated with those changes. In these locations, the architectural APE was limited to the parcel on which such improvements are proposed because the associated potential effects would be minor, visually unobtrusive, and would cause little change to the existing setting in a highly developed area.

Additionally, portions of the direct APE coincide with existing roadway ROW. In these locations, the direct APE considers ground disturbance associated with construction of roadway modifications, for example changes to lane geometry or addition of traffic signals or at-grade crossing equipment. The methodology employed in expanding the APE in these areas assumes that in these locations, the direct APE extends up to 10 feet on adjacent parcels to account for potential ground disturbance associated with driveway regrading and curb and/or sidewalk reconstruction. The modifications proposed in these areas are consistent with existing conditions and their introduction does not have the potential to affect adjacent parcels as a whole; therefore, the architectural APE coincides with the direct APE in these areas.

Pursuant to 36 CFR Part 800.5, the FTA has determined that the following properties are eligible for the NRHP for the following reasons:

- Cudahy Substation, 7950 Salt Lake Avenue, Cudahy – eligible under Criterion C as an intact example of a Southern California Edison substation building built within the scope of the company's programmatic architecture program. The period of significance is 1928.
- L & F Machine Company, 2110 Belgrave Avenue, Huntington Park – eligible under Criterion A for its role in producing essential, large-scale astronomical equipment, particularly during the astronomy boom of the 1950-60s. The period of significance is 1946-1989.
- Huntington Park High School, 6020 Miles Avenue, Huntington Park – eligible under Criterion C as a representative example of the Public Works Administration Moderne style of architecture. The buildings are also good examples of the work of architect George M. Lindsey. The period of significance is 1934-1939.

The FTA has also determined that the following properties are not eligible for the NRHP:

- 5925 South Alameda Street, Huntington Park
- 2629 Clarendon Avenue, Huntington Park
- 2672-2680 Randolph Street, Huntington Park
- 2569 Clarendon Avenue, Huntington Park
- 2205 Randolph Street, Huntington Park
- 2468 Randolph Street, Huntington Park
- 6101 Malabar Street, Huntington Park
- 2502 Randolph Street, Huntington Park
- 2512 Randolph Street, Huntington Park
- 2518 Randolph Street, Huntington Park
- 6049 Rugby Avenue, Huntington Park

- 2664 Randolph Street, Huntington Park
- 3383 East Gage Avenue, Huntington Park
- 3382 East Gage Avenue/6411 Salt Lake Avenue, Huntington Park
- 3376 East Gage Avenue, Huntington Park
- 3372 East Gage Avenue, Huntington Park
- 3418 Bell Avenue, Bell
- 3412 Bell Avenue, Bell
- 3410 Bell Avenue, Bell
- 7810 Otis Avenue, Cudahy
- 4620 Ardine Street, Cudahy
- 11518 Center Street, South Gate
- 12305 Industrial Avenue, South Gate
- 9135 Somerset Boulevard, Bellflower
- 9438 Alondra Boulevard, Bellflower
- 11609 186th Street, Artesia
- 11601 186th Street, Artesia

Based on review of the submitted materials, I have the following comments:

- I find the FTA's documentation and delineation of the APE to be sufficient.
- I concur with the above determinations of eligibility.

If you require further information, please contact Natalie Lindquist at Natalie.Lindquist@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

U.S. Department of Transportation
Federal Transit Administration

REGION IX
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November 17, 2023

Ms. Julianne Polanco
California State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA95816

Attention: Ms. Natalie Lindquist, State Historian

Re: Section 106 Finding of Effect for West Santa Ana Branch Transit Corridor Project (FTA_2018_1224_001)

Dear Ms. Polanco:

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (LACMTA), is continuing consultation with the California State Historic Preservation Officer (SHPO) under Section 106 of the National Historic Preservation Act (Section 106) and its implementing regulations (36 Code of Federal Regulations [CFR] Part 800) for the West Santa Ana Branch (WSAB) Transit Corridor Project (Project). The FTA is the lead federal agency for the Project. This letter requests your comment on the revised APE and concurrence on the finding of no adverse effect for this undertaking per 36 CFR 800.4 and 36 CFR 800.5.

In addition, this consultation includes support for United States Army Corps of Engineers (USACE) permits for this Project related to the river crossings. The FTA is acting on behalf of the USACE to fulfill its federal responsibility under Section 106 pursuant to 36 CFR 800.2(a)(2).

Background

The Project is a proposed light rail transit line that would extend through Southeast Los Angeles County. The WSAB Transit Corridor Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) studied four Build Alternatives: Alternatives 1, 2, 3, and 4. The Draft EIS/EIR was released in July 2021, and the public comment period ended on September 28, 2021. On January 27, 2022, the LACMTA Board of Directors selected Alternative 3 as the Locally Preferred Alternative (LPA).

The LPA extends 14.5 miles, from the Slauson/A Line Station in the north to the proposed Pioneer Station in the south. The LPA will consist of 12.1 miles of at-grade alignment and 2.4 miles of aerial alignment.

The LPA includes the following components: nine station configurations, five parking facilities, elevated crossings of the Los Angeles (LA) River Channel, Rio Hondo River Channel, and San Gabriel River Channel, street crossings (at-grade, freeway, elevated street, and elevated rail), traction power substations, and one maintenance and storage facility. The LPA includes a design option to close 186th Street, keep 187th Street open to traffic in the City of Artesia and turn Corby Avenue into a cul-de-sac with an access driveway for the existing business.

On December 21, 2018, FTA initiated Section 106 consultation with your office regarding the Area of Potential Effects (APE), which accounted for potential effects associated with all four Build Alternatives, and a proposed approach to the survey, identification, and evaluation of cultural resources. In a letter dated January 18, 2019, SHPO responded with comments on the APE and the proposed built environment screening methodology. In a letter dated April 26, 2019, the FTA provided additional information to address comments. In a reply letter dated May 29, 2019, SHPO indicated that it had no further comments on the APE and concurred with the screening methodology.

Consultation continued with a letter dated March 30, 2020 and the transmittal of the West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report–Rev 1 (Survey Report—Rev 1) The FTA requested comments on the revised APE and concurrence from your office on determination of the National Register of Historic Places (NRHP) eligibility for 36 built environment historic properties, the assumed NRHP eligibility of seven archaeological sites, and the NRHP ineligibility of 400 properties. The FTA did not receive a response from your office.

In response to public and agency comment received on the Draft EIS/EIR, the alternatives were refined. Accordingly, the updated West Santa Ana Branch Transit Corridor Project Cultural Resources Survey Report–Rev 2 (Survey Report—Rev 2) was submitted to your office on May 11, 2023. The FTA requested comment on the revised APE and concurrence on the determinations of eligibility. In a letter dated June 29, 2023, SHPO deemed sufficient the documentation and delineation of the APE and concurred with the determinations of NRHP eligibility.

Area of Potential Effect

The APE was delineated to consider potential direct and indirect effects, including potential noise, vibration, and/or visual effects to historic properties. Previously, the vertical extent of the APE ranged from approximately 90 feet above the existing ground surface and approximately 115 feet below the existing ground surface. Following the APE delineation in June 2023, the depth of the APE has been expanded to approximately 150 feet below the existing ground surface to account for geotechnical borings necessary to support project construction.

Evaluation of Effect

The enclosed West Santa Ana Branch Transit Corridor Project Final Cultural Resources Effects Report (Effects Report) presents an assessment of effects of a No Build Alternative and the LPA, including design option, on the historic properties located in the APE for the LPA.

No known archaeological historic properties were identified in the APE for the LPA. The APE for the LPA is considered to have low to moderate sensitivity for the presence of buried archaeological deposits that could qualify as historic properties/historical resources. The Project would result in no adverse effect to known archaeological historic properties.

The measures outlined in Section 6 of the Effects Report will be implemented if unanticipated archaeological resources are discovered during construction.

Nineteen built environment historic properties were identified in the APE for the LPA. The LPA will introduce new permanent visual elements within the ROW, including additional rail-related features such as tracks, fencing, pedestrian crossing gates, a grade crossing house, and a train control house. The proposed visual elements will be similar in scale and massing to the existing rail-related features currently in the vicinity. Construction activities will primarily occur within the public and rail ROWs and will temporarily introduce features (e.g., construction vehicles, equipment, security fencing, and barricades) that may alter the visual character of the surrounding area. However, these visual changes will be temporary because construction equipment, construction vehicles, barricades, and security fences will be removed once construction is completed.

Partial acquisitions of historic properties would accommodate slight alterations to the right of way and sidewalk. The LPA will not physically alter or modify historic structures, except as noted on the enclosed summary table at crossings of the Century Freeway–Transitway Historic District, Los Angeles River Channel, the Union Pacific Los Angeles River Rail Bridge, Rio Hondo, and San Gabriel River. The integrity of location, design, materials, or workmanship will not be diminished by the LPA. Due to the nature of the existing urban environment, the project-related visual elements from both construction and operation will not diminish the integrity of setting, feeling, or association, and will not detract from the character of the area. Temporary construction-related visual elements will not permanently alter or diminish historic integrity; at the end of construction, these elements will be removed and there will be no permanent effects/impacts from construction.

The LPA proposes the demolition of Century Boulevard Underpass, a character-defining feature of the Century Freeway–Transitway Historic District. Caltrans documentation of the district indicates that while the bridges contribute to the district, they are not individually significant or significant engineering achievements. Rather, the district's overall significance is derived from its association with an Environmental Justice lawsuit and subsequent legal agreement and its intermodal design and integration of then-novel ITS features. The LPA will alter a small portion of the district. The district's appearance will continue to reflect the intermodal and aesthetic design it currently employs. The new LRT and replacement freight bridges will be generally consistent in scale, massing, and materials with other character-defining bridges throughout the district. New LRT and replacement freight bridges will integrate relief consistent with that present on character-defining bridges throughout the district. The design of the new LRT bridge will be reviewed and approved by a professional meeting the Secretary of Interior (SOI) professional standards in architectural history, history, or architecture under Project Measure CR PM-1 (SOI Standards Design Review). Coordination with Caltrans will continue as the project design progresses.

In addition, the removal and replacement of minimal landscaping, including the removal and replacement of roughly 15 trees, may be required. The district's original landscaping is one of its character-defining features. A review of historical and aerial imagery of the district indicates that landscaping on the I-105 north berm within the APE appears to have been planted after 1996 and is not original. Trees removed during construction would be replaced in-kind and at a ratio of 1:1, consistent with the principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii)).

The overall intent of the original landscape design is expected to remain visible and intact with replacement of the removed trees. Proposed alterations to the district's landscaping will not alter any of the characteristics that qualify it for inclusion in the NRHP in a way that will reduce its overall integrity, given its roughly 19-mile length.

Construction of the new infill Metro C Line station will require realignment of approximately 2,500 feet (0.47 mile) of Metro C Line track. This is approximately 2.5 percent of the district's approximately 18 miles of Metro C Line track. The light rail in the median of I-105 is identified as a character-defining feature of the Century Freeway-Transitway Historic District. The LRT is significant for its integration into the freeway's design in support of its intermodal nature and not for its design or engineering. The tracks will remain in the median as an integrated component of the Century Freeway. They will continue to serve a purpose consistent with their historic and current function in support of the district's intermodal nature. The new infill station will be compatible in scale and massing with existing stations and will be located in the transitway median. No existing stations will be altered. The LPA will result in no adverse effect to the Century Freeway-Transitway Historic District.

The FTA applied the criteria of adverse effect per 36 CFR 800.5(a) and has determined that the Project would result in a finding of no adverse effect.

Request for Comment and Concurrence
Pursuant to 36 CFR 800.4, FTA requests comments on the revised APE, which includes consideration of the additional depth of soil disturbance from geotechnical borings. Additionally, in accordance with 36 CFR 800.5, FTA requests concurrence with a finding of no adverse effect on historic properties for this undertaking.

The FTA has also determined that these historic properties are subject to Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended. Based on your concurrence with the determination of no adverse effect under Section 106, FTA may make *de minimis* impact determinations under Section 4(f) for the above-listed properties.

If you have any questions, please contact Ms. Mary Nguyen, Director of the Office of Planning and Program Development, at (213) 202-3960, or by email at mary.nguyen@dot.gov.

Sincerely,

Ray Tellis
Regional Administrator

Enclosures:

- West Santa Ana Branch Transit Corridor Project-Summary Table of Historic Property Effects Evaluation for the LPA
- *West Santa Ana Branch Transit Corridor Project Final Cultural Resour*ces Effects Report (2023)

West Santa Ana Branch Transit Corridor Project
Summary of Historic Property Effects Evaluation for the LPA

Property Name/Address	Map Reference No. (MRN)	Section 106 Finding
1) 6000 Alameda Street, Huntington Park*	9-015	The LPA will not physically alter or modify this property. No adverse effect.
2) L&F Machine Company/2110 Belgrave Avenue, Huntington Park	9-034	The LPA will not physically alter or modify this property. No adverse effect.
3) 6101 Santa Fe Avenue, Huntington Park	10-012	A small portion of 6101 Santa Fe Avenue will be permanently acquired to accommodate slight alterations to the ROW and sidewalk. The building located on the property will not be physically altered or modified. No adverse effect.
4) 2860 Randolph Street, Huntington Park	10-017	The LPA will not physically alter or modify this property. No adverse effect.
5) Huntington Park High School/6020 Miles Avenue, Huntington Park	10-021	Approximately 700 square feet of 6020 Miles Avenue will be acquired to accommodate the LPA. The buildings located on the property will not be physically altered or modified by the LPA. No adverse effect.
6) Randolph Substation/Randolph Street, Huntington Park	11-016	The LPA will not physically alter or modify this property. No adverse effect.
7) 6300-6302 State Street, Huntington Park	11-018	The LPA will not physically alter or modify this property. No adverse effect.
8) Cudahy Substation/Salt Lake Avenue, Cudahy	15-032	A small portion of the Cudahy Substation property will be permanently acquired to accommodate slight alterations to the ROW and sidewalk. The substation building located on the property will not be physically altered or modified. No adverse effect.
9) No address; Los Angeles Department of Water and Power Boulder Lines 1 and 2 (P-19-188983)	17-005	The LPA will not physically alter or modify the overhead towers to the east and west of the proposed alignment. No adverse effect.
10) Union Pacific Los Angeles River Rail Bridge, South Gate	17-006	The existing bridge will remain intact and continue its historic and current use following implementation of the LPA. While the LPA will not physically alter the deck of the bridge, the bridge's existing concrete piers will be extended to the north to support the new LRT bridge constructed for the LPA to cross the LA River. Modifications to the piers will be undertaken using materials consistent with the existing piers, and the scale and massing of extended portions of the piers will be consistent with those currently extant. No adverse effect.
11) Los Angeles River Channel**, South Gate (portion of)	17-007	The LPA will result in construction within the subject segment, but the LPA will not alter the segment's orientation or its overall size or shape and will not impact its ability to function in its historic and current capacity. The new LRT bridge and its associated features, including soundwalls, rail track, and catenary poles and wires are compatible with the subject segment's surrounding urban industrial setting. No adverse effect.

Property Name/Address	Map Reference No. (MRN)	Section 106 Finding
12) Pueblo Del Rio Public Housing Complex Historic District (portion of)/5024 Holmes Avenue, Los Angeles (P-19-188179)	8-013	The LPA will not physically alter or modify this property. No adverse effect.
13) Southern California Edison Long Beach-Laguna Bell 60 kilovolt (kV) and 220kV transmission lines (P-19-192309)	18-016	The LPA will not physically alter the property's overhead towers that are north and south of the LPA alignment. No adverse effect.
14) Rio Hondo River Channel**, South Gate (portion of)	18-017	The LPA will introduce new permanent visual elements, into the Rio Hondo Channel, approximately 15 feet west of the existing Rio Hondo Bridge (which is not a historic property). The LPA will alter the channel by introducing a new LRT bridge, piers, and abutments. However, the river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout 51-mile river. No adverse effect.
15) Rancho Los Amigos Medical Center Historic District, Downey (P-19-189330)	19-013	The LPA will have no direct physical impact to any of the district contributors. The LPA will introduce new permanent visual elements within the rail ROW and on an adjacent property, including the Gardendale Station, additional rail tracks, pedestrian crossing gates, grade crossing houses, a train control and communication house, catenary poles and wires, and a TPSS site. Proposed visual elements will be similar in scale and massing to the existing setting, and the LPA will not diminish the property's integrity of setting, feeling, or association, and will not detract from the character and quality of the area. No adverse effect.
16) Century Freeway–Transitway Historic District (portion of)	21-027	The LPA will require demolition of one character-defining feature of the district (the Century Boulevard Underpass). Demolition will only impact 1 of 118 (less than 1 %) character-defining bridges/overcrossings. The new LRT and replacement freight bridges will be generally consistent in scale, massing, and materials with other character-defining bridges throughout the district. New LRT and replacement freight bridges will integrate relief consistent with that present on character-defining bridges throughout the district. In compliance with Project Measure CR PM-1 (SOI Standards Design Review), design of the new LRT bridge will be reviewed and approved by a professional meeting the SOI PQS in architectural history, history, or architecture as it advances. Removal and replacement of minimal landscaping, including the removal and replacement of up to 15 trees, may be required. The district's original landscaping is one of its character-defining features. Any trees removed during construction would be replaced in-kind and at a ratio of 1:1, consistent with the principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii)). The overall intent

Property Name/Address	Map Reference No. (MRN)	Section 106 Finding
		of the original landscape design is expected to remain visible and intact with replacement of the removed trees. Shifting 2,500 feet (0.47 mile) of track will be a minor change within a median of Century Freeway is already dedicated to transit use. New infill station will be compatible in scale and massing with existing stations and will be located in the transitway median; no existing stations will be altered. No adverse effect.
17) Bellflower Pacific Electric Railway Depot/16336 Bellflower Boulevard, Bellflower (P-19-186111)	28-008	The LPA will introduce permanent visual elements consistent in scale and design with the surrounding urban environment, a former light rail corridor. New permanent visual elements include a 12-foot-tall soundwall at-grade along the northern perimeter of the ROW, catenary poles and wires, fences, a new station, and parking. North-facing views of the original Bellflower Depot will remain available south of the ROW. Implementation of Measure VIB-6 will ensure that construction activities near historic structures will be held to a protective vibration damage threshold of 0.20 inch per second peak particle velocity, and equipment with the potential to damage historic buildings will not be used within 25 feet of the Bellflower Depot. No adverse effect.
18) 10040 Flora Vista Street, Bellflower	28-009	The LPA will not physically alter or modify the building. Therefore, the property's integrity of location, design, materials, and workmanship will not be diminished. No adverse effect.
19) San Gabriel River Channel**, Cerritos (portion of)	29-025	A new LRT bridge will be constructed roughly in the existing location of the San Gabriel River Bridge, which will be demolished by the Project. The bridge is not eligible for the NRHP. The LPA will introduce a new bridge, piers, and abutments. The river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout the 58-mile-long river. The new LRT bridge will not change the historic alignment of the river or result in the removal or substantial alteration of its character-defining features. No adverse effect.

*= Property mistakenly addressed as 1978 Belgrave Avenue in the Draft EIS/EIR.
**= segment of a channelized river that is contributing to a larger historic district encompassing elements of the Los Angeles County Drainage Area Project

Subject: FW: West Santa Ana Branch Transit Corridor Project

From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Tuesday, January 2, 2024 12:41 PM
To: Nguyen, Mary (FTA) <mary.nguyen@dot.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <KhannaM@metro.net>
Subject: RE: West Santa Ana Branch Transit Corridor Project

Mary,

That is really what I wanted to talk about. They are a few properties, like the LA River Rail Bridge, or really any bridge where the piers are going to be extended, that I'd like to see photosims of. A few others, I just have a few questions and then think that maybe pictures of the general vicinity might be enough. I don't want to ask for photosims when pictures that characterize the area surrounding the historic property might give me the information I need.

Natalie Lindquist
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
916-503-8738 – **new number**
natalie.lindquist@parks.ca.gov

From: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Sent: Tuesday, January 2, 2024 12:36 PM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <KhannaM@metro.net>
Subject: RE: West Santa Ana Branch Transit Corridor Project

Thanks Natalie,

We'll coordinate with the team to schedule a meeting. Are there certain historic properties that you are looking for a photo or sim?

Regards,
Mary

From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Tuesday, January 2, 2024 10:50 AM
To: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Cc: Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna,

Meghna <KhannaM@metro.net>
Subject: RE: West Santa Ana Branch Transit Corridor Project

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Mary,

My schedule is surprisingly open at the moment. Here is my availability:

Weds, Jan 3 – open
Thurs, Jan 4 – open
Mon, Jan 8 – open
Tues, Jan 9 – 9-2
Weds, Jan 10 – open
Thurs, Jan 11 - open

Natalie Lindquist
Historian II
California Office of Historic Preservation
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Sacramento, CA 95816-7100
916-503-8738 – **new number**
natalie.lindquist@parks.ca.gov

From: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>
Sent: Tuesday, January 2, 2024 9:02 AM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Cc: Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>; Whisman, Rusty (FTA) <russell.whisman@dot.gov>; Kelly, Kathleen (FTA) <kathleen.kelly@dot.gov>; Khanna, Meghna <KhannaM@metro.net>
Subject: RE: West Santa Ana Branch Transit Corridor Project

Natalie,

We would be happy to coordinate and schedule a meeting to answer any questions. Please provide suggested dates and times for this week and next week.

Thanks,

Mary Nguyen | Director, Office of Planning and Program Development
Federal Transit Administration, Region 9
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467
tel: 213.202.3960
fax: 213.202.3961
www.fta.dot.gov

From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Thursday, December 28, 2023 4:40 PM
To: Nguyen, Mary (FTA) <Mary.Nguyen@dot.gov>

Cc: Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>
Subject: West Santa Ana Branch Transit Corridor Project

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Mary,

I'm finishing up my review of this project and think it would be helpful to have a meeting to discuss the project. I have some comments and requests regarding documentation for visual effects and think that a meeting might help me to clarify what I will be asking for in our formal letter. I'd like to see photo simulations for some of the historic properties, but think in some cases, photos that illustrate current conditions might be sufficient. I think meeting with FTA might help to clarify what is appropriate in which instances.

Alicia is on vacation this week but I think she might also have some things she would like to discuss.

Natalie Lindquist
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916-503-8738 – **new number**
natalie.lindquist@parks.ca.gov

SHPO Coordination

Meeting with Office of Historic Preservation

Date	Time
January 3, 2024	10:00 – 11:00 am
Location	**Conference Call Information**
Microsoft Teams Meeting	

A. Attendee List

Name	Agency / Company	Email
Rusty Whisman	FTA	Russell.whisman@dot.gov
Mary Nguyen	FTA	Mary.Nguyen@dot.gov
Kathleen (KC) Kelly	FTA	kathleen.kelly@dot.gov
Natalie Lindquist	OHP	Natalie.Lindquist@parks.ca.gov
Meghna Khanna	Metro	KhannaM@metro.net
Kristin Carlson	WSP	Kristin.Carlson@wsp.com
Guy Blanchard	WSP	Guy.Blanchard@wsp.com
René Loya	WSP	Rene.Loya@wsp.com
Shannon Carmack	Rincon	scarmack@rinconconsultants.com
Rachel Perzel	Rincon	rperzel@rinconconsultants.com

B. Meeting Summary

The purpose of the meeting was to discuss the potential visual effects of the West Santa Ana Branch (WSAB) Project where it was in proximity to historic resources. Ms. Lindquist also stated that it would be helpful to discuss locations where the WSAB Project would have a physical effect on a resource, such as the extension of the debris walls for the Union Pacific LA River Rail Bridge. She said she did not have questions about the Century Freeway/Transitway Historic District.

Ms. Khanna stated that U.S. Army Corps of Engineers reviewed Cultural Resources Effects Report and their comments have been addressed.

Mr. Loya shared an exhibit of the Union Pacific LA River Rail Bridge and noted the portion of the existing debris wall that would be removed to accommodate the construction of new pier walls and debris walls to support the new WSAB light rail transit (LRT) bridge. It was noted that these

new supports and debris walls would essentially be an extension of the existing bridge pier walls. Ms. Carmack stated the debris wall is not a character defining feature of the bridge. Mr. Loya noted that the new bridge would be roughly parallel and just to the north of the existing Union Pacific LA River Rail Bridge. Ms. Lindquist requested a simulation or sketch that portrays the proximity of the proposed LRT bridge and the existing LA River Rail Bridge to one another and provides a comparison of their scale and mass.

Ms. Perzel noted that in the locations where the WSAB alignment crosses the San Gabriel River and Rio Hondo Channel, the existing bridges in these locations are not historic. The Metro team noted that there are existing bridges across each of the rivers. Ms. Lindquist responded that based on that information, only a simulation is requested for the LA River.

Regarding Pueblo del Rio Public Housing Complex Historic District, Ms. Carmack summarized the project relative to the historic district and Ms. Perzel shared photos of the existing setting surrounding Pueblo Del Rio. The existing pedestrian crossing over Long Beach Avenue was noted. Based on the information provided, Ms. Lindquist stated that a simulation is not requested for this location.

Ms. Lindquist stated that she will provide a formal letter requesting the simulation. She noted that Alicia Perez had comments or questions regarding archaeological resources. She stated that revisions to the Cultural Resources Effects Report may not be required, unless the comments from Ms. Perez require updates to the report. Otherwise, a letter with supplemental materials would be sufficient.

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Armando Quintero, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

January 4, 2024

VIA EMAIL

In reply refer to: FTA_2018_1224_001

Mr. Ray Tellis, Regional Administrator
Federal Transit Administration
888 South Figueroa Street, Suite 440
Los Angeles, CA 90017-5467

RE: Section 106 Finding of Effect for the Proposed West Santa Ana Branch Transit Corridor, Los Angeles County, CA

Dear Mr. Tellis:

The Federal Transit Administration (FTA). in coordination with Los Angeles County Metropolitan Transportation Authority, is continuing consultation under Section 106 of the National Historic Preservation Act, as amended (36 CFR 800) for above undertaking. As part of the submitted documentation the FTA provided a Final Cultural Resources Effects Report for the project area.

The undertaking is a proposed light rail transit line that would extend through Southeast Los Angeles County.

On December 21, 2018, FTA initiated Section 106 consultation with the State Historic Preservation Officer (SHPO) regarding the area of potential effect (APE) and the proposed approach to the survey, identification, and evaluation of cultural resources. In a letter dated January 18, 2019, the SHPO responded with comments on the APE and proposed a built environment screening methodology. In a letter dated April 26, 2019, FTA provided additional information to address SHPO's questions. In a letter dated May 29, 2019, SHPO indicated that there were no further comments on the APE and concurred with the proposed screening methodology. In a letter dated March 30, 2020, FTA requested comments on the revised APE and concurrence on the determinations of the National Register of Historic Places (NRHP) eligibility for 36 architectural properties, the assumed NRHP eligibility of 7 archaeological sites, and the NRHP ineligibility of 400 properties. The FTA did not receive a response from SHPO.

Since 2022, the APE was expanded to account for design modifications, traffic mitigation measures, and temporary construction easements. In a letter of May 11, 2023, the FTA requested comment on the revised APE and concurrence on determinations of eligibility. The SHPO responded by letter on June 29, 2023 and concurred with FTA's APE delineation and determinations.

The APE was delineated to consider potential direct and indirect effects, including potential noise, vibration, and/or visual effects to historic properties. Previously, the vertical extent of the APE ranged from approximately 90 feet above the existing ground surface and approximately 115 feet below the existing ground surface. Following the APE delineation in June 2023, the depth of the APE has been expanded to approximately 150 feet below the existing ground surface to account for geotechnical borings necessary to support project construction.

The FTA found no known archaeological properties within the APE and considers the APE to have low to moderate sensitivity for the presence of buried archaeological deposits that could qualify as historic properties. The FTA found that the undertaking will have no adverse effect to known archaeological properties. Measures outlined in Section 6 of the Effects Reports will be implemented if unanticipated archaeological resources are discovered during construction.

Nineteen built-environment historic properties, eligible for the National Register of Historic Places (NRHP), were identified in the APE. The FTA found that the undertaking will have no adverse effect to these 19 historic properties. The undertaking will introduce new permanent visual elements within the right of way (ROW), including additional rail-related features such as tracks, fencing, pedestrian crossing gates, a grade crossing house, and a train control house. The proposed visual elements will be similar in scale and massing to the existing rail-related features currently in the vicinity.

The undertaking will physically alter or modify the following five historic properties:

- Century Freeway–Transitway Historic District – The undertaking will require demolition of one character-defining feature of the district (the Century Boulevard Underpass). Demolition will only impact 1 of 118 (less than 1 %) character-defining bridges/overcrossings. The new light rail and replacement freight bridges will be generally consistent in scale, massing, and materials with other character-defining bridges throughout the district. New light rail and replacement freight bridges will integrate relief consistent with that present on character-defining bridges throughout the district. Design of the new light rail bridge will be reviewed and approved by a professional meeting the Secretary of the Interior's professional qualification standards in architectural history, history, or architecture as it advances.

  Removal and replacement of minimal landscaping, including the removal and replacement of up to 15 trees, may be required. The district's original landscaping is one of its character-defining features. Any trees removed during construction would be replaced in-kind and at a ratio of 1:1, consistent with the principles in the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines (36 CFR 800.5 (ii)). The overall intent of the original landscape design is expected to remain visible and intact with replacement of the removed trees.

  Shifting 2,500 feet (0.47 mile) of track will be a minor change within the median of Century Freeway that is already dedicated to transit use. The new infill station will be compatible in

scale and massing with existing stations and will be in the transitway median; no existing stations will be altered.

- Los Angeles River Channel – The undertaking will result in construction within the subject segment, but the undertaking will not alter the segment's orientation or its overall size or shape and will not impact its ability to function in its historic and current capacity. The new light rail bridge and its associated features, including soundwalls, rail track, and catenary poles and wires are compatible with the subject segment's surrounding urban industrial setting.

- Union Pacific Los Angeles River Rail Bridge – The existing bridge will remain intact and continue its historic and current use. While the undertaking will not physically alter the deck of the bridge, the bridge's existing concrete piers will be extended to the north to support the new light rail bridge constructed for the undertaking to cross the LA River. Modifications to the piers will be undertaken using materials consistent with the existing piers, and the scale and massing of extended portions of the piers will be consistent with those currently extant.

- Rio Hondo River Channel – The undertaking will introduce new permanent visual elements, into the Rio Hondo Channel, approximately 15 feet west of the existing Rio Hondo Bridge (which is not a historic property). The undertaking will alter the channel by introducing a new light rail bridge, piers, and abutments. However, the river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout 51-mile river.

- San Gabriel River Channel – The new light rail bridge will be constructed roughly in the existing location of the San Gabriel River Bridge, which will be demolished by the undertaking. The bridge is not eligible for the NRHP. The undertaking will introduce a new bridge, piers, and abutments. The river's character-defining features will remain intact and the new project elements will be compatible with the design, workmanship, and materials found throughout the 58-mile-long river. The new light rail bridge will not change the historic alignment of the river or result in the removal or substantial alteration of its character-defining features.

The FTA applied the criteria of adverse effect per 36 CFR 800.5(a) and has determined that the undertaking will have no adverse effect on historic properties.

Based on review of the submitted materials, I have the following comments:

1. Comments on the APE:
    - It is requested that the FTA submit a revised APE map that denotes the APE revisions (geotechnical boring).
2. Comments on the WSAB Cultural Resources Effects Report:

- Section 5.2.2.12 Union Pacific Los Angeles River Rail Bridge, South Gate. It is requested that the FTA provide a photo simulation or artistic rendering that illustrates what the new light rail bridge will look like next to the existing historic bridge.
- Section 6.2.1 Development of Cultural Resource Mitigation and Monitoring Program. Because the FTA has presented a finding of no adverse effect for the undertaking, it is recommended that the term mitigation be removed from the report title. Mitigation is more applicable to resolve adverse effects; thus, it may be more appropriate to rename the report to Cultural Resource Monitoring and Discovery Program or something similar.
- Section 6.2.4 Treatment of Unanticipated Discoveries. It appears that the FTA is proposing to develop and implement the Cultural Resource Mitigation and Monitoring Program in accordance with 36 CFR § 800.13(a)(2). As such, the SHPO requests the opportunity to review and comment on the draft Cultural Resource Mitigation and Monitoring Program prior to its implementation. This review would give the SHPO an opportunity to provide comment on FTA's proposed measures to identify and treat post-review discoveries should they occur during construction activities.

If you require further information, please contact Natalie Lindquist at Natalie.Lindquist@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

Appendix B-Section 2: USACE Consultation/Coordination

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS
LOS ANGELES DISTRICT
915 WILSHIRE BOULEVARD, SUITE 930
LOS ANGELES, CA 90017-3401

October 6, 2021

SUBJECT: USACE Request to be Cooperating Agency and Comments on DEIR/S for West Santa Ana Branch Transit Corridor Project.

Charlene Lee Lorenzo, Director
Federal Transit Administration, Region 9, Los Angeles Office
888 South Figueroa Suite 440
Los Angeles, California 90017-5467

Meghna Khanna, Project Manager
Los Angeles County Metropolitan Transportation Authority
One Gateway Plaza, Mail Stop 99-22-7
Los Angeles, CA 90012

Dear Ms. Lorenzo and Ms. Khanna:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS)/Environmental Impact Report (EIR) for the West Santa Ana Branch Transit Corridor Project. Our comments represent the Los Angeles District of the U.S. Army Corps of Engineers ("Corps") Regulatory and Engineering Divisions' interests in the project pursuant to our regulatory authorities promulgated under Section 404 of the Clean Water Act (33 U.S.C. 1344; hereafter, Section 404) and Section 14 of the Rivers and Harbors Act (33 U.S.C. 408; hereafter, Section 408) and considering our National Environmental Policy Act (NEPA) responsibilities.

Build Alternatives 1-3 involve the alteration of and discharge of fill material into three (3) federal flood control projects (federal project) containing waters of the U.S., specifically the Los Angeles River, Rio Hondo, and San Gabriel River. Build Alternative 4 involves the alteration of and a discharge of fill material into one (1) federal project containing waters of the U.S., specifically the San Gabriel River. As such, all the build alternatives would require authorization from the Corps under Section 404 and Section 408.

Based on the Draft EIS/EIR documentation, the Corps' Engineering Division believes that their action to authorize any of the proposed crossings under Section 408 may require the Corps to conduct at least an Environmental Assessment to fulfill their requirements under NEPA. As stated on page S-78 of the Draft EIS/EIR, the Federal Transit Administration (FTA) published the Notice of Intent pursuant to NEPA in the *Federal Register* on July 26, 2017. Under this version of the NEPA Regulations and the

version in the *Federal Register* as of the date of this letter, Federal agencies which have jurisdiction by law can be cooperating agencies in the preparation of an EIS.

By this letter, the Corps hereby requests to be a cooperating agency under 40 CFR Part 1501 and agrees to assist the FTA with preparing the final EIS/EIR due to our jurisdiction by law for areas that could be affected by the project and our special expertise in the following areas:

- Corps' Regulatory Program regulations at 33 CFR parts 320-332;
- Flood control; and
- Assessing the functions and services of aquatic resources and identifying appropriate methods to conduct such assessments.

Subject to availability of resources and in accordance with applicable laws and regulations, the Corps agrees to:

1. Assist in reviewing information and environmental analysis concerning which the Corps has special expertise.
2. Identify issues, concerns, and any technical studies that the Final EIS should address, including risk assessments for completed federal projects, to support the Corps in fulfilling its NEPA and other legal responsibilities.
3. Review the administrative final EIS/EIR. We request that FTA allow the Corps at least 30 days to review such documents.
4. Cooperate in the application of principles for integration of NEPA, the Section 404 Clean Water Act review process, the Public Interest Review process pursuant to 33 CFR 320.4, and the Section 408 review process pursuant to Engineering Circular 1165-2-220 Item 12.

The Corps will be required to comply with Section 106 of the National Historic Preservation Act of 1966 (NHPA; herein "Section 106") and Section 7 of the Endangered Species Act (ESA; herein "Section 7") for the federal actions under evaluation. It is appropriate for the FTA as the lead federal agency under NEPA to be the lead federal agency for purposes of compliance with Section 106 and Section 7. Pursuant to 50 C.F.R. § 402 and 36 C.F.R. § 800.2(a)(2), we request the FTA to ensure that the effects of the proposed activities subject to our statutory authorities are fully considered in the consultations with the U.S. Fish and Wildlife Service (USFWS), State Historic Preservation Officer (SHPO) and/or the Advisory Council on Historic Preservation, as applicable. In the event the FTA makes an effect determination or completes Section 7 of the ESA or Section 106 of the NHPA consultations absent coordination with the Corps, our agency must still demonstrate it is in compliance with the ESA and/or NHPA for our discretionary federal actions. The resource agencies with whom you consult and seek concurrence on your analysis of effects related to federally listed species and/or historic properties should be informed that the FTA's consultations

are inclusive of the Corps' federal actions/undertakings and are being carried out by the FTA on our behalf. I also request that we be given the opportunity to review pertinent biological and cultural resources documents, including draft biological opinions and draft MOAs. The Corps must be provided with a copy of the documentation demonstrating the FTA has complied with applicable requirements set forth in Section 7 of the ESA and Section 106 of the NHPA for the proposed project before we are able to render final Department of the Army (DA) permit decisions. When applications are submitted to the Corps for authorization under Section 404 and Section 408, please provide information documenting compliance with Section 106 and Section 7, which clearly describes the Area of Potential Effect and effects of the undertaking under Section 106 and the Action Area and effects of the activity under Section 7, such that the Corps can positively determine that the Section 106 and Section 7 compliance covers the Corps' action to authorize the regulated activities.

Comment 1. Chapter 2, Section 2.5.2 Build Alternatives (Page 2-16): If the existing piers and embankment walls are to be replaced, then the Corps would like to have as few piers in the channel as possible and the abutment placement pushed out to the land side of the levee systems LAR-CC2 and LAR RH2. The addition of new piers makes it harder for the Corps to keep the channel clear of debris and flowing as designed.

In addition, the SPL-HH policy for debris titled "Debris Loading on Bridges and Culverts" need to be satisfied wherever it is applied.

Comment 2. In Chapter 2 Alternatives Considered/Project Description, Table 2.8 Permits and Approvals (Page 2-54): The Corps' regulatory authority is identified as Section 404 and Section 408. This is confusing, because it obscures the fact that they are two very different pieces of legislation with different purposes. These short-hand names for the legislations should either be defined earlier in the document or within the table itself using the following example: "Section 404 of the Clean Water Act (33 U.S.C. 1344, hereafter Section 404)" and "Section 14 of the Rivers and Harbors Act (33 U.S.C. 408, hereafter Section 408)". In addition, remove reference to "Section 10 Bridge Permit". Section 10 of the Rivers and Harbors Act pertains to navigable waters of the U.S. While the Los Angeles River is a Traditionally Navigable Waterway for the purposes of Section 404, these reaches have not been evaluated for navigability under Section 10 of the Rivers and Harbors Act and are not subject to the ebb and flood of the tides.

Comment 3. In Chapter 2 Alternatives Considered/Project Description, Table 2.8 Permits and Approvals (Page 2-55): Under Regional Jurisdiction, please replace "Regional Water Quality Control Boards" with "Los Angeles Regional Water Quality Control Board" and add "Clean Water Act," before "Section 401".

Comment 4. Chapter 4 Affected Environment and Environmental Consequences (Starting on Page 4-1): For the Corps to be able to demonstrate that this EIS adequately covers the Corps' action (i.e., authorization of the river crossings under Section 404 and Section 408), the effects of the Section 408 components of this project (i.e., the river crossings) need to be identified as a Section 408 action and explicitly named, described, and evaluated for each element of the affected environment considered. Therefore, for each element considered (i.e., Land Use, Communities and Neighborhoods, etc.) the description of the Affected Environment must include a description of what is affected by the Section 408 action (i.e., each river crossing) and the analysis of the Effects of the Action must include an analysis of the effects due to the Section 408 action (i.e., each river crossing).

This is necessary to ensure that the Corps can base our Record of Decision for the Section 408 action on FTA's final EIS.

Comment 5. In Chapter 4 Affected Environment and Environmental Consequences, Table 4.0.1 Geographic Extent of Evaluation (Page 4-2, 4-3): The geographic extent for Noise and Vibration is defined as "Immediate vicinity". This is not a clear extent and is inconsistent with the 500-foot buffer evaluated in the discussion of Construction Impacts (Page 4-626). Recommend replacing with "500-feet". Finally, regarding the geographic extent for Archaeological Resources, the direct APE should include a direct reference to the bridge footings within the flood control channel. For example: "The direct APE encompasses the alignment ROWs, as well as all associated elements where construction would occur, including stations, laydown yards, maintenance facilities, parking lots, and bridge footings within flood control channels and waters of the U.S. … Where the Project is aerial, including where it bridges over flood control channels and waters of the U.S., the direct APE encompasses the width of the proposed ROW. In areas with potential direct ground disturbance, including at bridge footings in flood control channels and waters of the U.S., the vertical extent of the direct APE extends approximately…"

Comment 6. In Chapter 4, Section 4.8.1.1 Ecosystems/Biological Resources, Regulatory Setting and Methodology, Regulatory Setting (Page 4-320): Add "The Fish and Wildlife Act of 1956" to the list of authorities attributed to the U.S. Fish and Wildlife Service. The Fish and Wildlife Coordination Act (15 U.S.C. 742a, *et seq.*) requires that any federal agency that proposes to control or modify any body of water must first consult with US Fish and Wildlife Service or the National Marine Fisheries Service, as appropriate, with a view to the conservation of wildlife resources.

Comment 7. In Chapter 4, Section 4.8.2.2 Ecosystems/Biological Resources, Affected Environment/Existing Conditions, Special-Status Biological Resources,

Jurisdictional Waters (Page 4-327): Please change this header to "Wetlands and Other Waters of the U.S."

Comment 8. In Chapter 4, Section 4.8 Ecosystems/Biological Resources (Page 4-328): Remove reference to Section 10 of Rivers and Harbors Act. While the Los Angeles River is a Traditionally Navigable Waterway for the purposes of Section 404 of the Clean Water Act, these reaches have not been evaluated for navigability under Section 10 and are not subject to the ebb and flood of the tides.

Comment 9. In Chapter 4, Section 4.8 Ecosystems/Biological Resources (Page 4-333): This section describes the environmental consequences of the operation of the LRT on jurisdictional waters, not the construction. Please clarify this in the discussion. For example: "The LRT would span over these resources and therefore it's operation would not disturb…"

Comment 10. In Chapter 4, Section 4.10.4 Hazards and Hazardous Materials Project Measures and Mitigation Measures (Page 4-405): Mitigation Measure HAZ PM-2 Disposal of Groundwater (Operation) indicates the possibility of dewatering contaminated groundwater during operations. Under certain circumstances, such as when there is measurable sediment in that water, this could trigger a Clean Water Act section 404 permit. This possibility should be mentioned, and the Corps listed as one of the agencies that would be notified.

Comment 11. In Chapter 4, Section 4.11.1.1 Water Resources, Regulatory Setting, Federal, Clean Water Act (Page 4-415): Please strike "navigable waters and traditionally navigable" from the first sentence, so that it reads "The USACE has jurisdiction over waters of the U.S., which are defined in Title 33, Part 328.3 of the Code of Federal Regulations." We recommend removing all capitalizations of *waters* of the U.S. to be consistent with the referenced code. Please add a sentence stating that temporary (such as water diversion barriers) or permanent (such as bridge supports) discharges of dredged or fill material into the Los Angeles River, Rio Hondo, and San Gabriel River would require authorization from the Corps under Section 404 of the Clean Water Act. Finally, this is the appropriate place to discuss Section 401 and Section 402 of the Clean Water Act, currently discussed under State Regulations. These are federal regulations, even though the State implements them.

Comment 12. In Chapter 4, Section 4.11.1.1 Water Resources, Regulatory Setting, Rivers and Harbors Act of 1899 (Page 4-415): Please add "as amended" after 1899 and strike 403 from "(33 U.S.C. 403 and 408)", so that it reads "Rivers and Harbors Act of 1899, as amended (33 U.S.C. 408)." Refer to Comment 2 above.

Comment 13. In Chapter 4, Section 4.11.3 Environmental Consequences/ Environmental Impacts on Water Resources: The Draft EIS does not evaluate the environmental consequences of the proposed river crossings on the hydrology within the channels. This evaluation is critical for informing a decision to authorize the crossings or not under Section 408. Furthermore, Appendices A, B, and C to Appendix T to the DEIS mentions that the water surface elevation is dropped due to the proposed project and that the change was due to having a supercritical flow condition at these locations. The Corps will need to review in detail the hydraulic analysis and the hydraulic models used in the analysis before making a determination regarding the significance of these impacts. This section, along with Appendix T and its Appendices A, B, and C should be updated accordingly, as necessary.

In addition, the appropriate Manning's roughness coefficient should be used in the model geometry. For example, using 0.013 for San Gabriel River is not appropriate unless there is a specific reason.

Comment 14. Chapter 4, Section 4.14.2.1 Built Environment Historic Properties and Historical Resources (starting on Page 4-485): The Los Angeles River channel (as-builts dated 1950, last modified in 1952), Rio Hondo channel (as-builts dated 1950, last modified in 1952), and San Gabriel River channel (possibly constructed in 1964) are considered elements of the built environment. It does not appear that these were evaluated for eligibility to be listed in the National Register of Historical Places. These channels should be described and evaluated for eligibility in the Cultural Resources Survey Report (Appendix W) and the Cultural Resources Effects Report (Appendix X) pursuant to 36 CFR 60.4. If any of these channels are determined to be eligible, the effects should be described in the Cultural Resources Effects Report as well as in Section 4.14 of the Draft EIS. If the Union Pacific Railroad (Map Reference No. 17-006, Page 4-490) was previously determined eligible, the date of determination, date of SHPO concurrence letter, and relevant SHPO concurrence letter should be included in the Cultural Resources Survey Report (Appendix W, Page 7-78) and Cultural Resources Effects Report (Appendix X, Page 5-161). If the resource has been recommended, but not determined eligible with SHPO concurrence, the cited evaluation should be reviewed, an eligibility determination made, and the reasoning conveyed in the Cultural Resources Survey Report (Appendix W, Page 7-78) and Cultural Resources Effects Report (Appendix X, Page 5-161). Finally, the date of SHPO concurrence and the relevant SHPO letter for P-19-192309, the SCE's Long Beach-Laguna Bell 66kV and 220 kV Transmission lines (Map Reference No. 18-016) should be included in the Cultural Resources Survey Report (Appendix W, Page 7-72) and Cultural Resources Effects Report (Appendix X, Page 5-142).

Comment 15. In Chapter 4, Section 4.14.1.2 Historic, Archaeological, and Paleontological Resources; Methodology (Page 4-470): It would be helpful to the reader

to restate the depths of the APE from the table on page 4-3. Also, please include statement of the vertical APE at the water crossings.

Comment 16. In Chapter 4, Section 4.15.1.2 Tribal Cultural Resources, Methodology (Page 4-515): In the last sentence of the first paragraph under the heading "Native American Heritage Commission Sacred Lands File Search", please insert "(Appendix Z)" after "prepared for this Project", so that it reads "Responses received from the NAHC are included in Appendix A of the Traditional Cultural Properties and Tribal Cultural Resources Impact Analysis Report prepared for the Project (Appendix Z)".

Comment 17. Chapter 4, Section 4.18 Safety and Security (Page 4-571): The extension of existing abutments and new bridge beams have the potential to create new areas for individuals experiencing homelessness to occupy. This potential adverse effect on safety and security should be discussed in this section. If individuals were to occupy the abutments or under the bridge beams, they create a safety and security risk to regular maintenance of the flood control system, to themselves during rain events, and to the emergency personnel sent to rescue them. However, these adverse effects can be minimized by designing restrictive access to the abutments and areas under the bridge, designing the abutments in such a way as to prevent loitering or occupation, and relocating or preventing trespassers on a regular basis and at the request of the Corps.

Comment 18. Chapter 4, Section 4.19 Construction Impacts (Page 4-603): Construction related impacts on the operation and maintenance of the Los Angeles River are not assessed but should be. Potential adverse effects include localized flooding and decreased flood protection upstream. The potential adverse effects can be minimized by maintaining an open path through the construction site for the Corps' maintenance equipment at all times during construction, timing construction to occur in the dry season and in dry weather, and by complying with conditions attached to the Section 408 authorization.

We look forward to continued dialogue and coordination with the FTA and the Los Angeles County Transportation Authority on this project. If you have any Regulatory-related questions, please contact Lia Protopapadakis at (213) 452-3372 or via email at Lia.Protopapadakis@usace.army.mil; and for any Section 408-related questions, please contact Rafi Talukder at (213) 452-3745 or via email at Rafiqul.I.Talukder@usace.army.mil. Please refer to this letter and the Corps' Regulatory File Number SPL-2021-00450-LPF in your reply.

Sincerely,

Rafi Talukder, P.E.
Chief, Facility Support and Permits Section
408 Permit Coordinator
Engineering Division

U.S. Department of Transportation
Federal Transit Administration

REGION IX
Arizona, California, Hawaii, Nevada, Guam, American Samoa, Northern Mariana Islands

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October 13, 2021

Mr. Rafi Talukder, P.E.
Chief, Facility Support and Permits Section
408 Permit Coordinator
U.S. Army Corps of Engineers, Los Angeles District
Department of the Army
915 Wilshire Boulevard, Suite 930
Los Angeles, CA 90017-3401

Re: Regulatory File Number SPL-2021-00450-LPF; Acknowledgment of Cooperating Agency on West Santa Ana Branch Transit Corridor Project

Dear Mr. Talukder:

The Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (LACMTA), received comments on the West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) from the Los Angeles District of the U.S. Army Corps of Engineers (Corps) dated October 6, 2021. The Corps has requested to be a cooperating agency under 40 CFR Part 1501. In accordance with 40 CFR 1501.6 of the Council on Environmental Quality's Regulations for Implementing the Procedural Provision of the National Environmental Policy Act (NEPA), the FTA acknowledges the Corps as a cooperating agency because your agency has jurisdiction by law and special expertise.

The Corps had reviewed the Draft EIS/EIR for the project pursuant to regulatory authorities promulgated under Section 404 of the Clean Water Act (33 U.S.C. 1344; hereafter, Section 404) and Section 14 of the Rivers and Harbors Act (33 U.S.C. 408; hereafter, Section 408) and considering the Corps' NEPA responsibilities. All of the proposed build alternatives for the West Santa Ana Branch Transit Corridor Project would require authorization from the Corps under Section 404 and Section 408. In the October 6, 2021 letter, the Corps indicated that the agency had jurisdiction by law for areas that could be affected by the project and special expertise in the following areas:

- Corps' Regulatory Program regulations at 33 CFR parts 320-332;
- Flood control; and
- Assessing the functions and services of aquatic resources and identifying appropriate methods to conduct such assessments

The FTA and LACMTA will coordinate with the Corps for the review of information and environmental analysis in the areas where the Corps has special expertise, and will address comments raised in the October 6, 2021 letter in the Final EIS/EIR.

The coordination will include reviews of preliminary drafts of the Final EIS/EIR and technical studies in support of the Corps fulfilling its NEPA responsibilities. The FTA, in coordination with LACMTA, will provide the Corps with copies of consultations as requested, such as Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act. Discussion of the consultations conducted thus far may also be found in the Draft EIS/EIR.

We expect that at the end of the process the EIS will satisfy your NEPA requirements including those related to project alternatives, environmental consequences, and mitigation. Further, we intend to utilize the EIS and our subsequent record of decision as our decision-making documents and as the basis for the permit application.

If you have any questions or would like to discuss in more detail the project or our agencies' respective roles and responsibilities during the preparation of this EIS, please contact Mr. Rusty Whisman, Transportation Program Specialist, at (213) 202-3956, or by email at rusty.whisman@dot.gov.

Sincerely,

Ray Tellis
Regional Administrator

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Thursday, June 1, 2023 11:04 AM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA); Lam, Brian
Cc: Li, Veronica C CIV USARMY CESPL (USA); McCroskey, Lauren L CIV USARMY CESPL (USA); Gonzalez, Ivan D.; Carlson, Kristin; Lemke, Susannah D CIV USARMY CESPK (USA)
Subject: RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Thank you again for your timely review, Lia & team.

My team will work on responding to the comments and send it your way.

A few comments might require a meeting, especially comment regarding "eliminating the 2 APEs ("direct" and "architectural") and combine them into 1." The APE delineation methodology was established in consultation with FTA and SHPO has concurred with APE and survey methods.

Thanks,
Meghna Khanna, AICP
LA Metro
Senior Director, Countywide Planning & Development
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213.393.2339 (cell)
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From: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Sent: Thursday, June 1, 2023 8:41 AM
To: Lam, Brian <LamB@metro.net>; Khanna, Meghna <KhannaM@metro.net>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>; Lemke, Susannah D CIV USARMY CESPK (USA) <Susannah.D.Lemke@usace.army.mil>
Subject: RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Hi Brian and Meghna. Here are our comments of the Cultural Resources Effects Report and effects consultation letter. Let me know if you have any questions.
Thanks!

Lia Protopapadakis F.
Project Manager
L.A. and San Bernardino Counties Section, North Coast Branch, Regulatory Division
Los Angeles District, U.S. Army Corps of Engineers
lia.protopapadakis@usace.army.mil

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Cell: 213-320-8990

*** We are experiencing a high volume of requests for emergency work as a result of recent storm events. This may impact our ability to respond to customers seeking authorization for non-emergency work in waters of the United States. ***

From: Lam, Brian <LamB@metro.net>
Sent: Wednesday, May 31, 2023 5:27 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: [Non-DoD Source] RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Hi Lia – friendly reminder that comments on the Effects Report are due tomorrow COB. Thank you!

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From: Lam, Brian
Sent: Wednesday, May 3, 2023 4:39 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Got it. Thanks Lia – I just completed the drop off.

Files included:

Growth Inducing EIS/EIR Section **(comments due 5/16)**

- Growth Inducing Section (word and pdf)
- Comment matrix

Cultural Resources Effects Report **(comments due 6/1)**

- Effects Report (word and pdf)
- Comment matrix
- Finding of Effects Consultation Letter

Here is a table of upcoming sections that you can expect for review in the coming weeks.

Deliverable	Approximate Date to Metro	Review Duration	Reviewers
Growth Inducing EIS/EIR Section	Week of 5/1	15 calendar days	Metro/USACE
Land Use EIS/EIR Section	Week of 5/1	15 calendar days	Metro/USACE
Tribal Cultural EIS/EIR Section	Week of 5/1	15 calendar days	Metro/USACE

Cultural Resources Effects Report and SHPO Letter	Week of 5/1	20 business days	Metro/FTA/USACE
Geotech and Seismic EIS/EIR Section	Week of 5/8	15 calendar days	Metro/USACE
Parklands EIS/EIR Section	Week of 5/8	15 calendar days	Metro/USACE
Biological Resources EIS/EIR Section	Week of 5/8	15 calendar days	Metro/USACE

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From: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Sent: Wednesday, May 3, 2023 4:08 PM
To: Lam, Brian <LamB@metro.net>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

That is fine. Please let me know what the respective timelines for response are.

Thanks!

Lia Protopapadakis F.
Project Manager
L.A. and San Bernardino Counties Section, North Coast Branch, Regulatory Division
Los Angeles District, U.S. Army Corps of Engineers
lia.protopapadakis@usace.army.mil

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Cell: 213-320-8990

*** We are experiencing a high volume of requests for emergency work as a result of recent storm events. This may impact our ability to respond to customers seeking authorization for non-emergency work in waters of the United States. ***

From: Lam, Brian <LamB@metro.net>
Sent: Wednesday, May 3, 2023 3:50 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: [Non-DoD Source] RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Thanks Lia!

We also have the Growth Inducing EIS/EIR section ready for USACE review. Would it be okay to include those files in this same drop-off, or would you like a separate one?

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From: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Sent: Wednesday, May 3, 2023 3:33 PM
To: Lam, Brian <LamB@metro.net>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: RE: USACE review on Cultural Resources Effects Report and Finding of Effects Letter

I just sent the request.

Thanks!

Lia Protopapadakis F.
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*** We are experiencing a high volume of requests for emergency work as a result of recent storm events. This may impact our ability to respond to customers seeking authorization for non-emergency work in waters of the United States. ***

From: Lam, Brian <LamB@metro.net>
Sent: Wednesday, May 3, 2023 2:38 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Cc: Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>; McCroskey, Lauren L CIV USARMY CESPL (USA) <Lauren.L.Mccroskey@usace.army.mil>; Gonzalez, Ivan D. <GonzalezIv@metro.net>; Khanna, Meghna <KhannaM@metro.net>; Carlson, Kristin <Kristin.Carlson@wsp.com>
Subject: [Non-DoD Source] USACE review on Cultural Resources Effects Report and Finding of Effects Letter

Hi Lia,

The Draft Cultural Resources Effects Report and Finding of Effects Letter is available for USACE review. Our schedule accounts for a 20-business day review, so comments are due back by **June 1, 2023**.

Could you send me another drop-off request so I can transmit the draft Effects Report and letter for your team's review? Thank you!

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From: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>
Sent: Wednesday, July 19, 2023 11:30 AM
To: Lam, Brian <LamB@metro.net>; Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>
Cc: Khanna, Meghna <KhannaM@metro.net>; Alvarez, Brandy <AlvarezBr@metro.net>
Subject: RE: [Non-DoD Source] RE: USACE review of Revised Effects Report and Draft Safety and Security Section

I just got back from taking 2 weeks leave. We have reviewed internally and I'll get you our comments by COB today for Safety and security. We have No further comments on the cultural effects report.

Lia Protopapadakis F.
Los Angeles and San Bernardino Counties Section
North Coast Branch
Regulatory Division

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Sent with BlackBerry Work
(www.blackberry.com)

From: Lam, Brian <LamB@metro.net>
Date: Wednesday, Jul 19, 2023 at 10:22 AM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>, Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>
Cc: Khanna, Meghna <KhannaM@metro.net>, Alvarez, Brandy <AlvarezBr@metro.net>
Subject: [Non-DoD Source] RE: USACE review of Revised Effects Report and Draft Safety and Security Section

Good morning Veronica and Lia,

Wanted to follow up to see if USACE has any comments to the Safety and Security EIS/EIR section. Thank you!

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From: Lam, Brian
Sent: Thursday, July 6, 2023 4:00 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>; Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>

Cc: Khanna, Meghna <KhannaM@metro.net>
Subject: RE: USACE review of Revised Effects Report and Draft Safety and Security Section

Thanks Veronica. Just completed the drop off

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From: Lam, Brian
Sent: Thursday, July 6, 2023 2:57 PM
To: Flynn, Lia Protopapadakis CIV USARMY CESPL (USA) <Lia.Protopapadakis@usace.army.mil>; Li, Veronica C CIV USARMY CESPL (USA) <Veronica.C.Li@usace.army.mil>
Cc: Khanna, Meghna <KhannaM@metro.net>
Subject: USACE review of Revised Effects Report and Draft Safety and Security Section

Hi Veronica,

This morning I think Lia mentioned she was out of office this week. Would you be able to send me a drop off link for USACE review of:

- Draft Safety and Security EIS/EIR section (Comments due July 18); and
- Revised draft Cultural Effects Report (comments due August 3)

For reference, here is an updated table of upcoming deliverables for USACE review that Meghna shared on 6/29.

Section/Deliverable	Week of
Section 4(f) Chapter	7/10
Noise and Vibration EIS/EIR Section	7/10

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Submittal Review Comments		Submittal Name: Task 82.12 Draft Cultural Resources Effects Report & Letter Version: Draft		Date: July 6, 2023
Line Item	Page No. Document Name	Reviewer's Name	Comment	Response
			DRAFT COMMENTS	
1	Cultural Resources Effects Report Page 1-1	Lemke	Format: The way that this report is structured follows an environmental/NEPA document and is going to be a little confusing to a cultural reviewer. The summary in the transmittal letter was really helpful, and may sufficiently clarify what you are consulting on— but you may have some questions/follow-up from the SHPO reviewer. I'll leave this to your discretion: it might be a good idea to write a quick summary report to accompany the appendix that highlights the proposed APE expansion/added LPA activities under this consultation—to highlight what exactly is being consulted on.	The organization of the report was first established during preparation of the Draft EIS/EIR. Both the report and letter have been reviewed by FTA. No changes made. Despite differences in terminology, potential effects were adequately assessed.
2	Cultural Resources Effects Report Page 1-2	Lemke	Summary: eliminate the 2 APEs ("direct" and "architectural") and combine them into 1—according to the NHPA there is 1 APE per undertaking even when potential project effects/historic properties are varied. Also modify map so there is only 1 APE. Full Comment: Recommend combining the "direct APE" and the "architectural APE" and just call it the APE. In accordance with Section 106 there is just one APE that encompasses potential effects to historic properties (built environment or otherwise). 800.16 (d) Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.	The APE was first delineated prior to the most recent ACHP guidance which clarifies one APE for all resources. The APE delineation methodology has been coordinated with SHPO and received their concurrence. Despite differences in terminology, potential effects were adequately assessed.
3	Cultural Resources Effects Report Page 1-3	Lemke	Summary: Deleting text about limits of the arhitectural APE from this section and instead discuss this info in the analysis. If the undertaking has the potential to impact historic properties, it needs to be within the APE. Full Comment: Recommend deleting and making this point in your analysis, if the undertaking has the potential to impact historic properties, it needs to be within the APE.	See response to prior comment #2
4	Cultural Resources Effects Report Page 1-3	Lemke	Modify map to create 1 APE	See response to prior comment #2
5	Cultural Resources Effects Report, Page 2-4	Lemke	No Build Alternative: But this is no longer part of the analysis, correct? The revised APE is associated with the Locally Preferred Alternative?	The APE was first delineated when there were 4 Build Alternatives under evaluation. The APE was expanded in proximity to the LPA for refinements identified after the Draft EIS/EIR, however, the APE was not truncated to only correspond to the LPA. A No Build Alternative is still analyzed in the Final EIS/EIR. No change made.

Submittal Review Comments		Submittal Name: Task 82.12 Draft Cultural Resources Effects Report & Letter Version: Draft		Date: July 6, 2023
Line Item	Page No. Document Name	Reviewer's Name	Comment	Response
6	Cultural Resources Effects Report Page 4-1	Lemke	“contains zero archaeological historic properties” This is a really bold statement. Suggest modifying the language throughout the document to say “no archaeological historic properties have been identified within the APE” or “no known subsurface historic properties…” something along those lines. Would also suggest a recommendation for what to do if there is a discovery	Added "known" throughout where applicable so it now reads "contains zero known archaeological historic properties." The procedures for unanticipated discoveries are outlined in CR-4 in Section 6.
7	Cultural Resources Effects Report Page 5-2	Lemke	Refer to what would be done in the case of discovery, the risk might be low to moderate, but the possibility of finding an archaeological resource isn't zero.	Added reference to measures included in Section 6.
8	Cultural Resources Effects Report Page 5-2	Lemke	Suggest calling out “no adverse effect” here instead of saying no mitigation is required. (E.g. Based on the results of the study, Rincon Consultants recommends a finding of no adverse effect,” Note: under Section 106 the lead federal agency is the entity that makes the final effects determination	Addressed first part of comment as recommended. Did not change language to read that "Rincon recommends" as recommended, as the study was prepared by Rincon on behalf of Metro and FTA.
9	Cultural Resources Effects Report Page 5-3	Lemke	Summary: Unless DPRs were included in your last consultation package make sure to include the DPR forms for identified cultural resources in the project area. I suspect that many of the DPRs can be compiled and attached from the records search. Be sure to submit a supplemental DPR if the condition of the resource has changed since the last recording. Full Comment: Be sure to include the corresponding DPR forms for each of these resources	The methodology for recording surveyed properties was approved by SHPO and is as follows: Properties that were found to retain integrity were recorded on DPR forms and evaluated for historic significance in the NRHP and CRHR, as well as local designation where applicable. DPR forms were included in Appendix F of the Cultural Resources Survey Report. Properties found not to retain sufficient integrity were surveyed, photographed, and documented in a table included in Appendix H of the Cultural Resources Survey Report; however, they were not formally recorded on DPR forms. It was assumed that the historic status of properties previously listed in or determined eligible for listing in the NRHP and/or the CRHR was unchanged unless improvements were no longer extant or major alterations had been made recently, as noted. Parcels with survey eligibility findings that were completed within the past five years were not updated unless there were substantial changes to the parcel identified during the field survey. Parcels previously determined ineligible for the NRHP and CRHR that had not been surveyed within the past 10 years were updated with a DPR update form and reevaluated. DPR forms are not attached to the SHPO concurrence letter; rather all DPR forms along with previous documentation and updated DPR forms for previously recorded resources are included as Appendix F to the Survey Report, which is attached to the SHPO concurrence letter.

Submittal Review Comments		Submittal Name: Task 82.12 Draft Cultural Resources Effects Report & Letter Version: Draft		Date: July 6, 2023
Line Item	Page No. Document Name	Reviewer's Name	Comment	Response
10	Effect Consultation Letter Page 1	Protopapadakis F.	Identify FTA as lead federal agency acting on behalf of the Corps to fulfill the collective federal responsibility under Section 106 persuant to 36 CFR 800.2(a)(2) here in addition to page 4.	Added as recommended.
11	Effect Consultation Letter Page 2	Protopapadakis F.	Consistent with Lemke's comments on the Report, the survey report identified no "known" subsurface archeological resources, rather than "no archeological resources". Note the Corps will require any ground disturbance to halt in the event of an unanticipated discovery, which is a minimization meaure. This should be included here, and I believe it was a recommended minimization measure from the Construction impacts section of the DEIS/R.	Added "known" to clarify. Added reference to measures that would be implemented in the event of unanticipated discovery.

Appendix B-Section 3: Caltrans Consultation/Coordination

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Making Conservation a California Way of Life.

September 28, 2021

Ms. Meghna Khanna
Project Manager
Metro
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna:

Thank you for the opportunity to comment on the West Santa Ana Branch Draft Environmental Impact Statement/Environmental Impact Report and for coordinating with Caltrans staff throughout the project development process. As participating and cooperating agency, Caltrans looks forward to continued communication with Metro as the project moves forward. The Study Area crosses state and interstate freeways at several locations, and the Caltrans team has the following comments on those portions of the project, separated by subject.

Air Quality

- Section 1.5: Section 93.116(a) of the conformity rule requires that conformity analyses consider the full time frame of the conforming transportation plan; and the project should also analyze peak emissions according to the latest EPA conformity guidance. It is suggested to consider the horizon year of the latest conforming RTP (2020 RTP/SCS) of 2045 and the opening year of 2028.
- Section 1.5.1: Section 1.5 notes that the entire South Coast Air Basin represents the "affected area" on which VMTs are estimated based and, in turn, from which emissions are estimated. The boundary of the Basin (or affected area) encompasses counties of Riverside and San Bernardino. Section 1.6.1 in the Draft EIR/EIS, on the other hand, delineates travel market and study area; but Riverside or San Bernardino Counties are not identified as origin or destinations. It is suggested to clarify: how this project affects travel to and from Riverside and San Bernardino Counties; and how an evaluation of changes in emissions in Riverside or San Bernardino Counties is relevant.
- Section 1.5.2, Page 1-12: According to Table 2.2, 4 or 5 parking facilities are proposed as part of the Alternatives. These parking facilities are stationary sources similar to the maintenance support facility. The parking facilities, however, were not considered in any of the operational analyses in the same fashion as the MSF.
- Section 2.2, Page 2-7: It is suggested to revise all references to the latest conforming 2020 RTP/SCS throughout the report.

- Table 2.2: Freeway crossings should include I-10 and US 101 for some Alternatives.
- Tables 4.2 through 4.4: It is suggested that the monitoring data be updated with more recent years.
- Section 5.2.1.3: Section 7.1 notes that the construction would take approximately 6 years and the RTP 1TR1011 identifies the project completion in 2028. However, the FTIP ID LA0G1094 is currently identified as a study, not a project, and does not identify any programmed allocations in the next 6 years for construction or right-of-way activities. FTIP ID LA0G1094 erroneously identifies that this project is associated with RTP ID 1TR1017, not 1TR1011.
- Page 5-5, CO Analysis: It is suggested that the CO analyses consider such stationary sources as the proposed parking facilities.
- Section 5.2.2.3: There are 4 Alternatives with significantly different alignments; but only one FTIP ID is identified for conformity demonstration. Which alignment is currently identified in the regional model for conformity demonstration and will the project be able to be amended to the FTIP (and RTP) if a different alignment is selected as a preferred alternative?

Biology

- It appears that many of the highway crossings are existing rail routes. However, we are concerned that construction activities associated with development or modification of highway crossings could have impacts to biological resources within Caltrans' right of way. Concerns include excavation and grading impacts, clearing and grubbing impacts, noise and vibration impacts from construction work and potential pile driving, impacts to nesting birds and roosting bats (including urban populations), invasive species impacts, as well as permanent impacts of the project footprint. If excavation and grading occur within Caltrans' right of way, these activities could impact small mammals, reptiles, and insects within our right of way.
- If rail constantly travels beneath our freeways through Caltrans' existing box tunnel structures, this could have permanent noise impacts which would affect nesting birds and roosting bats within joints and cracks in our freeway structure.
- If clearing and grubbing would occur within Caltrans' right of way, this could impact nesting birds, bats, and sensitive plant species within Caltrans' right of way. In addition, clearing and grubbing could cause a spread of invasive plant species within Caltrans' right of way. It could also impact large, mature trees that birds use for roosting, foraging, and breeding habitat.
- Invasive plant species are not discussed in the Final Biological Resources Impact Analysis Report, but should be addressed, not only for their propensity to spread, but also that no invasive species will be used in any planting plans.

- California Department of Fish and Wildlife has defined the nesting season for passerines as starting February 1. This is the date Caltrans uses as the beginning of the bird nesting season.

Communities and Neighborhoods/Environmental Justice

- Consider using tools like CalEPA's California Communities Environmental Health Screening Tool (CalEnviroScreen) or US EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) to further investigate potential impacts to disadvantaged communities.
- Page 4-875 discusses that noise and vibration impacts to residential and other sensitive receptors remain adverse even after mitigation. We suggest including additional measures to further mitigate operational noise impacts from the project to nearby residents and other sensitive receptors.
- There are some discrepancies in the Environmental Justice discussion throughout the document. The Summary (Page S-74) states that for traffic operation, the project would result in a disproportionately high and adverse effect to the environmental justice community of Huntington Park, but the Environmental Justice section of the document states no disproportionately high and adverse effect. Similarly, environmental justice discussion pertinent to noise and vibration is confusing. We suggest revising the analysis to be consistent and to include additional measures to address any disproportionately high and adverse effects to environmental justice communities.

Corridor Management

- Pages 55, 211, 213, and 214: There are new proposed stations, park and ride facilities that are close to the on/off-ramps on Route 91 and Route 105. Should those on-/off-ramps be studied since there are more vehicle trips will be added to the on-/off-ramps?
- Page 224: Is this proposed new parking space?

Cultural

- Has the Revised Preliminary Cultural Resources Effects Report been submitted to the State Historic Preservation Officer (SHPO)? Please include the response or the proposed timeline for submittal and any comments or questions from SHPO or her staff regarding the proposed project when received. The document should discuss coordination with SHPO and other consulting parties and the outcome of the coordination.
- Caltrans has concerns about the Revised Preliminary Cultural Resources Effects Report in Appendix X regarding the expected effects and impacts to Century Freeway-

Transitway Historic District. Please disclose or describe expected effects and impacts to the Historic District and specify a requirement for design review and approval by a qualified historic Architect for the proposed four new bridge designs, post-construction replacement of character-defining landscape features or proposed Green Line platform alterations and improvements (including platform station improvements, elevators, escalators, stair enclosures, and soundwalls) for conformance with the Secretary of the Interior's Standards for Rehabilitation.

- The comments below address the analysis in Appendix X specifically, but they also apply to any summary in the EIS/EIR.

Effects/Impacts Analysis

- In Section 5, Effects/Impacts Analysis section of the technical report, please elaborate on the effects or impacts caused by the proposed project to the Century Freeway-Transitway Historic District. Caltrans disagrees that "The construction and operation of Alternatives 1, 2, 3, and 4 would result in no adverse effect/less than significant impacts to this historic property/historical resource and no minimization/mitigation measures are required" (page 5-166), given the proposed demolition of three contributing bridges and landscape and changes to the contributing light rail or to the mainline of the freeway lanes, which are each historic fabric of and were identified as contributing features to the Century Freeway-Transitway Historic District.

- Caltrans finds that the effects and impacts expected to be caused by the proposed project were not adequately discussed, and no build alternatives were analyzed that would avoid or lessen the effects and impacts that would be caused to the Century Freeway-Transitway Historic District. If the effects on to the Century Freeway-Transitway Historic District had been more thoroughly analyzed, the proposed project build alternatives would likely have been found to cause an adverse effect or impact to the historic district. Please revise the documents to adequately analyze the impacts of the project on the Century Freeway-Transitway Historic District.

- The term "reconstruction" is misused in the technical document and is potentially misleading in the context of historic preservation practice and actual project plans and measures. The National Park Service directs "Reconstruction is defined as the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location" (The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings, 2017). Reconstruction as a treatment is not applicable to extant contributing features that are proposed for demolition and would subsequently be constructed in different configurations. "Rehabilitation" is likely the appropriate treatment to be used in designing the proposed new bridges. Each of the three bridges, Façade Avenue

Overcrossing, Century Boulevard UP and Arthur Avenue Pedestrian and Utility Overcrossing unless specified otherwise, can be expected to be replaced by bridges that possess different characteristics than the existing bridges including visual qualities, including overall appearances, widths, distances among them, immediate and surrounding settings, materials, workmanship and in some cases, uses of the existing bridges.

Century Boulevard UP Bridge

- Appendix X does not clearly disclose that the Century Boulevard UP bridge (approximately 30-foot-wide in its existing state) would be replaced by two separate bridges, which are expected to be 74 feet or more wide. Additionally, Caltrans disagrees with the statement under bridge modification that they "would be reconstructed to maintain the rhythm of bridges that occurs throughout district," because none of the existing, contributing bridges are spaced that closely, which means that the physical spacing seen by motorists, users of the light rail, and passersby would be changed. The statement that the bridges were "not identified as eligible for architecture or engineering" is incorrect and inconsistent with the Finding of Effect prepared for the I-105 ExpressLanes project (December 2020).

- Based on the distinctive bridge barrier designs and detailing, the FOE for the I-105 ExpressLanes project concluded that the bridge widenings with rehabilitation and reconstructed decorative barrier treatments was not expected to cause an adverse effect. However, the proposed bridge replacements at Century Boulevard UP bridge would include a 20-foot-wide freight bridge with no accommodation for an access road, which currently exists on the freight bridge. It would be adjacent to and require construction of a second, 46-foot-wide, separate light rail bridge with fewer than 10 feet separating the new bridges (Appendix B – SHPO Consultation), which would be considerably larger and wider than the existing single overcrossing. Additionally, no mention was made of the proposed appearances of the new bridges or comparisons between existing and proposed (*e.g.* rail height, bridge depth top-to bottom, numbers of bents, types of abutments, materials, colors and finishes). Proposed replacement bridges would further contain additional improvements including an unknown number of OCS poles and catenary wires that would be far different in appearance, and likely requiring higher fences and railings than existing.

- Access roads required by UPRR/BNSF for inspections, maintenance and passage are a minimum of 13 feet in width at present. The railroad specifies, "The outside edge of the Access Road shall be located a minimum of 27 feet from the centerline of the nearest existing or future track" (*UPRR/BNSF Guidelines for Railroad Grade Separation Projects,* May 2016). Those railroad guidelines also direct that "If a bridge maintenance structure is not provided, an Access Road with a turnaround shall be designed and constructed in conjunction with the grade separation bridge structure." Caltrans staff

expects that the replacement railroad bridge would be considerably be wider than depicted and analyzed. If no access road would be included, would turnarounds north and south of the proposed new railroad bridge be required as well? They should also be analyzed.

Light Rail Platform Alterations

- Proposed alterations to the extant light rail alignment and its width, the addition of a platform, canopies, elevator, escalator and stair enclosures (vertical circulation elements) as well as soundwalls depicted in the plans at the light rail platform and the demolition of existing historic fabric should be fully explained and designed to be differentiated and compatible with the existing facility, in conformance with the Secretary of the Interior's Standards for Rehabilitation, subject to review and approval by a qualified Historic Architect to avoid an adverse effect or an impact.

Cumulative Impact

- Please elaborate on the cumulative impacts to the Century Freeway-Transitway Historic District by other known projects with the proposed project. Proposed alterations to the I-105 ExpressLanes Project, I-105/I405 Tunnel Lighting, Rosa Park Station Improvement Project, Vermont Transit Corridor, Crenshaw/LAX Transit Project, Crenshaw Northern Extension Project, and Airport Metro Connector or C Line (Green) Extension to Torrance could each be expected to cause small effects and impacts to the Century Freeway-Transitway Historic District that could become cumulatively considerable, including both direct and indirect effects. How many bridges and light rail stations are proposed to be altered or demolished as parts of these recent and future projects?

Consulting Party Status Request

- Based on the identification of these Cultural Resources issues and as the legal owner of the I-105 Century Freeway-Transitway Historic District, Caltrans herewith requests consulting party status for this project under Section 106 of the National Historic Preservation Act, pursuant to 36 CFR Section 800.2 (a) (2), 800.2 (c) (5) and 800.3(f) (3). Please contact Caltrans Environmental, Cultural Resources unit with your agency's response and all project-related Cultural Resources technical reports, SHPO responses and environmental documents via e-mail at claudia.harbert@dot.ca.gov (subject line: Metro WSAB Project Consulting Party). Kindly consider and respond to this written consulting party request within 30 days of its receipt.

Section 4(f)

- The Section 4(f) determination for the Century Freeway-Transitway Historic District may change depending on whether effects are found to be adverse. If they are found to be

adverse, the Section 4(f) analysis should be an individual evaluation rather than *de minimis*.

Visual/Aesthetics

- On pages 24 and 25, it is difficult to distinguish between the symbols for at-grade, underground and aerial.
- Structures within Caltrans right of way (including aerial structures crossing over freeways) shall have aesthetic treatment commensurate with aesthetic enhancements provided to municipalities and Metro facilities. Aesthetics on structures should have concurrence from Caltrans Engineering Services (DES) and the project Landscape Architect.
- Landscaping disturbed by the project shall be replaced in kind or as agreed upon by the Caltrans project Landscape Architect. Any irrigation disturbed by the project shall be replaced or repaired to be fully functional and connected to the remainder of the irrigation system. Any bare soil will be given a suitable ground cover of planting, hardscape or a 4" deep layer of mulch, with the concurrence of the Caltrans project Landscape Architect.
- Sound walls placed within the State right of way shall have suitable aesthetic design, with the concurrence of the Caltrans project Landscape Architect.

Hydraulics/Water Resources

- While most of the alternatives cross Caltrans freeways, there was no mention of drainage impacts at Caltrans' freeway crossings. Are there any impacts to drainages at those locations? If so, what will be the impact and how it will be mitigated?

General

- Please indicate in the document that Caltrans will be a cooperating agency under NEPA and a responsible agency under CEQA.

Thank you for considering our comments on the Draft EIS/EIR. If you have any questions, please contact Thoa Le at thoa.le@dot.ca.gov.

Sincerely,

RON KOSINSKI
District Director
Division of Environmental Planning

U.S. Department of Transportation
Federal Transit Administration

REGION IX
Arizona, California, Hawaii, Nevada, Guam, American Samoa, Northern Mariana Islands

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415-734-9490

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Los Angeles, CA 90017-5467
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October 26, 2021

Mr. Ron Kosinski
Deputy District Director
Division of Environmental Planning
California Department of Transportation, District 7
100 Main Street, Suite 100
Los Angeles, CA 90012

Re: Section 106 Consulting Party on West Santa Ana Branch Transit Corridor Project

Dear Mr. Kosinski:

The Federal Transit Administration (FTA) and the Los Angeles County Metropolitan Transportation Authority (LACMTA), received comments on the West Santa Ana Branch Transit Corridor Project Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) from the California Department of Transportation, District 7 (Caltrans District 7), dated September 28, 2021. Caltrans District 7 has requested to be a consulting party for the West Santa Ana Branch Transit Corridor Project under Section 106 of the National Historic Preservation Act. Caltrans District 7 has also requested copies of project-related Cultural Resources technical reports, State Historic Preservation Officer responses and environmental documents.

The FTA and the LACMTA acknowledge Caltrans District 7 as a Section 106 consulting party based on Caltrans' knowledge of historic properties and potential effects within the Caltrans right-of-way. The Final EIS/EIR will include responses to the comments received on the Draft EIS/EIR. The LACMTA will reach out to discuss comments received from Caltrans District 7. The FTA, in coordination with the LACMTA, will provide Caltrans District 7 with copies of reports and documents as requested. The Draft EIS/EIR and technical reports also may be found on the project website at: https://www.metro.net/projects/west-santa-ana/.

If you have any questions, please contact Mr. Rusty Whisman, Transportation Program Specialist, at 213-202-3956, or by email at rusty.whisman@dot.gov.

Sincerely,

Ray Tellis
Regional Administrator

WSAB Caltrans Coordination
Meeting Minutes

Date	Time
December 7, 2021	10:00 AM to 11:30 AM
Location	**Conference Call Information**
Microsoft Teams meeting	+1 213-458-5634 Phone Conference ID: 666 631 059#

A. Invite List

Name	Agency / Company	Email	Contact #
Meghna Khanna	Metro	KhannaM@metro.net	
Brian Lam	Metro	Lamb@metro.net	
Matthew Abbott	Metro	abbottm@metro.net	
Ivan Gonzalez	Metro	GonzalezIv@metro.net	
Mary Nguyen	FTA	Mary.Nguyen@dot.gov	
James Santos	FTA		
Jeanne Ogar	Aspen	jogar@aspeneg.com	
Kaz Kayoda	Caltrans	kaz.kayoda@dot.ca.gov	
Alison Wong	Caltrans	Alison.Wong@dot.ca.gov	
Janice Lu	Caltrans	Janice.Lu@dot.ca.gov	
Thoa Le	Caltrans	Thoa.Le@dot.ca.gov	
Joahnna Vergara	Caltrans	Joahnna.Vergara@dot.ca.gov	
Francesca Smith	Caltrans	Francesca.Smith@dot.ca.gov	

Name	Agency / Company	Email	Contact #
Claudia Harbert	Caltrans	Claudia.Harbert@dot.ca.gov	
Alonzo Plater	Caltrans	Alonzo.Plater@dot.ca.gov	
Gina Escalante	WSP	Gina.Escalante@wsp.com	
Kristin Carlson	WSP	Kristin.Carlson@wsp.com	
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Guy Blanchard	WSP	Guy.Blanchard@wsp.com	
Shannon Carmack	Rincon	scarmack@rinconconsultants.com	
Rachel Perzel	Rincon	rperzel@rinconconsultants.com	
Rene Loya	Jacobs	rene.loya@jacobs.com	

B. Agenda

1. Introductions and Purpose of Meeting
2. Overview of Presentation Provided to SHPO in September 2020
3. Discussion

C. Meeting Minutes

Participants provided brief personal introductions.

Meghna provided an overview of consultation with SHPO. She noted that SHPO agreed with a No Adverse Effect finding for the I-105 historic district and that this consultation and agreement was summarized in the Draft EIS/EIR.

Francesca commented that the built environment comments in the letter Caltrans submitted on the Draft EIS/EIR were directed at CEQA, not Section 106. Francesca commented that SHPO does not perform CEQA review, and that Caltrans comments are related to CEQA issues and not directed at Section 106 compliance. Based on this clarification in the nature of Caltrans' comments on the Draft EIS/EIR, the Metro team did not provide the presentation that was shared with SHPO in September 2020.

Francesca commented further that the demolition of the three bridges could be a substantial adverse change under CEQA and that the analysis should look at ways to avoid demolishing the character-

defining bridges. Francesca indicated that gaps in the analysis included the following: no stipulations regarding how bridges would look, lack of Secretary of the Interior qualified design review, and lack of discussion of replacing landscaping.

Mary asked for clarification about whether Caltrans was referring to landscaping as in vegetation or the landscape scale of the historic district. Francesca stated that landscaping is a character-defining feature of the district and that there is a landscape plan for the historic district as a result of the lawsuit and that each segment of the district has different landscaping. The Metro team noted necessity of reviewing original landscape plans mentioned by Francesca to see if that would result in any impacts to the district.

The topic of substantial adverse change was broached. Francesca noted that her primary concern is the potential for substantial adverse change and material impairment under CEQA to occur due to the demolition of three contributing bridges. Caltrans noted that although there may be no adverse effect under Section 106, the possibility of impacts under CEQA remain. Francesca noted that the bridges are character-defining features and recommended reviewing the CEQA guidelines. Francesca noted that alternatives that avoid impacts should be evaluated. Shannon stated that she does not agree that the removal of 3 of 118 bridges within the historic district would constitute a material impairment. Francesca noted that Caltrans is concerned with potential impacts to Caltrans-owned property.

Meghna pointed out that the Metro team has been coordinating with the Caltrans team for several years, including after I-105 was designated a historical resource. She stated that in January 2019, Metro and Caltrans began discussing the historic nature of the I-105. Francesca noted that she and the cultural team were not included in this coordination.

Meghna asked what the path forward was, and Francesca responded that the CEQA analysis should include an analysis of alternatives that avoid or lessens impacts. Kristin noted that Chapter 2 of the Draft EIS/EIR summarized alternatives that would minimize the number of bridges that required demolition and reconstruction; however, these alternatives would require substantial property acquisitions and still require the demolition of one bridge. Therefore, the decision was made to proceed with the design that required demolition and reconstruction of the three bridges. Francesca stated that this was helpful information and asked if that analysis was referenced in the Cultural Resources Section of the Draft EIS/EIR. Shannon responded, stating that it was not because the current analysis concluded that there is no impact, ergo an alternatives analysis is not necessary. Meghna asked if additional alternatives analysis would be required since alternatives were discussed in Chapter 2 of the Draft EIS/EIR. Kristin stated that it did sound like further analysis was required. Kristin also noted that the analysis assumed two of the bridges (Arthur Ave and Façade Ave) would be reconstructed in similar material to the current bridge type, though the number of spans would change in order to accommodate both the C Line infill station added as part of the WSAB project and the I-105 Express Lanes project. The third bridge (i.e., the freight bridge) would likely need to be a different material and wider based on coordination with Union Pacific Railroad. Ultimately, design decisions regarding that bridge are at Union Pacific Railroad's discretion and out of Metro's control. This potential change in material and width was included in the analysis and discussed with SHPO.

Claudia noted that Caltrans is not disputing the finding for Section 106 and therefore this finding will not be revised because the Metro team already has SHPO concurrence. She stated that Section 106 is a non-issue. Thoa stated that Caltrans is a responsible agency because they will have to issue an encroachment permit. Therefore, they have a responsibility to meet the requirements to CEQA and

NEPA and that the Caltrans Cultural Resources Team should be comfortable with the determination. Thoa recommended using the CEQA checklist as guidance in revising the analysis.

Francesca mentioned Caltrans' comments on the cumulative impacts assessment and noted that the analysis should consider impacts for currently proposed and future projects and provided a list of projects that should be included in the analysis (note – the list was consistent with that in the comment letter on the Draft EIS/EIR). She noted that if each project has a small impact, impacts could become cumulatively considerable.

Francesca noted that the character-defining features of the district include both landscaping and the bridges, and that the design of the bridges is part of the district's significance. In response, Shannon noted that neither the DPR form nor the condition assessment report for the district, which were prepared by Caltrans, identified the design of the bridges as the reason for their significance or as the reason they were identified as contributing elements to the district.

Meghna asked if Caltrans agrees with the Section 106 finding and Claudia responded that Caltrans did not need to offer concurrence for Section 106 finding because of existing SHPO concurrence. She stated that Section 106 is complete and confirmed that Caltrans would support the SHPO determination for Section 106, even if new analysis under CEQA results in a significant impact

Mary asked Caltrans to clarify the path forward and Caltrans noted the following recommendations: use the CEQA checklist as a guideline; the analysis should be sufficient to support determination; the Caltrans letter on the Draft EIS/EIR provides a clear path forward; the potential impact to landscaping needs to be considered; the alternative analysis needs to be integrated into the cultural resources assessment; need to further consider substantial adverse change; and look at the finding of effect for the I-105 Express Lane Project for guidance. Francesca noted that the term "reconstruction" was used inappropriately in the analysis and stated that the Caltrans letter on the Draft EIS/EIR provides guidance on this terminology.

Mary noted the potential for inconsistencies in the NEPA and CEQA findings and that the analysis will need to be very clear to differentiate between NEPA and CEQA findings. She noted that it is not typical to have a substantial adverse change under CEQA but a no adverse effect finding under Section 106. Francesca noted that she could also not think of situations where the impact conclusions were different for CEQA than Section 106. Thoa asked if a substantial adverse change under CEQA could change the Section 106 finding and Claudia stated that the Section 106 conclusion was set. Mary noted that Caltrans is asking the team to gather all of the pertinent information and have a second look at analysis and findings and consider how a significant adverse change can be avoided. Mary also asked that Caltrans provide what could be done to avoid a substantial adverse change. Mary noted that the cumulative impacts assessment would be reconsidered after the CEQA analysis was updated.

Francesca noted that Caltrans prepared a finding of no adverse effect for I-105 that Philbert Wong or Annabelle Maulano can provide to the Metro team. It was noted that Caltrans can also provide the original landscape plans. Thoa mentioned that it would be useful in the future if Caltrans were to review documents such as this in advance. Meghna noted that Metro offered to provide documents to Caltrans for early review prior to the release of the Draft EIS/EIR, but they declined. Meghna noted that the team will rereview the CEQA checklist, be sure the analysis is comprehensive, and review what was done for the I-105 Express Lanes Project. She stated that the Metro team would look to the Caltrans team for guidance and be in touch to schedule additional meetings.

The following document contains Caltrans' comments on the December 7, 2021, meeting summary, and responses from the Metro team. These comments were extracted from the redline meeting summary provided by Caltrans on May 25, 2022.

It has been standard practice throughout the duration of this project for meeting summaries to represent what was stated at the meeting, as it was presented at the time the meeting was held. While the additional clarifications may be relevant and assist Metro in further understanding Caltrans comments or making potential revisions to its project documents, they cannot be added to the meeting summary if they do not reflect what was verbalized in the meeting. As such, the Metro team extracted the comments into this separate document. This document and the Metro team responses will be appended to that meeting summary and included in the record.

Caltrans Comment: Caltrans added the following statements in text throughout the December 7, 2021, meeting summary:

- *It was not made clear in the meeting that concurrence was "preliminary," which not binding*[1]*.*
- *It was not clear that SHPO concurrence was "preliminary."*
- *…based on the assertion by Metro that the project had received concurrence, not "preliminary concurrence" which has no standing.*
- *Which was a misunderstanding that was not corrected - concurrence has not been received.*
- *This conclusion was based on the WSAB team's mischaracterization of completed SHPO concurrence.*
- *… based on the concept presented by the WSAB team that SHPO had actually provided concurrence.*

Metro Response: Please note that Metro provided Caltrans with several materials to support the December 7, 2021, meeting. These materials were sent to Caltrans staff on November 22, 2021, and attached to the December 7, 2021, meeting invite. Specifically, the following items were provided by Metro:

- Pages 7-2 through 7-16 of the Draft EIS/EIR Chapter 7: Public Outreach Agency Consultation (Attachment A)
- Pages 5-150 through 5-155 of the Revised Preliminary Cultural Resources Effects Report with meeting summary from the September 9, 2020, meeting with the Office of Historic Preservation (OHP) and associated PowerPoint presentation (Attachment B)
- Meeting summary associated with a meeting held between Metro and Caltrans on November 9, 2021 (Attachment C).

The materials described the findings related to the historic district as preliminary. Attachment B stated that the preliminary finding was presented to SHPO and that SHPO did not object to the preliminary finding. The following text from the Revised Preliminary Cultural Resources Effects Report was

[1] Throughout this memorandum, italicized text represents the text inserted by Caltrans into the December 7, 2021, meeting summary prepared by Metro.

highlighted in the version provided to Caltrans:

> "A meeting was held with the California Office of Historic Preservation on September 9, 2020. Metro provided an overview of the Project and the preliminary effects assessment for the project modifications to the I-105 as it relates to the I-105 Century Freeway Transitway Historic District. The Office of Historic Preservation staff did not object to the proposed effects assessment of No Adverse Effect. Information regarding Section 106 consultation is also provided in the Final Cultural Resources Survey Report—Rev 1 (Appendix W) and the West Santa Ana Branch Transit Corridor Project Revised Preliminary Cultural Resources Effects Report (Metro 2021u) (Appendix X).

Caltrans Comment: The built environment comments in the letter Caltrans submitted on the Draft EIS/EIR were *primarily related to* CEQA *issues*, *although some pertained to* Section 106.

Metro Response: During the December 7, 2021, Caltrans staff in attendance verbally stated at the onset of the meeting that the Caltrans comments submitted on the Draft EIS/EIR were related to CEQA issues, and the meeting summary indicates that the topic of the conversation shifted towards CEQA. The meeting summary notes that Caltrans did not object the project's preliminary Section 106 finding because SHPO had been informed of the preliminary finding and did not object. Metro requests that Caltrans identify which comments pertained to Section 106 so that these issues can be appropriately addressed.

Caltrans Comment: Caltrans noted that although there *may well have been* no *identified* adverse effects under Section 106 *in Metro's analysis [which was not complete at that time],* the possibility of impacts under CEQA remain.

Metro Response: The analysis presented in the Draft EIS/EIR was a complete analysis, sufficient to support circulation of the Draft EIS/EIR for public and agency comment. Any changes to the analysis based on feedback or comments from the public and reviewing agencies, including SHPO and Caltrans, would be considered by Metro. Metro also would update the analysis if changes occurred to the project's design or as needed to respond to comments.

Caltrans Comment: *[CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (i.e., its character-defining features) can be considered to materially impair the resource's significance.]*

Metro Response: The above statement regarding CEQA Guidelines is correct and applicable.

Caltrans Comment: *The CT Team later found out that the mentioned previous coordination was very limited in a couple of general project meetings (many meetings were cancelled) with no cultural specifics or requests for review of any cultural technical studies/analyses for the project, which would not have made it possible for CT to comment on the finding or determination back then.*

Metro Response: Please note that Metro assumes Caltrans would invite the appropriate internal agency staff as necessary and applicable to all project meetings.

Caltrans Comment: *[NEW NOTE: Caltrans comments on Cultural Resources must be transmitted to SHPO as consulting party comments with the Section 106 technical reports submitted].*

Metro Response: The Cultural Resources Effects Report will be updated as applicable to support the Final EIS/EIR. This report will be sent to SHPO to support a Finding of Effect prior to issuance of the Final EIS/EIR. Summaries of consultation with consulting parties and materials relevant to the Section 106 process and CEQA analysis will be included in the appendix of that technical report when the report is provided to SHPO.

Caltrans Comment: *None of that is described in the Cultural Resources technical reports.* Therefore, *based on what?* the decision was made to proceed with the design that required demolition and reconstruction of the three bridges.

Metro Response: The following was stated during the December 7, 2021, meeting and is depicted in the meeting summary:

> "Kristin noted that Chapter 2 of the Draft EIS/EIR summarized alternatives that would minimize the number of bridges that required demolition and reconstruction; however, these alternatives would require substantial property acquisitions and still require the demolition of one bridge. Therefore, the decision was made to proceed with the design that required demolition and reconstruction of the three bridges. Francesca stated that this was helpful information and asked if that analysis was referenced in the Cultural Resources Section of the Draft EIS/EIR. Shannon responded, stating that it was not because the current analysis concluded that there is no impact, ergo an alternatives analysis is not necessary.

Caltrans Comment: …the analysis assumed…the number of spans would change in order to accommodate both the C Line infill station *[which should rightly also be subject to review for conformance with the Standards as additions to the historic district]* added as part of the WSAB project and the I-105 Express Lanes project….Ultimately, design decisions regarding that bridge are at Union Pacific Railroad's discretion and out of Metro's control *but are nonetheless subject to conformance with Section 106 and CEQA*.

Metro Response: The analysis completed for Section 106 and CEQA did account for the change in the number of spans and bridge replacement material. Additionally, the subject of the conversation ongoing during that portion of the meeting was related to the material choice for the replacement Union Pacific (UP) freight bridge and the intent of the statement was to clarify the material that will be used for construction of the UP freight bridge is still to be determined and would be subject to approval by UP.

Caltrans Comment: *The decorative bridge barrier concrete treatments, however, is unique to this historic district and is part of the district and each bridge's design, materials, workmanship, feeling and association, aspects of those contributing resources' integrity which together, make the property significant*.

Metro Response: Information related to the historic district's decorative bridge barrier concrete

treatments will be added to the description of the resource included in the Cultural Resources Effects Report. However, as stated in the December 7, 2021, meeting summary: "Shannon noted that neither the DPR form nor the condition assessment report for the district, which were prepared by Caltrans, identified the design of the bridges as the reason for their significance or as the reason they were identified as contributing elements to the district."

Caltrans Comment: *(Caltrans did not decline to review the Draft EIS/EIR, Caltrans has requested for the Draft EIS/EIR previously) Caltrans notes that it requested advanced data sets with methodologies, and analysis for the following resource areas in late 2018: Transportation (LOS and VMT assumptions), Cultural, Construction, Hazardous Waste, Visual, and Storm Water.*

Metro Response: As discussed during the December 7, 2021, meeting and summarized in the meeting summary, Caltrans declined to review the administrative draft Draft EIS/EIR, prior to the document being released to the public. The meeting summary was revised to further clarify. Additionally, subsequent to the late 2018 meeting, Metro presented the methodology to Caltrans.

WSAB Caltrans Coordination
Meeting Minutes

Date	Time
Thursday April 21, 2022	9:00 AM to 10:00 AM
Location	**Conference Call Information**
Microsoft Teams meeting	+1 213-458-5634 Phone Conference ID: 666 631 059#

A. Attendees

Name	Agency / Company	Email	Contact #
Meghna Khanna	Metro	KhannaM@metro.net	
Brian Lam	Metro	Lamb@metro.net	
Matthew Abbott	Metro	abbottm@metro.net	
Ivan Gonzalez	Metro	GonzalezIv@metro.net	
Rusty Whisman	FTA	russell.whisman@dot.gov	
James Santos	HNTB	jcsantos@hntb.com	
Jeanne Ogar	Aspen	jogar@aspeneg.com	
Jill Hupp	Caltrans	jill.hupp@dot.ca.gov	
Kaz Kayoda	Caltrans	kaz.kayoda@dot.ca.gov	
Alison Wong	Caltrans	Alison.Wong@dot.ca.gov	
Janice Lu	Caltrans	Janice.Lu@dot.ca.gov	
Thoa Le	Caltrans	Thoa.Le@dot.ca.gov	
Joahnna Vergara	Caltrans	Joahnna.Vergara@dot.ca.gov	

Name	Agency / Company	Email	Contact #
Francesca Smith	Caltrans	Francesca.Smith@dot.ca.gov	
Claudia Harbert	Caltrans	Claudia.Harbert@dot.ca.gov	
Alonzo Plater	Caltrans	Alonzo.Plater@dot.ca.gov	
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Guy Blanchard	WSP	Guy.Blanchard@wsp.com	
Rene Loya	WSP	Rene.loya@wsp.com	
Shannon Carmack	Rincon	scarmack@rinconconsultants.com	
Rachel Perzel	Rincon	rperzel@rinconconsultants.com	

B. Agenda

1. Introductions
2. Presentation
3. Discussion

C. Meeting Minutes

Participants provided brief introductions.

Meghna Khanna welcomed those attending and introduced the PowerPoint presentation, which was presented by Shannon Carmack.

The presentation focused on providing a summary of the West Santa Ana Branch Transit Corridor (WSAB) project elements that would be located within Century Freeway-Transitway Historic District (comprising Interstate 105, Metro C Line, and numerous over/undercrossings) and updated project details and impacts analyses related to proposed project activities within the district. The presentation began with a summary of topics that resulted from the December 7, 2021, meeting between FTA, Metro, and Caltrans, and the WSAB team provided a list of resources reviewed since that time.

The presentation summarized each of the project elements subject to further analysis since the December 7, 2021, meeting. These elements include the bridges (Façade Avenue, Arthur Avenue,

Century Boulevard demolition and replacement, construction of the new light rail transit [LRT] bridge for the WSAB alignment) and landscaping, which were further evaluated under the California Environmental Quality Act (CEQA) based on Caltrans comments during the December 7, 2021, meeting. The bridge demolition and construction that is proposed within the historic district was described. It was noted that the Arthur Avenue and Façade Avenue replacement bridges would be consistent in scale, massing, and materials to the existing bridges; these bridges and the new LRT bridge would be designed with a decorative relief treatment to match the design found throughout the district. The WSAB project team indicated that the design of the Century Boulevard replacement bridge is subject to approval by Union Pacific (UP); however, the bridge would be generally consistent in scale and massing to the current Century Boulevard bridge. A comparison of the bridges within the WSAB Area of Potential Effects (APE) to other station crossing locations within the district (Vermont/Athens, Lakewood, Hawthorn/Lenox, Norwalk) was also provided for reference.

The presentation addressed the character-defining landscaping within the district. While no tree replacement or grubbing is currently anticipated as part of the WSAB project, in the event these actions become necessary, the WSAB project would follow the recommendations included in the I-105 Express Lane Landscaping Plan and replace landscaping at a one-to-one ratio.

The presentation concluded with a summary of the impacts analysis, confirming that the alterations proposed by the WSAB project would not result in a diminished loss of historic fabric such that the historic district would no longer be eligible for inclusion in the California Register of Historical Resources (CRHR) and qualify as a historical resource under CEQA. Analysis and explanation provided by the WSAB team indicated that the project would not result in a substantial adverse change in the significance of the I-105/Century Freeway-Transitway Historic District or in its material impairment. It concluded that the introduction of new visual elements, including the LRT bridge and the C Line infill station proposed for construction by the project would be compatible with the district in overall massing, scale, and design in accordance with (Secretary of the Interior [SOI]'s) Rehabilitation Standard No. 9.

Following the presentation, Ms. Khanna invited discussion among the group and Francesca Smith inquired whether the environmental document would be updated with the analysis presented by the WSAB team. Kristin Carlson responded by stating that the updated analysis would be included in the Final EIS/EIR.

Ms. Smith asked if the new station would be compliant with the SOI Standards for the Treatment of Historic Properties and noted that there was no mention of who would perform design review. Ms. Khanna responded by stating that the new station would follow Metro's system-wide design and feature elements consistent with those throughout the existing C Line. Ms. Smith asked if the station would follow the SOI treatment standards and Ms. Carmack responded that it would and would be compatible in design, scale, and massing. Ms. Smith asked who would perform the Standards design review and stated that any new construction in the historic district would need to comply with the SOI treatment standards. Ms. Carlson stated that at the time that the Final EIS/EIR is completed, the project will be at 15 percent design and that as the design advances further, the station design would be reviewed by a SOI-qualified professional. Ms. Smith noted that this detail should be included in the environmental document.

Ms. Smith inquired why only trees and not shrubs were mentioned in the analysis. Ms. Carmack clarified that the proposed one-to-one replacement would extend to shrubs as well as trees. Attendees

discussed the one-to-one replacement of trees and shrubs and Ms. Smith clarified that more detail regarding which trees and shrubs would be removed and where in the district replacements would be located is necessary. She also indicated that considerations for irrigation and species type need to be included. Ms. Carlson stated that the exact construction footprint is not currently known, so it is not possible to quantify the number of trees/shrubs that would be removed. She noted that this information would not be known at the time of completion of the Final EIS/EIR and therefor the analysis would not be updated with exact numbers. However, the one-to-one replacement ratio would be implemented.

Ms. Smith noted that compliance with Public Resources Code 5024 (5024) was not addressed by the WSAB team. Attendees generally discussed compliance with 5024. Jill Hupp noted that I-105, which comprises much of the Century Freeway-Transitway Historic District, is a state-owned resource and compliance with 5024 is necessary. It is Caltrans' responsibility to comply. Ms. Hupp noted that this compliance includes SHPO consultation in conformance with the Memorandum of Understanding between the California Department of Transportation and the California State Historic Preservation Officer Regarding Compliance with Public Resources Code Section 5024 and Governor's Executive Order W-26-92. After further discussion, Ms. Hupp clarified that compliance with 5024 should be simple in this case, and the appropriate process would be to provide Ms. Smith with the WSAB environmental document for her review. Ms. Smith would need to make sure that the Section 106 document is acceptable to her in terms of compliance with 5024. Rusty Whisman indicated that SHPO had not yet received the final Section 106 effects report for the project; however, consultation with SHPO yielded a preliminary no adverse effect finding for the I-105 historic district. Ms. Smith stated that Metro should coordinate with Caltrans to concurrently send letters to the SHPO asking for concurrence on compliance with Section 106 and 5024.

Ms. Smith inquired whether there has been an update regarding cumulative impacts, and Ms. Carmack responded that the team is in the process of compiling a list of projects and updating the impact analysis. She noted that the list of projects provided by Caltrans would be included in the analysis. Ms. Smith confirmed that the list was complete in regard to Caltrans projects.

Thoa Le asked to confirm if the Caltrans team agrees that there is no substantial adverse change under CEQA and no adverse effect under Section 106 as presented by the WSAB team. She asked if the Caltrans team needs more information and if Caltrans would like to see revisions to the Section 106 technical studies and EIS/EIR. Ms. Smith affirmatively stated that she needs to review the document prior to finalization. Ms. Le inquired whether the documents could be sent to Ms. Smith with all changes made prior to finalization. Ms. Khanna responded that yes, the document could be sent to Ms. Smith for review prior to finalization and inquired if Ms. Smith agreed with the findings as presented by the WSAB team. Ms. Smith responded stating that she probably agrees but would like to review the document prior to stating definitively. Ms. Carlson inquired whether it would be acceptable to Caltrans if the WSAB team submitted only the I-105 portions of the studies to Ms. Smith while the remainder of the studies are being updated. Ms. Smith responded stating that that was fine so long as what she is sent is the WSAB team's best and final version of the analysis.

5024 was broached again. Ms. Khanna asked if Caltrans and the WSAB team should consult with SHPO in compliance with 5024 separately. Ms. Smith responded that she would need to consult internally with her team to determine who would prepare the 5024 submittals on behalf of Caltrans. Ms. Khanna inquired about the 5024-timeline associated with SHPO review. Ms. Hupp responded, stating that the best approach would be for the Caltrans and the WSAB team to submit to SHPO (to

support compliance with both Section 106 and 5024) concurrently. It was clarified that the WSAB team has consulted with SHPO on the project's preliminary no adverse effect finding and so, a concurrent submittal would be possible. Ms. Hupp recommended a concurrent submittal and requested coordination with the WSAB team and Caltrans. Caltrans will indicate to SHPO that the Section 106 documentation sent by the WSAB team will also support 5024 compliance. Ms. Hupp confirmed that the timeline associated with SHPO review is 30 days. Ms. Smith suggested that the WSAB documentation include reference to 5024 compliance.

Ms. Khanna made the team aware that Metro is still working with UP regarding the bridge type for the Century Boulevard replacement bridge, and therefore, Caltrans would not be provided the updated analysis quickly. Ms. Khanna asked if it would be possible for Ms. Smith to provide input on the WSAB team finding if the analysis was submitted to Caltrans prior to having the bridge design details. Ms. Hupp stated that she was unable to comment and that this would be dependent upon whether Ms. Smith was satisfied with the level of documentation provided by the WSAB team. Ms. Smith stated that it would be best to wait to submit until all design information is available. Ms. Khanna stated that she would discuss with her team and circle back regarding timeline and approach. She then asked if there were further questions.

Ms. Le asked if there was an approximately timeline associated with the WSAB team resubmittal of analysis to Caltrans. Ms. Khanna responded that she would provide an update following Metro's upcoming meeting with FTA.

Ms. Smith stated that during the December 7, 2021, meeting, the WSAB team had told her that the SHPO had concurred with the finding of no adverse effect and asked to clarify if the concurrence was preliminary. Ms. Carlson responded stating that the previous concurrence from SHPO was preliminary. She stated that the WSAB team met with SHPO to discuss the project, its potential impacts to the Century Freeway-Transitway Historic District, the WSAB team's analysis, and asked if the SHPO would preliminarily concur with a no adverse effect finding under Section 106. She stated that only after designs are finalized, would the environmental documents be sent to SHPO for formal concurrence.

Ms. Le asked if Ms. Smith needed to perform her review prior to formal concurrence from SHPO. Ms. Smith responded that it would be best to submit the WSAB and 5024 documentation to SHPO concurrently. Ms. Khanna agreed and closed the meeting.

Post meeting:

On April 25, 2022, Ms. Smith provided as-built landscape plans for the area where WSAB is expected to cross I-105.

Next stop: new rail to southeast LA County.

WEST SANTA ANA BRANCH TRANSIT CORRIDOR



April 21, 2022

Meeting Agenda

1. Introductions
2. Summary of topics from 12/7/21 meeting
3. Efforts since 12/7/21 meeting
4. Key project elements within I-105 Historic District
5. Updated project details and impact analysis
6. Conclusion/Questions

12/7/21 Meeting Summary – Caltrans Comments

Request to review and integrate information from the following into the CEQA impact analysis:

- Final Finding of Effect (FOE) for the I-105 Express Lanes Project
- Draft Landscape Impact Summary Report for the I-105 Express Lanes Project
- I-105 Express Lanes Landscape Design Recommendation Memorandum

Describe proposed bridge design

Address potential impacts to landscaping in impact analysis

Efforts Since 12/7/21 Meeting

Reviewed the following:

- FOE for the I-105 Express Lanes Project
- Draft Landscape Impact Summary Report for the I-105 Express Lanes Project
- I-105 Express Lanes Landscape Design Recommendation Memorandum
- CEQA checklist, CEQA Guidelines for Impacts to Historical Resource
- Additional project details

Proposed Alterations within I-105 Historic District

- **Bridges**
  - Demolition of existing Façade Avenue Overcrossing and construction of new bridge in its place
  - Demolition of existing Century Boulevard Underpass and construction of new bridge in its place
  - Demolition of existing Arthur Avenue Pedestrian Overcrossing and construction of new bridge in its place
  - Construction of new bridge to accommodate WSAB Alignment
- **C Line Track and I-105 Lane Realignment**
  - Realignment of the approximately 2,500 feet of existing Metro C Line tracks
  - Reconfiguration of approximately 2,500 feet of I-105 lanes
- **Construction of Infill LRT Station and Vertical Circulation Elements**
  - Construction of infill station in the middle of I-105

Metro

WSAB Key Project Elements Addressed Since 12/7/21

Project Element	Project Feature	Updated Analysis
BRIDGE	Arthur Ave Demolition and Replacement Façade Ave Bridge Demolition and Replacement	• Replacement bridges consistent in scale, massing and materials. • Replacement bridges generally same width • Replacement bridges designed to match the existing decorative treatment that is unique to the corridor.
	New LRT Bridge	• The 46-foot wide LRT bridge will be concrete, with 10-foot-wide pedestrian walkways. • The 46-foot wide LRT bridge will be consistent with the existing bridges in District, with decorative treatment that is unique to the corridor.
	Century Boulevard Bridge Demolition and Replacement	• The final material and design is subject to UP approval. • Will be generally consistent in scale and massing with existing bridge. • The replacement bridge may be up to 35 feet in width. • If the bridge is concrete, it will be built to match the existing decorative treatment that is unique to the corridor. • If the bridge is steel, it will be designed with concrete bent cap with two columns.
LANDSCAPE	Landscaping	• Project will follow I-105 Express Lane Landscaping Plan replacement 1:1 ratio if trees are removed

WSAB Impacts Bridge Demolition and Replacement

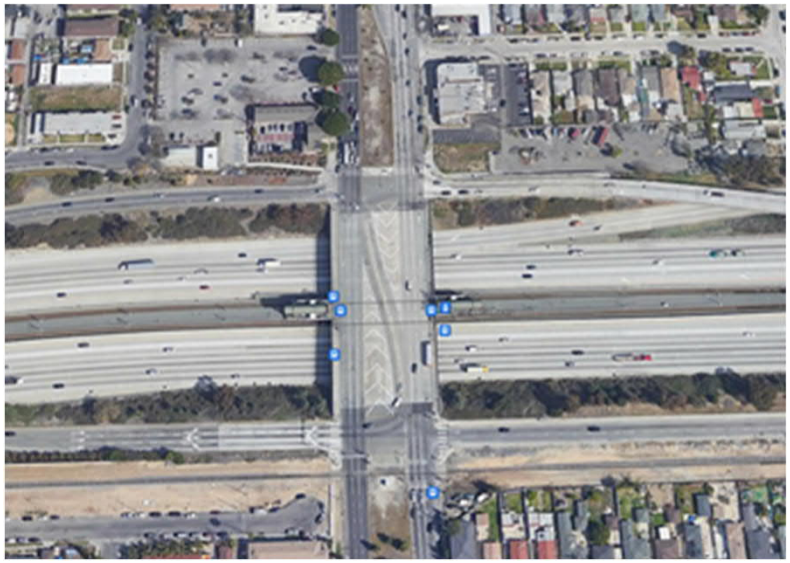
Bridge Name/ Number	Bridge Width (feet)			Bridge Spans		Structure Type*	
	Existing	Proposed	% Change	Existing	Proposed	Existing	Proposed
Arthur Ave 53 2426	15’	15’	0%	4	2	605	605
Façade Ave 53 2424	44’	46’	5.7%	4	2	605	605
Century Boulevard 53 2427	34’	35’	3%	4	2	605	605 or 302
New LRT N/A	N/A	46’	N/A	N/A	2	605	605

Note: * Structure Type Code referenced from California Log of Bridges and State Highways, October 2018.

6 = Prestressed Concrete / 3 = Steel / 05 = Box Beam or Girders –Multiple / 02 = Stringer/Multi-beam or Girder

Metro

Existing Station Crossings Similar to Combined 80’ LRT /Century Blvd. Bridge Width



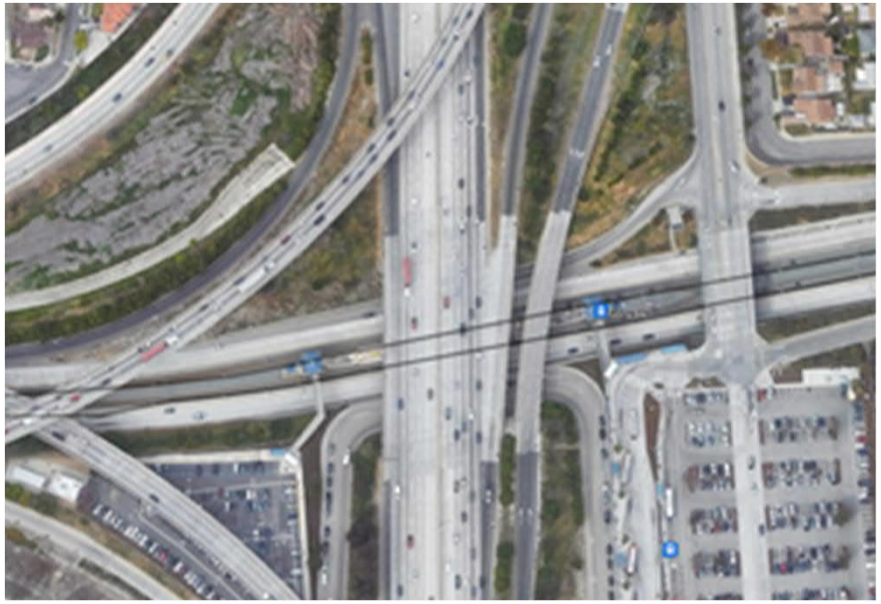
Vermont/ Athens 177’ Width



Hawthorne/ Lennox 176’ Width

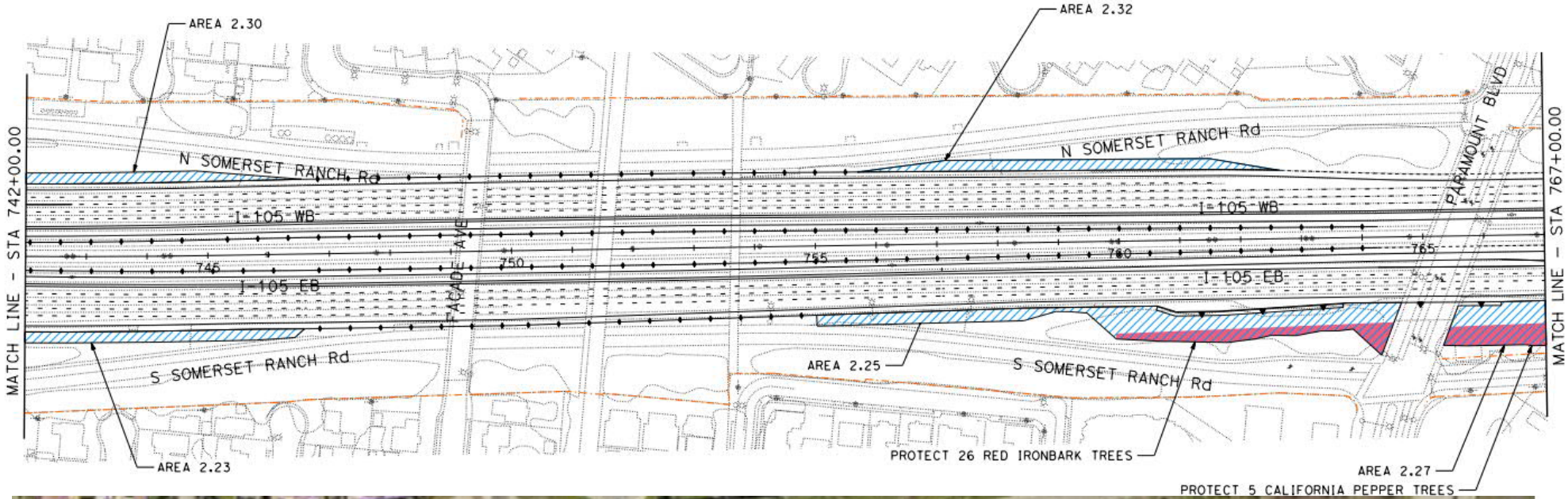


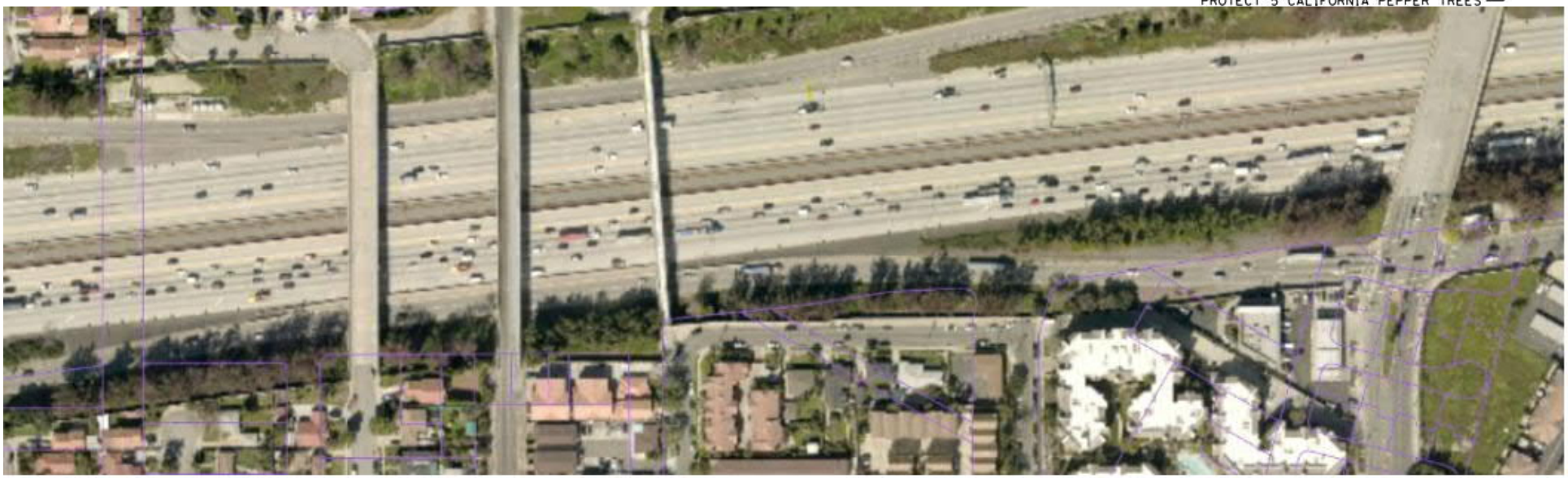
Lakewood 134’ width



Norwalk

Landscaping within WSAB Project Footprint





Metro

CEQA Impacts

Determining the Significance of Impacts to Historical Resources 15064.5(b)(1)(2):

(b) A project with an effect that may cause substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.

(b1) Substantial adverse change in the significance of a historical resource means 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".

(b2) The significance of a historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in the CRHR

Impacts to I-105/Century Freeway-Transitway Historic District Character-Defining Features

Caltrans Ranking	Feature and Description	Total Points	% CDF Impacted by Project	Project Impact Under CEQA
Most Significant	Limited interchanges (Interstates 405, 110, 710 and 605)	15	0%	No impact to this CDF.
Most Significant	Profile of route (at-grade, elevated, in trench or on berm)	14	0%	No impact to this CDF.
Significant	Multi-lane roadway (7.5 feet)	12	10%	Less than significant, shifting 2,500 feet of roadway by 7.5 feet will be minimal change
Significant	Alignment of route	12	0%	No impact to this CDF.
Significant	Green Line light rail system and stations in median	12	10%	Less than significant, shifting 2,500 feet of track will be minimal change
Significant	ITS system (CCTV, TMS, RMS, ATMS, CMS1)	11	0%	No impact to this CDF.
Significant	Original bridges and pedestrian overcrossings	10	3%	Less than significant, demolishing and replacing 3 of 118 contributing bridges will be a minimal change
Significant	Fully landscaped	10	0%	No impact to this CDF.
Significant	Controlled ramps and their lengths	9	0%	No impact to this CDF.

Note: Character Defining Features Ranking Table is from the Caltrans Conditions Assessment Report. Non-character-defining features of the district include: roadway standard pavement and curb, striping and pavement markers in roadway, sound walls, and retaining walls. These features do not contribute to the significance of the district. Therefore their alteration does not represent a potential significant impact per CEQA and their alteration was not quantified as part of this analysis.

Metro

Existing Conditions



Metro

Rendering following Completion of the WSAP Project



Metro

Conclusion

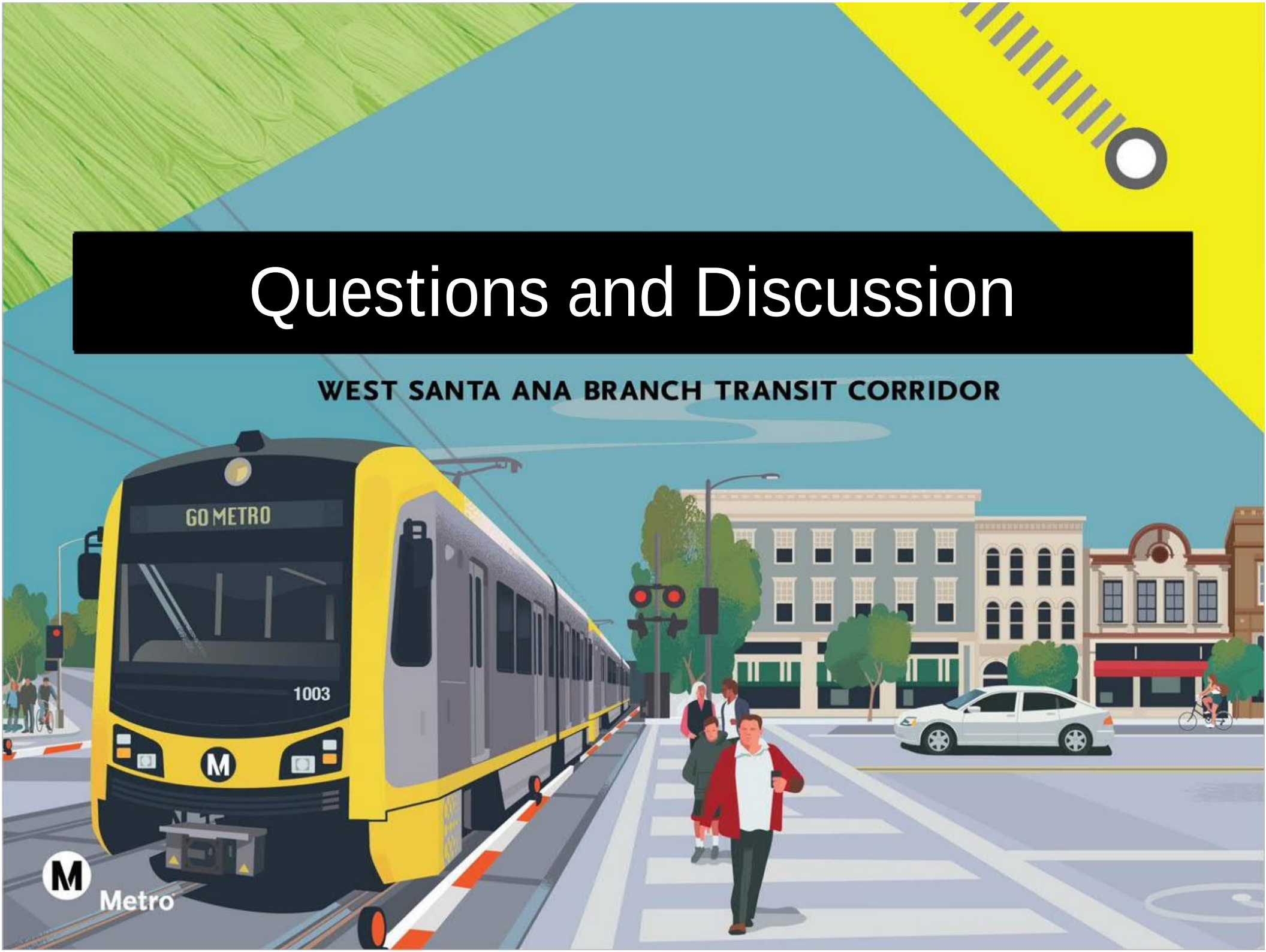
The WSAB Project will not result in a substantial adverse change in the significance of the I-105 Historic District, a historical resource under CEQA.

The WSAB Project will not result in material impairment of the I-105 Historic District.

The project will result in alterations and the loss of some original historic fabric including the demolition and reconstruction of three bridges which are contributors to the district. However, these alterations will not result such a diminished loss of historic fabric that the historic district would not longer be eligible for inclusion in the CRHR and qualify as a historical resource under CEQA.

The introduction of new visual elements, including the new LRT Rail Bridge and the C-Line Station will be compatible in massing, scale and design in accordance with Rehabilitation Standard No. 9.

Questions and Discussion



Meeting Summary

DATE	09 February 2023
VENUE	Microsoft Teams
MEETING TITLE	WSAB PSR/PR Monthly Coordination Meeting – Cultural Resources Focus
CONTRACT NO	Caltrans EA# 35860
ATTENDEES	Attendees: Metro: Meghna Khanna (Metro) Metro Consultant Team: Victor Martinez (WSP), Kristin Carlson (WSP), Theresa Dickerson (WSP), Guy Blanchard (WSP) Caltrans: Alison Wong (Caltrans), Janice Lu (Caltrans), Thoa Le (Caltrans), Francesca Smith (Caltrans), Hyung Joo Ham (Caltrans), Claudia Harbert (Caltrans), Alonzo Plater (Caltrans), Celeste Solano (Caltrans)

ITEM

1.0 GENERAL

- Introductions were made among the teams

2.0 CEQA CULTURAL ASSESSMENT FOR I-105

- Kristin provided a screen share of the memo received from Francesca (Attachment 1) with comments on the I-105 CEQA assessment prepared by the Metro team for the West Santa Ana Branch (WSAB) Project. The focus of the meeting was to discuss the comments received and determine a path forward.
- Term: mitigation measures
  - Francesca stated that per CEQA guidelines, mitigation is only required if there is an impact. Thoa suggested calling a measure "avoidance" or "minimization" if the analysis does not identify a significant impact.
  - Francesca stated: A project that has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties *can generally be considered to be* a project that will not cause a significant impact (14 CCR Section 15126.4(b)(1)). Guy quoted CEQA regulations Title 14, Section 15064.5(b) (3), which states a project that follows the Secretary of the Interior's (SOI) Standards… "shall be considered as mitigated to a level of less than a significant impact on the historical resource."
- CEQA impact assessment
  - The team reviewed substantial adverse change, material impairment and significance definitions in CEQA.
  - Francesca stated that the project is proposing demolition of a resource that contributes to the historic district. She provided several court cases and analogies regarding demolition of resources, including a project set in an orange grove that included rehabilitation of the farmhouse but would remove the orange grove. In Francesca's example, she stated the rehabilitation according to the Standards would not outweigh the expected impacts caused by the removal of the orange grove.
  - Guy noted that while Section 106 and CEQA differ, the CEQA assessment approached the project effects within the district as less than significant, in part due to the analysis completed for Section 106 and because the design would meet SOI standards. He requested input from the Caltrans team on how the project could be advanced to have a less than significant impact.
  - Francesca suggested that the CEQA assessment include additional detail on any alternatives considered that would have avoided demolition of the freight bridge and the impacts of that alternative. She stated that an alternative is alluded to but not explained in the CEQA section.
  - Francesca stated that CEQA is stronger regarding demolition of resources than Section 106. Attendees reviewed the information regarding demolition included on page 2 of the memorandum.

- Theresa asked if impacts are considered in the totality of the resource. Francesca responded that in CEQA, even if a resource remains a historic resource, that is misinterpreted to mean that there would be no substantial change. She stated the WSAB project would cause a substantial adverse change through the demolition, alteration, and/or relocation of resources and the setting. Francesca stated that any demolition of a character-defining feature is a significant adverse change if it is not mitigated. She noted that one bridge would be demolished, one bridge altered, and a new bridge added.
- Francesca agreed that the I-105 historic district would remain a historic district with the modifications included as part of the WSAB project. She noted the court case of *Glendale Historical Society v. City of Glendale*, which was focused on an individual historic property and included demolition of a garage, which was a part of the property. Francesca indicated that in the case, the Court did not accept the City's contention that a project does not adversely impact a historical resource so long as it remains eligible for, the local Register. She stated that the Court properly understood that a substantial impact may occur when a project destroys character-defining features that "convey [a property's] historical significance." She mentioned that the City did not prepare an EIR.
- Guy asked Francesca if the *Glendale* example involved a historic district, and Francesca confirmed that it did not.
- Francesca stated that based on the information provided, the analysis should conclude that the WSAB project would have significant cultural resources impacts under CEQA.
- Francesca stated that the analysis does not currently disclose impacts. Francesca noted she has a redline version of the CEQA analysis and Metro requested the document be shared with the team.
- Francesca noted the Façade Avenue Overcrossing would be altered to accommodate station elements.
- Francesca stated that replacing one bridge with two larger, wider bridges would not maintain the visual rhythm of the bridges as stated.
- Francesca provided photos of the existing and proposed column bents noting the differences. She stated that it would be helpful if the number of spans, bents and columns remained the same as existing.
- Francesca noted two bridges and station improvements would be far higher than the existing bridges, including their added elevators and elevator penthouses.
- Francesca noted elements of the existing bridges and columns that are important from an aesthetics standpoint, beyond the side relief that was noted in the analysis. She noted that aesthetics is considered in the Finding of Effect and should be analyzed in this CEQA document.
- Francesca stated that the Landscaping analysis should identify the number of trees that would be removed with the numbers and species to be replaced. Vic stated that he will consider how to quantify this information.

- Minimization/Mitigation of Impacts
  - Attendees then discussed potential solutions that could result in a less than significant impact conclusion under CEQA.
  - Francesca stated that demolition of a resource would likely remain significant, even with mitigation.
  - Attendees discussed the two potential materials for the replacement freight bridge – concrete or steel. Coordination with Union Pacific Railroad is underway to determine the material type. Because that bridge type has not been identified, Francesca noted that a steel bridge would likely not conform to the Standards for Rehabilitation and that even if the bridge were to be similar in scale and size that is not sufficient if the material type is too different from the existing bridge.
  - Attendees then discussed the infill station. Francesca stated that based on the plans, the station elements look quite large, whereas the rendering seems to minimize the size of the station. She noted that the 2 proposed elevators are on each end look substantial and appear to extend above the top of the existing bridge by approximately 2 stories.
  - Francesca noted that there can be disagreement on whether or not a design complies with SOI Standards for Rehabilitation.
  - Francesca stated that she cannot think of any potential mitigation that would reduce the impacts to less than significant, which she stated is common for demolitions.
  - Francesca asked if the project could be located elsewhere. Meghna noted that the WSAB project alignment is within railroad right-of-way and connects multiple environmental justice communities.
- Suggestions for Documentation
  - Francesca requested that the analysis be revised to elaborate on why impacts to historic resources in the district cannot be avoided. She also requested that the text be revised and re-ordered and that topics in paragraphs do not change subjects.
- Conclusion/Next Steps
  - Attendees discussed potential implications if the CEQA impact conclusion were to change.
  - Thoa stated that the Project Environmental/CEQA Team should look into the need to recirculate the revised draft environmental document or circulate a supplemental draft EIR if cultural CEQA impact is determined significant under CEQA (even before mitigation).

Meeting Summary

- Kristin provided an overview of the schedule for Section 106 consultation, stating that design should be completed in March 2023, at which point analysis updates would be completed and materials would be provided to SHPO several months later.
- Francesca noted that the project details requested (*e.g.* alternatives analysis, glare, and aesthetics) are needed for the 5024.
- Francesca to provide redline version of CEQA assessment.
- Metro to discuss freight bridge material and other related details with Union Pacific Railroad.

PREVIOUS ACTION ITEMS

Number	Task	Responsible Party	Date Due	Status
1	Metro will set up a meeting between Metro Real Estate and Caltrans ROW teams	Metro		In-Progress
2	Caltrans to review CEQA cultural assessment for I-105	Caltrans	1/23/23	Complete, comments provided 1/25/23
3	Metro will share the meeting minutes, outline for the PSR/PR, and schedule with the Caltrans team	Metro	1/18/23	Complete, materials provided 1/25/23 and 1/31/23
4	The Caltrans team will review the Table of Contents for the PSR/PR and the Final EIS/EIR Focused Summary Document	Caltrans	2/18/23	
5	Metro to confirm CEQA process for geotechnical borings	Metro		In-Progress

DISTRIBUTION: Attendees

Copies to:

NEW ACTION ITEMS

Number	Task	Responsible Party	Date Due	Status
1	Caltrans to provide redline version of the CEQA assessment	Caltrans		

DISTRIBUTION: Attendees

ATTACHMENT: CALTRANS REVISED DRAFT CEQA EFFECTS ASSESSMENT MEMO, JANUARY 24, 2023 (1).

Copies to:

The following document contains Caltrans' comments on the February 9, 2023, meeting summary, and responses from the Metro team. These comments were extracted from the redline meeting summary and email provided by Caltrans on February 23, 2023.

It has been standard practice throughout the duration of this project for meeting summaries to represent what was stated at the meeting, as it was presented at the time the meeting was held. While the additional clarifications may be relevant and assist Metro in further understanding Caltrans comments or making potential revisions to its project documents, they cannot be added to the meeting summary if they do not reflect what was verbalized in the meeting. As such, the Metro team extracted comments or clarifications provided by Caltrans into this separate document. This document and the Metro team responses will be appended to that meeting summary and included in the record.

Caltrans Comment: Under CEQA, cumulative impacts to I-105 must be considered as well. Section 15355 of the State CEQA Guidelines defines a cumulative impact as the condition under which two or more individual effects which, when onsidered [sic] together, are considerable or which compound or increase other environmental impacts… The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time (California Code of Regulations Section 15355). The proposed project being analyzed would likely contribute to a larger impact or effect if there are other projects that are expected to impact or effect the same historical resource or historic property.

Metro Response: This comment was received in an email following the meeting. Cumulative impacts under CEQA are included in a separate section and were not provided to the Caltrans team as part of this review. Metro will revise the CEQA historical resources section to include a discussion of cumulative impacts or reference where that analysis can be found.

Caltrans Comment: Use of "SOI Standards" corrected to "SOI Standards <u>for Rehabilitation</u>"

Metro Response: The text at 15064.5(b)(3) refers to both the "Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitation, Restoring, and Reconstructing Historic Buildings" and the SOI "Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings." Thus, reference to the "SOI Standards" throughout would describe the CEQA language and be inclusive.

Caltrans Comment: "Francesca corrected that interpretation: 'A project that has been determined to conform with the Secretary of the Interior's Standards for the Treatment of Historic Properties *can generally be considered to be* a project that will not cause a significant impact (14 CCR Section 15126.4(b)(1)).' It does not necessarily expunge other impacts that would be caused by a project."

Metro Response: The reference to 15064.5(b)(3) made during the meeting was a direct quote to the CEQA language and not an interpretation. The text added by Caltrans to the minutes (provided above) misquotes the text at Section 15126.4(b)(1), which states "Where maintenance, repair, stabilization,

rehabilitation, restoration, preservation, conservation or reconstruction of the historical resource will be conducted in a manner consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (1995), Weeks and Grimmer, the project's impact on the historical resource shall generally be considered mitigated below a level of significance and thus is not significant."

Caltrans Comment: Addition of court cases beyond *Glendale*.

Metro Response: Because these cases were not provided or discussed during the meeting, they have been struck from the minutes.

M e m o r a n d u m

Making Conservation a California Way of Life.

To: Alison Wong
Environmental Planner
Division of Environmental Planning

Date: January 24, 2023
File: 07-LA-105 PM 14.4
EA: 35860
EFIS: 0719000138

From: Francesca Smith
PQS, Principal Architectural Historian
Division of Environmental Planning, Cultural Resources Unit

Subject: WEST SANTA ANA BRANCH PROJECT, REVISED DRAFT CEQA EFFECTS ASSESSMENT LOS ANGELES COUNTY

We appreciate the opportunity to review the Revised Draft CEQA Effects Assessment (dated December 23, 2022), made comments in a forthcoming edition of the document and have the following additional remarks and important questions regarding CEQA impacts to the Century Freeway-Transitway Historic District and its contributing resources. Notably, the project description, analyses of impacts to historical resources, mitigation measures (which inexplicably are only necessary when impacts are expected), potential light and glare and expected aesthetics effects analyses are unfortunately deficient for CEQA compliance.

The proposed project would

- demolish the Century Boulevard Underpass (UP, Bridge No. 53-2427),
- alter the Façade Avenue Overcrossing (OC, Bridge No. 53-2424),
- demolish 2,500 linear feet of C Line tracks,
- destroy an unknown amount of landscaping,
- replace one bridge with two separate bridges (one of which would be an unknown design, the other would be larger than the existing bridge and use a different bent type with a different appearance), and
- add a new C Line Station in LRT tracks and freeway median with very visible vertical elements which would connect to the replaced Century Boulevard UC and altered Façade Avenue OC.

However, the Revised Draft CEQA Effects Assessment concludes that the project would somehow not cause impacts or "substantial adverse change" to historical resources under CEQA. Its conclusion is that the Project would not alter of the historic district such that it would be materially impaired, which is patently incorrect.

This analysis notably disregards the fact that under CEQA, historic district contributors like the Century Freeway-Transitway Historic District bridges are each considered "historical resources" and when "material impairment" is clearly defined in CEQA.

The California Code of Regulations, Title 14, Section 15064.5 states in "Determining the Significance of Impacts to Archaeological and Historical Resources[:]"

> (b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

> (1) Substantial adverse change in the significance of an historical resource means p*hysical demolition, destruction,* relocation, *or alteration of the resource or its immediate surroundings* such that the significance of an historical resource would be materially impaired [emphasis added].
>
> (2) The significance of an historical resource is materially impaired when a project:
>
> > (A) *Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource [like bridges, light rail line, and landscaping] that convey its historical significance* and that *justify its inclusion in*, or eligibility for, inclusion *in the California Register of Historical Resources*; or
> >
> > (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
> >
> > (C) *Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA*.

For this project, one bridge and nearly on half a mile (47.34 percent) of C line track would be "physically demolished." Another bridge would be partially demolished, to an unknown extent, and an undisclosed amount of landscaping is expected to be torn out in unidentified locations. In carrying out each of these actions, the destruction of character-defining features of the historic district would be undertaken, clearly causing material impairment to those identifying character-defining features. The construction of the light rail new station in the median of the freeway would cause "alteration of the resource… [as well as] or its immediate surroundings." The collective impact of each of these actions is expected to render this specific area of the Century Freeway-Transitway Historic District unrecognizable to its original appearance.

As stated above, substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings *such that the significance of the historical resource would be materially impaired*. In recent CEQA cases the Court has properly understood that a substantial impact may occur when a project would destroy character-defining features that convey a property's historical significance. The test is actually not whether or not a larger, 18-plus mile historic district would retain its National or California Register eligibility, that is a common mistake in CEQA practitioners and should absolutely be avoided.

In addition to these fatal flaws, only one option for the UPRR bridge replacement is briefly reviewed in the Revised Draft CEQA Effects Assessment. The other is not addressed or analyzed at all. "The whole of the action" that may result either directly or indirectly in physical changes to the environment is subject to review under CEQA, not *most of* the project components.

We bring your attention to the Section 106 effects findings for the I-110 Terminus (formerly I-110 Flyover) project, an ongoing METRO-sponsored project. Although Caltrans found that adverse effects would be caused by the proposed project, which was the addition of an aerial flyover ramp more than 140 feet away from St. John's Cathedral (a historic property and a historical resource), SHPO objected to the finding and insisted that an adverse effect would also be caused to the historically significant St. John's Parish House as well. In that case, the effects were merely atmospheric changes to the settings of those properties, not demolition of historic properties or historic resources. She also objected to the no adverse effects findings for three other nearby properties, stating that the project would cause an effect, but that the effect would not be adverse (Attachment 1). So potential setting and aesthetic impacts are crucial to this analysis and cannot be avoided. While that project is different from the proposed project, its lessons should nevertheless be considered.

The proposed mitigation measures are misnomers, unless a future, revised analysis acknowledges impacts to historical resources. In addition, as proposed, the wording is ambiguous with specialists providing merely "review" but would have no actual voice or remedy, such as providing comments, making revisions to plans, or even approving future project plans. What would such reviewers' recourse be if project components were found not to conform to the Secretary of the Interior' s Standards for the Treatment (Standards)? The purpose of such a condition or mitigation measure would further not be to "support conformance with the Standards" as described. How would that even work? The stated purpose would also be to *ensure* that the Standards were followed in proposed designs and features. Who would ensure that a qualified reviewer's direction was followed? We note that PQS specialists in History would furthermore not be qualified to perform such a review for this project.

As described herein Metro and its consultants must also consider potential impacts of the described project impacts as well as the potential for light and glare impacts from the proposed C Line station soundwalls on the Century Freeway-Transitway Historic District as well. See Save Our Capitol! v. Department of General Services (*Joint Committee On Rules of the California State Senate and Assembly, Real Party in Interest)/Save the Capitol, Save the Trees v. Department of General Services, et al.* (2022) Cal. App. 5th.

Because the fundamental objectives of CEQA are to disclose to decision makers and the public what the significant environmental effects of proposed activities or projects would be, identify ways to avoid or reduce environmental damage, prevent environmental damage by requiring the implementation of feasible alternatives or mitigation measures, disclose to the public the reasons for agency approval of activities or projects with significant environmental effects, foster interagency coordination in the review of activities or projects and enhance public participation in the planning

process we cannot approve the Revised Draft CEQA Effects Assessment as submitted. We recommend that any future editions be more carefully reviewed by Metro or peer reviewed by experts with proven CEQA and historical resources records for challenging projects before resubmitting to Caltrans.

Please contact me if you have any questions about the content of this memo or project-related items at francesca.smith@dot.ca.gov.

Attachment

cc: D7 Project File

ATTACHMENT 1

STATE OF CALIFORNIA – THE NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *Governor*

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

October 13, 2015 Reply To: FHWA_2015_0406_001

Kelly Hobbs, Chief
Section 106 Coordination Branch
Caltrans Division of Environmental Analysis
PO Box 942874
Sacramento, CA 94274-0001

Re: Finding of Effect for the Proposed Interstate 110 Flyover Project, Los Angeles County, CA

Dear Mr. Hobbs:

You are consulting with me about the subject undertaking in accordance with the January 2014 *First Amended Programmatic Agreement Among the Federal Highway Administration, the Advisory Council on Historic Preservation, the California State Historic Preservation Officer, and the California Department of Transportation Regarding Compliance with Section 106 of the National Historic Preservation Act, as it Pertains to the Administration of the Federal-Aid Highway Program in California* (PA).

Caltrans, in conjunction with Los Angeles County Transportation Agency (Metro), proposes to build an elevated, northbound off-ramp on I-110 between 30th Street and the Figueroa Street Overcrossing (Postmiles 10.10/20.92). The proposed structure would bypass the intersections at Flower Street and Adams Boulevard and the North Bound I-110 High Occupancy Toll (HOT) off ramp to Adams Boulevard, connecting the HOT lane traffic to Figueroa Street. A full project description can be found on page three and four of the Finding of Effect document and a depiction of the area of potential effect (APE) can be found on pages 4-8.

Identification efforts for the project resulted in the determination that there are five historic properties located within the APE for the project.

Caltrans has found that the undertaking will have an adverse effect on St. John's Episcopal Church, located at 510-518 West Adams Boulevard in Los Angeles. The flyover has the potential to obscure views towards and from St. John's. I have **no objections** to this finding.

Caltrans has also found that the undertaking will have no adverse effect on the St. John's Parish House. Caltrans states that although the flyover would be visible from the east, south and north elevations of St. John's Parish House, the effect would not be adverse because the building was moved and reoriented on the church property shortly after it was built, and none of the views to or from the historic property are original to the building when it was originally constructed before it was moved. I **object** to this finding.

When the Parish House was found eligible in September of 2002, it was due to its association with the church and the architects Pierpont and Walter S. Davis. The documentation, as well as the SHPO letter, acknowledge that the Parish House is part of the church property. Given the heavy association between the Church and the Parish House and that they are located next door to each other; I think a finding of adverse effect for this property would be more appropriate.

Caltrans has also found that the undertaking will have no effect on the following properties:

- Automobile Club of Southern California – 2601 S Figueroa Street, Los Angeles
- St. Vincent de Paul Church – 601 West Adams Boulevard, Los Angeles

- Thomas Stinson House, 2421 South Figueroa Street, Los Angeles

Caltrans found that there would be no direct impacts to these buildings. Although the flyover will be visible from the buildings it is Caltrans' opinion that the setting is so altered that there will be no effect to the properties. Based on my review of the submitted documentation I **object** to this finding. Given the visibility of the flyover from these buildings I do believe that the undertaking will have an effect, although I do not think it will be adverse due to the extensive changes that have occurred to the setting in the vicinity of these buildings.

Thank you for considering historic properties during project planning. If you have any questions, please contact Natalie Lindquist of my staff at (916) 445-7014 or email at natalie.lindquist@parks.ca.gov.

Sincerely,



Julianne Polanco
State Historic Preservation Officer

Meeting Summary

DATE	02 March 2023
VENUE	Microsoft Teams
MEETING TITLE	WSAB Cultural Resources Focus
CONTRACT NO	Caltrans EA# 35860
ATTENDEES	Attendees: Metro: Meghna Khanna (Metro), Ron Stamm (Metro) Metro Legal: Tiffany Wright (REMY MOOSE MANLEY), Laura Harris (REMY MOOSE MANLEY) Metro Consultant Team: Kristin Carlson (WSP), Guy Blanchard (WSP) Caltrans: Alison Wong (Caltrans), Janice Lu (Caltrans), Thoa Le (Caltrans), Francesca Smith (Caltrans), Claudia Harbert (Caltrans), Celeste Solano (Caltrans)

ITEM

1.0 GENERAL

- Introductions were made among the teams. Tiffany and Laura represent Metro outside legal counsel and have experience with the California Environmental Quality Act (CEQA), Section 106, and cultural resources.
- Caltrans informed Metro that the Caltrans cultural resources staff person from Headquarters was unable to attend the meeting; her focus is primarily on Public Resources Code 5024.

2.0 CEQA CULTURAL ASSESSMENT FOR I-105

- Francesca noted that she has not reviewed information for the project since the last meeting and felt the memo she provided was clear.
- Meghna stated the purpose of the meeting was for the Metro team to present information in response to her comments.
- Tiffany stated that the Metro team asked her and Laura to review the memo provided by Francesca and comment on the interpretation of CEQA statutes included in the memo. She stated that Metro legal's interpretation of CEQA guidelines for historic resources and historic districts is that impacts are considered in terms of the entire resource. She noted that they have not found anything in case law supporting Francesca's interpretation that contributing resources within a district should be treated individually, nor has she seen this application on other projects.
- Attendees discussed the case *Glendale Historical Society, a California non-profit corporation; Petitioner; v. City of Glendale and City Council of the City of Glendale; Respondent*. Tiffany stated that was in the trial court and the case was not related to impacts to a historic district, but rather to a historic resource, a single-family home. Francesca stated that per the case, demolition or material impairment of character defining features would cause substantial adverse change, similar to Section 106. She stated that it was relevant to this project even though it wasn't like-for-like (*i.e.*, a case related to a historic district and development of an EIR). Tiffany disagreed on the point. Laura explained that the agency in the *Glendale* case relied on an MND, so the fair argument standard applied in that case, not the substantial evidence standard. Francesca disagreed with Metro's attorneys' interpretation of the law.
- Francesca stated that the project would cause demolition of one bridge and construction of one new and alterations to another bridge, The new, wider bridge and elevator banks would be "far higher" than the existing bridges. She also noted one side of an existing bridge would be demolished. She opined that these changes would not comply with the Secretary of the Interior's (SOI) Standards as the elements should not be located on the east or west sides of the bridges, which are the most visible sides.
- Tiffany stated there is a framework for determining whether there is an impact to cultural resources under CEQA. She said there can be an effect, but the key is whether the changes are consistent with the district. She noted the district is significant because of the environmental justice lawsuit and changes made to the I-105 project as a result of the lawsuit.

She disagreed that Metro must conclude that impacts to the portion of the district would be a substantial adverse change.

- Francesca disagreed and stated that the rest of the district may remain eligible, but the project could nonetheless cause a substantial adverse change or material impairment. She stated that in the area of the WSAB project, the district would no longer be "readable".
- Laura noted the substantial evidence test and that the analysis provided by Metro's consultants provide that evidence. Francesca responded that the court would consider opinions of other experts too, but Laura noted that would not be the case if an Environmental Impact Report was prepared. Francesca confirmed.
- Francesca asked if a project is "messing up" about a quarter mile of a freeway, which will not be recognizable to what it was, how much would be enough to cause an impact. She stated this was the logic Metro was applying. Tiffany clarified that was not the logic. She said that while the project would result in alterations, those alterations would not be a significant adverse impact to the historic district.
- Francesca noted the project would contribute to cumulative impacts. Tiffany responded that the WSAB EIR included an analysis of cumulative impacts.
- Francesca stated she has not been convinced. She said she does not have a re-written CEQA assessment and the original assessment was disorganized. Claudia stated that the analysis was provided to their CEQA expert at headquarters who stated that it could not be sent to SHPO as written and needed work. Tiffany stated that Metro legal reviewed the write up and felt it was well laid out. Meghna responded that Metro will provide a write up with more detail.
- Meghna noted the question is how the two teams are interpreting CEQA regulations. She noted that the WSAB project is an LRT project that is connecting environmental justice communities, providing multimodal connections, and rebuilding a freight bridge that the project would demolish.
- The Metro team stated they believe the assessment was clear and asked if Caltrans could explain what was inadequate. Francesca stated that the write up should remove euphemisms like "remove" and use "demolish" instead. She also stated the analysis does not include what materials will be used for the UP bridge. Francesca felt that because this information was unavailable, the analysis was incomplete.
- Meghna stated multiple times that the freight bridge will be replaced with a bridge that reflects the appearance of the existing bridge and would be concrete and 4 spans. She asked if this would be sufficient to avoid the substantial adverse change. Francesca stated she would need to review the plans to make that determination. She stated that the information previously provided depicted a bridge that was substantially different form the existing bridge.
- Francesca noted that the analysis stated there was no impact but nonetheless identified mitigation. Laura noted that the text would be clarified that impacts are less than significant and that the Draft EIS/EIR had concluded that impacts to the historic district would be less than significant.
- Laura stated that bridge is a contributing resource to the historic district and the analysis presents facts as to why the bridge replacement would not result in a substantial adverse change. Laura also noted that fewer bridges are being demolished compared to the evaluation in the Draft EIS/EIR. She stated the analysis provides facts why the project will not keep the district from conveying its significance.
- Meghna requested that Metro legal be permitted to walk through their interpretation of CEQA statutes. Claudia responded that she did not feel that would be helpful.
- Francesca stated the "sticky points" of the project are the demolition as well as the proposed new construction. She stated that right now, the proposed new bridge is not consistent with the district. She said the project would break the continuity of the district and result in visual changes in the character of the area due to the different styles being introduced, cause a reduction in the number of contributing resources, and that the design for the new station elements calls attention to itself. She noted that the vertical circulation elements will change views to and from the district and that the contributing landscaping will be removed and cannot be replaced where there is a new bridge.
- Francesca read briefly from the National Register Bulletin 21, "Defining Boundaries For National Register Properties." Tiffany asked Francesca if her view was that the Section 106 standards were applicable to apply CEQA. Francesca confirmed that National Register guidance was normally considered applicable where CEQA or the California Register lacked specificity:
  - Areas that have lost integrity because of changes in cultural features or setting should be excluded when they are at the periphery of the eligible resources. When such areas are small and surrounded by eligible resources, they may not be excluded, but are included as noncontributing resources of the property. That is, do not select boundaries which exclude a small noncontributing island surrounded by contributing resources; simply identify the noncontributing resources and include them within the boundaries of the property.
  - Districts may include noncontributing resources, such as altered buildings or buildings constructed before or after the period of significance. In situations where historically associated resources were geographically separated from each other during the period of significance or are separated by intervening development and are now separated by

large areas lacking eligible resources, a discontiguous district may be defined. The boundaries of the discontiguous district define two or more geographically separate areas that include associated eligible resources.

- Tiffany stated that the project's historical resource analysis walks through the factors for eligibility and significance of the historic district and the impacts of the project on the eligibility and significance of the district has been provided. She stated there is a difference in opinion and as such, it becomes a substantial evidence question.
- Francesca stated I-105 is a linear historic district and that roughly a quarter mile would be altered. She asked if that might be an impact under CEQA. It was reiterated that there is a difference in opinion between Francesca and the Metro cultural resources experts.
- Laura stated that experts do not always have to agree and it comes down to an application of facts and standards. She noted there is an impasse in the conclusions of experts.
- Francesca asked Metro's legal counsel if they ever advocated on behalf of historic resources. Tiffany stated that her role as Metro legal counsel is to ensure Metro complies with CEQA requirements. They do not advocate for or against projects but for complying with the law. Francesca stated that this is a historic Caltrans resource and Caltrans is looking after their property. She stated she has not seen the new analysis.
- Meghna stated the team would go back and add additional detail to the analysis, but the analysis will likely not change. She said work is still ongoing with UP to move forward with a concrete, 4 span bridge. She said once there is additional detail, Metro will come back and share it with Caltrans. Francesca stated that Metro should come back with the whole of the project.
- Alison asked Francesca if the bridges are replaced with bridges designed as the existing bridges if that would result in no substantial impact. Francesca said she was uncertain and made an analogy about whether or not replica cars were significant. Alison asked why the bridge cannot be replaced with an identical bridge and Francesca stated because it is being replaced with a heavy freight bridge and LRT bridge and therefore replacement in this case was not like-for -like. Kristin reiterated that Metro is working with UP so the design of the replacement freight bridge matches the existing freight bridge.
- Francesca stated the connection of environmental justice communities would be part of a statement of overriding considerations and reminded the team that it was part of the Cultural Resources analysis.
- Alison asked for the steps forward if agreement cannot be reached. Meghna stated she needs to discuss with her team.
- Thoa noted that Caltrans will wait until there is new analysis to review. She asked Francesca if there was a change, would there be a chance that alterations would not be significant? Claudia stated that will not be answered until the new document is received.

PREVIOUS ACTION ITEMS

Number	Task	Responsible Party	Date Due	Status
1	Caltrans to provide redline version of the CEQA assessment	Caltrans		

NEW ACTION ITEMS

Number	Task	Responsible Party	Date Due	Status
1	Metro to provide evaluation with added detail/revisions			

DISTRIBUTION: Attendees

Copies to:

The following document contains Caltrans' comments on the March 2, 2023, meeting summary, and responses from the Metro team. These comments were extracted from the redline meeting summary and email provided by Caltrans on March 23, 2023.

It has been standard practice throughout the duration of this project for meeting summaries to represent what was stated at the meeting, as it was presented at the time the meeting was held. While the additional clarifications may be relevant and assist Metro in further understanding Caltrans comments or making potential revisions to its project documents, they cannot be added to the meeting summary if they do not reflect what was verbalized in the meeting. As such, the Metro team extracted comments or clarifications provided by Caltrans into this separate document. This document and the Metro team responses will be appended to that meeting summary and included in the record.

Caltrans Comment: "The CEQA Guidelines provide that a project that demolishes or alters those physical characteristics of an historical resource that convey its historical significance (*i.e.,* its character-defining features) can be considered to materially impair the resource's significance."

Metro Response: This statement was not made during the portion of the meeting where Caltrans has added the language, so it has been removed.

Caltrans Comment: "Francesca disagreed with Metro's attorneys' interpretation of the law, *which is immaterial to the point being made. Part of the question was whether substantial adverse change includes demolition of character-defining features. In that case, it was whether that triggered the requirement for the lead agency to prepare and EIR, which is extremely relevant.*"

Metro Response: The text in italics was removed from the meeting summary. This portion of the meeting including an explanation by Metro's attorneys regarding how the court's approach to *Glendale, which included preparation of a Mitigated Negative Declaration,* would differ from how a court would review an EIR. Metro attorneys described how the legal standards of review differ from that case to the current project. Caltrans-added text is already included in this section of the meeting minutes: "Tiffany stated that was in the trial court and the case was not related to impacts to a historic district, but rather to a historic resource, a single-family home. Francesca stated that per the case, demolition or material impairment of character defining features would cause substantial adverse change, similar to Section 106. She stated that it was relevant to this project even though it wasn't like-for-like (i.e., a case related to a historic district and development of an EIR)."

Caltrans text has been removed and revised to "Francesca disagreed with Metro's attorney's interpretation of the law."

Caltrans Comment: Quoted CEQA regulations added to minutes:

California Code of Regulations, Title 14, Section 15064.5 directs that:

(b) A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

(1) Substantial adverse change in the significance of an historical resource means 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.

(B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or

(C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA (emphasis added, CEQA Guidelines).

Metro Response: Because these regulations were not quoted in the meeting, they have been struck from the meeting minutes.

Caltrans Comment: See ITS #10: Exterior Stair/Elevator Tower Additions at https://www.nps.gov/orgs/1739/its-bulletins.htm.

Metro Response: Because these were not stated during the meeting, it has been struck from the meeting minutes.

Caltrans Comment: The same guidance states clearly "'Donut holes'[in historic districts] are not allowed" (Guidelines For Selecting Boundaries: All Properties, (page 2).

Metro Response: Because these was not stated during the meeting, it has been struck from the meeting minutes.

From:	Khanna, Meghna <KhannaM@metro.net>
Sent:	Thursday, July 20, 2023 10:50 AM
To:	Smith, Francesca@DOT
Cc:	Harbert, Claudia A@DOT; Le, Thoa@DOT; Lee, Elaine@DOT; Lu, Janice C@DOT; Alam, Md S@DOT
Subject:	RE: 35860 WSAB

Hello Francesca –

The 2020 version of the Cultural Resources Survey Report identified the parcel as 21-008 in the APE (Appendix A, sheet 21 of 33). The DPR forms (updated and the one from 2006) were included in Part 3 of the Survey Report.

In each place the property is referenced by the Map Reference Number 21-008.

The following have been uploaded to the Drobox for reference (https://www.dropbox.com/sh/21srqowjga1xuez/AAAF_qcec0qsvnci3yLDq2DSa?dl=0):

- Cultural Resources Survey Report – Rev 1 (2020) (3 files)
- Preliminary Cultural Resources Effects Report (2021)
- Cultural Resources Survey Report – Rev 2 (2023) (2 files)
- Letter from FTA to SHPO for Survey Report Rev 2
- Concurrence letter from SHPO to FTA on Survey Report Rev 2

In regards to historic district's larger setting:

- I-105 historic property boundaries are the Caltrans ROW and 12508 Center Street is approximately 200 feet from the Caltrans ROW.
- 12508 Center Street is not visible from locations along the I-105, which is below grade within a trench; the property is only visible from the pedestrian and UP bridges due to surrounding vegetation and other buildings that obscure views toward the building from other bridges within the historic district.
- The DPR form for the historic district acknowledges the district is "surrounded by various land uses included… a wide range of commercial uses, including retail, industrial (light and heavy manufacturing, warehouses and offices, heavy and light rail lines, park & ride lots,…".
- The DPR form does not identify any significant views or significant viewsheds important to the significance of the I-105 in the vicinity of the proposed WSAB work.
- Per NR Bulletin 15, setting is the physical environment of a historic property and refers to the character of the place in which the property played its historical role. It reflects the physical conditions under which a property was built and the functions it was intended to serve. It is important to examine a property within its boundaries but also between the property and its surroundings.
- This does not change the character of the I-105's setting as described in the DPR form, and the I-105 would continue to maintain its relationship with its evolving urban environment and EJ communities. The historic district would retain its integrity of setting.

Thanks,

Meghna Khanna, AICP
LA Metro
Senior Director, Countywide Planning & Development
Mobility Corridors
213.922.3931 (work)

213.393.2339 (cell)
metro.net | facebook.com/losangelesmetro | @metrolosangeles
Metro provides excellence in service and support.

From: Smith, Francesca@DOT <francesca.smith@dot.ca.gov>
Sent: Tuesday, July 18, 2023 4:39 PM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Harbert, Claudia A@DOT <claudia.harbert@dot.ca.gov>; Le, Thoa@DOT <thoa.le@dot.ca.gov>; Lee, Elaine@DOT <Elaine.Lee@dot.ca.gov>; Lu, Janice C@DOT <Janice.Lu@dot.ca.gov>; Alam, Md S@DOT <md.alam@dot.ca.gov>
Subject: RE: 35860 WSAB

Thank Meghna!
The last Cultural Resources Survey Reports we received were dated 2020 (Appendix W, Parts 1, 2 and 3) and 2021 (Appendix X).
We I did not find a property number in the APE that was assigned to the parcel on Center Street. It is immediately adjacent to the Century Freeway-Transitway and is therefore part of the historic district's larger setting. The setting is the larger area or environment in which a historic property is located. Caltrans has not received the updated Survey Reports. The public project website contains the older documents as well.
We appreciate and acknowledge receipt of the brief property update as well as the concurrence letter for the determinations of eligibility.
Best wishes,
Francesca Smith
PQS Principal Architectural Historian
Caltrans District 7
100 S. Main St., MS 16A
Los Angeles, CA 90012
telephone 213-266-3790

From: Khanna, Meghna <KhannaM@metro.net>
Sent: Tuesday, 18 July, 2023 8:49 AM
To: Smith, Francesca@DOT <francesca.smith@dot.ca.gov>
Cc: Harbert, Claudia A@DOT <claudia.harbert@dot.ca.gov>; Le, Thoa@DOT <thoa.le@dot.ca.gov>; Lee, Elaine@DOT <Elaine.Lee@dot.ca.gov>; Lu, Janice C@DOT <Janice.Lu@dot.ca.gov>; Alam, Md S@DOT <md.alam@dot.ca.gov>
Subject: RE: 35860 WSAB

EXTERNAL EMAIL. Links/attachments may not be safe.
Hello Francesca –

See attached the following information regarding the assessment of the property referenced in the email below that was completed in support of the West Santa Ana Branch Project. The property was included in WSAB Cultural Resources Survey Report Rev 1 (2020) and Rev 2 (2023) as Map Reference Number 21-008. The DPR update prepared for the project, along with the 2006 DPR form, were included in Appendix F of the Survey Report Rev 1 and Rev 2 and are attached to this email. The property evaluation update concluded that the property remains ineligible for listing in the NRHP, and is not eligible for the CRHR or local listing and lacks integrity as a result of multiple alterations.

Is there a reason Caltrans is mentioning this specific property as it outside Caltrans ROW?

See attached concurrence letter from SHPO. The eligibility determinations have been concurred with. We will transmit the latest survey report via dropbox.

More information:

The property referenced in the email (12508 Center Street in South Gate/MRN 21-008) was evaluated for listing in the NRHP in 2006 by Ben Taniguchi and Rebecca Smith. The property was recommended ineligible for listing in the NRHP as part of those efforts. We verified that this recommendation received SHPO concurrence in 2006. The property is listed in OHP's Historic Property Data File, the predecessor to the Built Environment Resources Directory, as a 6Y= Determined ineligible for NR by consensus through Section 106 process – Not evaluated for CR or Local Listing.

In accordance with the WSAB methods for the assessment of previously recorded properties, the property was field checked during the built environment survey completed for the project in 2018 and an updated DPR form was prepared. The property appeared in a condition consistent with its last recordation. CRHR criteria was addressed in the update (as it had not been addressed in the 2006 evaluation). The property evaluation update concluded that the property remains ineligible for listing in the NRHP, and is not eligible for the CRHR or local listing and lacks integrity as a result of multiple alterations. The property was included in WSAB Cultural Resources Survey Report Rev 1 (2020) and Rev 2 (2023) as Map Reference Number 21-008. The DPR update prepared for the project, along with the 2006 DPR form, were included in Appendix F of the Survey Report Rev 1 and Rev 2 and are attached to this email.

The survey and identification methods for the project were developed through consultation with SHPO. This approach was proposed to SHPO in a letter dated December 21, 2018. Specifically on page 14 of that letter, text stated: "Properties previously determined ineligible for the NRHP and CRHR which have not been surveyed within the past 10 years will be updated with a DPR update form and reevaluated." The methodology for the preparation of DPR forms is also outlined in Section 4.2.7 of the Cultural Resources Survey Report Rev 1 and Rev 2, and states: "Parcels previously determined ineligible for the NRHP and CRHR that had not been surveyed within the past 10 years were updated with a DPR update form and reevaluated. The previous documentation and updated DPR forms are included as Appendix F to this report." SHPO did not object to the methods related to previously determined eligible properties outlined in the Survey Report Survey Report Rev 1 and the Survey Report Rev 2 received formal SHPO concurrence on June 29, 2023

Thanks,
Meghna Khanna, AICP
LA Metro
Senior Director, Countywide Planning & Development
Mobility Corridors
213.922.3931 (work)
213.393.2339 (cell)
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Metro provides excellence in service and support.

From: Smith, Francesca@DOT <francesca.smith@dot.ca.gov>
Sent: Thursday, July 13, 2023 9:58 AM
To: Khanna, Meghna <KhannaM@metro.net>
Cc: Harbert, Claudia A@DOT <claudia.harbert@dot.ca.gov>; Le, Thoa@DOT <thoa.le@dot.ca.gov>; Lee, Elaine@DOT <Elaine.Lee@dot.ca.gov>
Subject: 35860 WSAB

Hi Meghna,
Good morning!
In our meeting this morning you described receiving SHPO concurrence on the Cultural Resources Survey Report (determinations of eligibility) last week. Please let us know the date of the tech report. The edition we received is dated March 13, 2020, so I believe we do not have the latest iteration.
Kindly transmit the latest edition, if we are missing it, as well as a copy of the SHPO concurrence letter with any attachments.

In reviewing the June 2023 project Cultural Resources Effects report, it was noted that the property at 12508 Center Street, in South Gate which is proposed for demolition for the new Park and Ride station was not evaluated for historic significance in our previous editions of the WSAB survey. The improvements were built in the 1920s, probably for California Fur Felt Hat Co. and was last evaluated for an FCC project more than five years ago. It was owned an occupied after 1939 by Harbor Furniture Co. and its successors. Harbor Furniture is mentioned in *My Blue Heaven* (2002) and may have had labor disputes that would be worth reviewing as well. Because the property was evaluated so long ago, those findings must be updated. The building permit records are attached for your use.

You may not have recalled the Caltrans was a Section 106 consulting party in our meeting. The FTA letter granting our agency consulting party status is attached for your records.

As we discussed, Caltrans will review the updated Section 106 effects when it is submitted concurrently with SHPO. It would, of course be preferable to review that tech report before SHPO received it.

Thanks very much for including us in the process. Feel free to call or write back if you have any questions.

Best wishes,

Francesca Smith
PQS Principal Architectural Historian
Caltrans District 7
100 S. Main St., MS 16A
Los Angeles, CA 90012
New cell 213-266-3790

California Department of Transportation

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August 24, 2023

Ms. Meghna Khanna
Project Manager
Los Angeles Metro
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna,

As a Section 106 consulting party, Cooperating Agency under NEPA, Responsible Agency for CEQA, and as the steward and owner of the Century Freeway-Transitway Historic District (District), Caltrans appreciates the opportunity to comment on the West Santa Ana Branch Cultural Resource Effects Report (Updated Report) dated July 5, 2023. This review is limited to expected effects and impacts to built environment resources in California Department of Transportation (Caltrans) right of way (ROW), within the boundaries of the District.

It is the opinion of Caltrans District 7 that the project, as proposed, does not meet the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards), and will therefore cause an adverse effect to the Century Freeway-Transitway Historic District. Historic districts are distinct areas with significant concentrations, linkages, and in this case, continuity of features that were united historically, culturally and aesthetically by a specific plan, shared history and physical development. Historic districts partially derive their importance from the connections and relationships among individual components. The concentration or continuity of individual contributors within a historic district is frequently of greater significance than its separate component buildings and structures: i.e., a historic district is typically greater than the sum of its parts. Individual components may contribute to the significance of a district even if undistinguished when considered separately. The District would be interrupted due to the permanent loss of nearly all character-defining features and the historic district fabric within the project area.

Century Freeway-Transitway Historic District Boundaries

The boundaries of the Century Freeway-Transitway Historic District are not accurately depicted in the Updated Report. In the Effects/Impacts Analysis section, Figure 5-25, the figure entitled "Overview of the [WSAB] APE in Relation to the Century Freeway-Transitway Historic District" is incorrect. The APE excludes North Somerset Ranch Road and South Somerset Ranch Road, which are character-defining ramps, as well as bridge approaches and abutments, landscaping and graded slopes.

Effects to Century Freeway-Transitway Historic District

The proposed project would demolish a Century Freeway-Transitway Historic District-contributing bridge and part of another (Century Blvd. UP and Façade Ave. OC). The WSAB project would permanently alter those bridges and add visually prominent, out-of-scale vertical circulation elements for the new median station that are not consistent with the Standards for Rehabilitation or guidelines. The proposed project would permanently remove the Century Blvd. UP from its historic location. It would irreparably alter the two character-defining bridges, which are physical features in the property's setting that contribute to its historic significance. The proposed vertical circulation elements of the median LRT platform would introduce visual, and atmospheric elements that would diminish the integrity of two of bridges, which are considered significant historic features of the District.

Rehabilitation as a treatment "is defined as the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values" (National Park Service 2017). The proposed WSAB project alterations within the District would not comply with the Standards, which are codified in both Section 106 (36 CFR 800.5 Assessment of adverse effects) and in the CEQA Guidelines (14 CCR Section 15300-15331). Table 1 briefly analyzes the effects of the project under Standards 2, 3, 4, 9 and 10.

Table 1

The Secretary of the Interior's Standards for Rehabilitation	**Caltrans Analysis**
2. The historic character of a property will be retained and preserved. *The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*	The demolition of the Century Blvd. UP (Bridge No. 53-02427) and the west side of the Façade Avenue OC (Bridge No. 53-02424) would constitute removal and alteration of character-defining features, both the bridge and the other bridge railing, of the larger Century Freeway- Transitway Historic District. The demolished bridge and demolished bridge railing would not be retained or preserved by the proposed project. The replacement of Century Blvd. UP Bridge with two new bridges that would be wider overall, have different spans and be supported on different pier shapes and types, as proposed, which would permanently alter all of that bridge's features, including the negative spaces and spatial relationships with other bridges, the landscape and mainline that characterize the property. **Proposed project would not comply with Standard 2.**
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements	Demolition of the character-defining Century Blvd. UP Bridge and the west side of the Façade Ave. OC Bridge would not recognize the bridges as physical records of their time, place or use. One bridge would be destroyed, the other would have its western side demolished.

The Secretary of the Interior's Standards for Rehabilitation	**Caltrans Analysis**
from other historic properties, will not be undertaken.	Replacement of Century Blvd. UP Bridge with two wider bridges would be a significant change that would easily cause a false sense of historical development. The Façade Ave. OC would be permanently altered by the demolition of one side, its widening, and the addition of two elevators, penthouses and a stair tower. **Proposed project would not comply with Standard 3.**
4. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	By demolishing the character-defining Century Blvd. UP Bridge, the western side of the Façade Ave. OC Bridge and likely landscaping, the distinctive materials, features, finishes, construction techniques or examples of craftsmanship that characterize both structures which contribute to the significance of the larger historic district would be permanently destroyed, not preserved. **Proposed project would not comply with Standard 4.**
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.	The demolition of the existing Century Blvd. UP Bridge with construction and use of two new, wider bridges in its place would constitute new additions, exterior alterations and related new construction that would destroy the extant historic materials, the features of the bridge, as well as the spatial relationships with other features that characterize the property. The new bridges with the added median LRT station and its vertical circulation elements are not expected to be compatible with the historic materials of the Century Bl. UP Bridge which would be permanently destroyed. The new bridges as well as the proposed station's vertical features, including but not limited to their sizes, scales, proportions and massing far above the existing bridge heights would not protect the integrity of the property or its environment, including its contributing landscape. Permanent demolition of the west side of the Facade Av. OC and its widening by two feet would destroy extant historic materials, features and spatial relationships that characterize the bridge. The widening is not expected to be compatible with the historic materials, features, size, scale and proportion or massing to protect the integrity of that property or its environment. **Proposed project would not comply with Standard 9.**
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	The proposed new bridge additions and demolition of the other bridge's west side, as well as the permanent connection to Façade Av. OC and adjacent, related new LRT platform construction at Century Bl. UP would be undertaken in such a manner that, if removed in the future, the essential form of the Century Bl. UP and Façade Av. OC bridges and integrity of the historic property and its related environment would be permanently impaired. One bridge and part of another, each of which contribute to the

The Secretary of the Interior's Standards for Rehabilitation	Caltrans Analysis
	significance of the historic district would be permanently destroyed. If the proposed new bridges and station in the median were removed in the future, the Century Bl. UP and west side of the Façade Avenue OC would have already been permanently demolished, making it impossible for those contributing resources to impart their historic significance or that of the historic district. **Proposed project would not comply with Standard 10.**
Source: Grimmer. Anne E. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings* (Washington, DC: National Park Service) updated 2017.	

Caltrans also disagrees with the Updated Report's CEQA conclusion that the proposed project would not alter the historic district such that it would be materially impaired. Substantial adverse change in the significance of the historic district and two contributing bridges would be caused by the project. The WSAB project would demolish and materially alter in an adverse manner those physical characteristics of the historic district and two bridges, three historical resources that convey their historical significance and justify the property's eligibility for the California Register as determined by the CEQA lead agency (CCR, Title 14, Section 15064.5 (2) (C)).

Encroachment Permit Requirement

As previously discussed with the Metro project team, Caltrans as the permitting agency is required to comply with NEPA and CEQA in order to issue an encroachment permit for work within Caltrans' right-of-way. Therefore Caltrans would need to adopt the project EIR/EIS before issuing the encroachment permit for the project. If the impact findings in the EIR/EIS are not consistent with Caltrans' findings under Section 106 and CEQA, Caltrans would not be able to adopt the document. In that case, a separate NEPA/ CEQA environmental document for work within Caltrans' right of way would be required at the time of permit application, before we can issue the Encroachment Permit for the project.

We appreciate the opportunity to comment on this important project. We are prepared to offer more detailed comments if you or the State Historic Preservation Officer would like further clarification. If you have any questions, please contact my staff, Thoa Le at thoa.le@dot.ca.gov .

Sincerely,

Kelly Ewing-Toledo

Kelly Ewing-Toledo
(Acting) Deputy District Director
Division of Environmental Planning

CC: Natalie Lindquist, State Historian II
Claudia Harbert, D7 HRC
D7 Project File

Caltrans Coordination Meeting Summary

WSAB Caltrans Coordination Meeting

Date	Time
September 27, 2023	2:00 – 2:30 pm
Location	**Conference Call Information**
Microsoft Teams Meeting	

1.1 Attendees

Name	Agency / Company
Meghna Khanna	Metro
Ray Sosa	Metro
Carlos Montez	Metro
Monica Benavides	Caltrans
Kelly Ewing-Toledo	Caltrans

Next stop: new rail to southeast LA County.

WEST SANTA ANA BRANCH TRANSIT CORRIDOR



Metro

Caltrans Coordination Meeting
September 27, 2023

Locally Preferred Alternative



- In January 2022, the Metro board selected Slauson/A Line to Pioneer (14.8-mile with 9 WSAB & 1 new C Line Stations) as the Locally Preferred Alternative (LPA) and focus of Final EIS/EIR.

- WSAB is a priority project for the Metro Board.

Component	Quantity
Alignment length	14.8 miles
Length of at-grade and aerial	12.2 miles at-grade; 2.6 miles aerial
Station configurations	9 along WSAB alignment, 1 at-grade **infill station along C Line** 3 aerial; 6 at-grade
Freeway crossings	4 (1 aerial/overcrossing at I-105; 3 freeway undercrossings at I-710, I-605, SR 91)
Freight realignment	Approx. 8 miles
River crossings	3 (Rio Hondo, LA River and San Gabriel)
Maintenance and storage facility site	1 (City of Bellflower)

Key Milestones

- October 2023: Submit Cultural Resources Effect Report and Finding of Effect
- Summer 2024: Final EIR Certification
- Fall 2024: Record of Decision
- 2024: Complete Federal New Starts Project Development Phase; anticipated federal funding request of $ 3 billion

Metro

WSAB I-105/C Line Interface (Before)



Metro

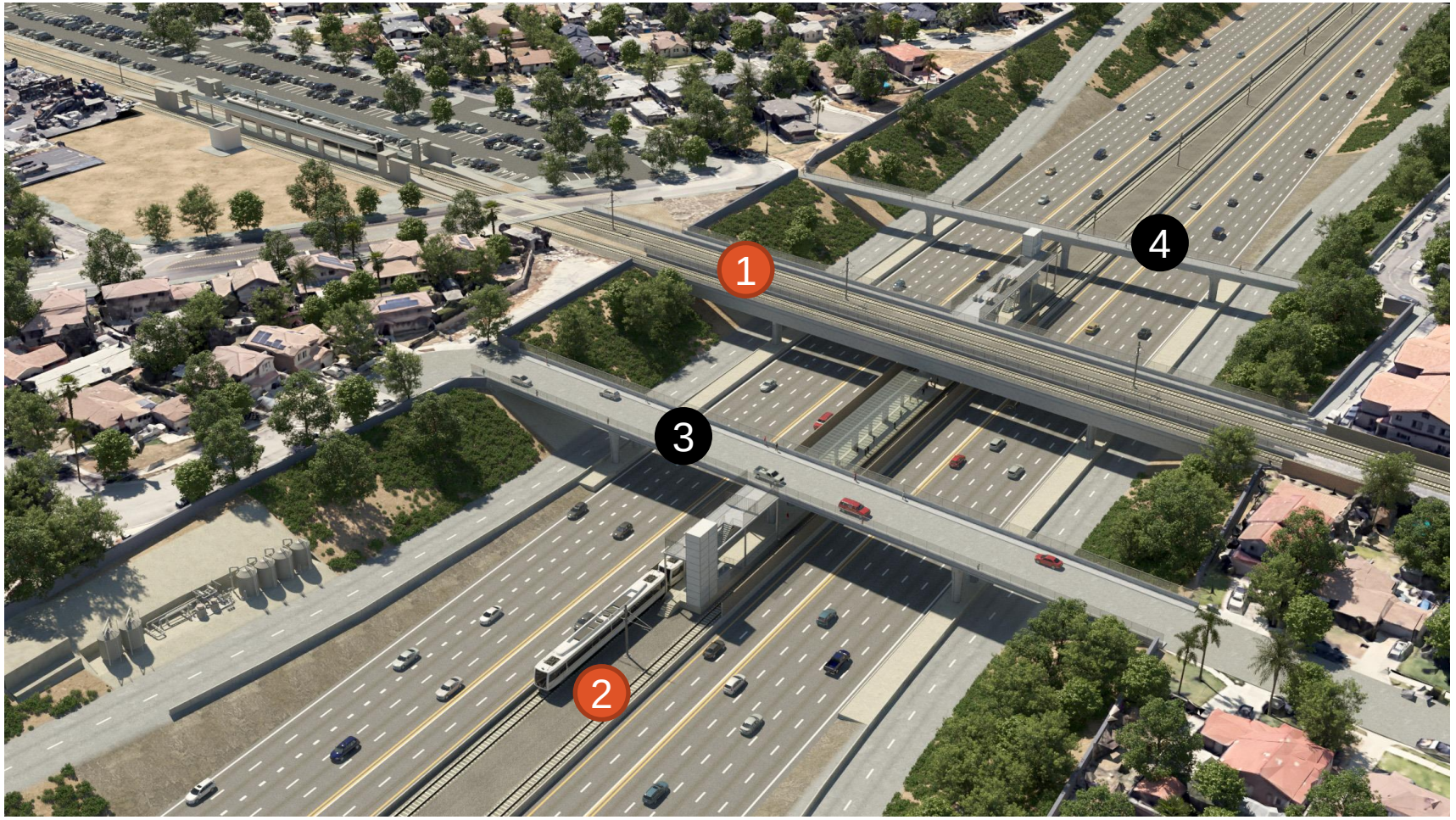
Current Design Elements in the Historic District (After)

3 Façade Avenue Overcrossing (remain intact with VCEs added)

1 **Proposed New LRT and Replacement Freight Bridges**

2 **Proposed Infill Station and Vertical Circulation Elements**

4 Arthur Avenue Overcrossing (remain intact)



Metro

WSAB Project: SHPO Consultation Summary

- Project effects/impacts analysis for the Historic District was presented to the State Historic Preservation Office (SHPO) on September 9, 2020, and again, following the implementation of Caltrans requested changes on May 22, 2023.

1. **September 9, 2020**: Preliminary **verbal concurrence** was received from SHPO on no adverse effect.

2. **May 22, 2023**:
   SHPO stated that:
   - Based on the rationale for eligibility for the Historic District, **there is flexibility in the project actions that can occur within the Historic District without resulting in an adverse effect determination**.

   - Project modifications would add to the functionality of the Historic District and that the proposed station modifications are complementary with the context of the district rather than detracting from it.

Metro

WSAB Project CEQA Determination: Consistent with I-105/Express Lane

The effects/impacts analysis for the Project was developed using Caltrans ExpressLanes documentation, which includes similar project elements/alterations as WSAB

- For the **ExpressLanes Project**, the analysis concluded **no adverse effect /significant impact** to the Historic District

- **Caltrans comments were taken into consideration** and design changes were made to the Project (4-span concrete bridge replacement, two bridges remain intact, trees will be replaced in-kind and at a ratio of 1:1, restoring landscape design etc.)

- A change to adverse effect under Section 106 and significant impact under CEQA for WSAB could **set a precedent for Caltrans** that future projects with similar modifications would result in an adverse effect/significant impact, including when Caltrans is the lead agency

ExpressLanes Project and WSAB Comparison

ExpressLanes Project	WSAB Project
Project designed to accommodate the WSAB Project and included effects analysis for bridge demolition and C line track realignment **Concluded no adverse effect**	Bridge demolition, modifications to the Façade Avenue Bridge VCEs and C Line track realignment **Concluded no adverse effect**
Freeway widening, ramp modifications, interchange modifications, widening of character-defining bridges, demolition and reconstruction of at least one character-defining bridge, removal and replacement of original landscaping, and the installation of retaining walls and soundwalls **Concluded no adverse effect**	Freeway widening, demolition and reconstruction of one character-defining bridge, construction of new LRT bridge, limited removal and replacement of landscaping, and the installation of retaining walls and soundwalls **Concluded no adverse effect**
Demolition/widening of bridges not an adverse effect as the bridges are not individually significant, and not significant for aesthetic or engineering qualities **Concluded no adverse effect**	Demolition of bridge not an adverse effect as the bridge is not individually significant, and not significant for aesthetic or engineering qualities **Concluded no adverse effect**
New bridge will approximate the features of the original bridge which is consistent with the fundamental principles in the Secretary's Standards **Concluded no adverse effect**	Replacement freight bridge and new LRT bridge will approximate the features of the original freight bridge which is consistent with the fundamental principles in the Secretary's Standards **Concluded no adverse effect**
Demolition of one bridge will reduce the number of contributing bridges but is such a low percentage it will not significantly affect the integrity of the larger historic district **Concluded no adverse effect**	Demolition of one bridge will reduce the number of contributing bridges but is such a low percentage it will not significantly affect the integrity of the larger historic district **Concluded no adverse effect**
One to one replacement of trees is consistent with the principles of the Secretary's Standards **Concluded no adverse effect**	One to one replacement of trees is consistent with the principles of the Secretary's Standards **Concluded no adverse effect**

WSAB Project Benefits

- Updated effects analysis includes minimization measures to reduce effects to the Historic District:
  - Avoids demolition and reconstruction of 2 bridges within Historic District
  - Review for LRT bridge and infill station to SOI standards
  - Modified design of replacement freight bridge from 2 span to 4 span, consistent with existing bridge
  - 1:1 tree replacement

- WSAB Project would **maintain the transportation corridors** of the Historic District, one of its character-defining features and the primary reasons for its historical significance

- **New LRT bridge** would include sidewalks which would **increase pedestrian access across I-105**

- Minimal disruption to adjacent communities for project implementation

- Project serves Environmental Justice communities

Metro

Conclusion

WSAB Project will result in **no adverse effect** to historic properties

- Not result in an adverse effect (Section 106)/significant impact (CEQA) to the I-105 Historic District, and the Project conforms to the Secretary of the Interior's Standards for Rehabilitation.
- The Historic District is significant for its association as one of the earliest environmental justice lawsuits (Criterion A) and for its
  - transportation engineering design with Intelligent Transportation System (ITS) features,
  - integral light rail alignment and stations in its median and the intermodal limited interchanges (Criterion C)
- None of the character-defining features of the Historic District were found to be individually significant
- The Project will require a minimal amount of demolition/alteration to a small portion (0.4-mile) of the 18.1-mile Historic District.

Back Up Slides

I-105/Century Freeway – Transitway Historic District Character-Defining Features

Ranking	CDF Number	Feature and Description	A	B	C	D	E	Total Points
Most Significant	1	Limited interchanges (Interstates 405, 110, 710 and 605)	3	3	3	3	3	15
Most Significant	2	Profile of route (at-grade, elevated, in trench or on berm)	2	3	3	3	3	14
Significant	3	Multi-lane roadway	1	3	2	3	3	12
Significant	4	Alignment of route	1	2	3	3	3	12
Significant	5	Green Line light rail system and stations in median	2	2	3	2	3	12
Significant	6	ITS system (CCTV, TMS, RMS, ATMS, CMS1)	2	2	3	2	2	11
Significant	7	Original bridges and pedestrian overcrossings	1	1	2	3	3	10
Significant	8	Fully landscaped	1	1	2	3	3	10
Significant	9	Controlled ramps and their lengths	1	1	2	2	3	9

Note: Non-character-defining features of the district include: roadway standard pavement and curb, striping and pavement markers in roadway, standard drainage facilities, standard signage and streetlight standards, sound walls, mast lighting at the I-710 interchange, pump stations, the C Line (Green) outside of the median and its stations southwest of the Aviation/LAX Station and additional C Line (Green) Maintenance and Storage Yards beyond the I-105 corridor that were not originally constructed as part of the I-105.

Metro

I-105/Century Freeway – Transitway Historic District Preliminary Effects Analysis Updates

Project Element Presented in 2020	Updated Project Element
Demolition of three bridges	Demolition of only one bridge
New LRT bridge	New LRT bridge to be designed in conformance with the Secretary of the Interior Standards
Replacement Century Boulevard freight bridge – 2 span	As requested by Caltrans, replacement Century Boulevard freight bridge will be 4 span. It will embody a design in keeping with that of the district and similar to other character-defining bridges. Its overall design, massing, scale, color, and materials will approximate the features of the original bridge by integrating a relief consistent with that present on character-defining bridges throughout the district.
New station in I-105 median	Station design will be reviewed and approved by a SOI qualified professional as design advances
C Line track realignment	No change
Initial analysis did not provide detailed information on landscaping	As requested by Caltrans, 1:1 replacement of all trees removed from the APE (max 15)

Metro

Effects Analysis Update

Project Element 2020	Preliminary Assessment 2020	Updated Project Element 2023	Updated Assessment 2023
Demolition and reconstruction of three bridges	No adverse effect	Demolition and reconstruction reduced to one bridge	No adverse effect
New LRT bridge	No adverse effect	New LRT bridge to be designed in conformance with the Secretary of the Interior Standards	No adverse effect
Replacement Century Boulevard freight bridge – 2 span, concrete	No adverse effect	Replacement Century Boulevard freight bridge will be 4 span (consistent with existing), concrete and will feature a design in keeping with that of the district	No adverse effect
New station in I-105 median	No adverse effect	Station design will be reviewed and approved by a SOI qualified professional as design advances	No adverse effect
C Line track realignment	No adverse effect	No change	No adverse effect
Initial analysis did not provide detailed information on landscaping	No adverse effect	1:1 in-kind replacement of all trees removed from the APE (max 15)	No adverse effect

WSAB Project

- The WSAB Project will not result in an adverse effect (Section 106)/significant impact (CEQA) to the I-105 Historic District, and the Project **conforms to the Secretary of the Interior's Standards for Rehabilitation**.

- The Historic District is significant for its association as one of the earliest environmental justice lawsuits (Criterion A) and for its
  - transportation engineering design with Intelligent Transportation System (ITS) features,
  - integral light rail alignment and stations in its median and the intermodal limited interchanges (Criterion C)

- None of the character-defining features of the Historic District were found to be individually significant

- The Project will require a minimal amount of demolition/alteration to a small portion (0.4-mile) of the 18.1-mile Historic District.

Metro

California Department of Transportation

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October 6, 2023

Ms. Meghna Khanna
Project Manager
Los Angeles Metro
One Gateway Plaza, MS 99-22-7
Los Angeles, CA 90012

Dear Ms. Khanna,

As a Section 106 consulting party, Cooperating Agency under NEPA, Responsible Agency for CEQA, and as the steward and owner of the Century Freeway-Transitway Historic District (District), Caltrans appreciates the opportunity to comment on the West Santa Ana Branch Cultural Resource Effects Report (Updated Report) dated July 5, 2023. This review is limited to expected effects and impacts to built environment resources in California Department of Transportation (Caltrans) right of way (ROW), within the boundaries of the District.

The Century Freeway-Transitway Historic District (historic district or district) is a linear historic district that encompasses roughly 18 miles of I-105 from California Street in El Segundo to Studebaker Road in Norwalk. The boundaries of the district are defined by the California Department of Transportation (Caltrans) ROW. The district includes the Metro C Line (formerly referred to as the Green Line) and 10 freeway-related Metro C Line LRT stations; the bridges and ramps constructed as part of the interstate; and the interchanges that connect I-105 to I-405, I-110,I-710, and I-605. The Historic District is significant for its association as one of the earliest environmental justice lawsuits (Criterion A) and for its transportation engineering design with Intelligent Transportation System (ITS) features, integral light rail alignment and stations in its median and the intermodal limited interchanges (Criterion C).

The proposed project would demolish the Century Boulevard UP and reconstruct a new freight bridge with an adjacent, but separate bridge to accommodate the new light rail line. The nearby Façade Avenue OC would be altered at the bridge railing to allow for connection to vertical circulation elements to the new median light rail station to be constructed in the I-105 median. These elements are all Character Defining Features of the Century Freeway-Transitway Historic District.

Based on conversations between the project team and Caltrans, Metro has incorporated design changes that we feel meet the Secretary of the Interior's Standards for Rehabilitation (SOIS). Those changes include:

- The demolition of only one bridge vs. three as earlier proposed;
- The replacement Century Boulevard freight bridge will be 4 span instead of 2 span. Its overall design, massing, scale, color, and materials will approximate the features of the original bridge by integrating a relief consistent with that present on character-defining bridges throughout the district;
- The new LRT bridge will be designed in conformance with the Secretary of the Interior Standards;
- The design of the infill station in the median of the I-105 design will be approved by a SOI qualified professional as design advances;
- Trees removed as a result of the project will be replaced at a 1:1 ratio.

Caltrans appreciates the collaboration with Metro and does not object to your Finding of No Adverse Effect for the project, particularly with regard the Century Freeway-Transitway Historic District. As Caltrans has responsibilities for historical resources in their right of way under PRC 5024, we do request review of a Secretary of the Interior's Standards (SOIS) Action Plan as design of the project advances. A copy of the final Plan will be required before Caltrans can approve an encroachment permit for the project. In addition, Caltrans does not object to the conclusion in the Updated Report's CEQA section that the proposed project would not alter the historic district such that it would be materially impaired.

We appreciate the opportunity to comment on this important project. If you have any questions, please contact my staff, Thoa Le at thoa.le@dot.ca.gov .

Sincerely,

Kelly Ewing-Toledo

Kelly Ewing-Toledo
(Acting) Deputy District Director
Division of Environmental Planning

CC: Natalie Lindquist, State Historian II
Claudia Harbert, D7 HRC
D7 Project File

APPENDIX C – CONSTRUCTION VIBRATION RESULTS

Eligible	APE Map No.	Property Location	Land Use	Year Built	Track Type	Horizontal Distance from Track Centerline to Building	Damage Risk Criteria - in/sec (PPV)	Predicted Maximum Construction Vibration Level – in/sec (PPV)	Exceed Damage Risk Criteria without Mitigation	Predicted Vibration Level – in/sec (PPV) with Mitigation Measure VIB-6
Yes	8-013	Pueblo Del Rio/5024 Holmes Avenue, Los Angeles (P-19-188179)	Building District	1941-1944	Aerial	357	0.50	0.00	No	N/A
Yes	9-015	6000 Alameda St, Huntington Park	Industrial	N/A	At-Grade	63	0.20	0.02 to 0.11	No	N/A
Yes	9-034	2110 Belgrave Ave, Huntington Park	Industrial	1946	At-Grade	63	0.50	0.02 to 0.11	No	N/A
Yes	10-012	6101 Santa Fe Ave, Huntington Park	Commercial	N/A	At-Grade	43	0.20	0.09 to 0.19	No	N/A
Yes	10-017	2860 Randolph St, Huntington Park	Residential	1926	At-Grade	54	0.20	0.07 to 0.13	No	N/A
Yes	10-021	6020 Miles Avenue, Huntington Park	Institutional	1909	At-Grade	502	0.30	0.00	No	N/A
Yes	11-016	Randolph Substation/Randolph Street, Huntington Park	Miscellaneous	N/A	Aerial	84	0.50	0.03 to 0.07	No	N/A
Yes	11-018	6300-6302 State St, Huntington Park	Commercial	1929	At-Grade	626	0.50	0.00	No	N/A
Yes	13-001	6231 Maywood Ave, Huntington Park	Industrial	1930	At-Grade	125	0.50	002 to 0.04	No	N/A
Yes	13-003	3477 Gage Avenue, Huntington Park	Commercial (Sign Structure Only)	1960	At-Grade	112	0.50	0.02 to 0.05	No	N/A
Yes	15-032	Cudahy Substation/Salt Lake Avenue	Miscellaneous	N/A	At-Grade	90	0.50	0.03 to 0.06	No	N/A
Listed	17-005	LADWP Boulder Lines 1 and 2 (1936)	Linear Utility (No Building)	N/A	At-Grade	14	0.50	0.50 to 1.02	**Yes (during Compacting)**	0.21 to 0.43 at 25 feet (below damage risk criteria)
Yes	18-016	Southern California Edison, Long Beach-Laguna Bell 60kV and 220 kV Transmission Lines	Linear Utility (No Building)	N/A	Aerial	30	0.50	0.16 to 0.32	No	N/A
Yes	19-013	7601 E Imperial Hwy, Downey	Miscellaneous	N/A	At-Grade	136	0.50	0.00	No	N/A
Yes	28-008	Bellflower Pacific Electric Railway Depot, 16336 Bellflower Boulevard, Bellflower	Institutional	N/A	At-Grade	11	0.50	0.72 to 1.46	**Yes (using a large vibratory roller or a compacter)**	0.21 to 0.43 at 25 feet (below damage risk criteria)
Contributing Property	32-021	The Frampton-Dantema House/18644 Alburtis Avenue, Artesia	Residential	1929	At-Grade	27	0.20	0.19 to 0.38	**Yes (during Compacting)**	0.10 to 0.20 at 40 feet (below damage risk criteria)