

# Appendix O Tribal Cultural Resources Impacts Report

## GOLD LINE EASTSIDE TRANSIT CORRIDOR PHASE 2



Prepared for  
Los Angeles Metropolitan  
Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012

June 2022

# Appendix O

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Prepared for:  
Los Angeles County Metropolitan Transportation Authority  
One Gateway Plaza  
Los Angeles, CA 90012

Prepared by:  
CDM Smith/AECOM Joint Venture  
600 Wilshire Boulevard, Suite 750  
Los Angeles, CA 90017

State Clearinghouse Number: 2010011062

# Table of Contents

1.0	Introduction .....	1
2.0	Proposed Project and Alternatives .....	2
2.1	Project Setting and Description .....	2
2.2	Build Alternatives .....	6
2.2.1	Alternative 1 Washington .....	6
2.2.1.1	Guideway Alignment .....	7
2.2.2	Alternative 2 Atlantic to Commerce/Citadel IOS .....	9
2.2.2.1	Guideway Alignment .....	9
2.2.3	Alternative 3 Atlantic to Greenwood IOS .....	9
2.2.3.1	Guideway Alignment .....	10
2.3	Maintenance and Storage Facilities .....	10
2.3.1	Commerce MSF .....	10
2.3.2	Montebello MSF .....	11
2.4	Ancillary Facilities .....	12
2.5	Proposed Stations .....	13
2.6	Description of Construction .....	14
2.7	Description of Operations .....	15
2.8	No Project Alternative .....	15
3.0	Regulatory Framework .....	16
3.1	Federal .....	16
3.1.1	National Historic Preservation Act .....	16
3.1.1.1	Traditional Cultural Properties .....	17
3.2	State .....	17
3.2.1	California Historic Landmarks .....	17
3.2.2	California Environmental Quality Act .....	17
3.2.3	California Native American Historical, Cultural, and Sacred Sites Act .....	18
3.2.4	Assembly Bill 52 .....	19
4.0	Methodology .....	20
4.1	Project Area of Direct Impacts .....	20
4.2	Identification of Register-Eligible Resources .....	20
4.3	Identification of Consulting Parties .....	21
5.0	Thresholds of Significance .....	22
6.0	Existing Setting .....	23
6.1	Tribal Cultural Resources Study Area .....	23
6.2	Identification of Register-Eligible Resources .....	25
6.2.1	CHL No. 385: Site of the Battle of Rio San Gabriel .....	25
6.3	Results of Consultation .....	26
7.0	Impacts .....	27
7.1	Impact TCR-1: Historical Resources .....	27
7.1.1	Alternative 1 Washington .....	27

7.1.1.1	Operational Impacts .....	27
7.1.1.2	Construction Impacts .....	28
7.1.2	Alternative 2 Atlantic to Citadel IOS.....	30
7.1.2.1	Operational Impacts .....	30
7.1.2.2	Construction Impacts .....	30
7.1.3	Alternative 3 Atlantic to Greenwood IOS .....	31
7.1.3.1	Operational Impacts .....	31
7.1.3.2	Construction Impacts .....	32
7.1.4	Maintenance and Storage Facilities .....	33
7.1.4.1	Operational Impacts .....	34
7.1.4.2	Construction Impacts .....	35
7.2	Impact TCR-2: Native Tribal Significance.....	36
7.2.1	Alternative 1 Washington.....	36
7.2.1.1	Operational Impacts .....	36
7.2.1.2	Construction Impacts .....	37
7.2.2	Alternative 2 Atlantic to Citadel IOS.....	38
7.2.2.1	Operational Impacts .....	38
7.2.2.2	Construction Impacts .....	39
7.2.3	Alternative 3 Atlantic to Greenwood IOS .....	40
7.2.3.1	Operational Impacts .....	40
7.2.3.2	Construction Impacts .....	41
7.2.4	Maintenance and Storage Facilities .....	42
7.2.4.1	Operational Impacts .....	42
7.2.4.2	Construction Impacts .....	43
8.0	Mitigation Measures and Impacts After Mitigation.....	45
8.1	TCR-1: Historical Resources.....	45
8.1.1	Alternative 1 Washington.....	45
8.1.1.1	Potential Operational or Construction Mitigation Measures .....	45
8.1.1.2	Design Option Potential Operational or Construction Mitigation Measures .....	46
8.1.1.3	Impacts After Mitigation.....	47
8.1.2	Alternative 2 Atlantic to Citadel IOS.....	48
8.1.2.1	Potential Operational or Construction Mitigation Measures .....	48
8.1.2.2	Design Option Potential Operational or Construction Mitigation Measures .....	48
8.1.2.3	Impacts After Mitigation.....	48
8.1.3	Alternative 3 Atlantic to Greenwood IOS .....	49
8.1.3.1	Potential Operational or Construction Mitigation Measures .....	49
8.1.3.2	Design Option Potential Operational or Construction Mitigation Measures .....	49
8.1.3.3	Impacts After Mitigation.....	50
8.1.4	Maintenance and Storage Facilities .....	50

8.1.4.1	Commerce Potential Operational or Construction Mitigation Measures .....	51
8.1.4.2	Montebello Potential Operational or Construction Mitigation Measures .....	51
8.1.4.3	Impacts After Mitigation.....	51
8.2	TCR-2: Native Tribal Significance .....	52
8.2.1	Alternative 1 Washington.....	52
8.2.1.1	Potential Operational or Construction Mitigation Measures .....	52
8.2.1.2	Design Option Potential Operational or Construction Mitigation Measures .....	53
8.2.1.3	Impacts After Mitigation.....	53
8.2.2	Alternative 2 Atlantic to Citadel IOS.....	54
8.2.2.1	Potential Operational or Construction Mitigation Measures .....	54
8.2.2.2	Design Option Potential Operational or Construction Mitigation Measures .....	54
8.2.2.3	Impacts After Mitigation.....	55
8.2.3	Alternative 3 Atlantic to Greenwood IOS .....	55
8.2.3.1	Potential Operational or Construction Mitigation Measures .....	55
8.2.3.2	Design Option Potential Operational or Construction Mitigation Measures .....	56
8.2.3.3	Impacts After Mitigation.....	56
8.2.4	Maintenance and Storage Facilities .....	57
8.2.4.1	Commerce Potential Operational or Construction Mitigation Measures .....	57
8.2.4.2	Montebello Potential Operational or Construction Mitigation Measures .....	57
8.2.4.3	Impacts After Mitigation.....	58
8.3	Mitigation Measure Applicability.....	58
9.0	No Project Alternative .....	60
9.1	No Project Alternative .....	60
9.1.1	Description .....	60
9.1.2	Impacts.....	60
9.1.2.1	Historical Resources .....	60
9.1.2.2	Native Tribal Significance .....	60
10.0	Summary of Alternatives .....	61
10.1	No Project.....	61
10.2	Alternative 1 Washington + MSF .....	61
10.2.1	Alternative 1 Washington + MSF + Design Options.....	61
10.3	Alternative 2 Atlantic to Citadel IOS + MSF .....	61
10.3.1	Alternative 2 Atlantic to Citadel IOS +MSF + Design Option .....	62
10.4	Alternative 3 Atlantic to Greenwood IOS + MSF.....	62
10.4.1	Alternative 3 Atlantic to Greenwood + MSF + Design Options .....	62
11.0	Preparers Qualifications.....	63
12.0	References Cited .....	64

## Tables

Table 8-1. Summary of Mitigation Measure Alternative Applicability.....	59
Table 10-1. Significant/Adverse Impacts Remaining After Mitigation .....	61

## Figures

Figure 2.1. Alternative 1 Washington GSA and DSA.....	3
Figure 2.2. Alternative 2 Atlantic to Commerce/Citadel IOS GSA and DSA .....	4
Figure 2.3. Alternative 3 Atlantic to Greenwood IOS GSA and DSA.....	5
Figure 2.4. Atlantic/Pomona Station Option.....	8
Figure 2.5. Montebello MSF S-Curve Alignment .....	12

## Attachments

Attachment A – Maps
Attachment B – Consultation Correspondence and Meeting Notes (Confidential)

## Acronyms

2020 RTP/SCS	Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy
AB	Assembly Bill
ADI	area of direct impacts
BNSF	Burlington Northern Santa Fe
CEQA	California Environmental Quality Act
CHL	California Historical Landmarks
CRHR	California Register of Historical Resources
CRMMP	Cultural Resources Monitoring and Mitigation Plan
DSA	detailed study area
EIR	Environmental Impact Report
GSA	general study area
GTTC	Gabrielino-Tongva Tribal Council
I	Interstate
IOS	Initial Operating Segment
LRT	light rail transit
LRTP	Long Range Transportation Plan
LRVs	light rail vehicles
Metro	Los Angeles County Metropolitan Transportation Authority
MSE	mechanically stabilized earth
MSF	Maintenance and Storage Facility
MUTCD	Manual of Uniform Traffic Control Devices
NAHC	Native American Heritage Commission
NPS	National Park Service

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NRHP	National Register of Historic Places
OCS	overhead catenary system
PHI	Points of Historical Interest
PRC	Public Resources Code
Project	Eastside Transit Corridor Phase 2 Project
ROW	right-of-way
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SLF	Sacred Lands File
SR	State Route
TBM	tunnel boring machine
TCP	Traditional Cultural Property
TCR	Tribal Cultural Resources
TPSS	traction power substation
USGS	United States Geological Survey

## 1.0 INTRODUCTION

This impacts report discusses the Eastside Transit Corridor Phase 2 Project (Project) setting in relation to tribal cultural resources (TCRs). It describes existing conditions, the current regulatory setting, and potential impacts from operation and construction of the Build Alternatives, including design options and MSF site options, and the No Project Alternative. This study was conducted in compliance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines, California Code of Regulations Section 15000 et seq.

The Project would extend the Los Angeles County Metropolitan Transportation Authority (Metro) L (Gold) Line, a light rail transit (LRT) line, from its current terminus at the Atlantic Station in the unincorporated community of East Los Angeles to the city of Whittier. It would extend the existing Metro L (Gold) Line approximately 3.2 to 9.0 miles, depending on the Build Alternative.

The Project area of analysis includes a general study area (GSA) that is regional in scope and scale, and a detailed study area (DSA) that encompasses an approximately two-mile area from the Project alignment in eastern Los Angeles County. Additionally, specialized study areas were developed for certain environmental impact categories where the potential impacts would occur within an area that varies from the GSA or DSA. All specialized study areas are contained within the GSA. For the purpose of analyzing potential impacts to TCRs, the specialized study area is the area of direct impacts (ADI). The ADI is the three-dimensional limit of proposed ground disturbance, including temporary ground disturbance. The ADI's geographic limits encompass the extent and depth of all proposed ground disturbance and spans approximately 292 acres. The ADI includes the LRT right-of-way (ROW) and any areas of direct ground disturbance during project construction, including staging areas.

A diverse mix of land uses are located within the GSA and DSA, including single- and multi-family residences, commercial and retail uses, industrial development, parks and recreational, health and medical uses, educational institutions, and vacant land. The Project would traverse densely populated, low-income, and heavily transit-dependent communities with major activity centers within the Gateway Cities subregion of Los Angeles County.

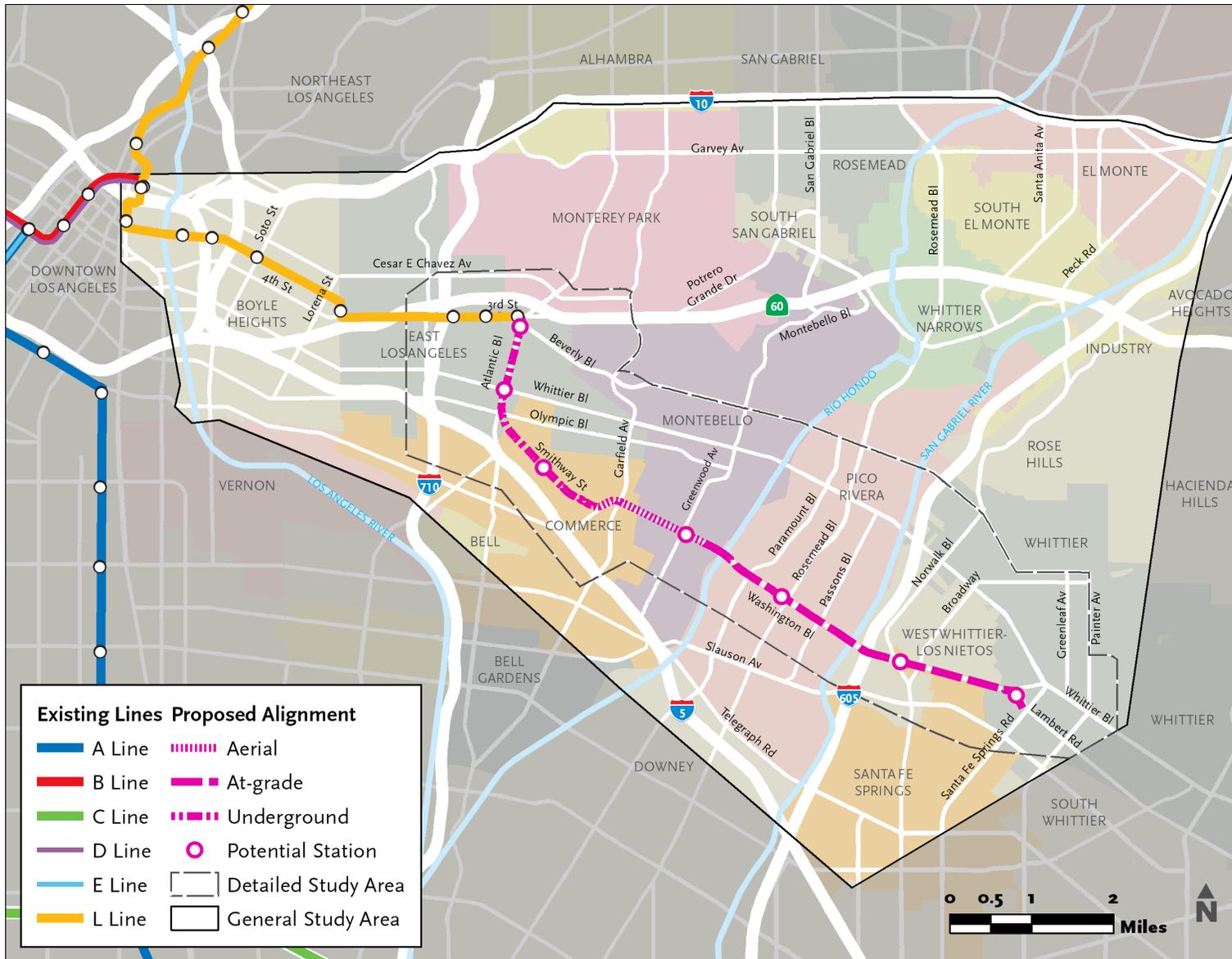
## 2.0 PROPOSED PROJECT AND ALTERNATIVES

### 2.1 Project Setting and Description

This impacts report evaluates potential environmental impacts of three Build Alternatives and a No Project Alternative. The Build Alternatives are: Alternative 1 Washington (Alternative 1), Alternative 2 Atlantic to Commerce/Citadel Initial Operating Segment (IOS) (Alternative 2), and Alternative 3 Atlantic to Greenwood IOS (Alternative 3).

For purposes of describing the Project, two study areas have been defined. The GSA is regional in scope and scale, whereas the DSA encompasses an approximately two-mile area from the Project alignment's centerline. The GSA is the same for all three of the Build Alternatives. The purpose of the GSA is to establish the study area for environmental resources that are regional in scope and scale, such as regional transportation, including vehicle miles traveled (VMT) and regional travel demands, population, housing, or employment. The GSA consists of several jurisdictions within Los Angeles County including the cities of Bell, Commerce, El Monte, Industry, Los Angeles, Montebello, Monterey Park, Pico Rivera, Rosemead, South El Monte, Santa Fe Springs, Whittier, unincorporated areas of Los Angeles County, which includes East Los Angeles and West Whittier-Los Nietos, and other cities within the San Gabriel Valley. It is generally bounded by Interstate (I) 10 to the north, Peck Road in South El Monte and Lambert Road in Whittier to the east, I-5 and Washington Boulevard to the south, and I-710 to the west. **Figure 2.1**, **Figure 2.2**, and **Figure 2.3** present the boundaries of the GSA for each of the three Build Alternatives.

The DSA establishes a study area to evaluate environmental resources that are more sensitive to the physical location of the Build Alternatives. The DSA for Alternative 1 Washington generally includes the area within a half-mile to two-mile distance from the guideway centerline, as shown in **Figure 2.1**. It encompasses five cities, Commerce, Montebello, Pico Rivera, Santa Fe Springs, and Whittier, and communities of unincorporated East Los Angeles and Whittier-Los Nietos. The DSA for Alternative 2 Atlantic to Commerce/Citadel IOS and Alternative 3 Atlantic to Greenwood IOS, does not extend as far to the east. As shown in **Figure 2.2** and **Figure 2.3** for Alternative 2 and Alternative 3 respectively, the DSA extends to the Rio Hondo and includes Commerce, Montebello, and unincorporated East Los Angeles.



Source: Metro; CDM Smith/AECOM JV, 2021.

Figure 2.1. Alternative 1 Washington GSA and DSA



Source: Metro; CDM Smith/AECOM JV, 2021.

Figure 2.2. Alternative 2 Atlantic to Commerce/Citadel IOS GSA and DSA



Source: Metro; CDM Smith/AECOM JV, 2021.

Figure 2.3. Alternative 3 Atlantic to Greenwood IOS GSA and DSA

## 2.2 Build Alternatives

This impacts report evaluates the potential environmental impacts of three Build Alternatives which have the same guideway alignment east of the existing terminus at Atlantic Station but vary in length. Alternative 1 has the longest alignment at approximately 9.0 miles with seven stations (one relocated/reconfigured and six new), two maintenance and storage facility (MSF) site options and would terminate at Lambert station on Lambert Road in the city of Whittier. Alternative 2 is approximately 3.2 miles in length with three stations, one MSF site option, and would terminate at the Commerce/Citadel station in the city of Commerce, with non-revenue lead tracks extending further into the city of Commerce to connect to the Commerce MSF site option. Alternative 3 is approximately 4.6 miles in length with four stations, two MSF site options, and would terminate at Greenwood station in the city of Montebello.

There are also design options under consideration for each of the three Build Alternatives that consist of a variation in the design of the relocated/reconfigured Atlantic Station (applicable to Alternatives 1, 2, and 3) and a variation in the station and alignment profile in Montebello (applicable to Alternatives 1 and 3). Construction and operation of one or both design options are considered and evaluated for Alternative 1 and Alternative 3.

To differentiate the impacts evaluation of a Build Alternative with or without the design option(s) incorporated, a Build Alternative without the design option(s) is referred to as the “base Alternative” (i.e., base Alternative 1). A Build Alternative with a design option incorporated is referred to by using the design option name (e.g., Alternative 1 with the Atlantic/Pomona Station Option and/or the Montebello At-Grade Option). The three Build Alternatives and the design options are described in greater detail below.

### 2.2.1 Alternative 1 Washington

Alternative 1 would extend the Metro L (Gold) Line LRT approximately 9.0 miles east from the current at-grade station at Atlantic Boulevard to an at-grade terminus at Washington Boulevard/Lambert Road in the city of Whittier. This alternative would include a relocated/reconfigured Atlantic station in an underground configuration and six new stations: Atlantic/Whittier (underground), Commerce/Citadel (underground), Greenwood (aerial), Rosemead (at-grade), Norwalk (at-grade), and Lambert (at-grade). The base Alternative 1 alignment would transition from the existing at-grade alignment to an underground configuration and would transition to an aerial configuration in the city of Commerce before transitioning to at-grade at Montebello Boulevard. The alignment includes approximately 3.0 miles of tunnel, 1.5 miles of aerial, and 4.5 miles of at-grade alignment.

The Alternative 1 alignment crosses the Rio Hondo and San Gabriel River and the Rio Hondo Spreading Grounds. The existing San Gabriel River and Rio Hondo bridges would be replaced with new bridges designed to carry both the LRT facility and the four-lane roadway.

An MSF and other ancillary facilities would also be constructed as part of the Project, including overhead catenary system (OCS), cross passages, ventilation structures, traction power substation (TPSS) sites, crossovers, emergency generators, radio tower poles and equipment shelters, and other supporting facilities along the alignment.

Two design options for Alternative 1 are described below.

### 2.2.1.1 Guideway Alignment

Under Alternative 1, the guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3<sup>rd</sup> Street. The guideway would turn south and run beneath Atlantic Boulevard to approximately Verona Street and Olympic Boulevard. The underground guideway would then curve southeast, running under Smithway Street near the Citadel Outlets in the city of Commerce. After crossing Saybrook Avenue, the guideway would daylight from underground to an aerial configuration. Depending on the MSF site option that is selected, the aerial guideway would continue parallel to Washington Boulevard, east of Garfield Avenue, and merge into the center median of Washington Boulevard (Commerce MSF site option) or merge into the center median of Washington Boulevard at Gayhart Street (Montebello MSF site option). The alignment would maintain an aerial configuration then transition to an at-grade configuration east of Carob Way and would remain at-grade in the center of Washington Boulevard. The at-grade alignment would terminate at Lambert station in the city of Whittier.

#### 2.2.1.1.1 Design Options

The following design options are being considered for Alternative 1:

**Atlantic/Pomona Station Option** – The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to a shallow open air underground station with two side platforms and a canopy (**Figure 2.4**). This station design option would be located beneath the existing triangular parcel bounded by Atlantic Boulevard, Pomona Boulevard, and Beverly Boulevard. The excavation depth of the station invert would be approximately 20 to 25 feet from the existing ground elevation.

This option would also impact the guideway alignment and location of the tunnel boring machine (TBM) extraction pit. The underground guideway would be located east of Atlantic Boulevard and require full property acquisitions at its footprint between Beverly Boulevard and 4<sup>th</sup> Street. The alignment would connect with the base Alternative 2 alignment just north of the proposed Atlantic/Whittier station. The TBM extraction pit would be east of Atlantic Boulevard between Repetto Street and 4<sup>th</sup> Street. Limits for the excavation would occur between the TBM extraction pit and the intersection of Pomona Boulevard and Beverly Boulevard.

**Montebello At-Grade Option** – This design option consists of approximately one mile of at-grade guideway along Washington Boulevard between Yates Avenue and Carob Way in the city of Montebello. In this design option, after crossing Saybrook Avenue, the LRT guideway would daylight from underground to an aerial configuration to avoid disrupting existing Burlington Northern Santa Fe (BNSF) Railway tracks. The aerial guideway would continue parallel to Washington Boulevard, then merge into the center median east of Garfield Avenue. At Yates Avenue, the guideway would transition from aerial to an at-grade configuration and remain at-grade until terminating near Lambert Road in the city of Whittier. This design option includes an at-grade Greenwood station located west of Greenwood Avenue. The lead tracks to the MSF site option would also be at-grade. Alternative 1 with the Montebello At-Grade Option would have approximately 3.0 miles of underground, 0.5 miles of aerial, and 5.5 miles of at-grade alignment.



Source: Metro; ACE Team, January 2022.

**Figure 2.4. Atlantic/Pomona Station Option**

## 2.2.2 Alternative 2 Atlantic to Commerce/Citadel IOS

Alternative 2 would extend the Metro L (Gold) Line approximately 3.2 miles from the current terminus at Atlantic Boulevard to an underground terminal station at the Commerce/Citadel station in the city of Commerce with lead tracks connecting to the Commerce MSF site option. Alternative 2 would include a relocated/reconfigured Atlantic station and two new stations: Atlantic/Whittier (underground), and Commerce/Citadel (underground). The base Alternative 2 alignment includes approximately 3.0 miles of underground, 0.1 miles of aerial, and 0.1 miles of at-grade alignment.

An MSF and other ancillary facilities would also be constructed as part of the Project, including OCS, tracks, cross passages, ventilation structures, TPSSs, track crossovers, emergency generators, radio tower poles and equipment shelters, and other facilities along the alignment.

### 2.2.2.1 Guideway Alignment

Under Alternative 2, the guideway would follow the same alignment as under Alternative 1. The guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3<sup>rd</sup> Street. The guideway would turn south and run beneath Atlantic Boulevard to approximately Verona Street and Olympic Boulevard. The underground guideway would then curve southeast, running under Smithway Street near the Citadel Outlets in the city of Commerce. The alignment would terminate at the Commerce/Citadel station with non-revenue lead tracks connecting to the Commerce MSF site option.

#### 2.2.2.1.1 Design Option

One design option, the Atlantic/Pomona Station Option described in **Section 2.2.1.1.1** and shown on **Figure 2.4** is being considered for Alternative 2.

## 2.2.3 Alternative 3 Atlantic to Greenwood IOS

Alternative 3 would extend the Metro L (Gold) Line approximately 4.6 miles east from the current terminus at Atlantic Boulevard to an aerial terminal station at the Greenwood station in the city of Montebello. This alternative would include a relocated/reconfigured Atlantic station and three new stations: Atlantic/Whittier (underground), Commerce/Citadel (underground), and Greenwood (aerial). The base Alternative 3 alignment includes approximately 3.0 miles of underground, 1.5 miles of aerial, and 0.1 miles of at-grade alignment.

An MSF and other ancillary facilities would also be constructed as part of the Project, including OCS, tracks, cross passages, ventilation structures, TPSSs, track crossovers, emergency generators, radio tower poles and equipment shelters, and other facilities along the alignment.

Two design options for Alternative 3 are described below.

### 2.2.3.1 Guideway Alignment

Under Alternative 3, the guideway would follow the same alignment as under Alternative 1. The guideway would begin at the eastern end of the existing East Los Angeles Civic Center Station, transitioning from at-grade to underground at the intersection of South La Verne Avenue and East 3<sup>rd</sup> Street. The guideway would then turn south and run beneath Atlantic Boulevard to approximately Verona Street and Olympic Boulevard. The underground guideway would then curve southeast, running under Smithway Street near the Citadel Outlets in the city of Commerce. After crossing Saybrook Avenue, the guideway would daylight from underground to an aerial configuration. Depending on the MSF site option that is selected, the aerial guideway would continue parallel to Washington Boulevard, east of Garfield Avenue, and merge into the center median of Washington Boulevard (Commerce MSF site option) or merge into the center media of Washington Boulevard at Gayhart Street (Montebello MSF site option). The aerial guideway would terminate at the Greenwood station in the city of Montebello.

#### 2.2.3.1.1 Design Option

Two design options described in **Section 2.2.1.1.1**, the Atlantic/Pomona Station Option and the Montebello At-Grade Option are being considered for Alternative 3. Alternative 3 with the Montebello At-Grade Option would have approximately 3.0 miles of underground, 0.5 miles of aerial, and 1.1 miles of at-grade alignment.

## 2.3 Maintenance and Storage Facilities

The Project has two MSF site options: the Commerce MSF site option and the Montebello MSF site option. One MSF site option would be constructed. The MSF would provide equipment and facilities to clean, maintain, and repair rail cars, vehicles, tracks, and other components of the system. The MSF would enable storage of light rail vehicles (LRVs) that are not in service and would connect to the mainline with one lead track. The MSF would also provide office space for Metro rail operation staff, administrative staff, and communications support staff. The MSF would be the primary physical employment centers for rail operation employees, including train operators, maintenance workers, supervisors, administrative, security personnel and other roles.

The Commerce MSF site option is located in the city of Commerce, and the Montebello MSF site option is located in the city of Montebello. The Commerce MSF site option is located where it could support any of the three Build Alternatives. The Montebello MSF site option is located where it could support either Alternative 1 or Alternative 3.

### 2.3.1 Commerce MSF

The Commerce MSF site option is located in the city of Commerce, west of Washington Boulevard and north of Gayhart Street. The site is approximately 24 acres and is bounded by Davie Avenue to the east, Fleet Street to the north, Saybrook Avenue to the west, and an unnamed street to the south. Additional acreage would be needed to accommodate the lead track and construction staging. As shown in a dashed line on **Figure 2.5**, the guideway alignment with the Commerce MSF site option would daylight from an underground to aerial configuration west of the intersection of Gayhart Street

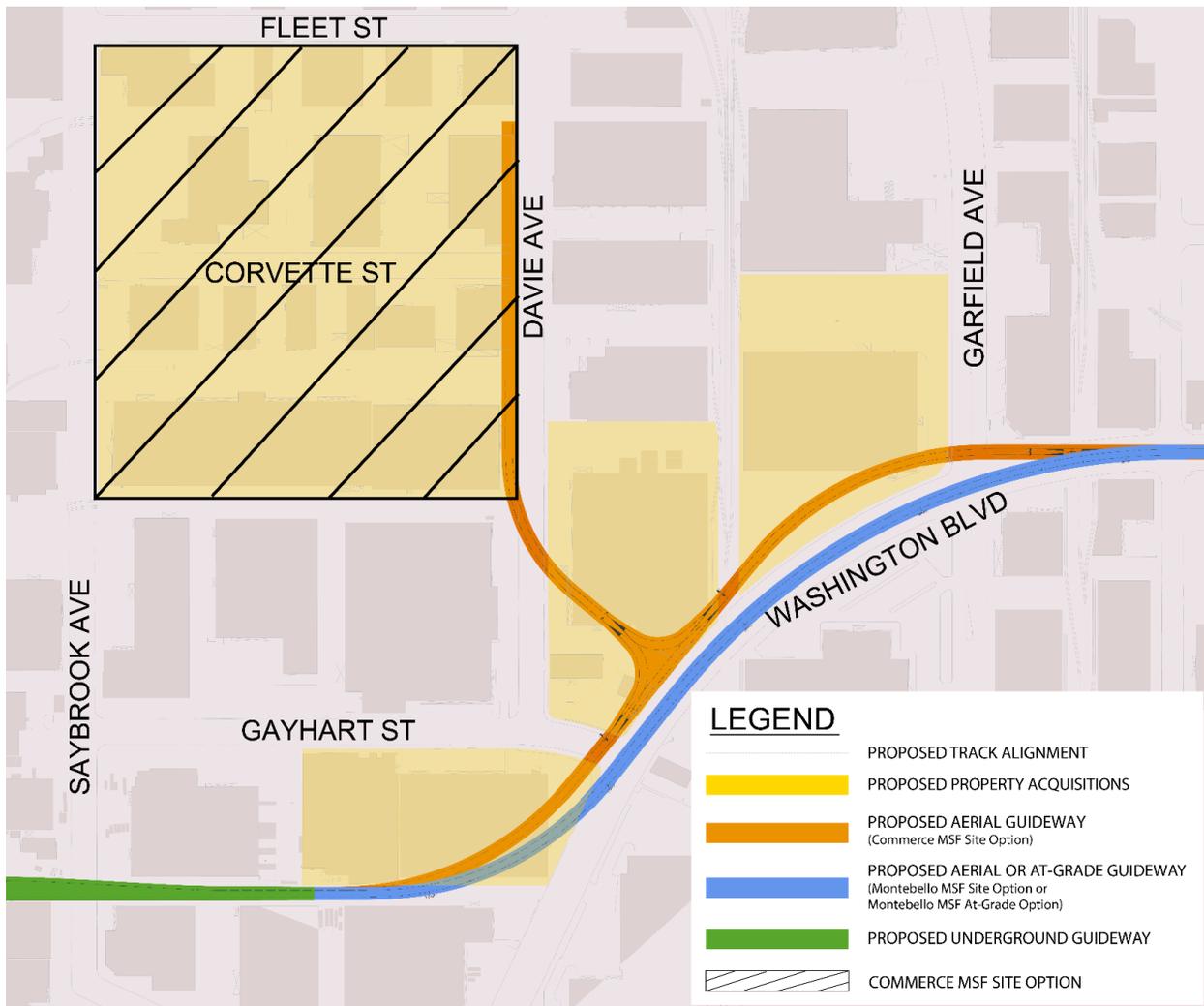
and Washington Boulevard and would run parallel to Washington Boulevard from Gayhart Street to Yates Avenue. The lead tracks to the Commerce MSF site option would be located northeast of the intersection of Gayhart Street and Washington Boulevard and extend in an aerial configuration and then would transition to at-grade within the MSF after crossing Davie Avenue. To construct and operate the Commerce MSF site option, Corvette Street would be permanently closed between Saybrook Avenue and Davie Avenue. Corvette Street is an undivided two-lane road and is functionally classified as a local street under the California Road System. The facility would accommodate storage for approximately 100 LRVs.

### 2.3.2 Montebello MSF

The Montebello MSF site option is located in the city of Montebello, north of Washington Boulevard and south of Flotilla Street between Yates Avenue and S. Vail Avenue. The site is approximately 30 acres in size and is bounded by S. Vail Avenue to the east, a warehouse structure along the south side of Flotilla Street to the north, Yates Avenue to the west, and a warehouse rail line to the south. Additional acreage would be needed to accommodate the lead track and construction staging. As shown on in a solid line on **Figure 2.5**, as with the Commerce MSF site option, the guideway alignment with the Montebello MSF site option would daylight from an underground to an aerial configuration west of intersection of Gayhart Street and Washington Boulevard. The alignment would be located further east than the alignment with the Commerce MSF site option. The aerial guideway for the Montebello MSF site option would transition to the median of Washington Boulevard at Gayhart Street. Columns that would provide structural support for the aerial guideway would be installed in the median of Washington Boulevard and would require roadway reconfiguration and striping on Washington Boulevard.

The lead tracks would be in an aerial configuration from Washington Boulevard, parallel S. Vail Avenue, and then transition to at-grade as it approaches the MSF. The facility would accommodate storage for approximately 120 LRVs.

The Montebello MSF At-Grade Option includes an at-grade configuration for the lead tracks to the Montebello MSF. This design option would be necessary if the Montebello At-Grade Option is selected under Alternative 1 or Alternative 3. In this design option, the lead tracks would be in an at-grade configuration from Washington Boulevard, paralleling S. Vail Avenue and remain at-grade to connect to the Montebello MSF site option. For this design option, through access on Acco Street to Vail Avenue would be eliminated and cul-de-sacs would be provided on each side of the lead tracks to ensure that access to businesses in this area is maintained. Acco Street is an undivided two-lane road and is functionally classified as a local street under the California Road System.



Source: Metro; ACE Team, January 2022.

**Figure 2.5. Montebello MSF S-Curve Alignment**

## 2.4 Ancillary Facilities

The Build Alternatives would require a number of additional elements to support vehicle operations, including but not limited to the OCS, tracks, crossovers, cross passages, ventilation structures, TPSS, train control houses, electric power switches and auxiliary power rooms, communications rooms, radio tower poles and equipment shelters, and an MSF. Alternatives 1, 2, and 3 would have an underground alignment of approximately 3 miles in length between La Verne and Saybrook Avenue. Per Metro’s Fire Life Safety Criteria, ventilation shafts and emergency fire exits would be installed along the tunnel portion of the alignment. These would be located at the underground stations or public right-of-way (ROW). The alignment for Alternative 1 and Alternative 3 would travel along the median of the roadway for most of the route. The precise location of ancillary facilities would be determined in a subsequent design phase.

## 2.5 Proposed Stations

The following stations would be constructed under Alternative 1:

- Atlantic (Relocated/Reconfigured) – The existing Atlantic Station would be relocated and reconfigured to an underground center platform station located beneath Atlantic Boulevard south of Beverly Boulevard in East Los Angeles. The existing parking structure located north of the 3<sup>rd</sup> Street and Atlantic Boulevard intersection would continue to serve this station.
  - Atlantic Pomona Station Option – The Atlantic/Pomona Station Option would relocate the existing Atlantic Station to a shallow underground open-air station with two side platforms and a canopy. This station design option would be located beneath the existing triangular parcel bounded by Atlantic Boulevard, Pomona Boulevard, and Beverly Boulevard. The existing parking structure located north of the 3<sup>rd</sup> Street and Atlantic Boulevard intersection would continue to serve this station.
- Atlantic/Whittier – This station would be underground with a center platform located beneath the intersection of Atlantic and Whittier Boulevards in East Los Angeles. Parking would not be provided at this station.
- Commerce/Citadel – This station would be underground with a center platform located beneath Smithway Street near the Citadel Outlets in the city of Commerce. Parking would not be provided at this station.
- Greenwood – This station would be aerial with a side platform located in the median of Washington Boulevard east of Greenwood Avenue in the city of Montebello. This station would provide a surface parking facility near the intersection of Greenwood Avenue and Washington Boulevard.
  - Under the Montebello At-Grade Option, Greenwood station would be an at-grade station located west of the intersection at Greenwood and Washington Boulevard.
- Rosemead – This station would be at-grade with a center platform located in the center of Washington Boulevard west of Rosemead Boulevard in the city of Pico Rivera. This station would provide a surface parking facility near the intersection of Rosemead and Washington Boulevards.
- Norwalk – This station would be at-grade with a center platform located in the median of Washington Boulevard east of Norwalk Boulevard in the city of Santa Fe Springs. This station would provide a surface parking facility near the intersection of Norwalk and Washington Boulevards.
- Lambert – This station would be at-grade with a center platform located south of Washington Boulevard just west of Lambert Road in the city of Whittier. This station would provide a surface parking facility near the intersection of Lambert Road and Washington Boulevard.

Alternative 2 would include Atlantic (Relocated/Reconfigured), Atlantic/Whittier, and Commerce/Citadel stations as described above.

Alternative 3 would include Atlantic (Relocated/Reconfigured), Atlantic/Whittier, Commerce/Citadel, and Greenwood stations as described above.

Station amenities would include items in the Metro Systemwide Station Standards Policy (Metro 2018) such as station pin signs, security cameras, bus shelters, benches, emergency/information telephones, stairs, map cases, fare collection, pedestrian and street lighting, hand railing, station landscaping, trash receptacles, bike racks and lockers, emergency generators, power boxes, fire hydrants, and artwork. Escalators and elevators would be located in aerial and underground stations. Station entry portals would be implemented at underground stations. Station access would be ADA-compliant and also have bicycle and pedestrian connections. Details regarding most of these items, including station area planning and urban design, would be determined at a later phase.

## 2.6 Description of Construction

Construction of the Project would include a combination of elements dependent upon the locally preferred alternative. The major construction activities include guideway construction (at-grade, aerial, underground); decking and tunnel boring for the underground guideway; station construction; demolition; utility relocation and installation work; street improvements including sidewalk reconstruction and traffic signal installation; retaining walls; LRT operating systems installation including TPSS and OCS; parking facilities; an MSF; and construction of other ancillary facilities. Alternative 1 would include construction of bridge replacements over the San Gabriel and Rio Hondo Rivers.

In addition to adhering to regulatory compliance, the development of the Project would employ conventional construction methods, techniques, and equipment. All work for development of the LRT system would conform to accepted industry specifications and standards, including Best Management Practices (BMP). Project engineering and construction would, at minimum, be completed in conformance with the regulations, guidelines, and criteria, including, but not limited to, Metro Rail Design Criteria (MRDC) (Metro 2018), California Building Code, Metro Operating Rules, and Metro Sustainability Principles.

The construction of the Project is expected to last approximately 60 to 84 months. Construction activities would shift along the corridor so that overall construction activities should be relatively short in duration at any one point. Most construction activities would occur during daytime hours. For specialized construction tasks, it may be necessary to work during nighttime hours to minimize traffic disruptions. Traffic control and pedestrian control during construction would follow local jurisdiction guidelines and the Manual of Uniform Traffic Control Devices (MUTCD) standards. Typical roadway construction traffic control methods and devices would be followed including the use of signage, roadway markings, flagging, and barricades to regulate, warn, or guide road users. Properties adjacent to the Project's alignment would be used for construction staging. The laydown and storage areas for construction equipment and materials would be established in the vicinity of the Project within parking facilities, and/or on parcels that would be acquired for the proposed stations and MSF site options. Construction staging areas would be used to store building materials, construction equipment, assemble the TBM, temporary storage of excavated materials, and serve as temporary field offices for the contractor.

## 2.7 Description of Operations

The operating hours and schedules for Alternatives 1, 2, and 3 would be comparable to the weekday, Saturday and Sunday, and holiday schedules for the Metro L (Gold) Line (effective 2019). It is anticipated that trains would operate every day from 4:00 am to 1:30 am. On weekdays, trains would operate approximately every 5 to 10 minutes during peak hours, every 10 minutes mid-day and until 8:00 pm, and every 15 minutes in the early morning and after 8:00 pm. On weekends, trains would operate every 10 minutes from 9:00 am to 6:30 pm, every 15 minutes from 7:00 am to 9:00 am and from 6:30 pm to 7:30 pm, and every 20 minutes before 7:00 am and after 7:30 pm. These operational headways are consistent with Metro design requirements for future rail services.

## 2.8 No Project Alternative

The No Project Alternative establishes impacts that would reasonably be expected to occur in the foreseeable future if the Project were not approved. The No Project Alternative would maintain existing transit service through the year 2042. No new transportation infrastructure would be built within the GSA aside from projects currently under construction or funded for construction and operation by 2042 via the 2008 Measure R or 2016 Measure M sales taxes. The No Project Alternative would include highway and transit projects identified for funding in Metro's 2020 Long Range Transportation Plan (LRTP) and Southern California Association of Governments (SCAG) *Connect SoCal 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy* (2020 RTP/SCS). The No Project Alternative includes existing projects from the regional base year (2019) and planned regional projects in operation in the horizon year (2042).

## 3.0 REGULATORY FRAMEWORK

TCRs are a specific set of resources defined by the State of California. They include Native American historic, cultural, and sacred sites, as well as sites, features, places, objects, and landscapes that have cultural value to California Native American tribes. Although federal law offers certain protections to resources of Native American origin and value, TCRs are specifically defined and protected by the State of California.

### 3.1 Federal

#### 3.1.1 National Historic Preservation Act

The National Historic Preservation Act established the National Register of Historic Places (NRHP) as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment." The NRHP recognizes properties that are significant at the national, state, and/or local levels.

Resources that may be eligible for listing in the NRHP include districts, sites, buildings, structures, and objects that are at least 50 years old and are significant in American history, prehistory, architecture, archaeology, engineering, and/or culture.

To be eligible for listing in the NRHP, the resource must meet one of the NRHP Criteria for Evaluation (A–D) (36 CFR 60.4), as follows:

- A property is associated with events that have made a significant contribution to the broad patterns of our history; or
- A property is associated with the lives of a person or persons significant in our past; or
- A property embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction; or
- A property has yielded, or may be likely to yield, information important in prehistory or history.

In addition, historic properties must possess integrity of location, design, setting, material, workmanship, feeling, and association.

Resources younger than 50 years may be eligible if they have exceptional importance and meet Criteria Consideration G, as described in Bulletin No. 22 from the National Park Service (NPS), "How to Evaluate and Nominate Potential National Register Properties that have Achieved Significance Within the Last 50 Years" (NPS 1979). Other types of resources that are typically not eligible for the NRHP, including religious properties, moved properties, birthplaces or graves, cemeteries, reconstructed

properties, and commemorative properties, may be eligible under other specific NRHP criteria considerations.

### 3.1.1.1 Traditional Cultural Properties

Traditional Cultural Properties is one class of resources that is eligible for inclusion in the NRHP. A Traditional Cultural Property (TCP) is a property that is eligible for inclusion in the NRHP based on its associations with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. TCPs are often, but not always, places of importance to Native American tribes.

## 3.2 State

### 3.2.1 California Historic Landmarks

California Landmarks were first commemorated privately by the Landmarks Club under the leadership of Charles Lummis beginning in 1895. In 1931, state law first required the Director of the Department of Natural Resources "to register and mark buildings of historical interest or landmarks" known as California Historical Landmarks (CHLs). In 1962, the State first established listing criteria, which were added to in 1970.

To be eligible for designation as a Landmark, a resource must meet at least one of the following criteria:

- The resource must be the first, last, only, or most significant of its type in the state or within a large geographical region (Northern, Central, or Southern California).
- Associate with an individual or group having a profound influence on the history of California.
- A prototype of, or an outstanding example of a period, style, architectural movement or construction, or is one of the more notable works or the best surviving work in a region of a pioneer architect, designer or master builder.

Legislation passed in 1974 introduced new criteria to the designation of CHLs. This new legislation did not revoke the status of any existing CHLs, but did correlate the creation of CHLs with the new California Register of Historical Resources (CRHR), described in detail below. CHL No. 770 and above are automatically listed on the CRHR. Any CHLs listed prior to No. 770 must be reevaluated according to current criteria if it is to be considered for listing in the CRHR.

### 3.2.2 California Environmental Quality Act

The CEQA Guidelines require the evaluation of potential impacts to "historical resources" that are defined as resources listed in or eligible for listing in the CRHR. Under California Public Resources Code (PRC) Section 5024.1, the CRHR was established to serve as an authoritative guide to the state's significant historical and archaeological resources. The CRHR consists of historical resources that are (a) listed automatically; (b) listed following procedures and criteria adopted by the State Historical

Resources Commission; and/or (c) nominated by an application and listed after a public hearing process. The criteria for listing historical resources in the CRHR are consistent with those developed by the NPS for listing in the NRHP but have been modified for state use to include a range of historical resources that better reflect the history of California.

A historical resource is significant at the local, state, or national level under one or more of the following four criteria (1–4):

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

Historical resources must also possess integrity, the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance, and retain enough of this historic character or appearance to be recognizable as a historical resource and to convey the reasons for this significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association.

In addition to historic properties listed in or eligible for listing based on the criteria for listing in the NRHP that are automatically considered historical resources under CEQA, the CRHR includes designated California Historic Landmarks, California Points of Historical Interest (PHI), and certain locally identified historic resources. Resources that are listed or eligible for listing in the CRHR are automatically considered historical resources under CEQA. CEQA also requires that mitigation measures to reduce or avoid impacts to historical resources be incorporated into a project, and that a range of alternatives be considered that could substantially lessen significant impacts to historical resources.

### **3.2.3 California Native American Historical, Cultural, and Sacred Sites Act**

The California Native American Historical, Cultural, and Sacred Sites Act applies to both state and private lands. This law requires that if human remains are discovered, construction or excavation activity must cease, and the county coroner must be notified. If the remains are of a Native American, the coroner must notify the California Native American Heritage Commission (NAHC). The NAHC then notifies those persons most likely to be descended from the Native American whose remains were discovered. The California Native American Historical, Cultural, and Sacred Sites Act stipulates the procedures the descendants may follow for treating or disposing of the remains and associated grave goods.

## 3.2.4 Assembly Bill 52

Assembly Bill (AB) 52, signed by Governor Edmund G. Brown Jr. in September 2014, establishes a new class of resources under CEQA: “tribal cultural resources” (or TCRs). AB 52 PRC Sections 21080.3.4, 21080.3.2, and 21082.3) states that upon written request by a California Native American Tribe, a CEQA lead agency must begin consultation once it determines that the project application is complete, before the agency issues a notice of preparation of an Environmental Impact Report (EIR) or notice of intent to adopt a negative declaration or mitigated negative declaration. AB 52 also required a revision of State CEQA Guidelines Appendix G, the environmental checklist. This revision created a new category for TCRs.

As defined in PRC Section 21074, to be considered a TCR, a resource must be either:

- Listed or determined to be eligible for listing, on the national, state, or local register of historic resources; or
- A resource that the lead agency determines, in its discretion and supported by substantial evidence, to treat as a TCR pursuant to the criteria in PRC Section 50241(c). PRC Section 5024.1(c) provides that a resource meets criteria for listing as an historic resource in the CRHR if any of the following apply:
  - It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
  - It is associated with the lives of persons important in our past.
  - It 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.
  - It has yielded, or may be likely to yield, information important in prehistory or history.

In applying the criteria set forth in subdivision (c) of Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 explicitly recognizes 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. One of the purposes of AB 52 is to establish a meaningful dialogue between the lead agency and Native American tribes through government-to-government consultation in order to identify and protect TCRs.

The NAHC is the primary state agency responsible for identifying Native American sacred sites and maintains a Sacred Lands File (SLF) to that end. In addition, the NAHC identifies Most Likely Descendants when Native American human remains are discovered anywhere other than a designated cemetery.

## 4.0 METHODOLOGY

This analysis is undertaken to determine if the Build Alternatives may have a significant impact to TCRs, thus requiring the adoption of mitigation measures in accordance with CEQA. The analysis covers all program components that could physically change the environment and potentially result in a physical impact to the environment. Additionally, this section summarizes the consultation conducted in compliance with the Native American notification and consultation efforts performed for compliance with Assembly Bill (AB) 52 and a records search at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System, California State University, Fullerton in 2019. AB 52 consultation efforts resulted in the identification of zero TCRs.

### 4.1 Project Area of Direct Impacts

This analysis follows the methodology of the archaeological study for the Project (see the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report). For the purpose of analyzing potential impacts to TCRs, the specialized study area is the ADI, which consists of the three-dimensional limits of proposed ground disturbance, including temporary ground disturbance. The ADI's geographic limits encompass the extent and depth of all proposed ground disturbance and spans approximately 292 acres. The ADI includes the proposed LRT ROW and any areas of direct ground disturbance during Project construction, including staging areas.

The ADI is documented on a series of maps provided in **Attachment A**.

### 4.2 Identification of Register-Eligible Resources

In accordance with PRC Section 21074, Metro identified resources within the ADI that are listed in, or eligible for listing in, the CRHR or a local register of historical resources. These resources are also eligible for consideration as potential TCRs. Local historical and ethnographic literature was reviewed to establish the prehistoric and ethnohistoric context of the ADI and to identify potentially significant tribal resources.

A records search for the Project was conducted at the SCCIC of the California Historical Resources Information System, California State University, Fullerton in 2010. An updated records search was conducted on October 22 and November 4, 2019. The SCCIC, an affiliate of the California Office of Historic Preservation, is the official state repository of cultural resources records and studies for Los Angeles County. The search included a review of all recorded prehistoric archaeological sites within a 1-mile radius of the Project and a review of all recorded historic archaeological and architectural sites and cultural resource reports on file within a 0.5-mile radius of the Project. In addition, the California PHI, CHL, the CRHR, the NRHP, the California State Historic Resources Inventory, and the City of Whittier Historic Landmarks and Districts were reviewed. Historical United States Geological Survey (USGS) quadrangle maps were also reviewed. Results of the SCCIC records search are provided in Attachment E of the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report.

Additionally, a field survey was conducted of the ADI in order to identify archaeological resources that may also be TCRs, including portable artifacts such as arrowheads; non-portable “features” such as cooking hearths; and residues such as food remains and charcoal.

## 4.3 Identification of Consulting Parties

Metro (lead agency) contacted the NAHC by letter and provided them with a brief project description and a map of the GSA. The NAHC responded to Metro on November 22, 2019 with an AB 52 consultation list of tribes and tribal contacts who are traditionally and culturally affiliated with the Project area. The NAHC also provided the results of the SLF search. The SLF search result was positive for sacred sites and the NAHC requested Metro contact the Gabrieleño Band of Mission Indians – Kizh Nation and the Gabrieleño/Tongva San Gabriel Band of Mission Indians for more information regarding these sites.

On December 3, 2019, a letter was sent to each of the tribes on the AB 52 consultation list. The letter was intended to initiate consultation with the tribes on both the state and federal levels, in order to comply with AB 52 and the terms of Section 106 of the National Historic Preservation Act. Letters describing the GSA and USGS topographic maps were sent on December 3, 2019 to the following Native American representatives, identified by the NAHC as potentially having knowledge of the GSA:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians – Kizh Nation
- Anthony Morales, Chairperson, Gabrieleño/Tongva San Gabriel Band of Mission Indians
- Sandonne Goad, Chairperson, Gabrieleño/Tongva Nation
- Robert Dorame, Chairperson, Gabrieleño Tongva Indians of California Tribal Council
- Charles Alvarez, Gabrieleño-Tongva Tribe

On December 10, 2019, Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians – Kizh Nation, responded and requested consultation. Accordingly, a consultation meeting was held between Chairperson Andrew Salas and Tribal Biologist Matthew Teutimez, representing the Gabrieleño Band of Mission Indians – Kizh Nation, and Project Manager Jenny Cristales-Cevallos, Lauren Cencic, Eva Moir, Michael Tauchen, Marc Beherec, and Jaime Guzman representing Metro, on March 25, 2020. On April 27, 2020, the Gabrieleño Band of Mission Indians – Kizh Nation provided additional information regarding their tribal lineage and ties to the ADI via email.

Correspondence received and meeting minutes may be found in Confidential **Attachment B** (this attachment is not part of the EIR pursuant to PRC § 21082.3(c)(1)). Tribal consultation is ongoing.

## 5.0 THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the State CEQA Guidelines, a Build Alternative would have a significant impact related to TCRs if it would cause a substantial adverse change in the significance of a TCR, defined in PRC 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. Therefore, a Build Alternative would have a significant impact related to TCRs if it would:

**Impact TCR-1: Cause a substantial adverse change in a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).**

**Impact TCR-2: Cause a substantial adverse change in a TCR that is 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

An impact to a TCR would include destruction or partial destruction of the resource or the integrity of the resource which would reduce the resource's cultural significance to a California Native American tribe.

## 6.0 EXISTING SETTING

### 6.1 Tribal Cultural Resources Study Area

At the time of European contact, the Project vicinity was occupied by Shoshonean-speaking Gabrieleño people. The Gabrieleño controlled both the GSA and all of its surroundings, including the Los Angeles Basin and what is now Orange County down to Aliso Creek (Kroeber 1925). The northern San Fernando Valley was the northernmost extent of the territory occupied by people who the Spanish referred to as the Fernadeño, whose name was derived from nearby Mission San Fernando. The Fernadeño spoke one of four regional Uto-Aztecan dialects of Gabrieliño, a Cupan language in the Takic family, and were culturally identical to the Gabrielino. The Tataviam and Chumash, of the Hokan Chumashan language family, lived to the north and west of this territory, respectively, and it is likely that the territorial boundaries between these linguistically distinct groups fluctuated in prehistoric times (Bean and Smith 1978; Shipley 1978).

Occupying what is now the southern Channel Islands and adjacent mainland areas of Los Angeles and Orange Counties, the Gabrieliño are reported to have been second only to their Chumash neighbors in terms of population size, regional influence, and degree of sedentism (Bean and Smith 1978). The Gabrieliño are estimated to have numbered around 5,000 in the pre-contact period (Kroeber 1925). Maps produced by early explorers indicate the existence of at least 40 Gabrielino villages, but as many as 100 may have existed prior to contact with Europeans (Bean and Smith 1978; McCawley 1996; Reid 1939[1852]).

Prehistoric subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, and larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison (Bean and Smith 1978; Reid 1939[1852]). The primary plant resources were the acorn, gathered in the fall and processed with mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly leafed-cherry (Reid 1939[1852]).

European occupation of the project area began with the Spanish arrival in California in 1769. The Spanish governor of California, Gaspar de Portola, launched an expedition from San Diego in a search for suitable sites for missions. Two years later, Franciscan missionaries founded Mission San Gabriel Archangel. Felipe de Neve established the pueblo of Los Angeles north of Mission San Gabriel in the late 18th century. The site had been recommended by a mission father, Juan Crespi, who had accompanied the pioneer expedition of Gaspar de Portola.

Mission San Gabriel was founded in 1771 adjacent to a Gabrieliño village in the vicinity of East Lincoln Avenue and San Gabriel Boulevard near the present-day city of Montebello, a place later known as Mission Viejo. The mission was relocated to its present location about 1774. By the early 1800s, the majority of the surviving Gabrieliño population had entered the mission system. Mission life promised the Native Americans security in a time when their traditional trade and political alliances were failing, and epidemics caused by introduced diseases and subsistence instabilities were increasing (Jackson 1999). This lifestyle change also brought with it significant negative consequences for Gabrieliño health and cultural integrity.

Alta California became a state, with its capital at Monterey, when Mexico won its independence from Spain in 1821. The authority of the California missions gradually declined, culminating with their secularization in 1834. Although the Mexican government directed that each mission's lands, livestock, and equipment be divided among its converts, the majority of these holdings quickly fell into non-indigenous hands. Mission buildings were abandoned and quickly fell into decay. After two generations of dependence on the missions, Native Americans were suddenly disenfranchised. After secularization, "nearly all of the Gabrielinos went north while those of San Diego, San Luis, and San Juan overran this county, filling the Angeles and surrounding ranchos with more servants than were required" (Reid 1977 [1851]:104). As the possibility of a takeover of California by the United States loomed large in the 1840s, the Mexican government increased the number of land grants in an effort to keep the land in Mexican hands, and more than 600 ranchos were created between 1833 and 1846.

The relative harmony between the distant northern province of Alta California and the mother country came to an end with the Mexican-American War in 1846. The DSA contains an important Mexican-American War battle site the Rio San Gabriel Battlefield. This conflict occurred on January 8, 1847, near the site of the present-day intersection of Washington Boulevard and Bluff Road in Montebello, when United States forces defeated Mexican troops.

The Battle of Rio San Gabriel illustrates the increasing complexity of the Native American presence in the Los Angeles area. The Battle of Rio San Gabriel took place at a place "the Californians always called CURUNGA" (Warner et al. 1876:31). The name Curunga ends in a common Gabrielino suffix, -nga, and therefore appears to be a Gabrielino place name. According to H.H. Bancroft, one of the combatants of the battle, Juan Avila, "calls the upper ford Corunga, implying that it was distinct from Bartolo" (Bancroft 1902:391, n. 10), Bartolo being another ford. But it is unclear whether the name is merely a toponym, such as the name of the ford or the ridge where the battle took place, or if the name is that of a village that once stood on the riverbank. During the Mexican-American War, Delawares from the eastern seaboard of the United States fought on the American side in Southern California and may have been at the battle. Meanwhile, in addition to the Californios, many of whom were of Native American ancestry, a Yaqui named Ignacio "El Guaimeno" fought on the Mexican side. Ignacio had been brought to Los Angeles as a slave by a Scotch immigrant and would be one of the few fatalities of the Battle of La Mesa the following day (Warner et al. 1876:31). Of the three tribes, the Delaware, Yaqui, and Gabrielino, only the Gabrielino are a California Native American tribe by statute, as they are the only tribe considered to have an ancestral tie to California.

The material fortunes of the Gabrielino continued to decline after the American invasion. Both Spanish and Mexican land laws allowed the local Native American populations to continue to live on the ranchos; indeed, the rancheros were reliant upon Native American labor. American land law, however, gave sole ownership and the right to sell to landowners. Anyone living on land without legal title was a squatter.

Nevertheless, over the course of the nineteenth and twentieth centuries, the Gabrielino maintained their identity while Gabrielino religion and culture changed. In 1852, Reid notes that the Gabrielino at San Gabriel used a portable temple that was reconsecrated with each use, rather than having permanent temples at each village as they once had (Reid 1968 [1852]). The centers of Gabrielino population—Los Angeles, San Gabriel, and San Fernando—remained the centers of ritual and culture. One of the most important rituals of Gabrielino religion, the annual mourning ceremony, is documented at both San Fernando and Los Angeles in the last quarter of the nineteenth century (Phillips 2010). Anthropologist C. Hart Merriam documented a morning ritual among Gabrielino who relocated to Tejon that took place in the twentieth century (Merriam 1955).

The Mission Indian Federation and its fight to obtain compensation from the United States Government for lands seized from Native Americans was an important force in maintaining Native American identity in California in the early twentieth century. The prospect of financial compensation and the sense of community fostered by the group led individuals to trace their family trees and rediscover their tribal identities. By the 1940s and 1950s the group that came to be known as the Gabrielino-Tongva Tribal Council (GTTC) began to coalesce; the organization eventually formally incorporated, and Fred “Sparky” Morales was elected its leader (Mozingo 1999). In the 1970s, 1980s, and 1990s, the Gabrielino fought to protect archaeological sites and rebury human remains (Jurmain and McCawley 2009). Various tribal groups broke away from the GTTC over issues such as federal recognition, proposed casino developments, and tribal enrollment requirements and formed their own tribal governments in the 1990s and 2000s. Today multiple Gabrielino tribal governments are recognized by the State of California, each with its own recognized constituents and priorities and each believing itself to represent the ancestral tribe of the Los Angeles Basin.

## 6.2 Identification of Register-Eligible Resources

The full details and results of the background research, records search and survey are documented in the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report. The background research, records search, and survey identified one resource within the ADI that is a listed CHL and appears to be eligible for listing in the CRHR.

### 6.2.1 CHL No. 385: Site of the Battle of Rio San Gabriel

One potential archaeological resource was identified in the ADI. It is a CHL which, as detailed in the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report, appears to be eligible for the CRHR. It is therefore a historical resource for the purposes of CEQA. The resource is the Site of the Battle of Rio San Gabriel. Located at the northeast corner of Bluff Road and Washington Boulevard, on the border of Montebello and Pico Rivera, is the approximate Site of the Battle of Rio San Gabriel, which occurred on January 8, 1847, during the Mexican-American War. The Rio Hondo was then known as the Rio San Gabriel, before the San Gabriel River shifted its banks.

There are two historical documents that indicate that a place with the Native American name “Curunga” existed at the site of the Battle of Rio San Gabriel, and therefore possibly within the ADI. The name Curunga appears to be Gabrielino in origin. However, it is unclear what the word means or what place specifically was Curunga. It is also unclear whether Curunga was all or only part of the battlefield. H.H. Bancroft noted that Juan Avila, a combatant on the Mexican side, “calls the upper ford Corunga, implying that it was distinct from Bartolo” (Bancroft 1902:391, n. 10), Bartolo being the name of another ford along the San Gabriel River at that time. Both witnesses indicate that Curunga was identical to a site known as Pico’s Crossing. The reconfiguration to the landscape that occurred when the San Gabriel River shifted its banks away from what is now the Rio Hondo complicate the identification of the location of either ford. It is unclear whether Curunga is located within the ADI.

Other than the fact that the Battle of Rio San Gabriel took place in the geographical location, there is no evidence of a connection between the battle which gives CHL No. 385 its significance (which appears to make it eligible for listing in the CRHR), and the historical resource termed Curunga. Based on currently available information the site of the Battle of Rio San Gabriel is therefore not a TCR.

## 6.3 Results of Consultation

The NAHC SLF search was positive, and the NAHC identified five Native American tribal governments with ancestral ties to areas within the ADI who may have knowledge of TCRs that may be impacted by the Project. These five tribal governments were invited to consult on the project. One of these, the Gabrieleño Band of Mission Indians – Kizh Nation, represented by Chairperson Andrew Salas and Tribal Biologist Matthew Teutimez, responded to the request for consultation.

Details of tribal consultation are confidential. However, the tribe stressed that the corridor passes through overlapping village territories, as well as within the boundaries of the ranchos for which tribes provided labor. Trade routes crisscrossing the ADI were also identified. In particular, the tribe noted that the vicinity of the river crossings and of a lake that formerly existed near the intersection of I-5 and Washington Boulevard provided natural resources to local Native American villages, thereby increasing the sensitivity of the ADI for TCRs.

The tribe asserted that the negative findings of the records search and survey of the project cultural study are likely because the area was developed before CEQA laws were in place rather than because no resources exist there. No specific resources that may be evaluated as potential TCRs were identified specifically within the ADI as a result of consultation.

The Gabrieleño Band of Mission Indians – Kizh Nation asserted that the entire alignment is sensitive for potential buried TCRs and recommended Native American monitoring for ground-disturbing activities; protocols for the unanticipated discovery and treatment of TCRs, archaeological resources, human remains and/or funerary objects; and professional standards for monitoring personnel.

Correspondence and meeting notes are included in Confidential **Attachment B** (this attachment is not part of the EIR pursuant to PRC § 21082.3(c)(1)).

## 7.0 IMPACTS

### 7.1 Impact TCR-1: Historical Resources

**Impact TCR-1:** Would a Build Alternative cause a substantial adverse change in a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).

#### 7.1.1 Alternative 1 Washington

##### 7.1.1.1 Operational Impacts

Under Alternative 1, there would be no operational impacts to resources listed or eligible for listing in the CRHR or in a local register. One resource listed as a CHL was identified within the Alternative 1 ADI (CHL No. 385). CHL No. 385 is not currently listed on the CRHR. As detailed in the Eastside Transit Corridor Phase 2 Cultural Resources Impacts Report, the resource appears to be eligible for listing. However, the resource is significant as a battlefield of the Mexican-American War, and its significance is not as a TCR. CHL No. 385 is not a TCR because its significance is associated with the Battle of the Rio San Gabriel in 1847 and not any resource of value to Native American tribes. No TCRs were identified within the ADI as a result of the background research, field survey, or tribal consultation. Although unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI, operation of Alternative 1 would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Thus, there would be no impacts on TCRs from operation of Alternative 1.

#### Design Options

##### *Atlantic/Pomona Station Option*

Operation of Alternative 1 with the Atlantic/Pomona Station Option would not affect resources listed or eligible for listing in the CRHR or in a local register differently than the base Alternative 1. As discussed in Alternative 1, no TCRs exist within the Atlantic/Pomona Station Option or the remainder of Alternative 1. One resource listed as a CHL was identified within the ADI. However, the resource is significant as a battlefield of the Mexican-American War, and its significance is not as a TCR. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. Thus, there would be no impacts on TCRs from operation of Alternative 1 with the Atlantic/Pomona Station Option.

### **Montebello At-Grade Option**

If Alternative 1 with the Montebello At-Grade Option were selected, the operational impacts on TCRs would be the same as those described under the base Alternative 1. One resource listed as a CHL was identified within the ADI. However, the resource is significant as a battlefield of the Mexican-American War, and its significance is not as a TCR. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. Thus, there would be no impacts on TCRs from operation of Alternative 1 with the Montebello At-Grade Option.

#### **7.1.1.2 Construction Impacts**

One resource listed as a CHL identified within the ADI is a battlefield of the Mexican-American War, and its significance is not as a TCR. Numerous village locations and trade routes were also identified by the consulting tribe in the vicinity of the ADI, and tribal consultation findings indicate that the entire alignment is sensitive for potential buried unidentified TCRs. Construction related to ground disturbance, including grading, excavation, boring/tunneling, has the potential to disturb and destroy unknown TCRs.

The tunnel boring machine (TBM) would be used in this area that is sensitive for TCRs. The TBM does not allow for discovery of intact archaeological resources because the method of construction limits observation of impacted soils. However, the TBM would only be used at depths containing soils deposited prior to human occupation and, thus, TCRs are not anticipated to be present in areas where the TBM would be used. To launch the TBM, a pit would be dug to a depth of approximately 44 to 48 feet below the current ground surface. The operation of the TBM would occur from approximately 44 to 60 feet below ground surface (bgs). These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project described in the Geology, Soils, Seismicity, and Paleontological Resources Impacts Report (Appendix G), identified fossils in the vicinity at depths that are shallower than the proposed construction method (i.e., 20 to 35 feet bgs) which also indicates a low likelihood for TCRs to occur at depths where tunneling would occur. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

However, ground disturbance, including grading and excavation at lesser depths has the potential to disturb and destroy unknown TCRs. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs.

Although the ADI is heavily disturbed and urbanized, some of the construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 would result in a significant impact.

MM TCR-1, MM TC-2, and MM TCR-3, discussed in **Section 8.1.1**, would be implemented. MM TCR-1 requires all construction personnel involved in ground-disturbing activities to be provided with appropriate TCRs training prior to any ground-disturbing activities. MM TCR-2 requires a Native American monitor to be retained for work at locations identified as sensitive during tribal consultation and agreed upon between the lead agency and the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government. MM TCR-3 requires a project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP) to be developed and implemented by Metro. This document would address areas where potentially significant prehistoric and historic archaeological deposits and TCRs are likely to be located within the ADI based on background research, a geoarchaeological analysis, and Tribal consultation. Implementation of MM TCR-1 through MM TCR-3 would ensure that workers have a clear understanding of TCRs that may be present in the construction area as well as procedures and plans for safely handling TCRs; thus, impacts would be reduced to less than significant. See **Section 8.1.1** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Options

### *Atlantic/Pomona Station Option*

If Alternative 1 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 1. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized above and identified in **Section 8.1.1**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.1** for the proposed mitigation and impacts after incorporation of mitigation.

### *Montebello At-Grade Option*

If Alternative 1 with the Montebello At-Grade Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 1 with an aerial alignment at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would involve construction at a shallow depth. Although excavation for the at-grade option would be relatively shallow, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 with the Montebello At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized above and identified in **Section 8.1.1**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.1** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.1.2 Alternative 2 Atlantic to Citadel IOS

No resources eligible for or listed in a local register or the CRHR were identified within the Alternative 2 ADI.

### 7.1.2.1 Operational Impacts

There would be no operational impacts to resources listed or eligible for listing in the CRHR or in a local register under Alternative 2. No TCRs or any other prehistoric resources or other resources of Native American significance were identified within the ADI as a result of the background research, field survey, or tribal consultation. Although unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI, operation of Alternative 2 would not require additional ground-disturbance that could impact these resources.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Thus, there would be no impacts on TCRs from operation of Alternative 2.

### Design Option

#### *Atlantic/Pomona Station Option*

Operation of Alternative 2 with the Atlantic/Pomona Station Option would not affect resources listed or eligible for listing in the CRHR or in a local register differently than the base Alternative 2. As discussed under the base Alternative 2, no TCRs exist within the Atlantic/Pomona Station Option or the remainder of Alternative 2. Thus, there would be no impacts on TCRs from operation of Alternative 2 with the Atlantic/Pomona Station Option.

### 7.1.2.2 Construction Impacts

Numerous village locations and trade routes were identified in the vicinity of the ADI. The TBM may run through these areas, however the TBM does not allow for discovery of intact archaeological resources because the method of construction limits observation of impacted soils. As discussed in **Section 7.1.1.2**, ground disturbance for this construction method would occur approximately 44 to 60 feet bgs. These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project identified fossils in the vicinity at depths that are shallower than the proposed construction method suggesting a lower likelihood for TCRs to be impacted by TBM. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

Construction related to ground disturbance, including grading and excavation, of Holocene deposits would have the potential to disturb and destroy TCRs that are currently unknown. Tribal consultation

findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. Although the ADI is heavily disturbed and urbanized, some of these activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, potential disturbance of TCRs during construction of Alternative 2 would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.1.2**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.2** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Option

### *Atlantic/Pomona Station Option*

If Alternative 2 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 2. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 2 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.1.2**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.2** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.1.3 Alternative 3 Atlantic to Greenwood IOS

### 7.1.3.1 Operational Impacts

There would be no operational impacts to resources listed or eligible for listing in the CRHR or in a local register by Alternative 3. No TCRs or any other prehistoric resources or other resources of Native American significance were identified within the ADI as a result of the background research, field survey, or tribal consultation. Although unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI, operation of Alternative 3 would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change

to a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Thus, there would be no impacts on TCRs from operation of Alternative 3.

## Design Options

### *Atlantic/Pomona Station Option*

Operation of Alternative 3 with the Atlantic/Pomona Station Option would not affect resources listed or eligible for listing in the CRHR or in a local register differently than the base Alternative 3. As discussed in Alternative 3, no TCRs exist within the Atlantic/Pomona Station Option or the remainder of Alternative 3. Thus, there would be no impacts on TCRs from operation of Alternative 3 with the Atlantic/Pomona Station Option.

### *Montebello At-Grade Option*

If Alternative 3 with the Montebello At-Grade Option were selected, the operational impacts on TCRs would be the same as those described under the base Alternative 3. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. Thus, there would be no impacts on TCRs from operation of Alternative 3 with the Montebello At-Grade Option.

## 7.1.3.2 Construction Impacts

Numerous village locations and trade routes were identified in the vicinity of the ADI. The TBM may run through these areas, however the TBM does not allow for discovery of intact archaeological resources because of the method of construction. As discussed in **Section 7.1.1.2**, ground disturbance for this construction method would occur approximately 44 to 60 feet bgs. These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project identified fossils in the vicinity at depths that are shallower than the proposed construction method suggesting a lower likelihood for TCRs to be impacted by TBM. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

Construction of Alternative 3 would require ground-disturbing activities, including grading and excavation, of Holocene deposits. These activities would have the potential to disturb and destroy TCRs that are currently unknown Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs.

Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No

precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction Alternative 3 would result in a significant impact.

MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and identified in **Section 8.1.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.3** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Options

### *Atlantic/Pomona Station Option*

If Alternative 3 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 3 with a station at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 3 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and identified in **Section 8.1.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.3** for the proposed mitigation and impacts after incorporation of mitigation.

### *Montebello At-Grade Option*

If Alternative 3 with the Montebello At-Grade Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 3 with an aerial alignment at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would be at a shallow depth. Although excavation for the at-grade option would be relatively shallow to the ground disturbance, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 3 with the Montebello At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and identified in **Section 8.1.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.3** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.1.4 Maintenance and Storage Facilities

No resources eligible for or listed in a local register or the CRHR were identified within the footprint of either of the Commerce MSF site option or the Montebello MSF site option.

## 7.1.4.1 Operational Impacts

### 7.1.4.1.1 Commerce MSF

The Commerce MSF site option would not have any operational impacts to resources listed or eligible for listing in the CRHR or in a local register. No TCRs or any other prehistoric resources or other resources of Native American significance were identified within the ADI as a result of the background research, field survey, or tribal consultation. Although unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI, operations would not require additional ground-disturbance.

MSF operations would include cleaning, repair and maintenance activities, storage of LRVs and equipment, and provision of office space for rail operation staff, administrative staff, and communications support staff. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Thus, there would be no impacts on TCRs from operation of the Commerce MSF site option.

### 7.1.4.1.2 Montebello MSF

The Montebello MSF site option would not have any operational impacts to resources listed or eligible for listing in the CRHR or in a local register. No TCRs or any other prehistoric resources or other resources of Native American significance were identified within the ADI as a result of the background research, field survey, or tribal consultation. Although unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI, operations would not require additional ground-disturbance.

MSF operations would include cleaning, repair and maintenance activities, storage of LRVs and equipment, and provision of office space for rail operation staff, administrative staff, and communications support staff. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). Thus, there would be no impacts on TCRs from operation of the Montebello MSF site option.

## Design Options

### *Montebello MSF At-Grade Option*

If the Montebello MSF At-Grade Option were selected, the operational impacts on TCRs would be the same as those described for the Montebello MSF site option with an aerial alignment at this location. Project operations would include repair and maintenance, office work and storage and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. Thus, there would be no impacts on TCRs from operation of the Montebello MSF At-Grade Option.

## 7.1.4.2 Construction Impacts

### 7.1.4.2.1 Commerce MSF

Project excavations have the potential to disturb and destroy TCRs that are currently unknown. Project construction requires large amounts of ground-disturbing activities, including grading and excavation, in Holocene deposits. These activities would have the potential to disturb and destroy TCRs that are currently unknown. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs.

Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of the of the Commerce MSF would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.1.4**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.4** for the proposed mitigation and impacts after incorporation of mitigation.

### 7.1.4.2.2 Montebello MSF

Project excavations have the potential to disturb and destroy TCRs that are currently unknown. Project construction requires large amounts of ground-disturbing activities, including grading and excavation, in Holocene deposits. These activities would have the potential to disturb and destroy TCRs that are currently unknown. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs.

Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of the of the Montebello MSF would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.1.4**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.4** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Option

### *Montebello MSF At-Grade Option*

The Montebello MSF At-Grade Option would introduce an at-grade crossing over Washington Boulevard to enter the Montebello MSF. If the Montebello MSF At-Grade Option were selected, the construction impacts on TCRs would be similar to those described with the base Alternative 3 with an aerial alignment at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would be at a shallow depth. Although excavation for the at-grade option would be relatively shallow, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of the of the Montebello MSF At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.1.4**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.1.4** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.2 Impact TCR-2: Native Tribal Significance

**Impact TCR-2: Would a Build Alternative cause a substantial adverse change in a TCR that is 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

### 7.2.1 Alternative 1 Washington

#### 7.2.1.1 Operational Impacts

Operation of Alternative 1 would not impact resources of tribal significance. No specific surviving resources of tribal significance were identified within the ADI. Consultation did indicate that unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI. However, operations would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of Alternative 1.

## Design Options

### *Atlantic/Pomona Station Option*

Operation of Alternative 1 with the Atlantic/Pomona Station Option would not affect resources listed or eligible for listing in the CRHR or in a local register differently than the base Alternative 1. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Alternative 1 with the Atlantic/Pomona Station Option.

### *Montebello At-Grade Option*

If Alternative 1 with the Montebello At-Grade Option were selected, the operational impacts on TCRs would be the same as those described under the base Alternative 1 with an aerial alignment at this location. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Alternative 1 with the Montebello At-Grade Option.

## 7.2.1.2 Construction Impacts

Numerous village locations and trade routes were identified in the vicinity of the ADI. The TBM may run through these areas, however the TBM does not allow for discovery of intact because of the method of construction. As discussed in **Section 7.1.1.2**, ground disturbance for this construction method would occur 44 to 60 feet bgs. These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project identified fossils in the vicinity at depths that are shallower than the proposed construction method suggesting a lower likelihood for TCRs to be impacted by TBM. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

Construction activities related to ground disturbance, including grading and excavation, would have the potential to disturb and destroy TCRs that are currently unknown in Holocene deposits. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs.

Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No

precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.1**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.1** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Options

### *Atlantic/Pomona Station Option*

If Alternative 1 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 1. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in summarized in **Section 7.1.1.2** and discussed in **Section 8.2.1**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.1** for the proposed mitigation and impacts after incorporation of mitigation.

### *Montebello At-Grade Option*

If Alternative 1 with the Montebello At-Grade Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 1 with an aerial alignment at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would be at a shallow depth. Although excavation for the Montebello At-Grade Option would be relatively shallow, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 1 with the Montebello At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.1**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.1** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.2.2 Alternative 2 Atlantic to Citadel IOS

### 7.2.2.1 Operational Impacts

Operation of Alternative 2 would not impact resources of tribal significance. No specific resources of tribal significance were identified within the ADI. Consultation did indicate that unknown, buried

resources may exist within the ADI. However, project operations would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of Alternative 2.

## Design Option

### *Atlantic/Pomona Station Option*

Operation of Alternative 2 with the Atlantic/Pomona Station Option would not affect TCRs differently than the base Alternative 2. As discussed in the base Alternative 2, no TCRs exist within the Atlantic/Pomona Station Option or the remainder of the Alternative 2 ADI. Thus, there would be no impacts on TCRs from operation of Alternative 2 with the Atlantic/Pomona Station Option.

### 7.2.2.2 Construction Impacts

Numerous village locations and trade routes were identified in the vicinity of the ADI. The TBM may run through these areas, however the TBM does not allow for discovery of intact archaeological resources because of the method of construction. As discussed in 7.1.1.2, ground disturbance for this construction method would occur 44 to 60 feet bgs. These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project identified fossils in the vicinity at depths that are shallower than the proposed construction method suggesting a lower likelihood for TCRs to be impacted by TBM. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

Construction of the base Alternative 2 would require ground-disturbing activities, including grading and excavation, in Holocene deposits. These activities would have the potential to disturb and destroy TCRs that are currently unknown. Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. If unmitigated, this potential disturbance of TCRs during construction of the base Alternative 2 would result in a significant impact.

MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in Section 7.1.1.2 and discussed in Section 8.2.2, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than

significant. See **Section 8.2.2** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Option

### *Atlantic/Pomona Station Option*

If Alternative 2 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under Alternative 2 with a station at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 2 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.2**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.2** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.2.3 Alternative 3 Atlantic to Greenwood IOS

### 7.2.3.1 Operational Impacts

Operation of Alternative 3 would not impact resources of tribal significance. No specific resources of tribal significance were identified within the ADI. Consultation did indicate that unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI. However, project operations would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of Alternative 3.

## Design Options

### *Atlantic/Pomona Station Option*

Operation of Alternative 3 with the Atlantic/Pomona Station Option would not impact resources of tribal significance. As discussed in the base Alternative 3, no TCRs exist within the Atlantic/Pomona Station Option or the remainder of Alternative 3. Thus, there would be no impacts on TCRs from operation of Alternative 3 with the Atlantic/Pomona Station Option.

### **Montebello At-Grade Option**

If Alternative 3 with the Montebello At-Grade Option were selected, the operational impacts on TCRs would be the same as those described under the base Alternative 3. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact associated with an adverse change to a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Alternative 3 with the Montebello At-Grade Option.

### **7.2.3.2 Construction Impacts**

Numerous village locations and trade routes were identified in the vicinity of the ADI. The TBM may run through these areas, however the TBM does not allow for discovery of intact archaeological resources because of the method of construction. As discussed in **Section 7.1.1.2**, ground disturbance for this construction method would occur approximately 44 to 60 feet gds. These deeper soil levels are not likely to contain buried resources because they are too old to have been available for human occupation before they were buried by subsequent geomorphic processes. A paleontological records search conducted for the Project identified fossils in the vicinity at depths that are shallower than the proposed construction method suggesting a low likelihood for TCRs to be impacted by TBM. Therefore, because TBM would be used at depths with soils deposited prior to human occupation, tunneling is not expected to disturb or destroy unknown TCRs and impacts associated with tunnel boring are less than significant.

Construction activities that cause ground disturbance, including grading and excavation in Holocene deposits would have the potential to disturb and destroy TCRs that are currently unknown. Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. If unmitigated, this potential disturbance of TCRs during construction of the base Alternative 3 would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.3** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Options

### *Atlantic/Pomona Station Option*

If Alternative 3 with the Atlantic/Pomona Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 3 with a station at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, excavation for the Atlantic/Pomona Station Option would be less deep than for a fully underground station, but would have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 3 with the Atlantic/Pomona Station Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.3** for the proposed mitigation and impacts after incorporation of mitigation.

### *Montebello At-Grade Option*

If Alternative 3 with the Montebello At-Grade Option were selected, the construction impacts on TCRs would be similar to those described under the base Alternative 3 with an aerial alignment at this location. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would be at a shallow depth. Although excavation for the Montebello At-Grade Option would be relatively shallow, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of Alternative 3 with the Montebello At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.3**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.3** for the proposed mitigation and impacts after incorporation of mitigation.

## 7.2.4 Maintenance and Storage Facilities

### 7.2.4.1 Operational Impacts

#### 7.2.4.1.1 Commerce MSF

The Commerce MSF site option would not have any operational impacts to resources of tribal significance. No specific resources of tribal significance were identified within the ADI. Consultation did indicate that unknown, buried resources that may be eligible for inclusion in the CRHR may exist within the ADI. However, project operations would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact a TCR that is a TCR because it is

significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Commerce MSF site option.

#### 7.2.4.1.2 Montebello MSF

The Montebello MSF site option would not have any operational impacts to resources of tribal significance. No specific resources of tribal significance were identified within the ADI. Consultation did indicate that unknown, buried resources may exist within the ADI. However, project operations would not require additional ground-disturbance.

Project operations would consist of LRT. Operations would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Montebello MSF site option.

### Design Options

#### *Montebello MSF At-Grade Option*

The Montebello MSF At-Grade Option would introduce an at-grade crossing over Washington Boulevard to enter the Montebello MSF. If the Montebello MSF At-Grade Option were selected, the operational impacts on TCRs would be the same as those described for the Montebello MSF site option with an aerial alignment at this location. Project operations would consist of LRT and would not directly or indirectly affect the integrity or significance of any known or potentially resources that are eligible for inclusion in the CRHR or local register that may be TCRs. There would be no operational impact a TCR that is a TCR because it is significant to a California Native American tribe. Thus, there would be no impacts on resources of tribal significance from operation of the Montebello MSF At-Grade Option.

#### 7.2.4.2 Construction Impacts

##### 7.2.4.2.1 Commerce MSF

Construction of the Commerce MSF site option would require activities that cause ground disturbance, including grading and excavation, and would have the potential to disturb and destroy TCRs in Holocene deposits that are currently unknown. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of the Commerce MSF site option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.4**, would ensure that workers have a

clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.4** for the proposed mitigation and impacts after incorporation of mitigation.

### 7.2.4.2.2 Montebello MSF

Construction of the Montebello MSF site option would require activities that cause ground disturbance, including grading and excavation, and would have the potential to disturb and destroy TCRs in Holocene deposits that are currently unknown. Tribal consultation findings indicate that the entire alignment is sensitive for potential buried, unidentified TCRs. Although the ADI is heavily disturbed and urbanized, some of these construction activities would extend below the disturbed surface and into undisturbed Holocene deposits which have the potential to preserve buried cultural resources. If present, these undisturbed soils would lie below artificial fill, pavement, and other recent disturbances and would overlie older Quaternary, pre-human occupation soils. Cultural resources may be buried in these Holocene soils beneath natural alluvial deposits near watercourses or hidden beneath pavement and other development at unknown locations. No precontact archaeological sites were identified in the ADI, so precise locations with a higher potential to contain such resources cannot be identified. If unmitigated, this potential disturbance of TCRs during construction of the Montebello MSF site option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.4**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.4** for the proposed mitigation and impacts after incorporation of mitigation.

## Design Options

### *Montebello MSF At-Grade Option*

The Montebello MSF At-Grade Option would introduce an at-grade crossing over Washington Boulevard to enter the Montebello MSF. If the Montebello MSF At-Grade Option were selected, the construction impacts on TCRs would be similar to those described under the Montebello MSF site option. As discussed in the Eastside Transit Corridor Phase 2 Construction Impacts Report, at-grade construction would be at a shallow depth. Although excavation for the Montebello MSF At-Grade Option would be relatively shallow, excavations have the potential to disturb and destroy TCRs that are currently unknown. If unmitigated, this potential disturbance of TCRs during construction of the Montebello MSF At-Grade Option would result in a significant impact. MM TCR-1, MM TCR-2, and MM TCR-3, as summarized in **Section 7.1.1.2** and discussed in **Section 8.2.4**, would ensure that workers have a clear understanding of TCRs that may be present in the construction area, and that procedures and plans would be in place for monitoring for and for safely handling TCRs. Implementation of MM TCR-1 through MM TCR-3 would reduce impacts to less than significant. See **Section 8.2.4** for the proposed mitigation and impacts after incorporation of mitigation.

## 8.0 MITIGATION MEASURES AND IMPACTS AFTER MITIGATION

### 8.1 TCR-1: Historical Resources

Impact TCR-1: Would a Build Alternative cause a substantial adverse change in a TCR that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).

#### 8.1.1 Alternative 1 Washington

As discussed in **Section 7.1**, the base Alternative 1 has the potential to have a significant impact under Impact TCR-1 to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction related to ground disturbance including grading and excavation. Project excavations have the potential to disturb and destroy unknown TCRs.

##### 8.1.1.1 Potential Operational or Construction Mitigation Measures

There would be no operational impacts on TCRs; therefore, no operational mitigation measures are required. The following mitigation measures would be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction of the base Alternative 1 to a less than significant level.

**MM TCR-1: Tribal Cultural Resources Training.** Prior to any ground-disturbing activities, all construction personnel involved in ground-disturbing activities shall be provided with appropriate Tribal Cultural Resources training. The training shall instruct the personnel regarding the legal framework protecting Tribal Cultural Resources, typical kinds of Tribal Cultural Resources that may be found within the project area, and proper procedures and notifications if Tribal Cultural Resources are inadvertently discovered.

**MM TCR-2: Retain a Native American Monitor.** A Native American monitor shall be retained for work at locations identified as sensitive during tribal consultation and agreed upon between the lead agency and the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government. The monitor shall only be present on-site during the construction phases that involve ground disturbing activities where areas of ground disturbance and/or removed spoils are visible for inspection. If during cultural resources monitoring the qualified archaeologist or Native American Monitor determines that the sediments being excavated are previously disturbed or unlikely to contain significant cultural materials, the qualified archaeologist or Native American Monitor can recommend that monitoring be reduced or eliminated.

**MM TCR-3: Unknown Tribal Cultural Resources.** A project-wide Cultural Resources Monitoring and Mitigation Plan (CRMMP) shall be developed and implemented by Metro. This document shall address areas where potentially significant prehistoric and historic archaeological deposits, and Tribal Cultural Resources are likely to be located within the ADI based on background research, a geoarchaeological analysis, and Tribal consultation. The CRMMP shall encompass both archaeological and Tribal Cultural Resources and shall be kept confidential. Preparation of the CRMMP shall necessitate the completion of pedestrian survey of the private property parcels in the ADI that were not accessible during the preparation of this Eastside Transit Corridor Phase 2 EIR.

The CRMMP shall include a detailed prehistoric and historic context that clearly demonstrates the themes under which any identified resources shall be determined significant. Should significant deposits be identified during earth-moving activities, where feasible, the CRMMP shall address methods for data recovery, anticipated artifact types, artifact analysis, report writing, repatriation of human remains and associated grave goods, and curation or other methods of disposition in consultation with the Tribe.

The CRMMP shall also require that an archaeologist qualified in prehistoric and historical archaeology and a Native American monitor who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location be retained prior to ground-disturbing activities. The CRMMP shall be a guide for monitoring activities. If buried Tribal Cultural Resources or cultural resources, such as flaked or ground stone, historic debris, building foundations, or non-human bone, are discovered during ground-disturbing activities, work shall stop in that area and within 50 feet of the find until a qualified archaeologist and Native American Monitor can assess the significance of the find and, if necessary, develop appropriate treatment measures. If resources are Native American in origin and may also be Tribal Cultural Resources, treatment and curation of these resources shall be determined during tribal consultation. Treatment measures typically include development of avoidance strategies, capping with fill material, or mitigation of impacts through data recovery programs such as excavation or detailed documentation.

### 8.1.1.2 Design Option Potential Operational or Construction Mitigation Measures

#### Atlantic/Pomona Station Option

MM TCR-1, MM TCR-2, and MM TCR-3, described above, will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs during construction to a less than significant level. No additional mitigation measures are required for operation or construction of Alternative 1 with the Atlantic/Pomona Station Option.

## Montebello At-Grade Option

MM TCR-1, MM TCR-2, and MM TCR-3, described above, will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs during construction to a less than significant level. No additional mitigation measures are required for operation or construction of Alternative 1 with the Montebello At-Grade Option.

### 8.1.1.3 Impacts After Mitigation

#### 8.1.1.3.1 Operational Impacts Determination

The base Alternative 1 would have less than significant impacts under Impact TCR-1 and no mitigation is required.

### Design Options

#### *Atlantic/Pomona Station Option*

Alternative 1 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-1 and no mitigation is required.

#### *Montebello At-Grade Option*

Alternative 1 with the Montebello At-Grade Option would have less than significant impacts under Impact TCR-1 and no mitigation is required.

### 8.1.1.3.2 Construction Impacts Determination

With implementation of MM TCR-1, MM TCR-2, and MM TCR-3, construction impacts from Alternative 1 under Impact TCR-1 would be reduced to a less than significant level.

### Design Option

#### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce construction impacts to a less than significant level.

#### *Montebello At-Grade Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce construction impacts to a less than significant level.

## 8.1.2 Alternative 2 Atlantic to Citadel IOS

As discussed in **Section 7.1.2**, the base Alternative 2 has the potential to have a significant impact to resources that are eligible for inclusion in the CRHR, which may also be TCRs, under Impact TCR-1 during construction related to ground disturbance including grading and excavation. Project excavations have the potential to disturb and destroy unknown TCRs.

### 8.1.2.1 Potential Operational or Construction Mitigation Measures

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs during construction to a less than significant level. No additional mitigation is required for operation or construction of the base Alternative 2.

### 8.1.2.2 Design Option Potential Operational or Construction Mitigation Measures

#### **Atlantic/Pomona Station Option**

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs during construction to a less than significant level. No additional mitigation is required for operation or construction of Alternative 2 with the Atlantic/Pomona Station Option.

### 8.1.2.3 Impacts After Mitigation

#### 8.1.2.3.1 Operational Impacts Determination

Operation of the base Alternative 2 would have less than significant impacts under Impact TCR-1 and no mitigation is required.

#### **Design Options**

##### ***Atlantic/Pomona Station Option***

Operation of Alternative 2 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-1 and no mitigation is required.

#### 8.1.2.3.2 Construction Impacts Determination

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

## Design Option

### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

## 8.1.3 Alternative 3 Atlantic to Greenwood IOS

As discussed in **Section 7.1.3**, the base Alternative 3 has the potential to have a significant impact to resources that are eligible for inclusion in the CRHR, which may also be TCRs, under Impact TRA-1 during construction related to ground disturbance including grading and excavation. Project excavations have the potential to disturb and destroy unknown TCRs.

### 8.1.3.1 Potential Operational or Construction Mitigation Measures

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation is required for the base Alternative 3.

### 8.1.3.2 Design Option Potential Operational or Construction Mitigation Measures

#### **Atlantic/Pomona Station Option**

MM TCR-1, MM TCR-2, and MM TCR-3, described above, will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation measures are required for Alternative 3 with the Atlantic/Pomona Station Option.

#### **Montebello At-Grade Option**

MM TCR-1, MM TCR-2, and MM TCR-3, described above, will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation measures are required for Alternative 3 with the Montebello At-Grade Option.

### 8.1.3.3 Impacts After Mitigation

#### 8.1.3.3.1 Operational Impacts Determination

The base Alternative 3 would have less than significant impacts under Impact TCR-1 and no mitigation is required.

#### Design Options

##### *Atlantic/Pomona Station Option*

Alternative 3 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-1 and no mitigation is required.

##### *Montebello At-Grade Option*

Alternative 3 with the Montebello At-Grade Option would have less than significant impacts under Impact TCR-1 and no mitigation is required.

#### 8.1.3.3.2 Construction Impacts Determination

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

#### Design Option

##### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

##### *Montebello At-Grade Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

### 8.1.4 Maintenance and Storage Facilities

As discussed in **Section 7.1.4**, construction of the Commerce MSF site option, the Montebello MSF site option, or the Montebello MSF At-Grade Option have the potential to have a significant impact to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction related to ground disturbance including grading and excavation. Project excavations have the potential to disturb and destroy unknown TCR.

### **8.1.4.1 Commerce Potential Operational or Construction Mitigation Measures**

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation is required for operation or construction of the Commerce MSF site option.

### **8.1.4.2 Montebello Potential Operational or Construction Mitigation Measures**

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation is required for operation or construction of the Montebello MSF site option.

#### **Design Options**

##### ***Montebello MSF At-Grade Option***

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, during construction to a less than significant level. No additional mitigation measures are required for the Montebello MSF At-Grade Option.

### **8.1.4.3 Impacts After Mitigation**

#### **8.1.4.3.1 Operational Impacts Determination**

##### **Commerce MSF**

Operation of the Commerce MSF site option would have no impact under Impact TCR-1 and no mitigation is required.

##### **Montebello MSF**

Operation of the Montebello MSF site option would have no impact under Impact TRC-1 and no mitigation is required.

##### **Design Option**

Operation of the Montebello MSF At-Grade Option would have no impact under Impact TRC-1 and no mitigation is required.

### 8.1.4.3.2 Construction Impacts Determination

#### Commerce MSF

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

#### Montebello MSF

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

#### Design Option

Montebello MSF At-Grade Option

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to resources that are eligible for inclusion in the CRHR, which may also be TCRs, to a less than significant level.

## 8.2 TCR-2: Native Tribal Significance

**Impact TCR-2: Would a Build Alternative cause a substantial adverse change in a TCR that is 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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

### 8.2.1 Alternative 1 Washington

As discussed in **Section 7.2**, the base Alternative 1 has the potential to have a significant impact under Impact TCR-2 during construction to resources that are of cultural value to Native Americans and may, therefore, be TCRs. Project excavations have the potential to disturb and destroy unknown TCRs.

#### 8.2.1.1 Potential Operational or Construction Mitigation Measures

There would be no operational impacts on TCRs; therefore, no operational mitigation measures are required. MM TCR-1 through MM TCR-3, as discussed in **Section 8.1.1**, will be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs, during construction of the base Alternative 1 to a less than significant level.

## 8.2.1.2 Design Option Potential Operational or Construction Mitigation Measures

### Atlantic/Pomona Station Option

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction. No additional mitigation measures are required for operation or construction of Alternative 1 with the Atlantic/Pomona Station Option.

### Montebello At-Grade Option

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction. No additional mitigation measures are required for operation or construction of Alternative 1 with the Montebello At-Grade Option.

## 8.2.1.3 Impacts After Mitigation

### 8.2.1.3.1 Operational Impacts Determination

The base Alternative 1 would have less than significant impacts under Impact TCR-2 and no mitigation is required.

### Design Options

#### *Atlantic/Pomona Station Option*

Alternative 1 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-2 and no mitigation is required.

#### *Montebello At-Grade Option*

Alternative 1 with the Montebello At-Grade Option would have less than significant impacts under Impact TCR-2 and no mitigation is required.

### 8.2.1.3.2 Construction Impacts Determination

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

## Design Options

### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

### *Montebello At-Grade Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

## 8.2.2 Alternative 2 Atlantic to Citadel IOS

As discussed in **Section 7.2.2**, the base Alternative 2 has the potential to have a significant impact under Impact TCR-2 during construction to resources that are of cultural value to Native Americans and may, therefore, be TCRs. Project excavations have the potential to disturb and destroy unknown TCRs.

### 8.2.2.1 Potential Operational or Construction Mitigation Measures

Operational impacts on TCRs would be less than significant; therefore, no operational mitigation measures are required.

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs, during construction of the base Alternative 2 to a less than significant level.

### 8.2.2.2 Design Option Potential Operational or Construction Mitigation Measures

#### *Atlantic/Pomona Station Option*

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs, during construction of Alternative 2 with the Atlantic/Pomona Station Option to a less than significant level.

### 8.2.2.3 Impacts After Mitigation

#### 8.2.2.3.1 Operational Impacts Determination

The base Alternative 2 would have less than significant impacts under Impact TCR-2 and no mitigation is required.

#### Design Options

##### *Atlantic/Pomona Station Option*

Alternative 2 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-2 and no mitigation is required.

#### 8.2.2.3.2 Construction Impacts Determination

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs, during construction of the base Alternative 2 to a less than significant level.

#### Design Options

##### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

## 8.2.3 Alternative 3 Atlantic to Greenwood IOS

As discussed in **Section 7.2.3**, the base Alternative 3 has the potential to have a significant impact under Impact TCR-2 during construction to resources that are of cultural value to Native Americans and may, therefore, be TCRs. Project excavations have the potential to disturb and destroy unknown TCRs.

### 8.2.3.1 Potential Operational or Construction Mitigation Measures

Operational impacts on TCRs would be less than significant; therefore, no mitigation measures are required.

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid, minimize, and/or mitigate potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs, during construction of the base Alternative 3 to a less than significant level.

## 8.2.3.2 Design Option Potential Operational or Construction Mitigation Measures

### Atlantic/Pomona Station Option

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction. No additional mitigation measures are required for Alternative 3 with the Atlantic/Pomona Station Option.

### Montebello At-Grade Option

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction. No additional mitigation measures are required for Alternative 3 with the Montebello At-Grade Option.

## 8.2.3.3 Impacts After Mitigation

### 8.2.3.3.1 Operational Impacts Determination

The base Alternative 3 would have less than significant impacts under Impact TCR-2 and no mitigation is required.

### Design Options

#### *Atlantic/Pomona Station Option*

Alternative 3 with the Atlantic/Pomona Station Option would have less than significant impacts under Impact TCR-2 and no mitigation is required.

#### *Montebello At-Grade Option*

Alternative 3 with the Montebello At-Grade Option would have less than significant impacts under Impact TCR-2 and no mitigation is required.

### 8.2.3.3.2 Construction Impacts Determination

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

## Design Options

### *Atlantic/Pomona Station Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

### *Montebello At-Grade Option*

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts on resources that are of cultural value to Native Americans, which may also be TCRs to a less than significant level.

## 8.2.4 Maintenance and Storage Facilities

### 8.2.4.1 Commerce Potential Operational or Construction Mitigation Measures

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction to a less than significant level. No additional mitigation is required for operation or construction of the Commerce MSF site option.

### 8.2.4.2 Montebello Potential Operational or Construction Mitigation Measures

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction to a less than significant level. No additional mitigation is required for operation or construction of the Montebello MSF site option.

## Design Options

### *Montebello MSF At-Grade Option*

MM TCR-1, MM TCR-2, and MM TCR-3 will be implemented to avoid or minimize potential impacts on resources that are of cultural value to Native Americans, which may also be TCRs during construction. No additional mitigation measures are required for the Montebello MSF At-Grade Option.

## 8.2.4.3 Impacts After Mitigation

### 8.2.4.3.1 Operational Impacts Determination

#### Commerce MSF

Operation of the Commerce MSF site option would have no impact under Impact TCR-2 and no mitigation is required.

#### Montebello MSF

Operation of the Montebello MSF site option and Montebello MSF At-Grade Option would have no impact under Impact TRC-2 and no mitigation is required.

### 8.2.4.3.2 Construction Impacts Determination

#### Commerce MSF

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to a less than significant level.

#### Montebello MSF

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to a less than significant level.

#### Design Option

Montebello MSF At-Grade Option

Implementation of MM TCR-1, MM TCR-2, and MM TCR-3 would reduce impacts to a less than significant level.

## 8.3 Mitigation Measure Applicability

As described above, one or more Build Alternatives, design options, and/or MSF site options have been identified as having significant impacts on TCRs. Mitigation measures to address these impacts are also identified. **Table 8-1** summarizes which measures are applicable to each Build Alternative and MSF site option. Unless otherwise noted, the Build Alternative mitigation measures apply to the base alternative and design option, and the MSF mitigation measures apply to the Commerce MSF site option, the Montebello MSF site option, and the Montebello MSF At-Grade Option. If there would be no impact or less than significant impacts, no mitigation is required and therefore, as identified in **Table 8-1**, mitigation measures are not applicable (N/A).

See **Table 8-1** for summary of mitigation measures.

**Table 8-1. Summary of Mitigation Measure Alternative Applicability**

Mitigation Measure	Alternative 1	Alternative 2	Alternative 3	MSF
<b>TCR-1 Historical Resources</b>				
MM TCR-1	Applicable	Applicable	Applicable	Applicable
MM TCR-2	Applicable	Applicable	Applicable	Applicable
MM TCR-3	Applicable	Applicable	Applicable	Applicable
<b>TCR 2 Native Tribal Significance</b>				
MM TCR-1	Applicable	Applicable	Applicable	Applicable
MM TCR-2	Applicable	Applicable	Applicable	Applicable
MM TCR-3	N/A	Applicable	Applicable	Applicable

## 9.0 NO PROJECT ALTERNATIVE

### 9.1 No Project Alternative

#### 9.1.1 Description

The No Project Alternative would maintain existing transit service through the year 2042. No new transportation infrastructure would be built within the DSA aside from projects currently under construction or funded for construction and operation by 2042 via the 2008 Measure R or 2016 Measure M sales taxes. This alternative would include the highway and transit projects in Metro's 2020 L RTP Update and the 2020 RTP/SCS. Under the No Project Alternative, none of the proposed Build Alternatives, design options, or MSFs would be constructed or operated.

#### 9.1.2 Impacts

##### 9.1.2.1 Historical Resources

There would be no new LRT construction or operation in the DSA under the No Project Alternative and therefore, there would be no Project-related impacts from construction or operation on historic resources.

##### 9.1.2.2 Native Tribal Significance

There would be no new LRT construction or operation in the DSA under the No Project Alternative and therefore, there would be no Project-related impacts from construction or operation on resources of tribal significance.

## 10.0 SUMMARY OF ALTERNATIVES

See Table 10-1 below.

**Table 10-1. Significant/Adverse Impacts Remaining After Mitigation**

Impact Topic	No Project Alternative	Alternative 1	Alternative 2	Alternative 3	MSF
Impact TCR-1: Historical Resources	None	Less than significant	Less than significant	Less than significant	Less than significant
Impact TCR-2: Native Tribal Significance	None	Less than significant	Less than significant	Less than significant	Less than significant

### 10.1 No Project

There would be no Project-related impacts on TCRs under the No Project Alternative.

### 10.2 Alternative 1 Washington + MSF

The operation and construction of the base Alternative 1 and either the Commerce MSF or Montebello MSF site option would have a less than significant impact under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

#### 10.2.1 Alternative 1 Washington + MSF + Design Options

The operation and construction of Alternative 1 with the Atlantic/Pomona Station Option and/or the Montebello At-Grade Option and either the Commerce MSF site option, Montebello MSF site option, or the Montebello MSF At-Grade Option would have a less than significant impact under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

### 10.3 Alternative 2 Atlantic to Citadel IOS + MSF

The operation and construction of the base Alternative 2 and the Commerce MSF site option would have a less than significant impact under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

### **10.3.1 Alternative 2 Atlantic to Citadel IOS +MSF + Design Option**

The operation and construction of Alternative 2 with the Atlantic/Pomona Station Option and the Commerce MSF site option would have a would have less than significant impacts under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

### **10.4 Alternative 3 Atlantic to Greenwood IOS + MSF**

The operation and construction of the base Alternative 3 and either the Commerce MSF site option or Montebello MSF site option would have a less than significant impact under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

#### **10.4.1 Alternative 3 Atlantic to Greenwood + MSF + Design Options**

The operation and construction of Alternative 3 with the Atlantic/Pomona Station Option and/or the Montebello At-Grade Option and either the Commerce MSF site option, Montebello MSF site option, or the Montebello MSF At-Grade Option would have a less than significant impact under Impact TCR-1 (Historical Resources) and Impact TCR-2 (Native Tribal Significance).

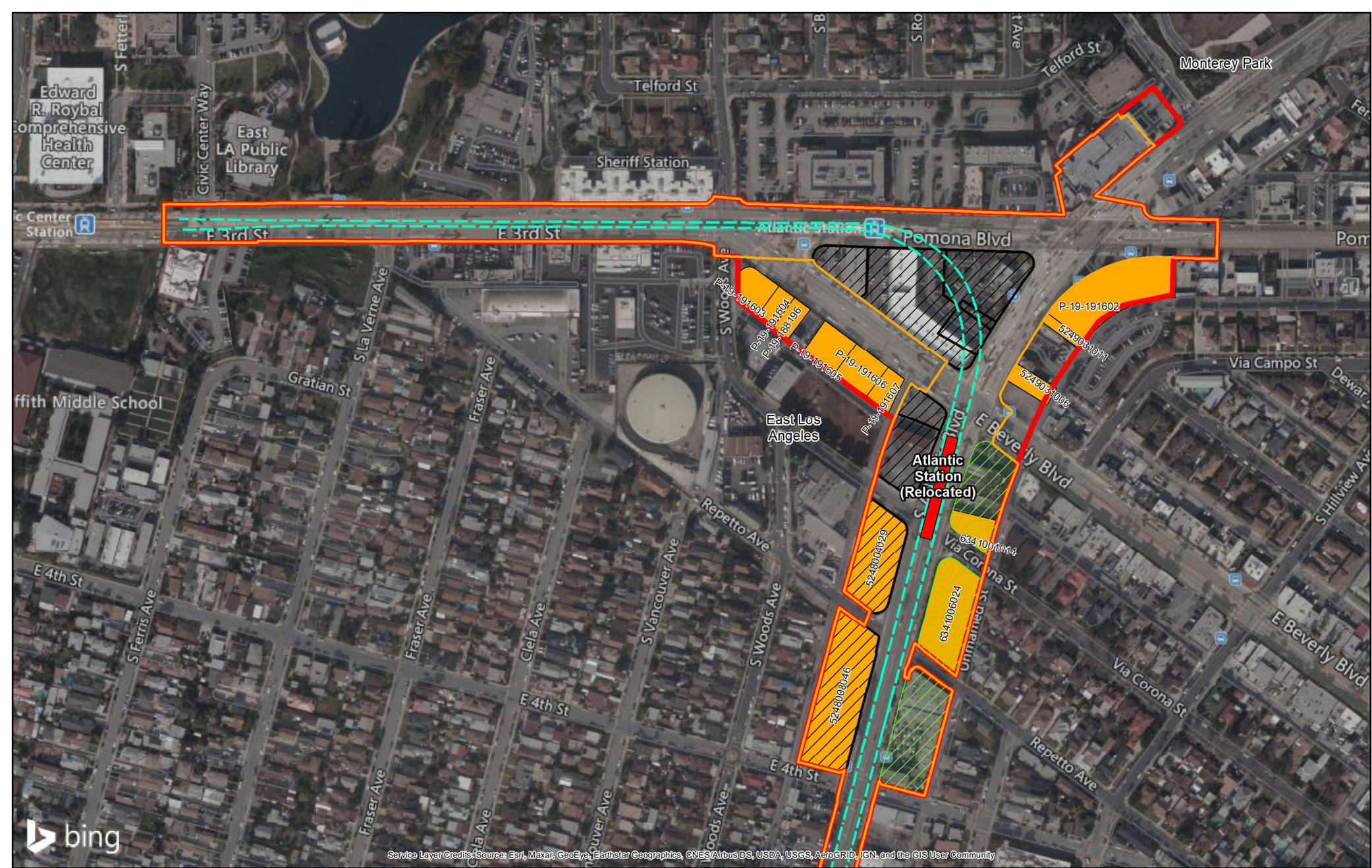
## 11.0 PREPARERS QUALIFICATIONS

Name	Title	Education	Experience (Years)
Marc Beherec	Archaeologist	PhD – Anthropology, University of California, San Diego, 2011 MA – Anthropology, University of California, San Diego, 2004 BA – Anthropology (minor Geology), University of Texas, Austin, 2000	20
Trina Meiser	Architectural Historian	MA – Historic Preservation Planning, Cornell University, 2003 BA – History, Kenyon College, Gambier, Ohio, 1998	20
Monica Wilson	Cultural Planner II	MA – Public History, California State University, Sacramento, 2015 BA – History, California State University, Sacramento, 2012	8

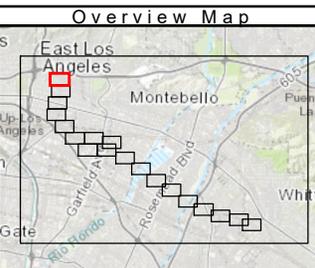
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# ATTACHMENT A – MAPS



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (Underground)
- Potential Staging Area
- Historic Property/Historical Resource**
- Not eligible

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

**Scale:** 1:3,900  
1 in = 325 ft

**Date:** 8/13/2021

**Projection:** NAD 83 UTM Zone 11N

Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

Project: 60039033

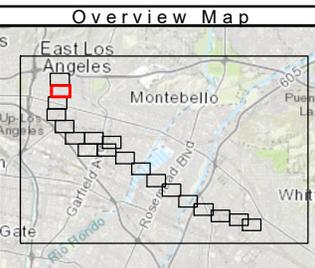
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**Figure 2**

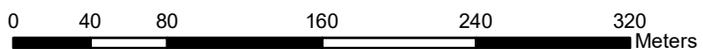




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- Area of Potential Effects
- Area of Direct Impacts
- - - Rail Guideway (Underground)
- Potential Staging Area



Scale: 1:3,900  
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 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N



Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

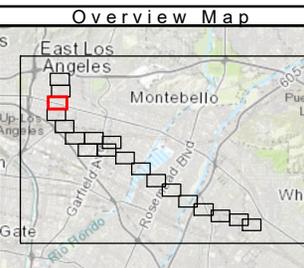
**Tribal Cultural**

Project: 60039033





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- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (Underground)
- Potential Staging Area
- Historic Property/Historical Resource**
- Eligible
- Not eligible

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

**Scale:** 1:3,900  
1 in = 325 ft

**Date:** 8/13/2021

**Projection:** NAD 83 UTM Zone 11N

Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

Project: 60039033

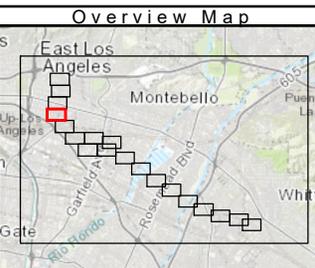
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**Figure 4**





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- Area of Potential Effects
- Area of Direct Impacts
- - - Rail Guideway (Underground)



Scale: 1:3,900  
 1 in = 325 ft  
 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N

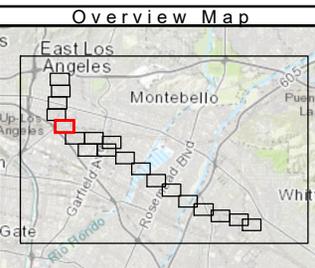
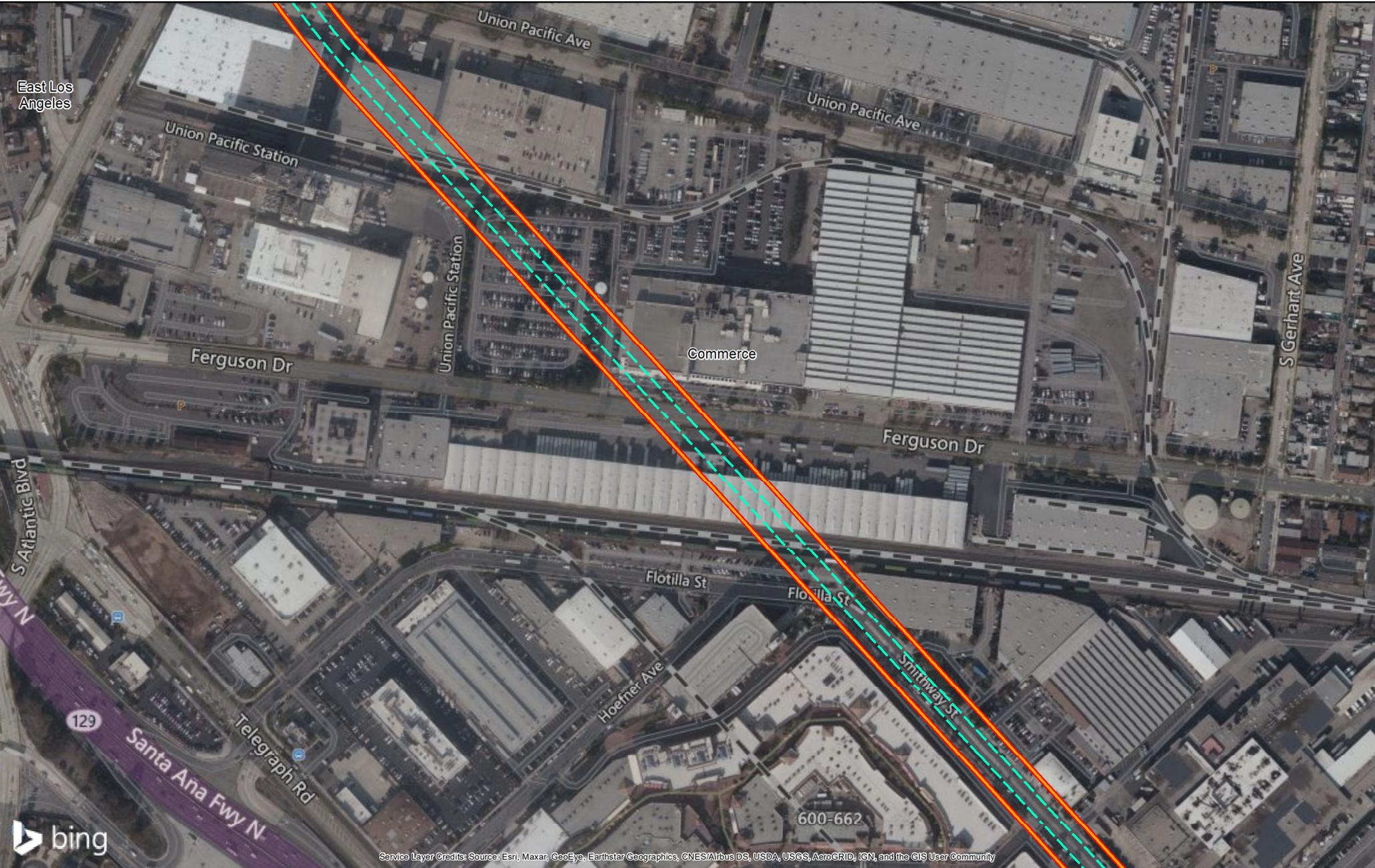


Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

**Tribal Cultural**

Project: 60039033





- ▬ Area of Potential Effects
- ▬ Area of Direct Impacts
- - - Rail Guideway (Underground)



Scale: 1:3,900  
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 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N

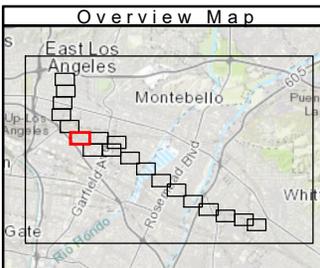
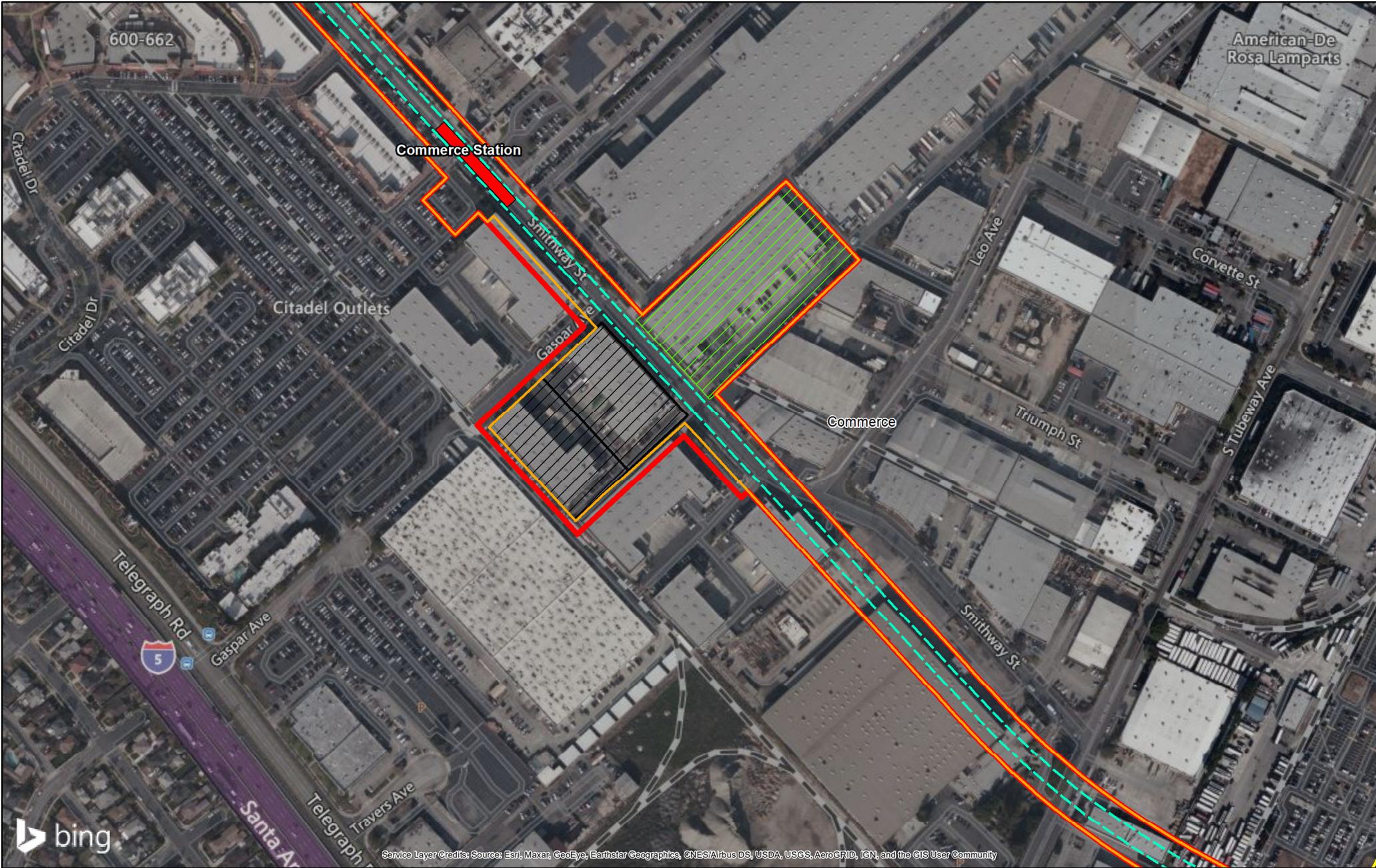


Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

**Tribal Cultural**

Project: 60039033





- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (Underground)
- Potential Staging Area
- Vail Field Industrial Addition Historic District (Eligible)

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

**Scale:** 1:3,900  
 1 in = 325 ft  
 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N

Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

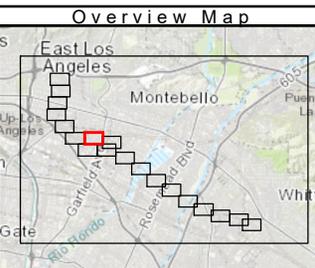
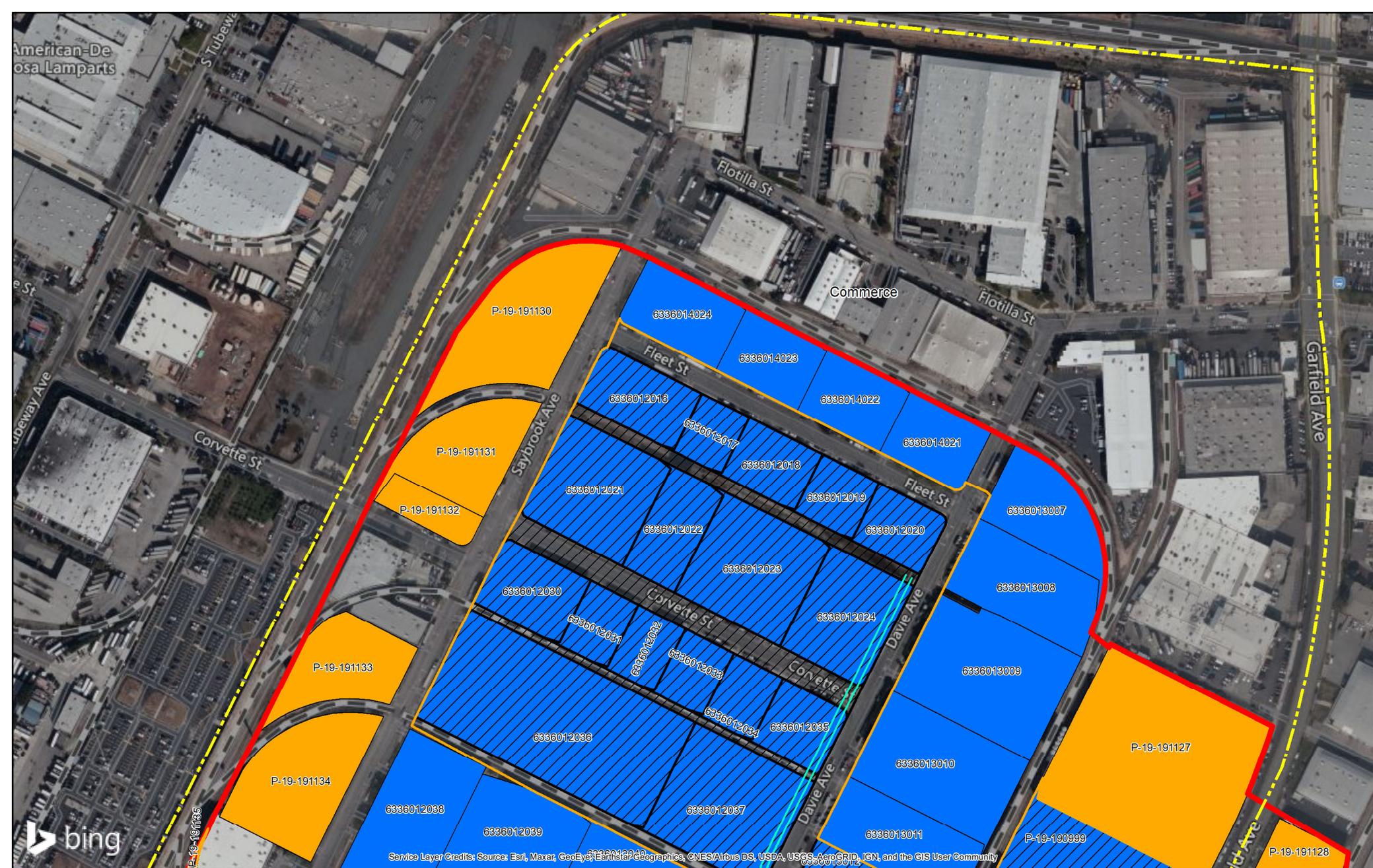
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Project: 60039033

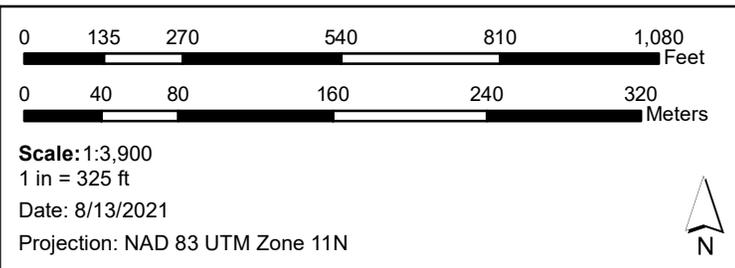
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**Figure 7**





- Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Rail Guideway (At-grade)
- Vail Field Industrial Addition Historic District (Eligible)
- Historic Property/Historical Resource**
- Eligible
- Not eligible



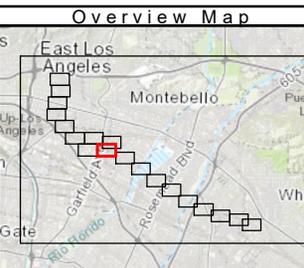
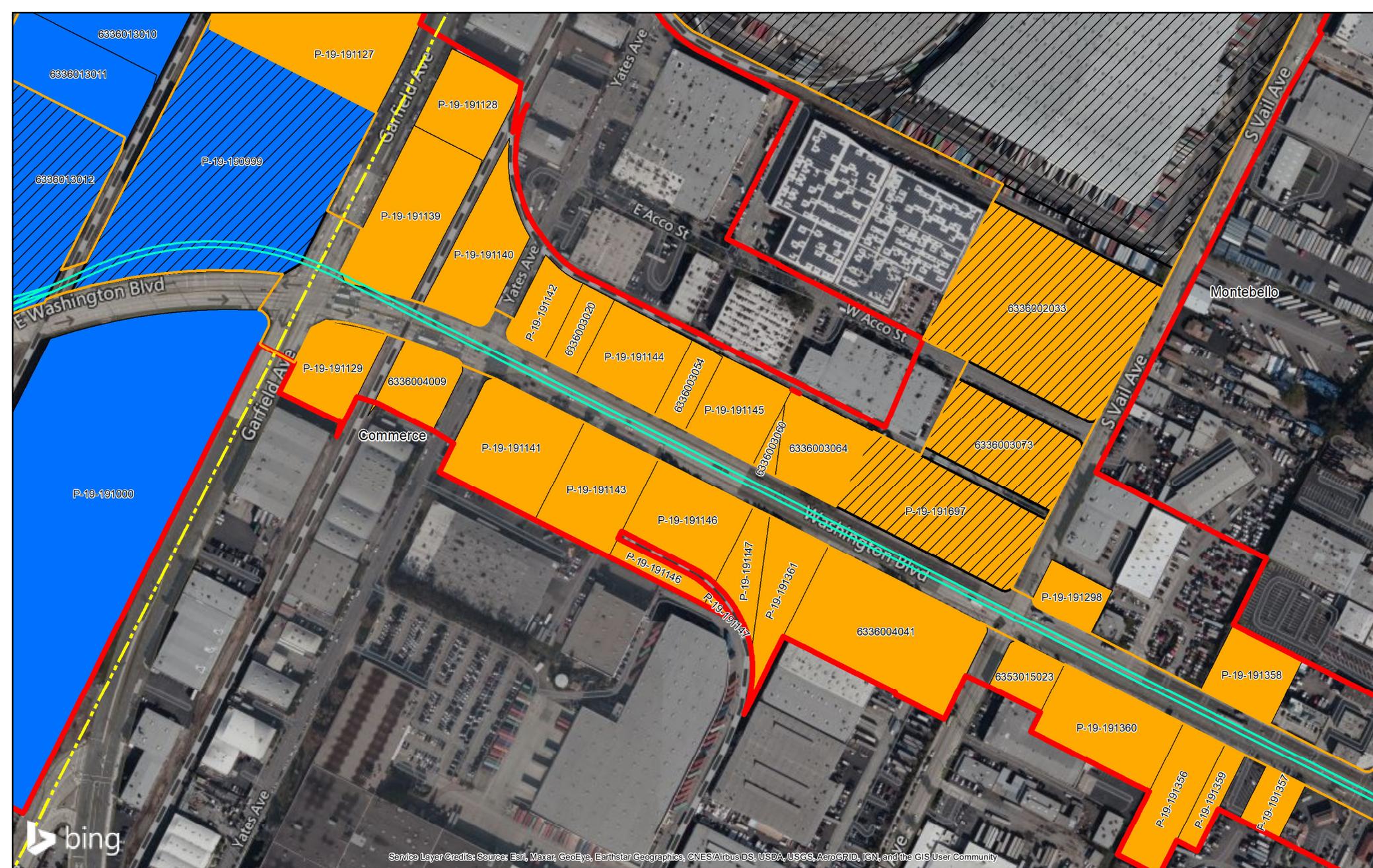
Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

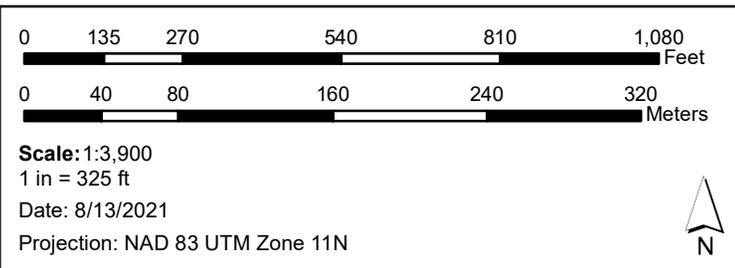
Project: 60039033

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**Figure 9**



- Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Rail Guideway (At-grade)
- Vail Field Industrial Addition Historic District (Eligible)
- Historic Property/Historical Resource**
- Eligible
- Not eligible



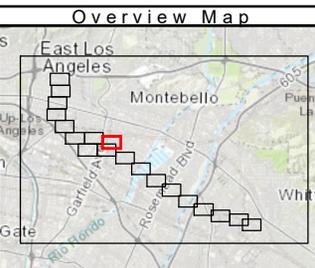
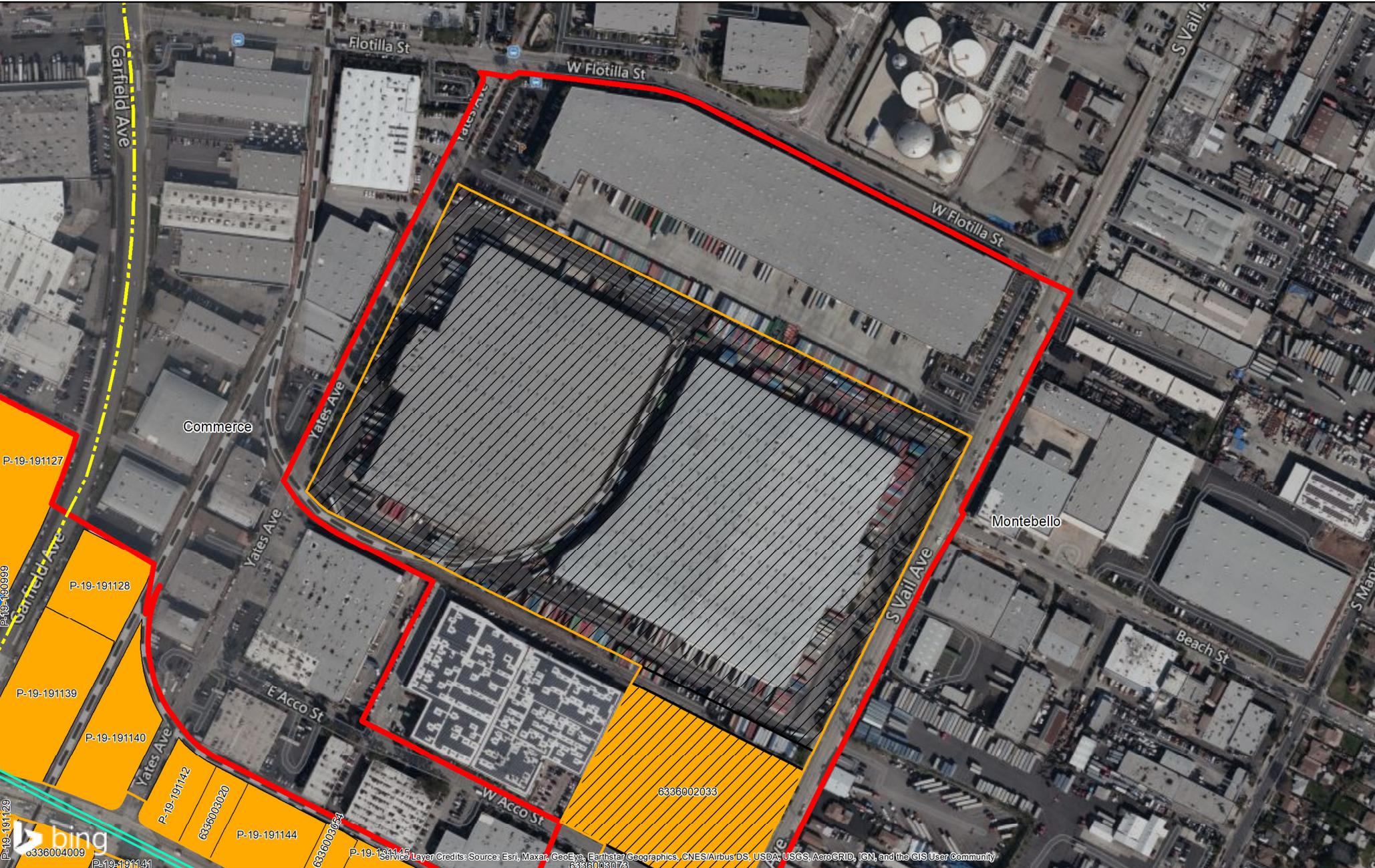
Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

Project: 60039033

**AECOM**

**Figure 10**



- Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Vail Field Industrial Addition Historic District (Eligible)
- Historic Property/Historical Resource**
- Eligible
- Not eligible

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

**Scale:** 1:3,900  
1 in = 325 ft

**Date:** 8/13/2021

**Projection:** NAD 83 UTM Zone 11N

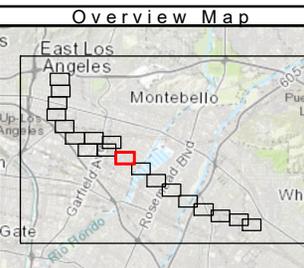
Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

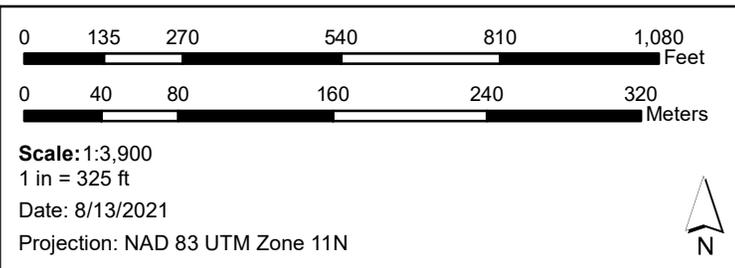
Project: 60039033

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**Figure 11**



- █ Area of Potential Effects
- █ Area of Direct Impacts
- █ Proposed Station
- █ Property Acquisition
- █ Rail Guideway (At-grade)
- █ Potential Staging Area
- Historic Property/Historical Resource**
- █ Eligible
- █ Not eligible



Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

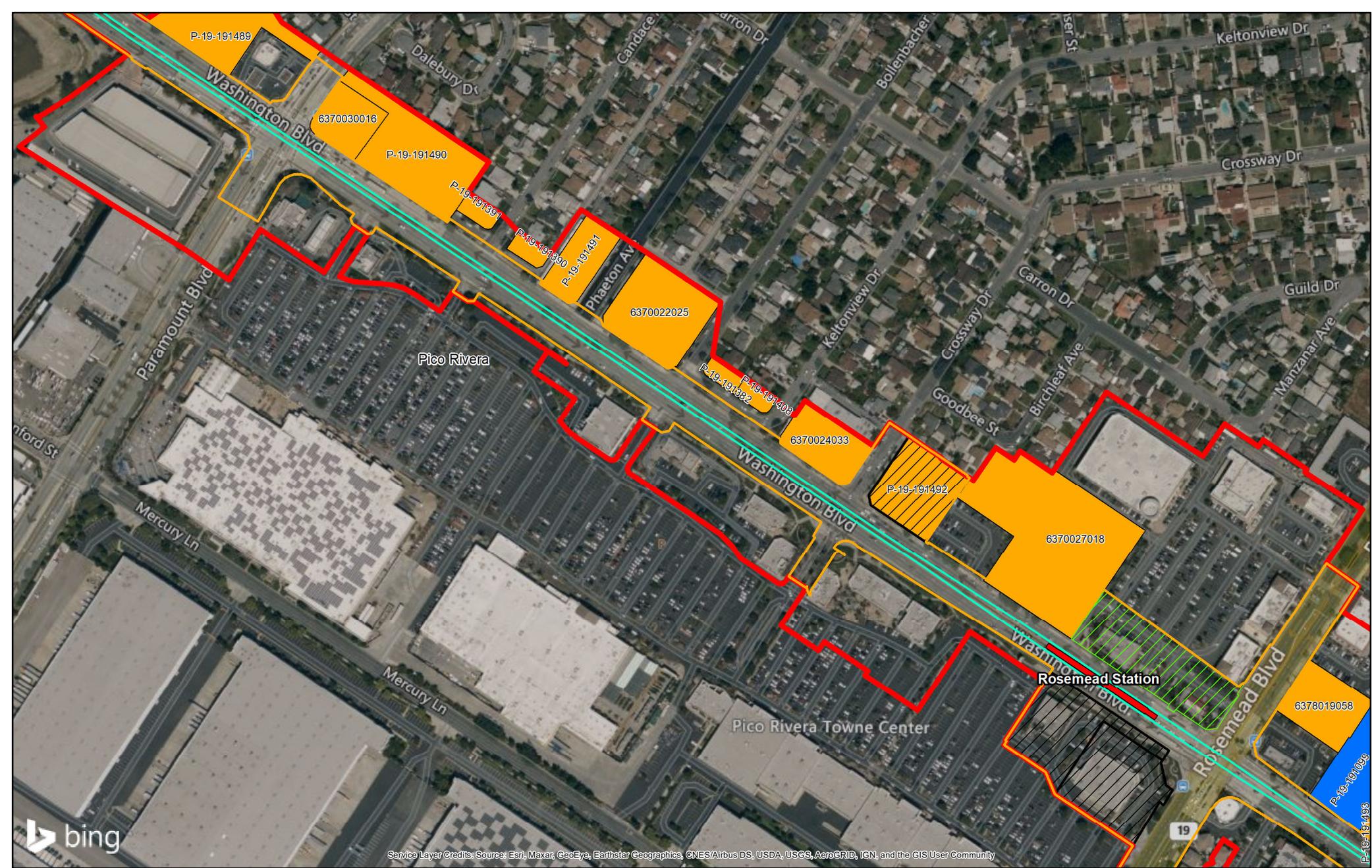
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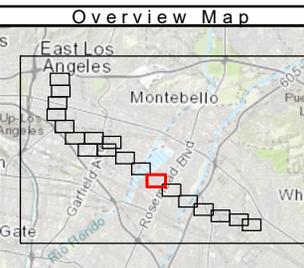
**Figure 12**

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- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (At-grade)
- Potential Staging Area
- Historic Property/Historical Resource**
- Eligible
- Not eligible

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

**Scale:** 1:3,900  
1 in = 325 ft

**Date:** 8/13/2021

**Projection:** NAD 83 UTM Zone 11N

Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

Project: 60039033

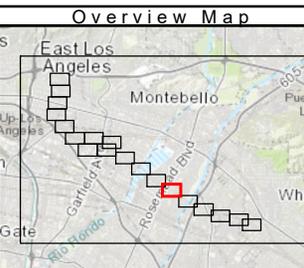
**AECOM**

**Figure 14**

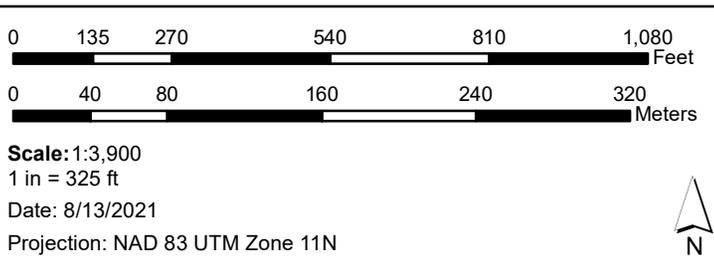




Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (At-grade)
- Potential Staging Area
- Historic Property/Historical Resource**
- Eligible
- Not eligible
- Not Determined During Survey



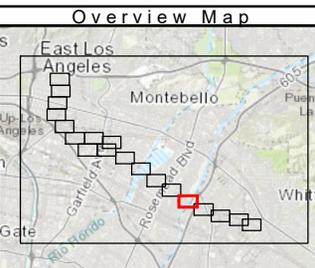
Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

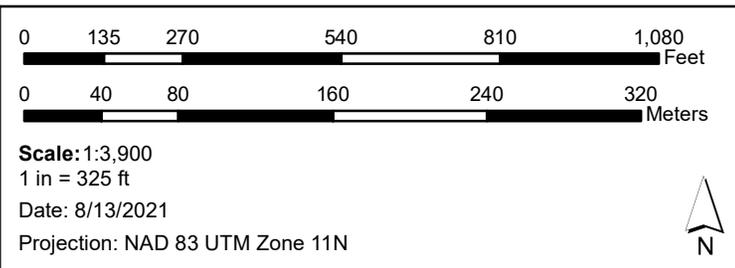
Project: 60039033

**AECOM** **Figure 15**





- Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Rail Guideway (At-grade)
- Historic Property/Historical Resource**
- Not eligible

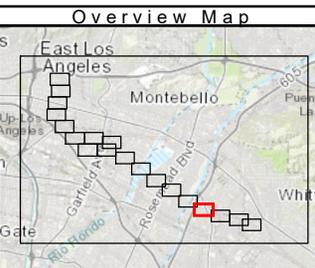
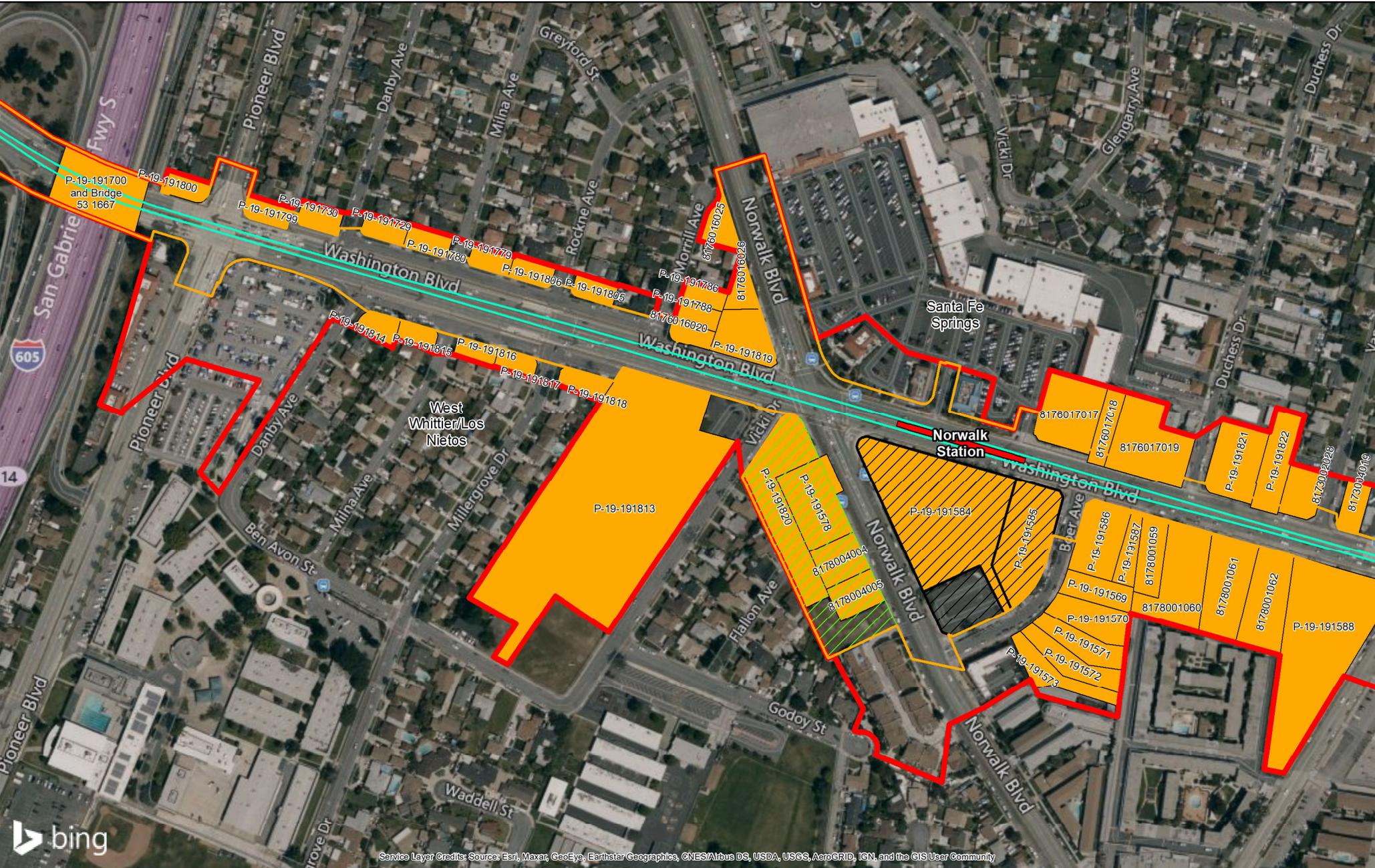


Eastside Transit Corridor Phase 2 Project  
Washington Alternative

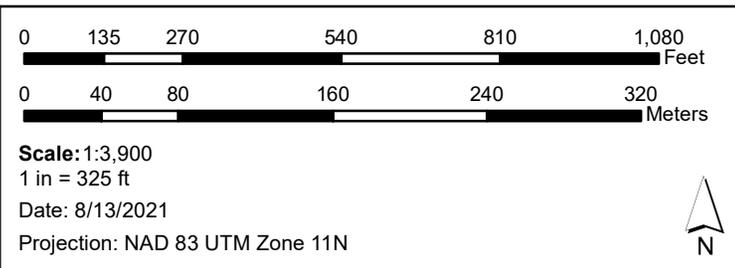
**Tribal Cultural**

Project: 60039033

**AECOM** **Figure 16**



- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Potential Staging Area
- Historic Property/Historical Resource**
- Not eligible



Eastside Transit Corridor Phase 2 Project  
Washington Alternative

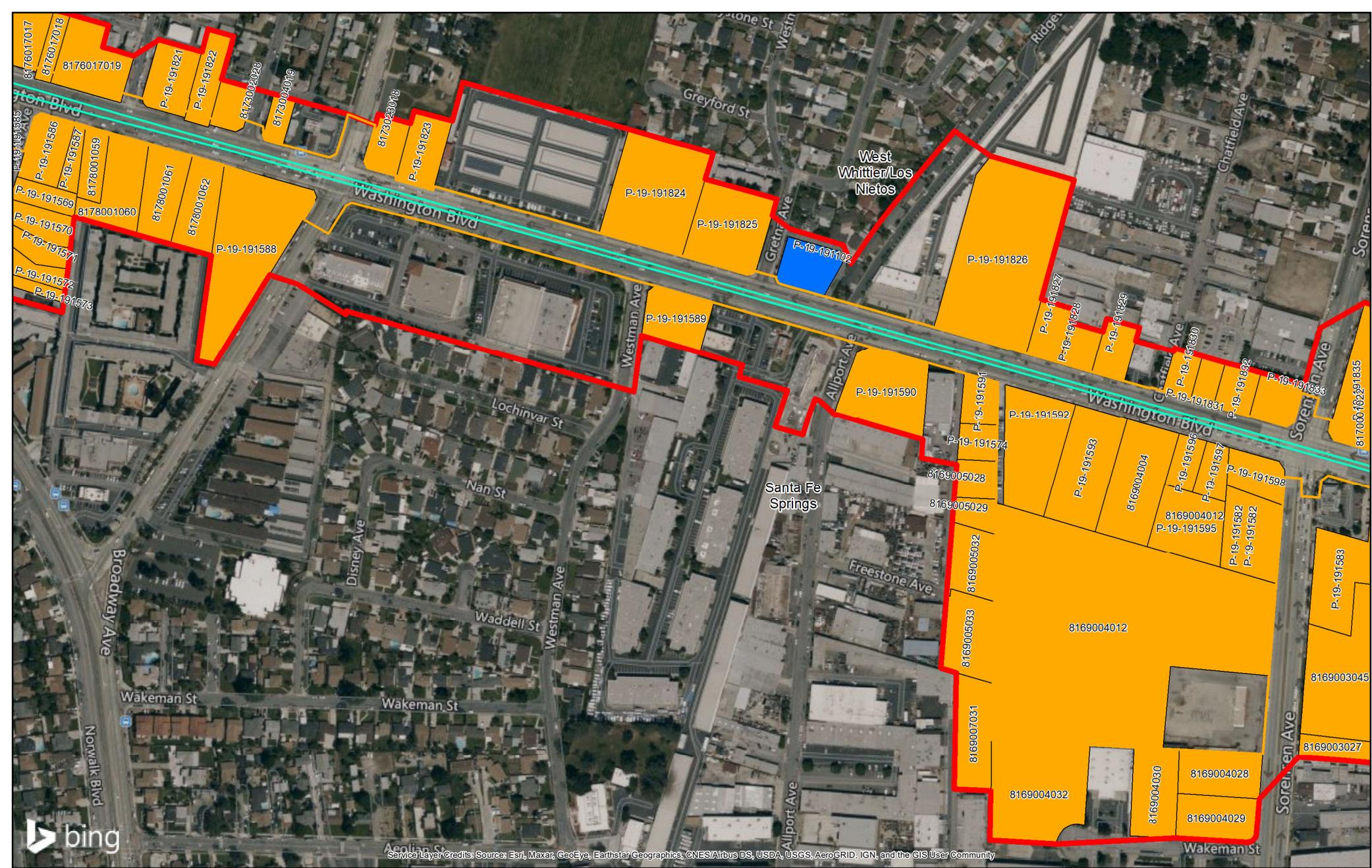
**Tribal Cultural**

Project: 60039033

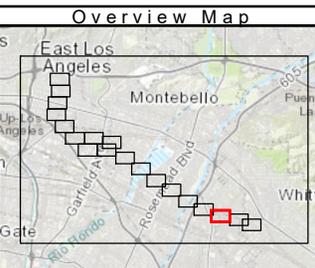
**AECOM**

**Figure 17**





Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- █ Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Rail Guideway (At-grade)
- Historic Property/Historical Resource**
- Eligible
- Not eligible



Scale: 1:4,200  
 1 in = 350 ft  
 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N

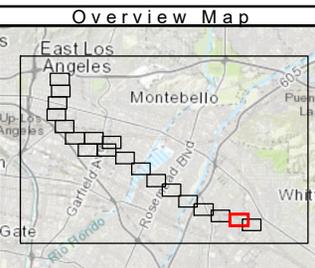


Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

**Tribal Cultural**  
 Project: 60039033  
**AECOM** **Figure 18**



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- Area of Potential Effects
- Area of Direct Impacts
- Property Acquisition
- Rail Guideway (At-grade)
- Historic Property/Historical Resource**
- Eligible
- Not eligible

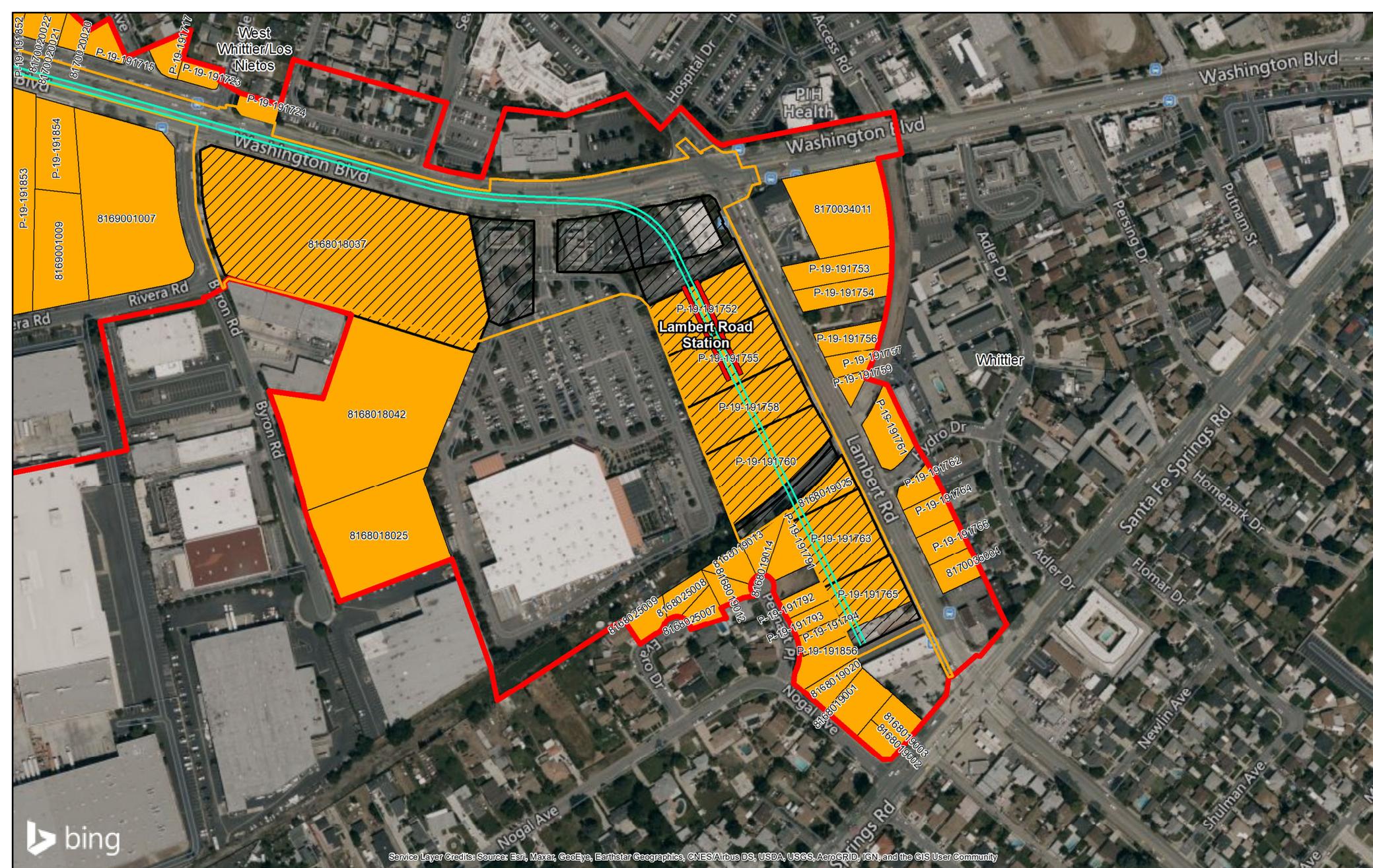


Scale: 1:3,900  
 1 in = 325 ft  
 Date: 8/13/2021  
 Projection: NAD 83 UTM Zone 11N

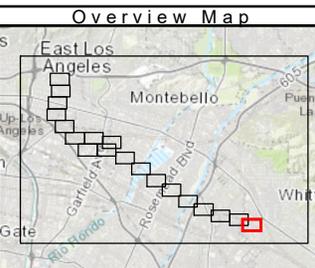


Eastside Transit Corridor Phase 2 Project  
 Washington Alternative

**Tribal Cultural**  
 Project: 60039033  
**AECOM** **Figure 19**



Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



- Area of Potential Effects
- Area of Direct Impacts
- Proposed Station
- Property Acquisition
- Rail Guideway (At-grade)
- Historic Property/Historical Resource**
- Not eligible

0 135 270 540 810 1,080 Feet

0 40 80 160 240 320 Meters

Scale: 1:3,900  
1 in = 325 ft

Date: 8/13/2021

Projection: NAD 83 UTM Zone 11N

Eastside Transit Corridor Phase 2 Project  
Washington Alternative

**Tribal Cultural**

Project: 60039033

**AECOM**

**Figure 20**





# **ATTACHMENT B – CONSULTATION CORRESPONDENCE AND MEETING NOTES (CONFIDENTIAL)**

This attachment is confidential and not part of the EIR pursuant to PRC Section 21082.3(c)(1)).