Appendix Q. Draft Individual Section 4(f) Evaluation

RIVERSIDE COUNTY TRANSPORTATION COMMISSION

Riverside-Downtown
STATION IMPROVEMENTS

Riverside-Downtown Station Improvements Project

Draft Individual Section 4(f) Evaluation

March 2021

RIVERSIDE COUNTY TRANSPORTATION COMMISSION

Riverside-Downtown
STATION IMPROVEMENTS

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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
ADA	Americans with Disabilities Act
APE	Area of Potential Effect
ASR	Archaeological Survey Report
BNSF	Burlington Santa Fe Railway
CA	California
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CP	Control Point
CPUC	California Public Utilities Commission
DOI	Department of the Interior
DOT	Department of Transportation
DTSC	Department of Toxic Substance Control
FHWA	Federal Highway Administration
FMC	Food Machinery Corporation
FOE	Finding of Effect
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HRR	Historic Resources Report
IEOC	Inland Empire Orange County
LOD	Limits of Disturbance
MP	milepost
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
PV LINE	Perris Valley Line
RCTC	Riverside County Transportation Commission
RDS	Riverside Downtown Station

SCRRA	Southern California Regional Rail Authority
SECTION 4 (f)	Section 4(f) of the U.S. Department of Transportation Act
SECTION 106	Section 106 of the National Historic Preservation Act
SHPO	State Historic Preservation Officer
SR	State Route
SF	square feet
U.S.C.	United States Code
U.S. DOT	United States Department of Transportation

1.0 Draft Individual Section 4(f) Evaluation

This chapter describes the documentation necessary to support determinations required to comply with the provisions of Section 4(f) of the Department of Transportation Act of 1966, as amended (*Code of Federal Regulations* (CFR) Title 23 Part 774 (23 CFR 774) as codified in U.S. Code (U.S.C.) Title 49 , Section 303 (49 U.S.C. Section 303) and generally referred to as "Section 4(f)"). This Draft Individual Section 4(f) evaluation was prepared in accordance with the regulations of the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) for Section 4(f) compliance[1].

1.1. Introduction

The Riverside County Transportation Commission (RCTC) and Metrolink propose to improve the Riverside-Downtown Station Milepost (MP) 9.9 to MP 10.2 on the Burlington Northern Santa Fe (BNSF) San Bernardino Subdivision located just east of State Route (SR) 91 and a short distance from the SR 60 in the City and County of Riverside, California. The Riverside-Downtown Station Improvements Project (Project) would result in improvement of the existing Riverside-Downtown Station (RDS).

Proposed improvements include construction of an additional passenger loading platform, the extension of the existing pedestrian overcrossing and additional elevator and associated tracks which would allow for two trains to service the station off the BNSF mainline. The proposed track would be required to connect and integrate into the existing station layover tracks on the east side to improve train meet times without impacting BNSF operations. The Project would also provide additional parking and improved vehicular traffic circulation on the east side of the station.

- The proposed project described in this chapter will receive federal funding through the FTA and would have a "use" of property protected by Section 4(f) as defined in 23 CFR 774.17 (Section 2.0 of this evaluation provides more detail). Therefore, documentation of compliance with Section 4(f) is required. Section 4(f) protects the following properties of national, state, and local significance:
- Publicly owned, publicly accessible parklands and recreational lands
- Public wildlife/waterfowl refuges, regardless of public access
- Historic sites, regardless of public or private ownership
- If parks, recreational areas, or refuges are determined not to be properties of national, state, or local significance by the official(s) with jurisdiction, and after review by FTA for reasonableness, then Section 4(f) protection generally does not apply. Absent a determination from the official with jurisdiction regarding the significance of these properties, FTA assumes that they are significant properties and applies the requirements of Section 4(f). Historic sites listed on, or eligible for listing on, the National Register of Historic Places (NRHP) are significant properties for Section 4(f) purposes.

[1] Codified in 23 CFR 774; 23 U.S.C § 138.49; U.S.C § 3030, the FTA Standard Operating Procedure 18 Section 4(f) Evaluation (2016); and the FHWA July 12, 2012 Section 4(f) Policy Paper.

FTA may only approve a transportation project that requires the land use of applicable properties, as previously described, after the Section 4(f) analysis, which includes the following three methods:

1. Preparing a *de minimis* impact determination
2. Applying an FTA programmatic Section 4(f) evaluation once they are approved
3. Preparing an Individual Section 4(f) evaluation

1.2. Section 4(f) "Use" Definitions

As defined in 23 CFR 774.17, the "use" of a protected Section 4(f) property occurs when any of the following conditions are met:

Direct Use: A direct use of a Section 4(f) property occurs when property is permanently incorporated into a proposed transportation project. This may occur as a result of partial or full acquisition of a fee simple interest, permanent easement, or temporary easement that exceeds regulatory limits.

Temporary Use: A temporary use of a Section 4(f) property occurs when there is a temporary occupancy of property that is considered adverse in terms of the preservation purposes of the Section 4(f) statute. A temporary occupancy of property does not constitute a use of a Section 4(f) resource when all of the following conditions are satisfied:

- Duration is less than the time needed for construction of the Project and there is no change in ownership of the land.
- The nature and magnitude of the changes to the Section 4(f) property are minimal.
- There are no anticipated permanent adverse physical impacts, nor is there interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis.
- The land being used will be fully returned to a condition at least as good as that which existed prior to the Project.
- There is a documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Constructive Use: A constructive use of a Section 4(f) property occurs when a transportation project does not incorporate land from the resource, but the proximity of the Project results in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired (23 CFR 774.15).Section 4(f) Approval Options

1.3. Section 4(f) Approval Options

***De Minimis* Impact:** The requirements of Section 4(f) are satisfied with respect to a Section 4(f) resource if it is determined by the FTA that a transportation project would have only a "*de minimis* impact" on the Section 4(f) resource. The provision allows avoidance, minimization, mitigation, and enhancement measures to be considered in making the *de minimis* determination. The official(s) with jurisdiction over the resource must be notified of FTA's determination. 23 CFR 774.17 defines a *de minimis* impact as follows:

- For parks, recreation areas, and wildlife/waterfowl refuges, a *de minimis* impact is one that would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f), and the official with jurisdiction has concurred with this determination after there has been a chance for public review and comment (Note: For

parks, recreation areas, and wildlife/waterfowl refuges, public notice and an opportunity for public review and comment concerning the effects on the protected features, attributes, or activities of the property must be required from the official with jurisdiction).

- For historic sites, *de minimis* impact means that the FTA has determined, in accordance with Section 106 of the of the National Historic Preservation Act (NHPA) (36 CFR part 800), that either no historic property is affected by the Project, or the Project would have "no adverse effect" on the property in question. The official with jurisdiction must be notified that the FTA intends to make a *de minimis* finding based on their concurrence with the "no adverse effect" determination under 36 CFR 800. This is usually done in the effect determination letter send to the official with jurisdiction for their concurrence.

Programmatic Evaluations: FHWA Programmatic Section 4(f) Evaluations are a time-saving procedural option for preparing individual Section 4(f) Evaluations for certain minor uses of Section 4(f) property. Programmatic Section 4(f) Evaluations are developed by FHWA based on experience with many projects that have a common fact pattern, from a Section 4(f) perspective. FTA currently does not have any approved Programmatic Section 4(f) Evaluation processes in place but will be developing these in the near future; FHWA Section 4(f) Programmatic Evaluations do not apply to FTA.

Individual Section 4(f) Evaluations: An individual Section 4(f) Evaluation must be completed when approving a project that requires the use of Section 4(f) property if the use results in a greater than *de minimis* impact and a Programmatic Section 4(f) Evaluation cannot be applied to the situation (23 CFR 774.3). The Individual Section 4(f) Evaluation documents the evaluation of the proposed use of Section 4(f) properties in the project area of all alternatives. The individual Section 4(f) Evaluation requires two findings as follows:

1. That there is no feasible and prudent alternative that completely avoids the use of Section 4(f) property.
2. That the project includes all possible planning to minimize harm to the Section 4(f) property resulting from the transportation use (23 CFR 774.3(a)(1) and (2)).

2.0 Project Description

2.1. Introduction/Background

The Riverside County Transportation Commission (RCTC) and Metrolink propose to improve the RDS located at Milepost (MP) 9.9 to 10.2 on the Burlington Northern Santa Fe (BNSF) San Bernardino Subdivision located just east of State Route (SR) 91 and a short distance from the SR 60 in the city and county of Riverside, California.

Proposed improvements include construction of an additional passenger loading platform, the extension of the existing pedestrian overcrossing, and, addition of an elevator and associated tracks, which would allow for two trains to service the station off the BNSF mainline. The proposed track would be required to connect and integrate into the existing station layover tracks on the east side to improve train meet times without impacting BNSF operations. The Project would also provide additional parking and improved vehicular traffic circulation on the east side of the station Figure 2-1. Regional and Project Location Map[2]).

2.2. Project Objectives

The purpose of the proposed project is to expand the capacity, improve operations and efficiency, connectivity, and the passenger experience at the RDS. The basic project objectives supporting the purpose of the Project are listed below:

- Expand platform capacity to meet passenger train storage needs
- Allow for train meets off the BNSF mainline and minimize impacts to BNSF operations
- Improve transit connectivity and accessibility while minimizing impacts on improvement projects near the station that are already designed or in construction
- Facilitate more efficient passenger flow and reduce dwell times
- Enhance safety and access for station users
- Accommodate projected future commuter ridership demand

2.3. Alternatives Considered

2.3.1. No Project Alternative

The No Project Alternative would not meet the project objectives or improve operations to accommodate the 91/Perris Valley (91/PV) Line and the Inland Empire Orange County (IEOC) Lines. Train capacity and storage would be limited to the existing platforms. This alternative does not meet the purpose and need for station improvements and additional passenger service.

[2] Enlarged versions of all maps and diagrams in this report are provided in Appendix B.

Figure 2-1. Regional and Project Location Map

2.3.2. Build Alternative

RCTC and Metrolink propose improvements to the following elements of the Station (Table 2-1):

Table 2-1. Proposed Project Elements

Element	Description
1. Station Platform and Track Improvements	• Add new center platform (Platform 3) • Add new tracks (station Tracks 5 and 6) • Modification of railroad signal system
2. Pedestrian Overpass Access Improvements	• Extend pedestrian access to new Platform 3 • Emergency egress would be provided at three locations
3. Traffic Circulation Options, Parking and Streetscape Improvements	• Add sidewalks and trees • Traffic Circulation Options and Howard Avenue Extension • Add up to 560 additional parking spaces • Relocate ADA parking

ADA = Americans with Disabilities Act

Figure 2-2 illustrates each of the project elements previously described. Refer to Figure 2-3 through Figure 2-8 for details on each of the proposed options (1A through 3B).

1. *Platform and Tracks*

The proposed improvements also include building an additional passenger loading platform and tracks on the east side of the existing station to improve Metrolink service and extending the existing pedestrian overpass to access the new (proposed) platform. The proposed track would also connect into the existing station layover tracks on the north end of the station, provide additional parking, and improve traffic flow on the east side of the station.

2. *Pedestrian Overpass Access Design Option*

As part of the Build Alternative, the existing pedestrian overpass access would be extended to the new platform. There is one pedestrian overpass access design option (Pedestrian Overpass Access Design Option 1) to further extend the existing pedestrian overpass to the new surface parking lot.

3. *Traffic Circulation and Parking and Streetscape Improvement Design Options*

The Build Alternative also includes six traffic circulation improvements and parking lot design options. The traffic circulation improvements on the east side of the station address the need for 560 parking spaces and include six different options to address traffic circulation. The Howard Avenue extension (Options 2A and 2B) would require acquisition of parcels directly east of the existing overflow parking lot. The design options are associated with the new proposed surface parking lot, with different scenarios for combining the proposed parking lot with the existing overflow parking lot on the northeast side of the station.

Parking and Streetscape Improvements: All six of the traffic circulation and parking options studied (1A through 3B) would include the following streetscape components:

1. Adding sidewalks and street trees along the perimeter of the new and existing parking lots, in the planter strips next to the roadway on 12th Street, Howard Avenue, and 10th and 9th Streets.
2. Adding up to 560 parking spaces (proposed surface parking lot) with access to the east side of the station via at-grade pedestrian crossings. ADA parking would be adjacent to Platform 3 on the east side of the station.

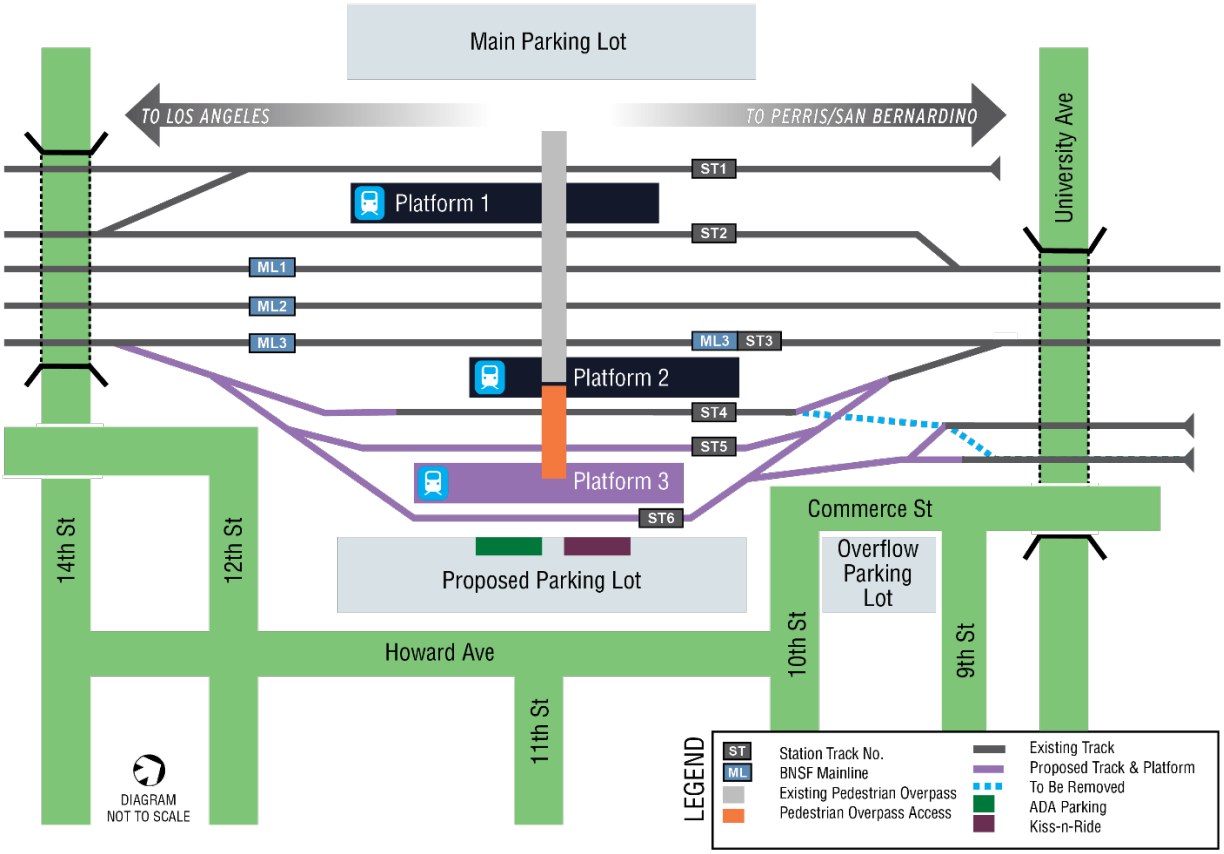


Figure 2-2. Project Elements

Traffic Circulation and Parking: The Build Alternative also includes a study of six traffic circulation improvement options to accommodate the 560 parking spaces (parking lots) for the station and address circulation of pedestrians and vehicles to the station. Table 2-2, Build Alternative Options provides an overview of how traffic circulation to the station could be accommodated. Figure 2-3 through Figure 2-8 illustrate traffic circulation and parking option configurations and show the impacts associated with each option.

Table 2-2. Proposed Project Elements

Build + Design Option	Description
Pedestrian Overpass Access Improvements	
Pedestrian Overpass Access Design Option 1	Extend pedestrian overpass access to the new Platform 3 and to the new surface parking lot.
Traffic Circulation and Parking Improvement Options	
Traffic Circulation and Parking Option 1A	New surface parking lot east of station Requires acquisition and demolition of existing structures and other ancillary structures and residential parcels on the corner of 12th Street and Howard Avenue to facilitate construction of the proposed improvements.
Traffic Circulation and Parking Option 1B	Same as Traffic Circulation and Parking Option 1A but avoids impacts to residential parcels on the corner of 12th Street and Howard Avenue.
Traffic Circulation and Parking Option 2A	New surface parking lot east of station combined with existing overflow parking lot with the extension of Howard Avenue through to 9th Street. Requires acquisition and demolition of existing structures and other ancillary structures and residential parcels on the corner of 12th Street and Howard Avenue. This option requires acquisition of additional parcels north of Howard Avenue and 10th Street, extending north one block to intersect with 9th Street.
Traffic Circulation and Parking Option 2B	Same as Traffic Circulation and Parking Option 2A, but avoids impacts to residential parcels on the corner of 12th Street and Howard Avenue.
Traffic Circulation and Parking Option 3A	Same as Traffic Circulation and Parking Option 1A and 2A but avoids impacts to additional parcels east of the existing overflow parking lot by routing Howard Avenue around the parcels.
Traffic Circulation and Parking Option 3B	Same as Traffic Circulation and Parking Option 1B and 2B but avoids impacts to additional parcels east of the existing overflow parking lot.

- Parking Option 1A – Add a new surface parking lot and maintain separation from the existing overflow parking lot on the east side of the station. Acquisition and demolition of residential parcels on the corner of 12th Street and Howard Avenue would be required (Figure 2-3, Build Alternative with Parking Option 1A).

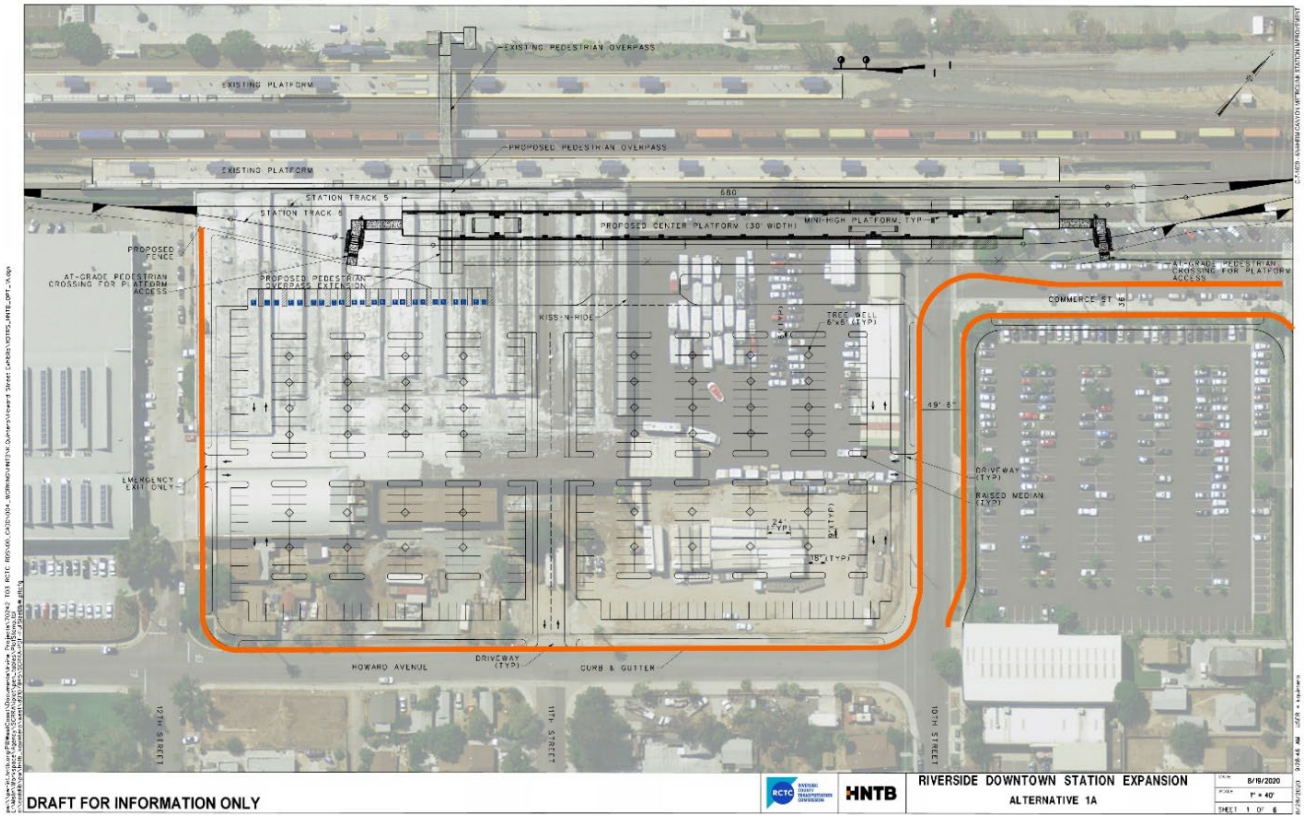


Figure 2-3. Build Alternative with Parking Option 1A

- Parking Option 1B – Add a proposed surface parking lot and maintain separation from the existing overflow parking lot on the east side of the station and avoid impacts to residential parcels at the corner of 12th Street and Howard Avenue (Figure 2-4, Build Alternative with Parking Option 1B).

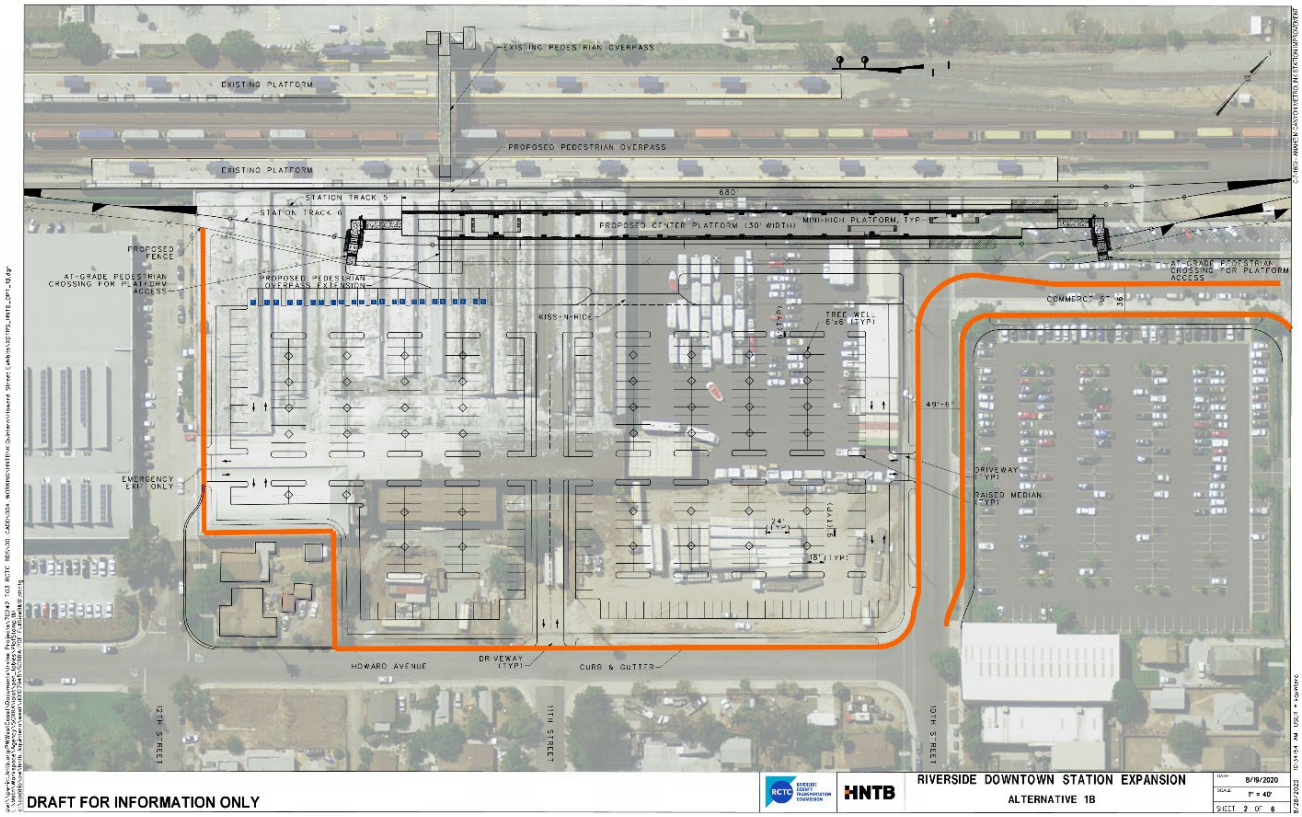


Figure 2-4. Build Alternative with Parking Option 1B

- Parking Options 2A and 2B – Proposes a new surface parking lot directly east of the station combined with the existing overflow parking lot (Figure 2-5, Build Alternative with Parking Option 2A and Figure 2-6, Build Alternative with Parking Option 2B).
  - Parking Option 2A – Combine a proposed surface parking lot with the existing overflow parking lot on the east side of the station, which would require acquisition and demolition of residential parcels on the corner of 12th Street and Howard Avenue. This option would also include extending Howard Avenue through to 9th Street and would require additional acquisition of parcels directly east of the existing overflow parking lot, as well as partial street vacations for 10th Street and Commerce Street (Figure 2-5, Build Alternative with Parking Option 2A).

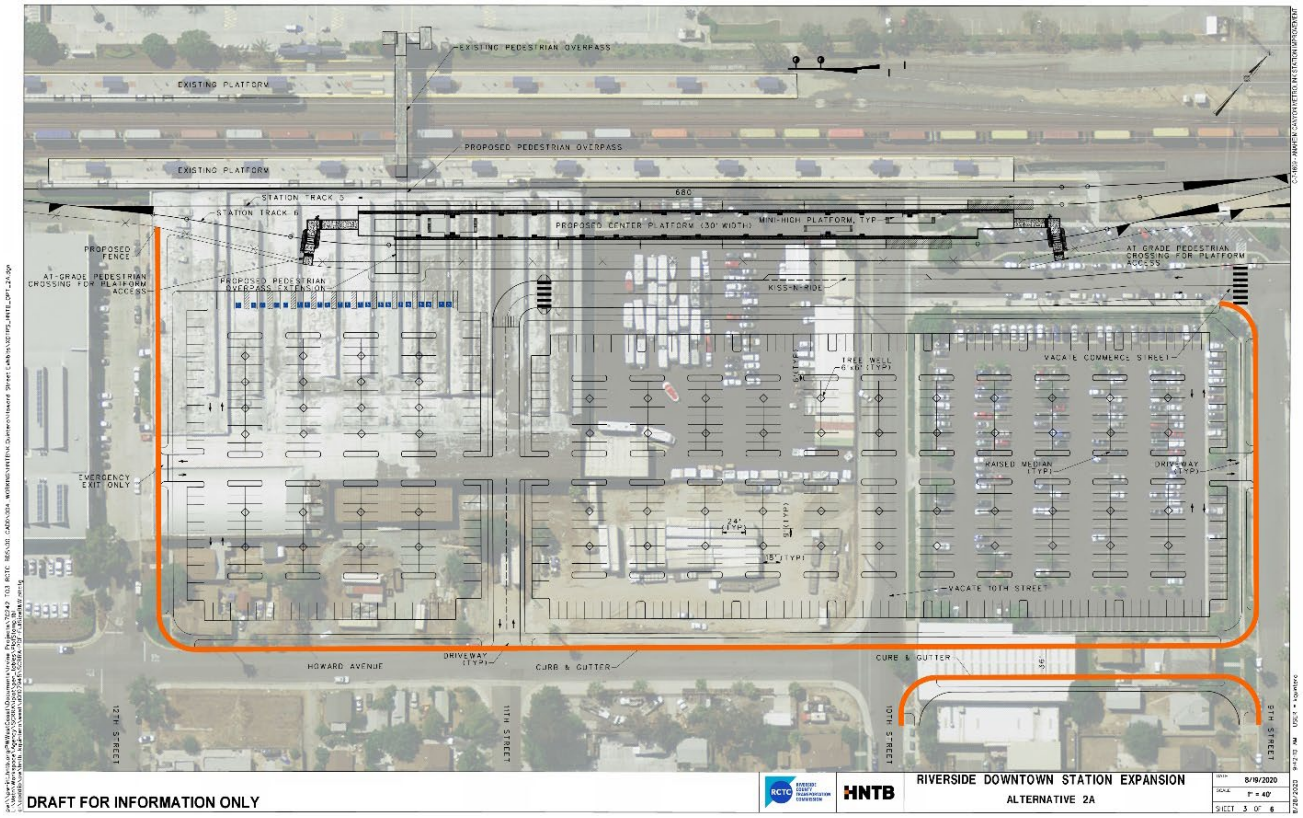


Figure 2-5. Build Alternative with Parking Option 2A

— Parking Option 2B – Combine a proposed surface parking lot with the existing overflow parking lot on the east side of the station and avoid impacts to residential parcels at the corner of 12th Street and Howard Avenue. This option would also include extending Howard Avenue through to 9th Street and would require additional acquisition of parcels directly east of the existing overflow parking lot, as well as partial street vacations for 10th Street and Commerce Street (Figure 2-6, Build Alternative with Parking Design Option 2B).

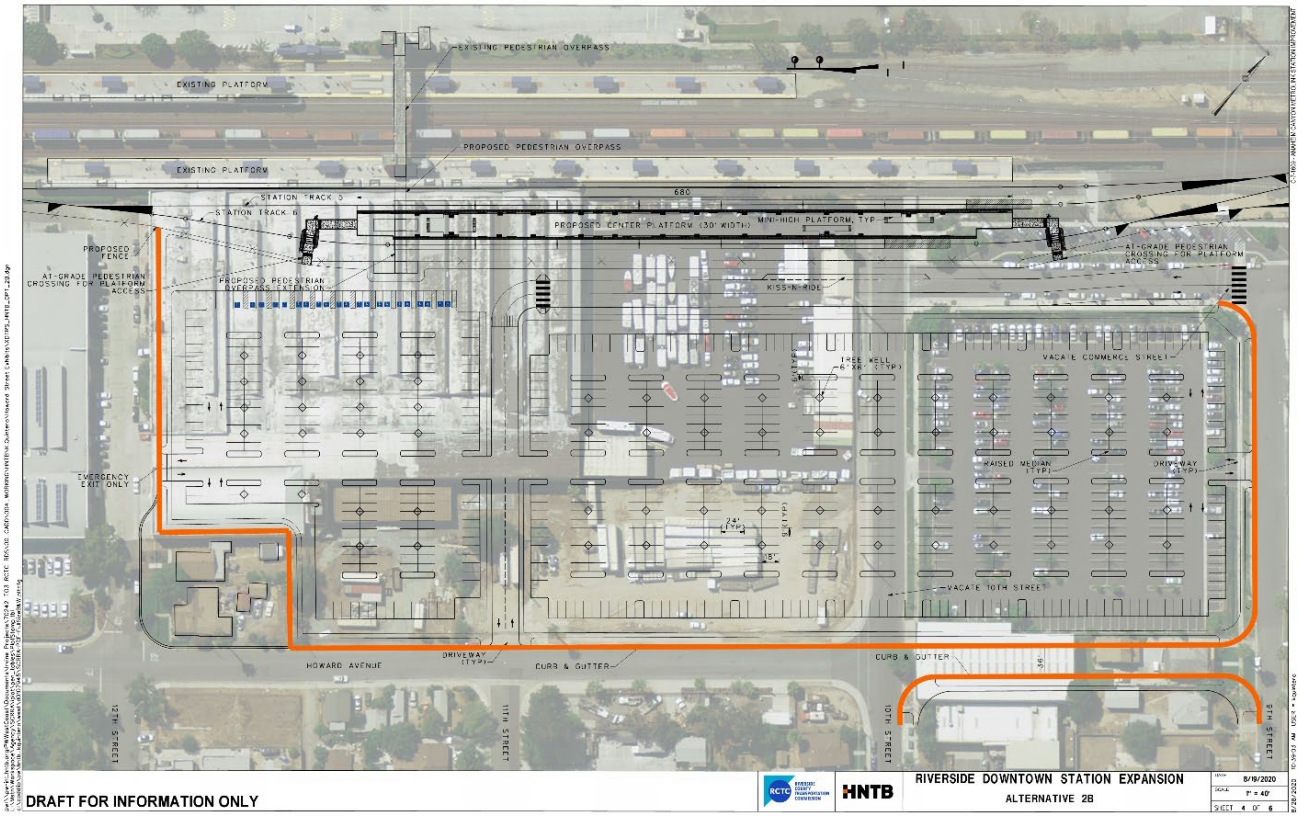


Figure 2-6. Build Alternative with Parking Option 2B

- Parking Options 3A and 3B – Proposes a new surface parking lot directly east of the station combined with the existing overflow parking lot and extension of Howard Avenue through to 9th Street (Figure 2-7, Build Alternative with Parking Option 3A and Figure 2-8, Build Alternative with Parking Option 3B).
  - Parking Option 3A – Combine a proposed surface parking lot with the existing overflow parking lot on the east side of the station, which would require demolition of residential parcels on the corner of 12th Street and Howard Avenue. This option would also include extending Howard Avenue through to 9th Street, as well as partial street vacations for 10th Street and Commerce Street while avoiding additional acquisition of parcels directly east of the existing overflow parking lot (Figure 2-7, Build Alternative with Parking Option 3A).

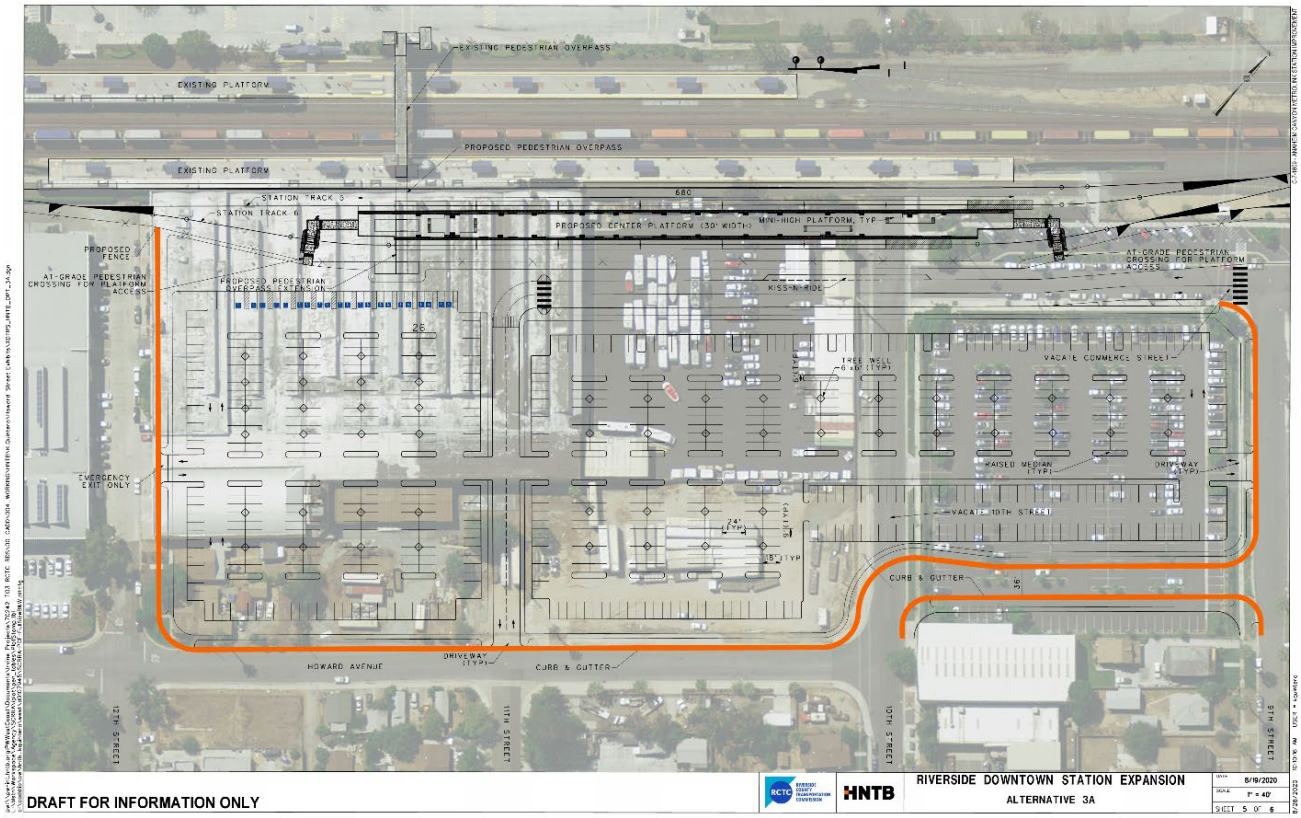


Figure 2-7. Build Alternative with Parking Option 3A

— Parking Option 3B – Combine a proposed surface parking lot with the existing overflow parking lot on the east side of the station and avoid impacts to residential parcels at the corner of 12th Street and Howard Avenue. This option would also include extending Howard Avenue through to 9th Street, as well as partial street vacations for 10th Street and Commerce Street while avoiding additional acquisition of parcels directly east of the existing overflow parking lot (Figure 2-8, Build Alternative with Parking Option 3B).

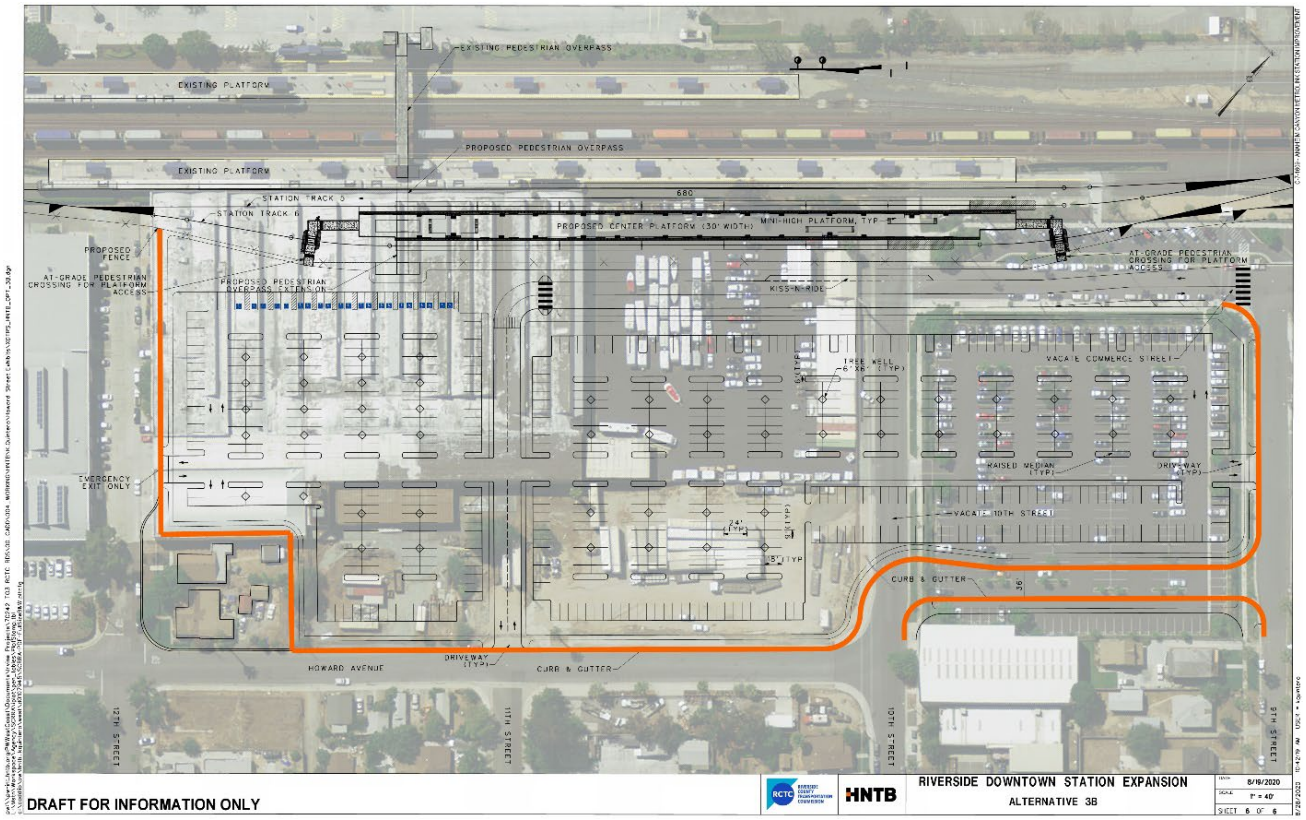


Figure 2-8. Build Alternative with Parking Option 3B

3.0 Section 4(f) Resources

The Build Alternative was described in Section 2.0 of this Draft Individual Section 4(f) Evaluation and Figures 2-3 through 2-8 show the proposed project and the project footprint. A historic property protected under Section 4(f) is a property that is on or eligible for listing on the NRHP. This section describes the historic properties protected under Section 4(f) that would be adversely affected by the Build Alternative, Affected Environment.

3.1. Area of Potential Effects

The Area of Potential Effect (APE) was established early in project development for determining the presence or absence of historic and archaeological sites, objects, structures, buildings, districts, and landmarks in the project area that must be considered during project planning. The APE encompasses the Riverside Downtown Station from MP 9.9 to MP 10.2 on the BNSF San Bernardino Subdivision and adjacent local streets, on 9th and 14th Streets and Howard Avenue in the City of Riverside (Figure 3-1).

The APE encompasses two elements. The first is the Limits of Disturbance (LOD). This is the zone where there may be ground disturbance from project construction (often referred to as the Direct APE). The LOD includes both the horizontal and vertical areas associated with ground-disturbing and physical construction activities. Surrounding the LOD, the second element includes a buffer zone where there may be additional effects on surrounding parcels from noise, vibration, or visual intrusions associated with construction and post-construction project operation. This buffer zone is referred to as the APE for the Historic Built Environment.

Figure 3-1. Area of Potential Effects with Historic Resources

3.2. Historic Resources Report

A Historic Resources Report (HRR) and an Archaeological Survey Report (ASR) was prepared (March 2021) in compliance with Section 106 of the National Historic Preservation Act (NHPA) (36 CFR Part 800) (HNTB, 2021). The HRR evaluated historic built environment properties within the architectural APE and the ASR evaluated prehistoric and historic archaeological resources within the archaeological APE.

3.2.1. Section 4(f) and Section 106

The consideration of historic properties under Section 4(f) differs from their consideration under Section 106 of the NHPA. The results of the Section 106 process included a list of historic properties determined to be significant (i.e., eligible for inclusion in the NRHP) and the potential impacts that the proposed project would have on those properties. An Individual Section 4(f) Evaluation must be completed when approving a project that requires the use of a historic property on or eligible for the NRHP and results in a use greater than a *de minimis* impact. The historic properties identified through the Section 106 process are then considered in the Individual Section 4(f) Evaluation. The Individual Section 4(f) Evaluation documents the evaluation of the proposed use of the Section 4(f) properties in the project area of all alternatives. One key difference between the two regulations and processes is that Section 106 requires a consultation process between the federal agency and State Historic Preservation Office (SHPO) in order to identify historic properties, evaluate effects, and then consult on ways to avoid, minimize, or mitigate those effects. The Section 4(f) process requires federal agencies to avoid the use of significant historic sites, unless there is no prudent or feasible alternative, and if no prudent and feasible exists, then include in the Project all possible planning to minimize harm. Thus, the Section 106 process is more consultative, while the Section 4(f) process requires consideration of specific outcomes.

3.3. Historic Properties Protected under Section 4(f)

Of the 41 parcels within the APE, 16 were previously recorded historic resources, 6 are newly-recorded resources, and the remainder of the parcels were either vacant lots, the current station, or parking lots. Of the 16 previously recorded historic properties, only 2 are recommended eligible for the NRHP and are protected under Section 4(f). The two resources, spanning across at least five parcels within the APE, comprise the Food Machinery Corporation (FMC) Complex (Plant 1 and Plant 2). (APE Map Numbers [Nos.] 17, 18, 21, 28, and 33)

Of the six newly-recorded properties within the APE, only one is a Section 4(f) resource recommended eligible for the NRHP. The historic resource comprises four dwellings located on one parcel (No. 30 in the APE). Collectively, they represent early iterations of worker's houses, two of which take on the form of a Shotgun House. The remaining (newly-recorded) properties within the APE are commercial structures, including warehouses on Commerce Street, and a commercial retail establishment on 14th Street. None of the remaining resources were recommended eligible for the NRHP. Figure 3-2 shows where the Section 4(f) properties for the FMC Complex (Plant 1 and Plant 2) and Worker Houses are located within the APE (outlined in blue).

Table 3-1 shows the addresses, APE Map Nos., and Assessor Parcel Numbers (APNs) for the FMC Complex (Plant 1 and Plant 2) and Worker Houses.

Table 3-1. Section 4(f) properties within the APE

Property Name	Address	(APE Map No.)/APN
FMC Complex Plant 1	3087 12th Street	**(17) /** 211201004 **(18)** / 211201006 **(21)** / 211201026 **(28)** / 211201039
FMC Complex Plant 2	3080 12th Street	**(33)** / 211231024
Worker Houses	4110, 4120, 4130, 4140 Howard Avenue	**(30)** / 211203009

Source: HRR (HNTB 2021)

Figure 3-2. Section 4(f) Properties within the APE
Source: HNTB. HRR, March 2021

3.4. Section 4(f) Historic Properties

3.4.1. The Food Machinery Complex

Table 3-2 shows the addresses, APE Map Nos., and APNs for the FMC Complex (Plant 1 and Plant 2).

Table 3-2. Food Machinery Complex

Property Name	Address	(APE Map No.)/APN
FMC Complex Plant 1	3087 12th Street	**(17)** / 211201004 **(18)** / 211201006 **(21)** / 211201026 **(28)** / 211201039
FMC Complex Plant 2	3080 12th Street	**(33)** / 211231024

Source: HRR (HNTB 2020)

FMC Plant 1 and 2 (APE Map Nos. 17, 18, 21, 28, and 33) appear to be NRHP-eligible under Criteria A and B at the statewide level of significance. Plants 1 and 2 are NRHP-eligible under Criterion B for association with FMC engineer, James M. Hait, who designed the Water Buffalo, and who would later become chairman of FMC Corporation.

FMC Plants 1 and 2 are recommended NRHP-eligible under Criterion D because, Sanborn maps, dated 1908 and 1945, reveal the presence of "Japanese Shanties" (1908) at the southeast corner of the property, which later became "Mexican Shanties" (1945). An early, racially-segregated swimming pool is likely buried at the southwest intersection of 12th Street and Howard Avenue, beneath blacktop paving. The pool was originally part of Lincoln Park before Howard Avenue was connected between 12th and 13th Streets.

FMC Plant 1 (APE Map Nos. 17, 18, 21, and 28) is NRHP-eligible under Criterion B because of the food machinery contributions of the FMC Riverside Complex, based on the important citrus industry inventions of Fred Stebler, George Parker, and Hale Paxton. All three of these men were employed by the FMC in the company's first Riverside years, and through their innovations, they established FMC as an industry leader in the realm of food machinery (

FMC Plant 2 (APE Map No. 33) is also NRHP-eligible under Criterion C as an intact, expressive example of World-War-II-era industrial architecture. The period of significance for Plant 1 is 1938 to 1980 and for Plant 2 is 1942 to 1958.

Existing photos of FMC Plants 1 and 2 are shown in Figure 3-3 through Figure 3-5.

Figure 3-3. FMC Plant 1 Building A West Elevation
Looking Northeast

Figure 3-4. FMC Plant 1 Building A, Interior Bowstring Truss and Sawtooth Roof
Looking West/Southwest

Figure 3-5. Plant 2 (Solarmax) East Elevation
Looking West

3.4.2. Worker Houses Located at 4110, 4120, 4130, and 4140 Howard Avenue

Table 3-3 shows the addresses, APE Map Nos., and APNs of Worker Houses.

Table 3-3. Worker Houses

Property Name	Address	(APE Map No.)/APN
Worker Houses	4110, 4120, 4130, 4140 Howard Avenue	(30) / 211203009

Source: HRR (HNTB 2020)

The houses located at 4110, 4120, 4130, and 4140 Howard Avenue (APE Map No. 30) are recommended eligible for the NRHP, two as representative examples of shotgun houses, and two as an expression of simple, worker's housing located in Eastside, which was home to communities associated with the citrus industry, including Japanese, Mexican, Mexican American, African American, and people of European descent. The worker houses are significant on the state and local level, meeting NRHP Criterion C.

The Project's impacts would alter the houses' integrity of setting, feel, and association, as Build Alternative Options 1A through 3B would require demolition of the FMC's Plant 1 (APE Map Nos. 17, 18, 21, and 28) and one or both the houses on the corner of 12th and Howard (APE Map Nos. 22 and 23), which are part of the historic setting of the houses. However, this change would not alter the aspects of integrity of location and design, which are (along with setting) the most important aspects of integrity under Criterion C. The Project's effect is recommended as No Adverse Effect, as the houses' overall integrity of location, design, workmanship, feel, and association would remain intact enough to convey their historic significance (Figure 3-6 through Figure 3-9[3]).

[3] Figures 3.6- through 3.9 were included in the HRR (HNTB, March 2021) and are Google Earth 2020 (R) sourced.

Figure 3-6. 4110 Howard Avenue

Figure 3-7. 4120 Howard Avenue

Figure 3-8. 4130 Howard Avenue

Figure 3-9. 4140 Howard Avenue

4.0 Section 4(f) Use

This chapter presents the potential direct use, temporary occupancy, and constructive use of the Build Alternative and historic properties as described in Section 3.0 of this document. Section 4(f) applies only to programs and projects undertaken by the United States (U.S.) Department of Transportation (DOT) and only to publicly owned parks, recreation areas, and wildlife refuges, and to historic sites, whether publicly or privately owned. Historic sites are generally those listed on or eligible for the listing on the NRHP. For protected historic sites, Section 4(f) is triggered when:

- Land from a historic site is permanently incorporated into a transportation facility.
- The Project temporarily occupies land from the historic site in a manner that results in adverse impacts to the qualities that made the historic site eligible for the NRHP.
- No land from a historic site is permanently incorporated into the Project, but "proximity impacts" to the historic site are so severe that the qualities that made the historic site eligible for the NRHP are substantially impaired (referred to as a "constructive use").

Definition of Effect and Criteria of Adverse Effect

The definition of effect is contained within 36 CFR Part 800 as follows: "*Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register."

An adverse effect 36 CFR Part 800.16(i) occurs "when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association per 36 CFR 800.5(a)(1)." Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

4.1. Environmental Consequences

4.1.1. No Build Alternative

The No Build Alternative would not include any of the elements of the Build Alternative; therefore, it would not result in the use of any land from a Section 4(f) property and there would be no impacts to the FMC Plants 1 and 2 (APE Map Nos. 17, 18, 21, 28, and 33) or Worker Houses (APE Map No. 30). Therefore, the No Build Alternative is not discussed in this section. It is discussed in the Avoidance Alternatives Analysis of this Draft Individual Section 4(f) Evaluation.

4.1.2. Build Alternative

The proposed Build Alternative would result in a Section 106 Finding of Historic Properties Adversely Affected. This section describes the effects of the Build Alternative to the FMC Plant 1 and Plant 2 (APE Map Nos. 17, 18, 21, 28, and 33) and Worker Houses (APE Map No. 30). and whether the effects would constitute a use under Section 4(f). Table 4-1 shows the addresses, APE Map Nos., and APNs for the FMC Complex (Plant 1 and Plant 2).

Table 4-1. FMC Complex Build Alternative

Property Name	Address	APE Map No./APN
FMC Complex Plant 1	3087 12th Street	**(17)** / 211201004 **(18)** / 211201006 **(21)** / 211201026 **(28)** / 211201039
FMC Complex Plant 2	3080 12th Street	**(33)** / 211231024

Source HRR (HNTB March 2021)

The Build Alternative would result in demolition of the FMC's Plant 1, which would result in a direct use under Section 4(f) and an adverse effect to the FMC Complex as a whole, according to 36 CFR 800.5(a)(2)(i). Demolishing Plant 1 (a primary character-defining feature of the FMC Complex) adversely affects the FMC Complex's ability to convey its historic significance and diminishes the complex's integrity of location, design, material, workmanship, setting, feel, and association.

The Build Alternative would not result in direct impacts to Plant 2; however, Plant 2 would be the only remaining building in the complex of seven extant historic buildings in the FMC Complex upon project completion. Demolishing Plant 1 adversely affects Plant 2. The scale of the buildings is a character-defining feature of the complex, and removing approximately half of the complex, which is in close proximity to the remaining Plant 2, adversely affects Plant 2's ability to convey its significance. However, no land from Plant 2 would be permanently incorporated into the Project, and proximity impacts, due to demolition of Plant 1, would not be so severe that the qualities that made Plant 2 eligible for the NRHP are substantially impaired. Therefore, there would be no use of Plant 2 under Section 4(f).

Figure 4-1 shows the FMC with existing conditions and Figure 4-2 shows visual simulations of the FMC with proposed conditions.

Table 4-2 shows the addresses, APE Map No., and APN for the Worker Houses.

Table 4-2. Build Alternative Worker Houses

Property Name	Address	(APE Map No.) APN
Worker Houses	4110, 4120, 4130, 4140 Howard Avenue	**(30)** / 211203009

Source HRR (HNTB March 2021)

The demolition of FMC Plant 1 would occur across the street from the worker houses and would not directly impact any of the houses. However, this change would not alter the aspects of integrity of location and design and a No Adverse Effect because the overall integrity of location, design, workmanship, feel, and association of the houses would remain intact enough to convey their historic significance. No land from any of the Worker Houses would be permanently incorporated into the Project and proximity impacts of demolishing Plant 1 and the adjacent houses would not substantially impair the qualities that made the Worker Houses NRHP-eligible. Therefore, there would be no use of the Worker Houses under Section 4(f). Figure 4-1 and Figure 4-2 show the existing and visual simulations of proposed conditions for the FMC Complex Plant 1 and Plant 2, and Figure 4-3 and Figure 4-4 show the existing and proposed conditions for Worker Houses located on Howard Avenue.

Figure 4-1. View of FMC Plants 1 and 2 and Metrolink Station, Looking Southeast (Existing)

Figure 4-2. FMC Complex Plant 1 and Plant 2 with Project (Proposed)

Figure 4-3. 11th and Howard Avenue (Existing)
Looking South

Figure 4-4. 11th and Howard Avenue with Project (Proposed)
Looking South

5.0 Alternatives Analysis

Section 4(f) specifies that the Secretary of Transportation may approve a transportation program or project requiring the use of Section 4(f) property only if there is no prudent and feasible alternative to using that land. 23 CFR 774.17 defines a feasible and prudent avoidance alternative as follows:

1. A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
2. An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
3. An alternative is not prudent if:
   i. To a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need;
   ii. It results in unacceptable safety or operational problems;
   iii. After reasonable mitigation, it still causes:
      A. Severe social, economic, or environmental impacts;
      B. Severe disruption to established communities;
      C. Disproportionate impacts to minority or low-income populations; or
      D. Severe impacts to environmental resources protected under other Federal statutes.
   iv. It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
   v. It causes other unique problems or unusual factors; or
   vi. It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

5.1. Avoidance Alternatives

Avoidance alternatives were developed to avoid or minimize impacts to the FMC Complex (Plants 1 and 2) (APE Map Nos. 17, 18, 21, 28, and 33). The avoidance alternatives were evaluated against Section 4(f) feasible and prudent avoidance alternative criteria, as defined in 23 CFR 774.17, and a series of core performance criteria used to screen all potential alternatives that address the following program and service needs for the proposed station improvements and are consistent with project objectives:

- Ability to maintain Metrolink equipment storage needs
- Ability to improve connectivity between other Metrolink lines and local transit
- Safe access for pedestrians
- Right of way availability

- Property acquisition needs
- Environmental mitigation
- Impact to adjacent businesses
- Ability to service growth plan
- Potential for additional service growth beyond plan (e.g. parking)
- Impact to BNSF operations

5.1.1. No Build Alternative

Under the No Build Alternative, implementation of improvements at the RDS would not be constructed and the current configuration of the RDS would remain the same. Although this alternative would avoid impacts to Section 4(f) resources, the No Build Alternative would not meet the project purpose and need. The No Build Alternative would not expand platform capacity to meet passenger train storage needs or improve efficiency because train meets would continue on the BNSF mainline. The No Build Alternative would not improve regional connectivity or accessiblity for commuters or improve operations to accommodate the 91/Perris Valley (91/PV) Line, and the IEOC Lines and train capacity and storage would be limited to the existing platforms. The No Build Alternative does not meet the project purpose and need; therefore, the No Build Alternative is not a prudent and feasible avoidance alternative because it would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need.

5.1.2. Avoidance Alternative 1: New Platform and Tracks on the West Side of the Existing Station

Avoidance Alternative 1 was developed to avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station by moving proposed improvements to the west side of the station (Figure 5-1). This avoidance alternative would provide a new platform and tracks on the west side of the existing station and pedestrian at-grade crossings at both ends of the new platform. The existing pedestrian overpass would be extended to the new platform with an option to extend to the main parking lot.

Determination

Although Avoidance Alternative 1 would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 1 would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It does not allow the Perris Valley trains to use the west side platform because there are no existing crossovers between the RDS and the Perris Valley Line connection, and BNSF will not allow new crossovers to be added/constructed.
- It would eliminate two existing layover tracks on the west side of the station and preclude construction of a future planned third layover track at this location. Removing layover tracks directly adjacent to the station would result in commuter trains being serviced and parked at a remote facility, which would add operational logistics and costs to accommodate the loss of the layover tracks at the RDS. The remote facility would need to be checked for adequate space to service and park the trains. Agreements with BNSF would also need to be obtained for adequate permission to move trains between the remote facility and the RDS. The remote facility would also require additional train movements on the BNSF system, which would be above the current limits in the Shared Use Agreement between BNSF and RCTC. Therefore, renegotiation of the Shared Use Agreement would be required; efforts to

renegotiate the existing Shared Use Agreement have been ongoing for the last 20 years and BNSF may object to the additional train movements.

- It would require construction of a new railroad bridge over 14th Street.
- It would require a new turnout and control point on BNSF Mainline Track 1.
- It would reduce parking capacity and require reconfiguration of bus access into the main station parking lot.

Figure 5-1. Avoidance Alternative 1 New Platform and Tracks on the West Side of the Existing Station

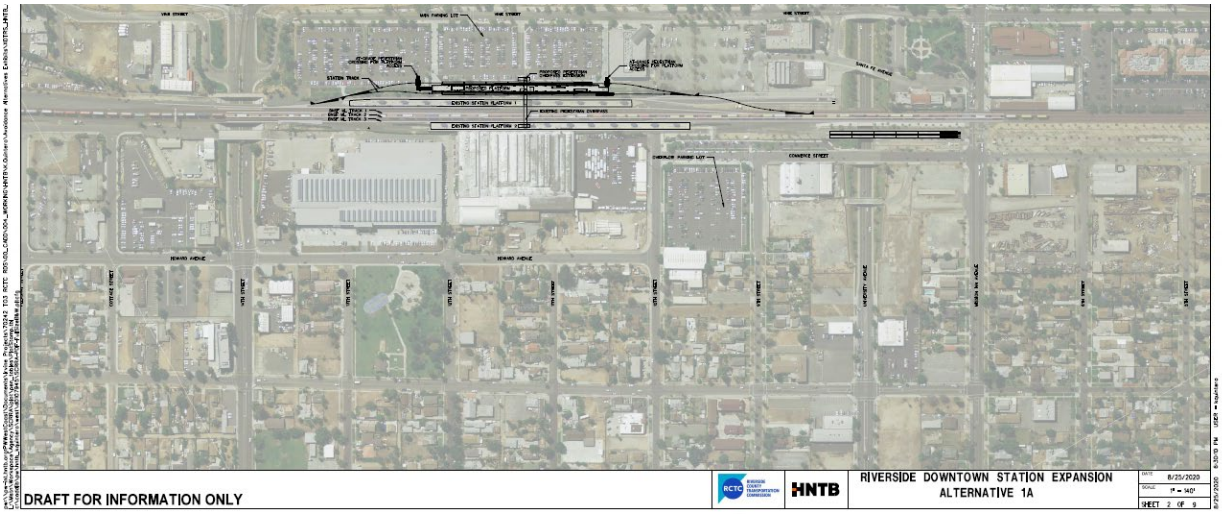
5.1.3. Avoidance Alternative 1A: New Platform and Tracks on the West Side of the Existing Station (avoids crossing the 14th Street Railroad Bridge)

Avoidance Alternative 1A avoids the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station by moving improvements to the west side of the station (Figure 5-2). Avoidance Alternative 1A would provide a new turnout to the platform and tracks on the west side of the existing station and pedestrian at-grade crossings at both ends of the new platform. The existing pedestrian overpass would be extended to the new platform with an option to extend to the main parking lot.

Determination

Although Avoidance Alternative 1A would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 1 would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It does not allow the Perris Valley trains to use the west side platform due to the lack of crossovers between the RDS and the Perris Valley Line connection and BNSF will not allow new crossovers to be added/constructed.
- It eliminates and requires replacement of two existing layover tracks on the west side of the station and precludes construction of a future planned third layover track at this location. The removal of layover tracks directly adjacent to the station would result in commuter trains being serviced and parked at a remote facility in Colton, which would add operational logistics and costs to accommodate the loss of the layover tracks at the RDS. The remote facility would need to be checked for adequate space to service and park the trains. Agreements with BNSF would also need to be obtained for adequate permission to move trains between the remote facility and the RDS. The remote facility would also require additional train movements on the BNSF system, which would be above the current limits in the Shared Use Agreement between BNSF and RCTC. Therefore, renegotiation of the Shared Use Agreement would be required. Efforts to renegotiate the Shared Use Agreement have been ongoing for the last 20 years, and BNSF may object to the additional train movements.
- It requires a new turnout and control point on BNSF Mainline Track 1.
- It reduces existing parking capacity and requires reconfiguration of bus access into the main station parking lot.



5.1.4. Avoidance Alternative 2: New Platform and Tracks on the East Side of the Existing Station

Avoidance Alternative 2 was also developed to avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station by moving the proposed improvements north of the FMC Complex (Figure 5-2). This avoidance alternative would provide a new platform and tracks on the east side of the existing station and pedestrian grade crossings at the east end of the new platform. This alternative would increase Metrolink train storage capacity while minimizing impacts to BNSF operations. In addition, the south end of the new platform would be near the existing overflow parking lot, providing passengers convenient access.

Determination

Although Avoidance Alternative 2 would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) it is not a prudent and feasible avoidance alternative because Avoidance Alternative 2 would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It includes a stub-ended configuration which is not acceptable for train operations at this location because trains that are parked on the east side of Platform 2 would block trains from exiting and require a reverse/double move on the BNSF mainline, adversely impacting their operations. The additional movements would create delays, inefficiencies, and unacceptable operations.
- It requires a right-hand turnout within the limits of the existing platform at the station, which would not meet Metrolink standards and would not be permitted due to operational restrictions.
- It requires widening of the existing bridge over University Avenue.
- It eliminates two existing layover tracks on the east side. The removal of layover tracks directly adjacent to the station would result in commuter trains being serviced and parked at a remote facility in Colton, which would add operational logistics and costs to accommodate the loss of the layover tracks at the RDS. The remote facility would need to be checked for adequate space to service and park the trains. Agreements with BNSF would also need to be obtained for adequate permission to move trains between the remote facility and the RDS. The remote facility would require additional train movements on the BNSF system, which would be above the current limits in the Shared Use Agreement between BNSF and RCTC. Therefore, renegotiation of the Shared Use Agreement would be required. Efforts to renegotiate the Shared Use Agreement have been ongoing for the last 20 years, and BNSF may object to the additional train movements.
- The location of the proposed platform, combined with the configuration of station tracks, prevents the placement of proper pedestrian paths between the proposed platform and existing Platform 2. The pedestrian paths from the proposed platform to Platform 2 would violate Metrolink criteria and result in unsafe conditions. Without paths from the proposed platform to Platform 2, passengers would need to leave the main station area to access the existing platforms and west side main parking area.
- It does not increase parking capacity.

Figure 5-3. Avoidance Alternative 2

5.1.5. Avoidance Alternative 2A: New Platform and Tracks on the East Side of the Existing Station (avoids existing layover tracks)

Avoidance Alternative 2A avoids the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) and the two existing layover tracks on the east side of the station by moving the proposed improvements north of Mission Inn Avenue (Figure 5-4). This avoidance alternative would provide a new platform and tracks on the east side of the existing station and pedestrian grade crossings at both ends of the new platform.

Determination

Although Avoidance Alternative 2A would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 2A would require Mission Inn Avenue to be grade separated and would result in an estimated cost of $45 million, which would more than double the estimated cost of the Project, resulting in additional construction costs of an extraordinary magnitude. In addition, it would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It requires Mission Inn Avenue to be grade separated to accommodate the 4th and 5th tracks and meet California Public Utilities Commission (CPUC) standards.
- It requires a new turnout on BNSF Mainline Track 3 and Control Point (CP).
- It increases the distance of the west end of the new platform to the pedestrian bridge to 2,300 feet from the main parking, and the east end of the platform to the furthest parking spot in the main parking area is 4,600 feet, which would not provide convenient passenger access.
- It does not increase parking capacity.

Figure 5-4. Avoidance Alternative 2A

5.1.6. Avoidance Alternative 2B: New Platform and Tracks on the East Side of the Existing Station (avoids existing layover tracks and Mission Inn Avenue)

Avoidance Alternative 2B avoids the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station and avoids the existing layover tracks by shifting the track improvements farther north, past Mission Inn Avenue (Figure 5-5). This avoidance alternative would provide a new platform and tracks on the east side of the existing station and pedestrian grade crossing at the south end of the new platform.

Determination

Although Avoidance Alternative 2B would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 2B would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It includes a stub-ended configuration that is not acceptable for train operations at this location because it would require a reverse/double move on the BNSF mainline, adversely impacting train operations. The additional movements would create delays, inefficiencies, and unacceptable operations.
- It requires a new turnout on BNSF Mainline Track 3 and a new CP.
- It increases the distance to the west end of the new platform to the pedestrian bridge to 2,300 feet from the main parking, and the east end of the platform to the furthest parking spot in the main parking area is 4,600 feet, which would not provide convenient passenger access.
- It does not increase parking capacity.

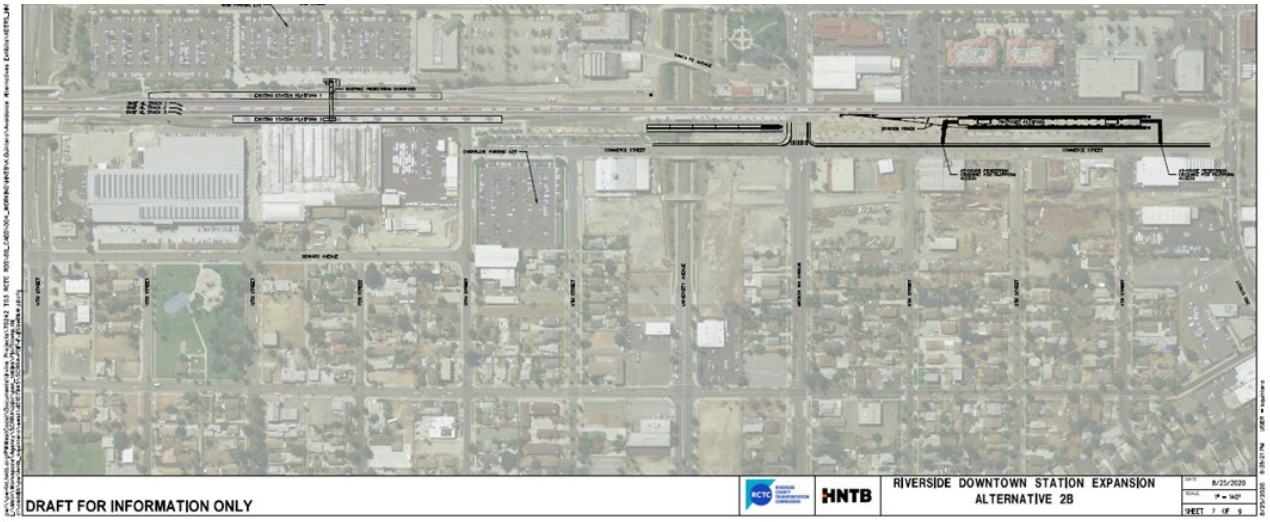


Figure 5-5. Avoidance Alternative 2B

5.1.7. Avoidance Alternative 2C: New Platform and Tracks on the East Side of the Existing Station (not stub ended)

Avoidance Alternative 2C avoids the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station by shifting the improvements just north of FMC Complex (Figure 5-6). This avoidance alternative would provide a new platform and tracks just north of RDS and pedestrian grade crossings at both ends of the new platform.

Determination

Although Avoidance Alternative 2C would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 2C would require Mission Inn Avenue to be grade separated and would result in an estimated cost of $45 million, which would more than double the estimated cost of the Project, resulting in additional construction costs of an extraordinary magnitude. In addition, it would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- The location of the proposed platform combined with the configuration of station tracks prevents the placement of proper pedestrian paths between the proposed platform and existing Platform 2. The pedestrian paths from the proposed platform to Platform 2 would violate Metrolink criteria and result in unsafe conditions. Without paths from the proposed platform and Platform 2, passengers would need to leave the main station area to access the existing platforms and west side main parking area.
- It requires Mission Inn Avenue to be grade separated to accommodate the 4th and 5th tracks and meet CPUC standards.
- It requires widening of the existing bridge over University Avenue.
- It eliminates and requires replacement of two existing layover tracks. The removal of layover tracks directly adjacent to the station would result in commuter trains being serviced and parked at a remote facility in Colton, which would add operational logistics and costs to accommodate the loss of the layover tracks at the RDS. The remote facility would need to be checked for adequate space to service and park the trains. Agreements with BNSF would also need to be obtained for adequate permission to move trains between the remote

facility and the RDS. The remote facility would also require additional train movements on the BNSF system, which would be above the current limits in the Shared Use Agreement between BNSF and RCTC. Therefore, renegotiation of the Shared Use Agreement would be required. Efforts to renegotiate the Shared Use Agreement have been ongoing for the last 20 years, and BNSF may object to the additional train movements.

- It requires a new turnout on BNSF Mainline Track 3 and CP.
- It increases the distance from west end of platform to the pedestrian bridge to 1,100 feet from the main parking, and the east end of the platform to the furthest parking spot in the main parking area is 3,400 feet, which would not provide convenient passenger access.

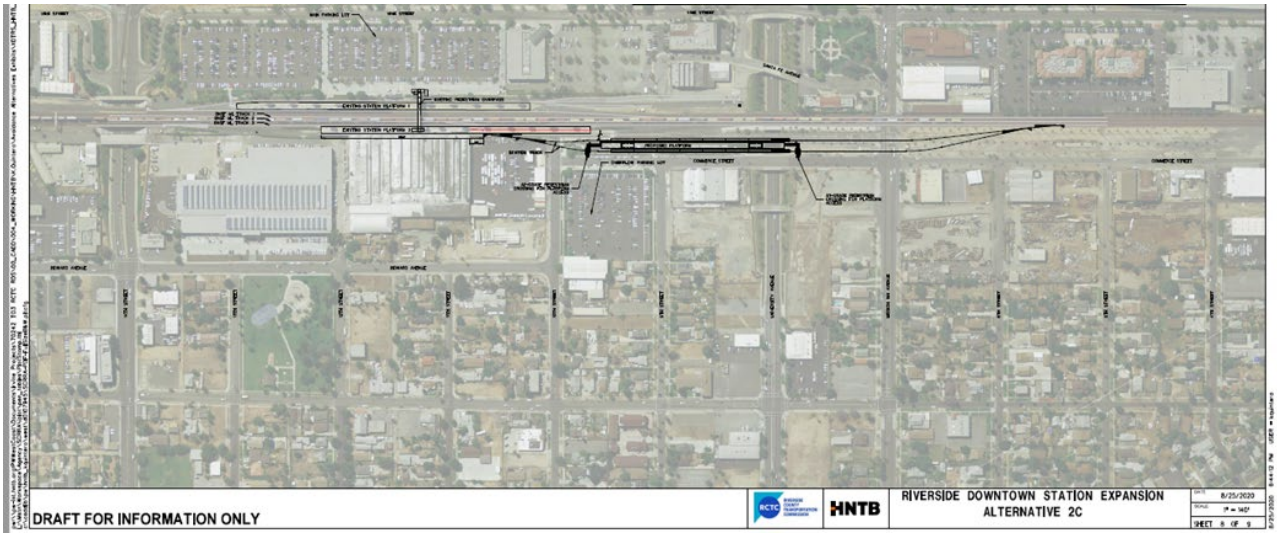


Figure 5-6. Avoidance Alternative 2C

5.1.8. Avoidance Alternative 3: New Platform and Tracks on the East Side of 14th Street

Avoidance Alternative 3 avoids the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33) on the east side of the station by moving proposed improvements south of 14th Street (Figure 5-7). Avoidance Alternative 3 would provide a new platform and tracks on the south side of the existing station, and pedestrian grade crossings would be provided at both ends of the new platform.

Determination

Although Avoidance Alternative 3 would avoid the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33), it is not a prudent and feasible avoidance alternative because Avoidance Alternative 3 would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need, as described herein:

- It is not an acceptable configuration for train operations at this location because it would require a reverse/double move on the BNSF mainline, adversely impacting train operations. The additional movements would create delays, inefficiencies, and unacceptable operations.
- It requires relocation and modification of existing signals facilities.
- It requires extensive right of way acquisition of frontage road and adjacent properties to accommodate a new platform and tracks and also requires a vacation of Commerce Street.

- It increases the distance from the west end of platform to the pedestrian bridge to 2,300 feet from the main parking, and the east end of the platform to the furthest parking spot in the main parking area is 4,600 feet, which would not provide convenient passenger access.

Figure 5-7. Avoidance Alternative 3

5.1.9. Core Performance Criteria

In addition to Section 4(f) feasible and prudent avoidance alternative criteria defined in 23 CFR 774.17; all potential alternatives, including the avoidance alternatives, were evaluated based on how they best met the core performance evaluation criteria and if they met the project purpose and need.

Purpose and Need

The purpose of the proposed project is to expand the capacity, improve operations and efficiency, connectivity, and the passenger experience at the RDS.

Project Objectives

The Project objectives are as follow:

- Expand platform capacity to meet passenger train storage needs
- Allow for train meets off the BNSF mainline and minimize impacts to BNSF operations
- Improve transit connectivity and accessibility while minimizing impacts on improvement projects near the station that are already designed or in construction
- Facilitate more efficient passenger flow and reduce dwell times
- Enhance safety and access for station users
- Accommodate projected future demand

In the evaluation of the Build Alternative and Avoidance Alternatives 1, 1A, 2, 2A, 2B, 2C, and 3 against the core performance criteria, the Build Alternative was identified as the best alternative for the expansion of the RDS because it met the purpose and need and most of the core performance criteria, including the capacity for additional growth in the future.

Table 5-1 describes the core evaluation criteria and summarizes how each of the alternatives met the core evaluation criteria.

Table 5-1. Summary of Core Evaluation Criteria by Avoidance Alternative

Evaluation Criteria	Build Alternative	Avoidance Alternatives 1 and 1A	Avoidance Alternative 2	Avoidance Alternatives 2A and 2B	Avoidance Alternative 2C	Avoidance Alternative 3
No impacts to Layover capacity	X	--	--	X	--	X
Meets Connectivity/ Service Plan Needs	X	X	--	--	--	--
No property acquisition/No Impact to adjacent businesses	--	--	X	X	X	--
No impact to BNSF operations	X	--	X	--	--	--
Meets Metrolink Design Criteria	X	X	--	X	--	X
No impacts to Capacity for future growth (e.g. parking)	X	--	--	--	--	--
Meets Purpose and Need	X	--	--	--	--	--
Criteria Met	**6**	**2**	**2**	**3**	**1**	**2**

X = meets core performance criteria

-- indicates does not meet core performance criteria

5.1.10. Consideration of Section 4(f) Avoidance Alternatives

Avoidance Alternatives 1, 1A, 2, 2A, 2B, 2C, and 3 avoid impacts to the FMC Complex (Plant 1 and Plant 2) (APE Map Nos. 17, 18, 21, 28, and 33); however, they did not meet the performance criteria or the purpose and need. Avoidance Alternatives 1, 1A, 2, 2A, 2B, 2C, and 3 were evaluated using the criteria outlined in 23 CFR 774.17, and they did not meet the criteria for a prudent and feasible avoidance alternative because they would compromise the Project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need. Avoidance Alternatives 2A and 2C would require a grade separation of Mission Inn Avenue and would result in an estimated cost of $45 million, which would more than double the estimated cost of the Project, resulting in construction costs of an extraordinary magnitude. Based on this evaluation, there is no feasible and prudent avoidance alternative to avoid the use of land from any and all Section 4(f) properties.

6.0 Measures to Minimize Harm

After determining there are no feasible and prudent alternatives to avoid the use of a Section 4(f) property, the project approval process for the Draft Individual Section 4(f) Evaluation requires that the action includes all possible planning, as defined in 23 CFR 774.17, to minimize harm to a Section 4(f) property resulting from such use, as stated in project approval as defined in 23 CFR 774.3 (a)(2).

All possible planning, as defined in 23 CFR 774.17, means that all reasonable measures (identified in the Individual Section 4(f) Evaluation*)* to minimize harm or mitigate adverse impacts and effects must be included in the proposed project.

With regard to historic sites, the measures normally serve to preserve the historic activities, features, or attributes of the site, as agreed to by FTA (the federal lead agency) and SHPO, (the official(s) with jurisdiction over the Section 4(f) resource), in accordance with the Section 106 consultation process under 36 CFR Part 800, Protection of Historic Properties.

In evaluating the reasonableness of measures to minimize harm under 23 CFR 774.3(a)(2), FTA will consider the preservation purpose of the statute and the following factors:

- The views of the official(s) with jurisdiction over the Section 4(f) property
- The cost of the measures (whether it is a reasonable public expenditure in light of the adverse impacts of the Project on the Section 4(f) property) and the benefits of the measure to the property, in accordance with 23 CFR 771.105(d)
- Any impacts or benefits of the measures to communities or environmental resources outside of the Section 4(f) property

All possible planning does not require analysis of feasible and prudent avoidance alternatives because such analysis will have already occurred in the context of searching for feasible and prudent alternatives that avoid Section 4(f) properties altogether under 23 CFR 774.3(a)(1) or is not necessary in the case of a *de minimis* impact determination under 23 CFR 774.3(b).

Protection of Historic Properties 36 CFR Part 800 (Section 106)

Under Section 106 of the NHPA, anticipated adverse effects should be avoided, minimized, or mitigated wherever possible to satisfy federal regulations for the treatment of historic properties.

The following efforts were made by the design team to reduce impacts, to the extent possible, to the FMC Plant I; however, destruction of the FMC Plant I structure could not be avoided.

6.1. Minimization of Harm

6.1.1. Build Alternative Options for Adaptive Reuse

An adaptive reuse option was also considered to minimize harm to the historic FMC Complex's Plant 1 and Plant 2 (APE Map Nos. 17, 18, 21, 28, and 33) while weighing the overall project objectives against core performance criteria, as previously discussed. The following conceptual analysis addresses an adaptive reuse scenario for a complete retrofit/reuse of the existing Plant 1, and a partial reuse of Plant 1 (APE Map Nos. 17, 18, 21, and 28) by incorporating the building into the Project.

The Build Alternative places the new tracks and passenger loading platform in the current location of Plant 1. Adaptive reuse of the building to serve as an enclosed passenger rail station would entail structural changes to the building to accommodate the tracks and platform while retaining the building's exterior and interior historic materials and structural elements. Based on a structural condition analysis performed in 2019, there are a number of existing structural issues associated with the predominantly timber-constructed building (timber trusses, timber purlins, timber girders, timber roof, timber columns, and timber floor planks). Many of the timber trusses, girders, and columns show signs of cracking and splitting that could compromise the compression capabilities of these structural, supporting members. In order to meet structural and seismic code, a new "skeleton" structure would have to be constructed because the timber structural members are deteriorating. In addition to these changes, the majority of the glass windows in the clerestories have been replaced with translucent plastic panels (existing condition), and the current owners of the building have been making ongoing repairs to the structure, further compromising the design and material integrity of the historic structure. The exterior walls (including the character-defining, multi-light windows) would need to be removed or partially removed to allow proper ventilation of the interior while trains are stopped inside. The exposed timber framing, trusses, and sawtooth roof would be the only historic elements remaining, and they would be heavily modified from their original configuration (encased in steel or concrete), as a result of the changes necessary to meet fire and safety codes.

Operational Constraints

In order to reuse Plant 1 as part of the expansion of the RDS, new tracks would have to ladder off an existing station track and the new station tracks would have to thread through the building structure. Operationally, this would reduce the capacity of the existing and proposed platform and would also require a substantial retrofit of the structure. This alternative could impact BNSF operations and layover tracks, and consideration would need to be made to accommodate the right size train. This alternative may also require building another bridge over University Avenue.

Environmental Impacts

There are environmental concerns with the adaptive reuse alternative. In 2018, a Phase I Environmental Site Assessment (RCTC, 2018) was performed at the proposed project site. There are recognized environmental conditions (RECs) and activity use limitations for portions of the proposed project site. Land use covenants also dictate that the site must not be used for sensitive receptors, and soil disturbance activities must not be conducted without the consent of the Department of Toxic Substances Control (DTSC). There are ongoing remediation efforts at the proposed project site, and DTSC has also indicated a hazardous waste plume in soils and groundwater. The cost of remediation would depend on the type of impact to groundwater (up to $5 million for limited excavation), which would take up to 3 years to complete, and monitoring would be required for at least 30 years. DTSC could still provide RCTC with a land use covenant restricting some uses of the property. Currently, the only use that has been approved by DTSC is a surface parking lot.

Cost Factors

In summary, there are a number of challenges associated with adaptive reuse of the existing approximately 120,000-square foot (SF) structure to accommodate the proposed passenger rail platform and tracks. If the entire structure is retrofitted for adaptive reuse, it could cost between $600 and $800 per SF ($72 million to $96 million, respectively) due to the following factors:

- Hazardous waste/materials (e.g. lead paint; spills over the decades from Industrial tenants).
- Ventilation requirements – in lieu of mechanical ventilation, at least 50 percent of the walls would have to be removed and likely a large portion of the roof opened up to accommodate ventilation.

- Fire-resistive construction – as an "Enclosed" station under National Fire Protection Association 130, structure and finishes would have to be 2-hour, fire-rated construction, separated from other uses. Essentially, the exposed timber framing would need to be encased in fire-rated materials, such as concrete or steel.
- The canopy would have to include a full fire-sprinkler system.
- Portions not used for train boarding (and used other than a shed) require demising walls between occupancies.
- A steel moment-resisting frame would be needed to frame the openings of the appropriate dimension where the tracks enter and exit; similarly, at the point where the pedestrian bridge, elevator tower, and stairs enter, a moment frame would need to be constructed, resulting in a special condition in contrast to the support of the rest of the sawtooth roof. Results could be fairly uniform.

While this alternative would reuse the structural timber trusses and supports and retain the distinctive sawtooth roof, the building's overall integrity of design, materials, workmanship, and feel would be compromised as a result of the substantial loss of historic fabric associated with adaptive reuse as a covered, enclosed train station. The alterations to make the structure a fire-rated enclosure for the train station includes encapsulation of the reused timber trusses, supports, and framing elements (all character-defining features) in fireproof materials, such as concrete or steel. This alternative would not meet the Secretary of the Interior's Standards for Rehabilitation and would result in an adverse effect under Section 106 and a use under Section 4(f).

6.1.2. Partial Reuse

Another option (partial reuse option) would be to deconstruct Plant 1 (APE Map Nos. 17, 18, 21, and 28) so that only a canopy remained, covering a portion of the proposed track and platform, reducing the structure's size to a much smaller one than the existing size of Plant 1. The canopy structure would be open (not enclosed or filled with train exhaust or hazardous waste/materials) to allow for ventilation. The existing structure is approximately 450 feet long. The entire length of structure would likely remain if the new platform is completely within the footprint of the building. However, with the canopy option, portions of the building would be removed (exterior walls, interior partitions, and spaces), leaving a 450-foot-long canopy above the station platform. The canopy structure would only be 56,000 SF, as opposed to the full adaptive reuse of the existing 120,000 SF structure.

Environmental Impacts

There are also environmental concerns with the Partial Reuse Alternative. In 2018, a Phase I Environmental Site Assessment was performed at the proposed project site (RCTC, 2018). There are RECs and activity use limitations for portions of the proposed project site. Land use covenants also dictate that the site shall not be used for sensitive receptors, and soil disturbance activities shall not be conducted without the consent of DTSC. There are ongoing remediation efforts at the proposed project site and DTSC has also indicated a hazardous waste plume in soils and groundwater. The cost of remediation would depend on the type of impact to groundwater (up to $5 million for limited excavation), which would take up to 3 years to complete, and monitoring would be required for at least 30 years. DTSC could still provide RCTC with a land use covenant restricting some uses of the property. Currently, the only use that has been approved by DTSC is a surface, (open air) parking lot.

Cost Factors

In summary, there are a number of challenges associated with partial reuse of the existing approximately 120,000 square foot (SF) structure to accommodate the proposed passenger rail platform and tracks. If the entire structure was deconstructed so only the canopy remained, the estimated cost would be between $34 $45 million. The remainder of the parcel could be developed into parking (a permitted use); although, there may be fewer spaces (approximately 80 to 100 spaces lost), as a result of the partial reuse option.

In addition to the cost of deconstruction, remediation may be required with costs between $600 and $800 per SF ($72 million to $96 million) due to the following factors:

- Hazardous waste/materials (e.g. lead paint; spills over the decades from Industrial tenants).
- Fire-resistive construction – the canopy may be considered an "Enclosed" station under National Fire Protection Association 130, the remaining structure and finishes would have to be 2-hour, fire-rated construction, separated from other uses. Essentially, the exposed timber framing of the canopy and supports would need to be encased in fire-rated materials, such as concrete or steel.
- The canopy would have to include full fire-sprinkler system.
- Portions not used for train boarding (and used other than a shed), require demising wall between occupancies.
- A steel moment-resisting frame would be needed to frame the openings of the appropriate dimension where the tracks enter and exit. Similarly, at the point where the pedestrian bridge, elevator tower, and stairs enter, a moment-resisting frame would need to be constructed, resulting in a special condition in contrast to the support of the rest of the sawtooth roof. Results could be fairly uniform.

While this alternative would partially reuse the structural timber trusses and supports and retain the distinctive sawtooth roof, the building's overall integrity of design, materials, workmanship, and feel would be compromised as a result of the substantial loss of historic fabric. The alterations to make the structure a fire-rated enclosure for the train station includes encapsulation of the reused timber trusses, supports, and framing elements (all character-defining features) in fireproof materials, such as concrete or steel. This alternative would not meet the Secretary of the Interior's Standards for Rehabilitation and would result in an adverse effect under Section 106 and a use under Section 4(f).

Design challenges associated with the (partial) adaptive reuse option include: 1) a redundant steel frame would have to be built underneath the sawtooth roof to cradle it, essentially, building a new building within an existing building, with its own foundation and fire-resistive cladding; 2) the foundation installation would be further complicated by the need to keep existing columns and beams (overhead clearance for drill rig) in place; 3) the fragility of the sawtooth roof would entail exceptionally careful handling by the contractor to avoid irreparable damage; and, finally, 4) special detailing and connections would be needed to connect new to old in a context sensitive manner.

While the partial reuse of the building would retain portions of character-defining features (the sawtooth roof, supporting columns, and trusses), the removal of the exterior walls, the historic fenestration, interior partitions and spaces, and portions of the sawtooth roof would compromise the building's integrity of design, materials, workmanship, feel, and association. Additional interpretive measures would need to be included in the overall mitigation strategy, such as interpretive displays, careful removal and salvaging of building materials to be donated, and photographic documentation of the structure prior to alterations (Historic American Buildings Survey- [HABS] level documentation). This alternative would not meet the Secretary of the

Interior's Standards for Rehabilitation and would result in an adverse effect under Section 106 and a use under Section 4(f).

Given the extensive loss of integrity associated with adaptive and partial reuse, the environmental impacts, and overall costs of remediation and structural alteration, both the full adaptive reuse and partial reuse of the structure are not considered viable alternatives.

When neither avoidance nor reduction is possible in establishing final design, construction, and operation details of the undertaking, mitigation measures pursuant to 36 CFR Part 800.6 will be included in a Memorandum of Agreement, which will be agreed upon by appropriate parties and executed in consultation with SHPO. The following avoidance, minimization and mitigation measures are recommended for agreement among the funding, construction, operation, consulting, and review parties.

6.1.3. Preliminary Proposed Mitigation Measures

Under Section 106 of the NHPA (36 CFR § 800.5 and § 800.6), resolution of adverse effects is the next step in the Section 106 process. The following list of options for mitigation measures can be further developed in consultation with the California SHPO and Interested and Consulting Parties. The following measures are directly tied to mitigating adverse effects to the FMC Complex (Plant 1 and Plant 2):

- HABS/HAER photographic documentation (to supplement existing HAER project).
- Deconstruction and reuse of salvaged building components (in the new Project and/or to be donated).
- Oral histories archived at local museum or California Historical Society Museum.
- Interpretive displays.
- Treatment Plan for Plant 2 (APE Map No. 33) to retain what is left of its integrity.
- Build Alternative with Design Options 1A through 3B the following measure is proposed to address indirect setting effects: Vegetated screening and decorative barriers could be placed between the parking lot and the residences on 12th Street and Howard Avenue and further mitigated through streetscape enhancements (already proposed as part of the Project).

7.0 Least Overall Harm Analysis and Concluding Statement

As stated in Chapter 1.0, Section 4(f) requires that when there are no "prudent and feasible" avoidance alternatives to the "use" of Section 4(f) properties, and multiple Build Alternatives are being evaluated, the lead federal agency must choose from the remaining Build Alternatives that use the Section 4(f) property and select the alternative that causes the "least overall harm" in light of the statute's preservation purpose. The least overall harm is determined by balancing the following seven factors:

1. Ability to mitigate adverse impacts on each Section 4(f) property, including any measures that result in benefits to the property
2. Relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection
3. Relative significance of each Section 4(f) property
4. Views of the official(s) with jurisdiction over each Section 4(f) property
5. Degree to which each alternative meets the purpose and need for the Project
6. The magnitude of any adverse impacts on resources not protected by Section 4(f) (after reasonable mitigation)
7. Substantial differences in cost among the project alternatives

The first four factors relate to the net harm that each project alternative would cause to the Section 4(f) property, and the remaining three factors take into account concerns with the project alternatives that are not specific to Section 4(f).

As discussed in Chapter 5.0, there is no feasible and prudent avoidance alternative that meets the purpose and need and avoids the use of the Section 4(f) property. The No Build Alternative and Avoidance Alternatives 1, 1A, 2, 2A, 2B, 2C, and 3 are the avoidance alternatives that were considered but were found not to be prudent and feasible because it compromises the proposed project to a degree that it is unreasonable to proceed with the Project in light of its stated purpose and need.

Multiple Build Alternatives are not being evaluated and there is only one Build Alternative under consideration; it is the only alternative that meets the purpose and need. Section 3.3.3.2 of the FHWA *Section 4(f) Policy Paper* states that the least harm alternative analysis is required when multiple alternatives that use a Section 4(f) property remain under consideration. For the proposed project, only the Build Alternative remains under consideration; therefore, a least harm alternative analysis is not required.

8.0 Coordination Activities

8.1. Section 4(f) Coordination

Section 4(f) consultation requires coordination with SHPO (the official with jurisdiction over the Section 4(f) property), the Department of the Interior (DOI), and with any federal agency with jurisdiction over the Section 4(f) property.

8.1.1. State Historic Preservation Office and Department of the Interior

SHPO is the official with jurisdiction over the FMC. The Draft Individual Section 4(f) Evaluation must be sent to DOI and to the official with jurisdiction over the Section 4(f) resource .The DOI and SHPO's response (or no response) to the Draft Individual Section 4(f) Evaluation are forthcoming and will be included in the Final Section 4(f) Evaluation. DOI and SHPO were given a 45 calendar-day review period. According to 23 CFR 774.5(a), if comments are not received within 15 days after the comment deadline, [FTA] may assume a lack of objection and proceed with the action

8.2. Section 106 Coordination

8.2.1. State Historic Preservation Office

On April 7, 2020, FTA, as federal lead agency, in coordination with RCTC, sent a letter to initiate Section 106 consultation for the RDS Improvements Project to SHPO asking for comments on the delineation of the APE pursuant to Section 106 of the NHPA, as amended 36 CFR 800 (FTA, 2020). The following documents were also attached: a regional location map, Proposed Project Area Map, APE Map, and the APE Technical Memo (HNTB, February 2020).

On June 4, 2020, SHPO sent a letter to FTA and found the APE as delineated was appropriate (SHPO, 2020).

Subsequent design options and the refinements to the existing project description warranted an update to the project description to reflect the refinements and to provide additional detail. To address the refinements, on January 5, 2021, FTA sent a letter to SHPO requesting their review and comment on the Updated Project Description Memorandum (HNTB, 2020). FTA's letter concluded the original project description and the current APE (including the LOD) were consistent with the design refinements and additional project details described in the Build Alternative for the following reasons:

- The APE Methodology Technical Memorandum (HNTB, 2020) described improving traffic circulation, and the proposed traffic circulation and parking options (with the optional extension of Howard Avenue from 10th to 9th Streets) are consistent with that original project description.
- The LOD included all the areas anticipated to have ground disturbance and excavation. For clarification, the maximum depth of disturbance is up to 10 feet across all areas within the LOD where structure removal, excavation of materials, foundations, and other ground-disturbing construction activities might occur. In addition, a tribal monitor and an

archaeologist will be on site monitoring all ground-disturbing activities during construction, and a post-review discovery plan will be in place prior to commencement of construction activities.

On March 17,2021, SHPO sent a letter to FTA concluding that the original project description and the current APE (including the LOD) were consistent with the design refinements and additional project details described in the Build Alternative (SHPO, 2021).

On March 25, 2021, FTA submitted the HRR (HNTB, 2021) to SHPO for review and comment.

Correspondence is contained in Appendix A.

8.2.2. Public Outreach

RCTC conducted public outreach as part of the environmental process. The various outreach efforts and responses relevant to Section 4(f) and Section 106 are summarized herein.

On February 6, 2020, RCTC hosted a scoping meeting for the RDS Improvements Project. The scoping meeting provided an opportunity for the public, community, interest groups, media, and government agencies to obtain information, ask questions, and provide comments regarding the proposed project.

Cultural comments were received during scoping and are summarized as follows:

- Impact on the historic building
- Maintaining the historic value of the building
- Opportunity to reuse the historic building
- Incorporate building into design (make it a hub for people)

8.2.3. City of Riverside Cultural Heritage Board

On December 16, 2020, the project team conducted a virtual meeting with the City's Cultural Heritage Board to familiarize members with the Project and efforts to identify historic and culturally significant resources within the APE and invite them to participate as an interested party, comment on the undertaking, and answer any questions. Following the meeting, on January 11, 2021, FTA, in coordination with RCTC, sent a letter to the Cultural Heritage Board inviting the board to participate as interested parties in the Section 106 process (FTA, 2021).

8.2.4. Interested Parties

On January 11, 2021, FTA, in coordination with RCTC, sent letters to the following interested parties for Section 106 consultation:

- American Association for State and Local History
- California Citrus State Historic Park
- The California Historical Society
- California Preservation Foundation
- City of Riverside
- Japanese American Citizens League, Riverside Chapter
- Lincoln Park Neighborhood Group

- Museum of Riverside
- National Trust for Historic Preservation
- Old Riverside Foundation
- Riverside African-American Historic Society
- Riverside County Mexican American Historical Society
- Riverside Historical Society
- Riverside Neighborhood Partnership
- The Mission Inn Foundation

On January 12, 2021, the Riverside Historic Society responded that they did not have any concerns with this project with regard to historic structures and the like.

On January 25, 2021, the Museum of Riverside (formerly the Riverside Metropolitan Museum) provided comments to RCTC. These comments provided additional information about the significance of Lincoln Park (No. 31 in the APE) and brought to the project team's attention that there are significant resources in the general vicinity, but outside the APE. The Museum of Riverside recommended that a historical archaeologist assess sites and any houses to be acquired or demolished prior to grading near the lodge (outside the APE).

On January 27, 2021, the American Association for State and Local History responded that they do not participate in local preservation or improvement projects.

On February 2, 2021, the City of Riverside provided comments regarding the historic status of the Mission Inn Historic District (not NRHP-eligible) and the Seventh Street Historic District (NRHP-eligible).

On February 17, 2021, the Old Riverside Foundation provided comments regarding the historic significance of the FMC Complex to Riverside's history, including 3080 10th Street, which is also a part of the FMC Complex. They also indicated that there are historic residences in the APE, beyond the LOD, on Howard Avenue and 12th Street. And finally, they informed the project team about the historic lodges in the Eastside neighborhood.

On February 25, 2021, the Riverside County Mexican American Historical Society responded that the organization did not have any historic sites to identify related to the project.

9.0 Determination of Section 4(f) Use

The foregoing discussion regarding the Project's potential use of Section 4(f) properties, avoidance alternatives, and measures to minimize harm results in the following determination, the Build Alternative would result in the use of one Section 4(f) property. The Build Alternative would not result in temporary use, a *de minimis* impact, or a constructive use.

Table 9-1 presents a summary of Section 4(f) Properties evaluated for use within the APE.

Table 9-1. Summary of Section 4(f) Properties and Use Determination for Build Alternative

Section 4(f) Property Name (APE Map Nos.)/APN	**On or Adjacent to Alignment**	**Section 106 Effect Determination**	**Use (None, Direct, Temporary, or Constructive)**	***De Minimis* (Yes/No)**
FMC Plant 1 **(17)** / 211201004 **(18)** / 211201006 **(21)** / 211201026 **(28)** / 211201039	On Alignment	Finding of Adverse Effect	Use - Direct	No
FMC Plant 2 **(33)** / 211231024	On Alignment	Finding of Adverse Effect	Use - None	No
Workers Houses: 4110, 4120, 4130, 4140 Howard Avenue **(30)** / 211203009	Adjacent to	No Adverse Effect	Use - None	No

Therefore, based on the Individual Section 4(f) Evaluation, there is no feasible and prudent avoidance alternative to the use of land from the FMC Plant 1 (APE Map Nos. 17, 18, 21, and 28), and the Build Alternative causes the least overall harm, given the statute's preservation purpose.. The proposed action includes all possible planning to minimize harm resulting from the use of the FMC Plant 1 and Plant 2 (APE Map Nos. 17, 18, 21, 28, and 33).

10.0 List of Preparers

10.1. FTA

Mahilet Amare, Project Manager, General Engineer

Candice Hughes, Environmental Protection Specialist

10.2. RCTC

David Lewis, Capital Projects Manager

Erik Galloway, RCTC Measure A

Karl Sauer, Rail

Gustavo Quintero, Environmental/Haz Review

10.3. HNTB

Graham Christie, Project Manager

Karen Quintero, Project Engineer

Elisabeth Suh, Environmental Lead

Tami Podesta, Section 4(f) Lead

James Santos, Environmental Review

Lilly Acuna, Environmental Planner

Kimberly Demuth, Cultural Resources Lead

Leslie Schwab, Cultural Resources

Lorae Klein, Technical Editor

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HNTB. 2020. *Section 106 APE Methodology and Updated Project Description.* December

HNTB. 2021. *Historic Resources Report* March

HNTB. 2021. *Archaeological Survey Report*. March

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Appendix A. Agency Consultation

U.S. Department
of Transportation
Federal Transit Administration

REGION IX
Arizona, California,
Hawaii, Nevada, Guam
American Samoa,
Northern Mariana Islands

90 7th Street
Suite 15-300
San Francisco, CA 94103-6701
415-734-9490

888 South Figueroa Street
Suite 440
Los Angeles, CA 90017-5467
213-202-3950

April 7, 2020

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ms. Natalie Lindquist, Historian

Subject: Section 106 Consultation for the Riverside-Downtown Station Improvements Project

Dear Ms. Polanco:

The Federal Transit Administration (FTA) in coordination with the Riverside County Transportation Commission (RCTC) and Metrolink is conducting consultation under Section 106 of the National Historic Preservation Act for the Riverside-Downtown Station Improvements Project (Project). The Project will be a federal undertaking because the FTA will be providing financial assistance. The FTA serves as the federal lead agency. This letter initiates consultation with the State Historic Preservation Officer and requests comments on the delineation of the Area of Potential Effect (APE) pursuant to Section 106 of the National Historic Preservation Act (NHPA) as amended (36 C.F.R. 800).

Overview of the Proposed Project

The existing Riverside-Downtown Station is located at 4066 Vine Street, Riverside, 92507, and at approximately Milepost 9.9 to 10.2 on the Burlington Northern Santa Fe (BNSF) San Bernardino Subdivision,within the City and County of Riverside, California. The Project would build an additional passenger loading platform and tracks to improve Metrolink service and extend the existing pedestrian bridge to have additional elevator and stair access. The proposed track would connect into the existing station layover tracks on the south side. The Project would also provide parking and improve traffic flow on the south side of the station. These improvements would enhance Metrolink train connections without affecting BNSF service.

As described and illustrated in the attached Technical Memorandum – ***Riverside-Downtown Station Improvements Project, APE Methodology Technical Memo*** (January 2020) (Attachment A: Figures 1, 2, and 3), the proposed Project includes:

- Building a new 720-foot center platform
- Constructing new tracks and making other track improvements
- Modifying the railroad signal system
- Extending the pedestrian bridge approximately 50 feet, including elevator and ADA access
- Relocating ADA parking
- Adding approximately 500 parking spaces (surface lot) to the south side of station
- Building a new pedestrian at-grade rail crossing
- Modifying the bus drop-off area
- Adding sidewalks

Area of Potential Effect (APE)

The proposed APE includes built resources and historic and cultural landscapes and all areas that could be directly or indirectly affected by the proposed project. Direct effects include physical changes to historic properties. Indirect effects include visual effects or effects caused by noise or vibration. The horizontal extent of the APE is generally defined as the parcels of land adjacent to the project site and potential construction staging areas.

The types of ground disturbance activities anticipated include removal of existing track, demolition of existing building and foundation, and removal of soils to a maximum depth of approximately 10 feet. The types of ground disturbance activities also included the following: excavation, backfill and grading up to a depth of 10 feet. Staging/laydown areas would be accommodated within the defined APE. Please refer to the attached APE map.

The APE also includes a buffer zone where there may be indirect effects on surrounding parcels from noise, vibration or visual intrusions associated with construction and post-construction Project operation. Maximum elevation of proposed structures (pedestrian bridge) would be approximately 35 feet above surface grade.

Built resources and historic properties and all areas that could be directly or indirectly affected by the proposed project are included in the APE. Direct effects include physical changes to historic properties and the anticipated removal of a large industrial building whose National Register of Historic Places (NRHP) eligibility will be investigated.

The APE is referred to as the Limit of Distrubance (LOD) in the ***Riverside-Downtown Station Improvements Project, APE Methodology Technical Memo*** (January 2020).

Native American and Tribal Consultation

A search of the Sacred Lands File from the Native American Heritage Commission (NAHC) was conducted on December 19, 2019 with negative results, indicating that no known resources were within the Project APE. The NAHC provided information for twenty-six Native American tribes or individuals to be contacted for further information regarding the general project vicinity. FTA and RCTC are currently contacting Native American tribes and other consulting parties per 36 CFR Part 800.2(c) to help identify if there are any other prehistoric sites, sacred sites, and/or traditional cultural properties located in the vicinity of the Project Study Area.

Efforts for Historic Resources Identification

In accordance with 36 CFR Part 800.4(a)(2), information about known and potential historic properties within the APE will be reviewed. Investigations will be prepared by consultants who meet the Secretary of the Interior's Professional Qualifications Standards in archaeology, history, and architectural history. The project would be constructed by 2024, and identification efforts will be focused on properties constructed before 1969.

Findings

In accordance with 36 CFR § 800.4, the FTA is requesting your comments on delineation of the APE.

If you have any questions, please contact Ms. Candice Hughes, Environmental Protection Specialist, at (213) 629-8613 or by email at candice.hughes@dot.gov.

Sincerely,

RAYMOND S TELLIS

Digitally signed by RAYMOND S TELLIS
Date: 2020.04.07 18:32:31 -07'00'

Ray Tellis
Regional Administrator

Enclosures: Regional Location Map
Proposed Project Area Map
Area of Potential Effects Map (APE Map)
Area of Potential Effects (APE) Technical Memo

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Lisa Ann L. Mangat, *Director*

Julianne Polanco, State Historic Preservation Officer
1725 23rd Street, Suite 100, Sacramento, CA 95816-7100
Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

June 4, 2020

VIA EMAIL

Reply To: FTA_2020_0408_001

Mr. Ray Tellis, Regional Administrator
Federal Transit Administration, Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103-6701

Re: Proposed Riverside-Downtown Station Improvements Project, Riverside, CA, Riverside County, CA

Dear Mr. Tellis:

The State Historic Preservation Officer (SHPO) received the Federal Transit Administration's (FTA) letter of April 7, 2020, initiating consultation on the above-referenced project to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended), and its implementing regulations at 36 CFR § 800. The FTA included a technical memorandum describing the area of potential effect (APE) for the project as well as maps of the project area.

The FTA is proposing to build an additional passenger loading platform and tracks to improve Metrolink service and extend the existing pedestrian bridge to have additional elevator and stair access. The proposed track would connect into the existing station layover tracks on the south side. The Project would also provide parking and improve traffic flow on the south side of the station. These improvements would enhance Metrolink train connections without affecting BNSF service.

In accordance with 36 CFR § 800.4, the FTA is requesting your comments on delineation of the APE. The proposed APE includes built resources and historic and cultural landscapes and all areas that could be directly or indirectly affected by the proposed project. Direct effects include physical changes to historic properties. Indirect effects include visual effects or effects caused by noise or vibration. The horizontal extent of the APE is generally defined as the parcels of land adjacent to the project site and potential construction staging areas.

The types of ground disturbance activities anticipated include removal of existing track, demolition of existing building and foundation, and removal of soils to a maximum depth of approximately 10 feet. The types of ground disturbance activities also included the following: excavation, backfill and grading up to a depth of 10 feet. Staging/laydown

areas would be accommodated within the defined APE. Please refer to the attached APE map.

The APE also includes a buffer zone where there may be indirect effects on surrounding parcels from noise, vibration or visual intrusions associated with construction and post-construction Project operation. Maximum elevation of proposed structures (pedestrian bridge) would be approximately 35 feet above surface grade.

Built resources and historic properties and all areas that could be directly or indirectly affected by the proposed project are included in the APE. Direct effects include physical changes to historic properties and the anticipated removal of a large industrial building whose National Register of Historic Places (NRHP) eligibility will be investigated.

Based on review of the submitted documentation, the APE as currently delineated appears appropriate.

If you have any questions, please contact Natalie Lindquist, Historian, at natalie.lindquist@parks.ca.gov or Elizabeth Hodges at elizabeth.hodges@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

U.S. Department of Transportation
Federal Transit Administration

REGION IX
Arizona, California, Hawaii, Nevada, Guam, American Samoa, Northern Mariana Islands

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January 5, 2021

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ms. Natalie Lindquist, Historian

Re: Section 106 APE Methodology and Revised Project Description, Riverside-Downtown Station Improvements Project (FTA_2020_048_001)

Dear Ms. Polanco:

The Federal Transit Administration (FTA) in coordination with the Riverside County Transportation Commission (RCTC) and the Southern California Regional Rail Authority (Metrolink) is conducting consultation under Section 106 of the National Historic Preservation Act for the Riverside-Downtown Station Improvements Project (Project). The Project will be a federal undertaking because the FTA will be providing financial assistance. The FTA serves as the federal lead agency. This letter continues consultation with the State Historic Preservation Officer and requests comments on the revised Project Description, as well as the delineation of the Area of Potential Effect (APE) pursuant to Section 106 of the National Historic Preservation Act (NHPA) as amended (36 C.F.R. 800).

The original Area of Potential Effect (APE) Methodology Memorandum for the Riverside-Downtown Station Improvements Project was submitted to your office on April 7, 2020 and was approved on June 4, 2020. Subsequent design refinements to the existing project description warranted a review of the APE methodology for the project, resulting in the attached APE Methodology and Revised Project Description Memo. The project description Build Alternative was revised to include traffic circulation improvement options which are included as design options. The attached memorandum provides an update to the APE Methodology and Revised Project Description to describe how the subsequent refinements of the traffic circulation and parking options, including the extension of Howard Avenue from 10th Street to 9th Street, are consistent with the original APE delineation for this project.

Revised Project Description

The original project description included a new station platform, pedestrian overcrossing, additional parking, and traffic circulation improvements on the east side (previously referred to as the south side) of the station, and included track connectivity into the existing station layover tracks on the east side. Also included were parking and improvements for traffic flow on the east side of the station. Furthermore, the original project description included:

- Building a new 720-foot center platform
- Constructing new tracks and making other track improvements
- Modifying the railroad signal system
- Extending the pedestrian bridge approximately 50 feet, including elevator and Americans with Disabilities Act (ADA) access
- Relocating ADA parking
- Adding approximately 500 parking spaces (surface lot) to the south side of station
- Building a new pedestrian at-grade rail crossing
- Modifying the bus drop-off area
- Adding sidewalks

The project refinements are confined to the traffic circulation and parking options (six total: 1A, 1B, 2A, 2B, 3A and 3B) that are currently being evaluated as design options for the Riverside-Downtown Station Improvements Project. Parking spaces increased from 500 parking spaces to 560 parking spaces, and six traffic circulation with parking options and configurations were added to accommodate future parking and traffic circulation needs. The bus drop-off area is no longer under consideration for the Project (See Table 3 Proposed Project Elements).

Area of Potential Effect (APE)

The original APE defined a direct effects APE (Limits of Disturbance, LOD) and an indirect APE for Built-Environment resources. The original APE project description included the passenger station improvements, including the loading platforms, extension of an existing pedestrian overcrossing, and construction of new tracks to service the new platforms. The original project description also outlined (proposed) parking and traffic flow improvements in the vicinity of the existing station. The original LOD also included areas for construction-related excavation to an estimated maximum depth of 10 feet below surface across the proposed project area where existing structures and/or soils would require excavation.

In the attached Section 106 APE Methodology and Revised Project Description Memorandum for the proposed Riverside-Downtown Station Improvements Project the LOD is included in Table 1 and Table 2. Based on the revised project description, the original APE delineation remains valid.

Efforts for Historic Resources Identification

In accordance with 36 CFR Part 800.4(a)(2), information about known and potential historic properties within the APE will be reviewed. Investigations will be prepared by consultants who meet the Secretary of the Interior's Professional Qualifications Standards in archaeology, history, and architectural history. The project is expected to be constructed by 2024, therefore the identification efforts will be focused on properties constructed before 1969.

Findings

In accordance with 36 CFR § 800.4, the FTA is requesting your comments on delineation of the APE.

If you have any questions, please contact Ms. Candice Hughes, Environmental Protection Specialist, at (213) 629-8613, or by email at candice.hughes@dot.gov.

Sincerely,

RAYMOND S TELLIS

Ray Tellis
Regional Administrator

Enclosures: Figure 1 Proposed Project Area Map
Figure 2 Regional Location Map
Figure 3 Area of Potential Effects Map
Updated APE Project Description and Methodology Memo

State of California • Natural Resources Agency
Gavin Newsom, *Governor*

DEPARTMENT OF PARKS AND RECREATION
OFFICE OF HISTORIC PRESERVATION
Armando Quintero, *Director*

Julianne Polanco, State Historic Preservation Officer
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Telephone: (916) 445-7000 FAX: (916) 445-7053
calshpo.ohp@parks.ca.gov www.ohp.parks.ca.gov

March 17, 2021

VIA EMAIL

Reply To: FTA_2020_0408_001

Mr. Ray Tellis, Regional Administrator
Federal Transit Administration, Region 9
90 7th Street, Suite 15-300
San Francisco, CA 94103-6701

Re: Proposed Riverside-Downtown Station Improvements Project, Riverside, CA, Riverside County, CA

Dear Mr. Tellis:

The State Historic Preservation Officer (SHPO) received the Federal Transit Administration's (FTA) letter of January 5, 2021, continuing consultation on the above-referenced project to comply with Section 106 of the National Historic Preservation Act of 1966 (as amended), and its implementing regulations at 36 CFR § 800. The FTA included a technical memorandum describing the area of potential effect (APE) for the project as well as maps of the project area.

The original Area of Potential Effect (APE) Methodology Memorandum for the Riverside-Downtown Station Improvements Project was submitted the SHPO on April 7, 2020 and agreed to on June 4, 2020. Subsequent design refinements to the existing project description warranted a review of the APE methodology for the project, resulting in a new APE Methodology and Revised Project Description Memo. The FTA study determined that the proposed changes in project description are consistent with the original APE delineation for this project.

Based on review of the submitted documentation, the APE as originally delineated still appears appropriate.

If you have any questions, please contact Natalie Lindquist, Historian, at natalie.lindquist@parks.ca.gov.

Sincerely,

Julianne Polanco
State Historic Preservation Officer

U.S. Department of Transportation
Federal Transit Administration

REGION IX
Arizona, California, Hawaii, Nevada, Guam, American Samoa, Northern Mariana Islands

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March 25, 2021

Ms. Julianne Polanco
State Historic Preservation Officer
Office of Historic Preservation
California Department of Parks and Recreation
1725 23rd Street, Suite 100
Sacramento, CA 95816

Attention: Ms. Natalie Lindquist, Historian

Re: Section 106 Consultation for the Riverside-Downtown Station Improvements Project (FTA_2020_048_001)

Dear Ms. Polanco:

The Riverside County Transportation Commission (RCTC) and the Southern California Regional Rail Authority (Metrolink) propose to improve the Riverside-Downtown Station, Mile Post (MP) 9.9 to MP 10.2, on the Burlington Northern Santa Fe (BNSF) San Bernardino Subdivision, located just east of the State Route (SR) 91 and a short distance from the SR 60 in the City and County of Riverside, California. The Riverside-Downtown Station Improvements Project (Project) would result in improvement of the existing Riverside-Downtown Station (RDS), including a new station platform, pedestrian overcrossing, additional parking, and traffic circulation improvements. The station is located at 4066 Vine Street, Riverside, California, 92507.

Section 106 Consultation

The Area of Potential Effects (APE) Methodology Memorandum for the Riverside-Downtown Station Improvements Project was submitted to your office on April 7, 2020, and was approved on June 4, 2020. Subsequent design options and the associated changes to the existing project description warranted an update to the APE project description to provide additional detail.

The original APE defined a direct effects APE (Limits of Disturbance) and an indirect APE for Built-Environment resources. The original project description included the passenger station improvements, including the new station platform, extension of an existing pedestrian overcrossing, and construction of new tracks to service the new platform. The original project description also outlined (proposed) parking and traffic flow improvements in the vicinity of the existing station. Since the submittal of the original APE memorandum, RCTC refined the project description and submitted the revised description to the SHPO on January 5, 2021. The SHPO responded with no questions or comments on March 17, 2021.

Historic Resources Report

Per 36 CFR Part 800.4(a)(2), and to satisfy the regulatory requirements associated with Section 106 of the NHPA as well as CEQA, the Historic Resources Report (HRR) provides the results of the Archaeological Survey Report (ASR), the built-environment, and the historic resources survey (NRHP-eligible, as well as, CRHR-eligible properties). All historic-era properties identified within the APE are recorded on State of California Department of Parks and Recreation (DPR) inventory forms.

The investigations were prepared by consultants who meet the Secretary of the Interior's Professional Qualifications Standards in archaeology, history, and architectural history. The project is proposed to begin construction by late 2021, therefore, the identification efforts were focused on properties constructed before 1966 (45 years old or older).

Please see the table Summary of Section 106 Anticipated Effects to Historic Properties which includes relevant APE Map numbers, property names and addresses, and Assessor Parcel Numbers (APNs).

Summary of Section 106 Effects to Historic Properties

APE Map No.	Property Name/Address	APN	Section 106 (Preliminary) Effect Determinations
17 18 21 28	FMC Complex Plant 1 3087 12th Street	211201004 211201006 211201026 211201039	Adverse Effect
33	FMC Complex Plant 2 3080 12th Street	211231024	Adverse Effect
30	Worker's Houses 4110, 4120, 4130, 4140 Howard Avenue	211203004	No Adverse Effect

FMC = Food Machinery Corporation

Avoidance alternatives were developed to avoid or minimize harm (through adaptive reuse) to the FMC Complex's Plant 1. However, the avoidance alternatives would move the passenger loading platform and new tracks to the opposite side (west side) of the BNSF rail corridor or to the northeast of the proposed project area. All avoidance alternatives fail to meet the stated goals, objectives, and the purpose and need for the proposed station improvements and were eliminated from further consideration. Additionally, two adaptive reuse scenarios were evaluated that would incorporate Plant 1 into the Project's station design. A full reuse and a partial reuse of the structure were evaluated. Both were eliminated from further consideration due to the associated environmental impacts, prohibitive costs of remediation and structural alterations, and the resulting loss of historic material and design integrity that would compromise the structure's ability to convey its historic significance. Please see Section 5.3 and Section 5.4, for a detailed discussion on Avoidance Alternatives, Minimization of Harm/Build Alternative Option for Adaptive Reuse.

Additional Consultation

In accordance with 36 CFR Part 800.4(a)(3), the RCTC has contacted local historic groups and other stakeholders that may have an interest in the project and is continuing coordination (HRR, Section 3.5). The FTA and RCTC are also continuing consultation with identified Native American and Tribal groups (HRR, Section 3.4). If you are aware of any additional agencies, organizations, or individuals that could be interested in the effects of the proposed project on historic properties, please provide us with the appropriate contact information.

Finding of Effect

For the development of the Finding of Effect (FOE), FTA and RCTC shall continue consultation with the State Historic Preservation Officer (SHPO) and interested parties, as well as, Native American and Tribal groups to resolve any expected adverse effects through mitigation. Mitigation, such as photographic documentation, deconstruction and reuse of salvaged building components, and other measures to minimize harm to the affected resources will be investigated. There are also off-site mitigation measures which may be developed as part of a mitigation agreement document such as a Memorandum of Agreement (MOA).

If you have any questions, please contact Ms. Mahilet Amare, Project Manager, at (213) 629-8610, or by email at mahilet.amare@dot.gov, or Ms. Candice Hughes, Environmental Protection Specialist, at (213) 629-8613, or by email at candice.hughes@dot.gov.

Sincerely,

RAYMOND S TELLIS

Ray Tellis
Region Administrator

Attachments: Historical Resources Report (HRR)

Appendix B. Enlarged Maps and Diagrams

Figure 2-1. Regional and Project Location Map

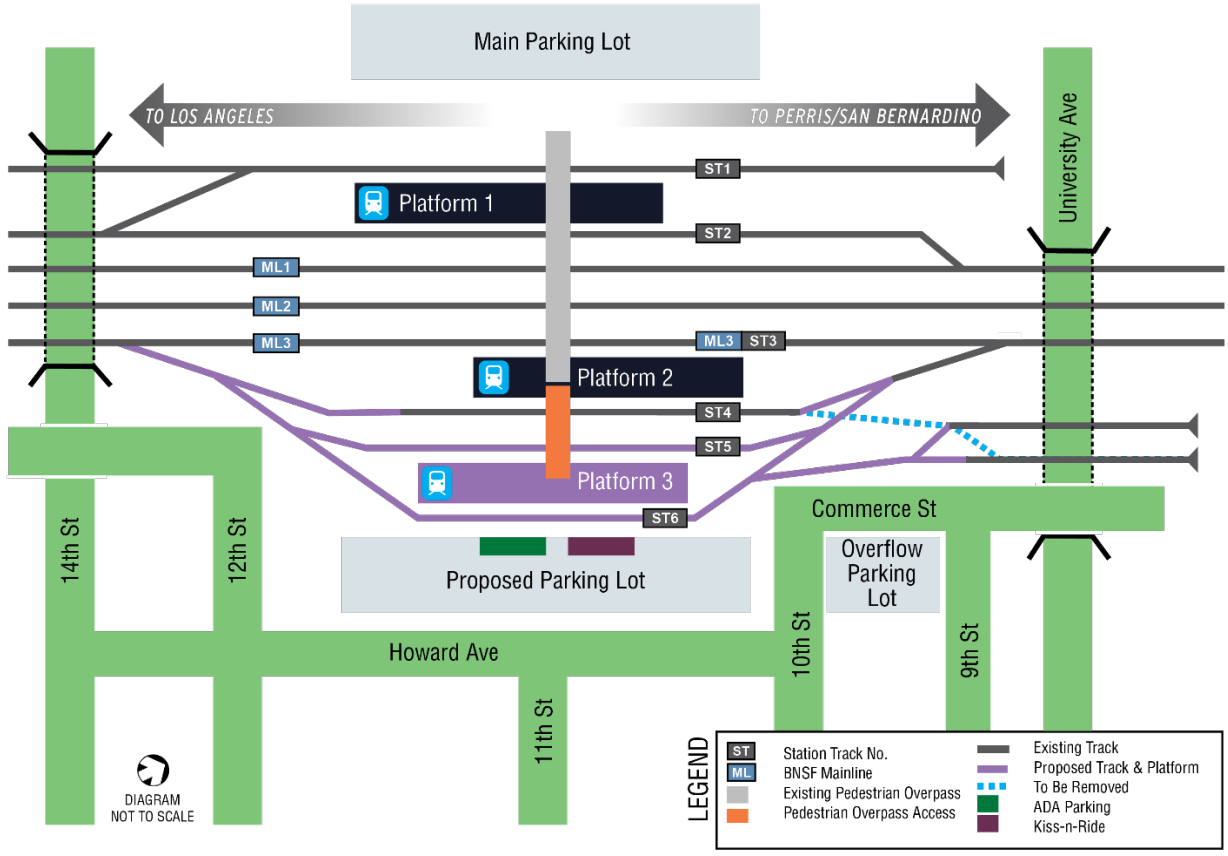

Figure 2-2. Project Elements

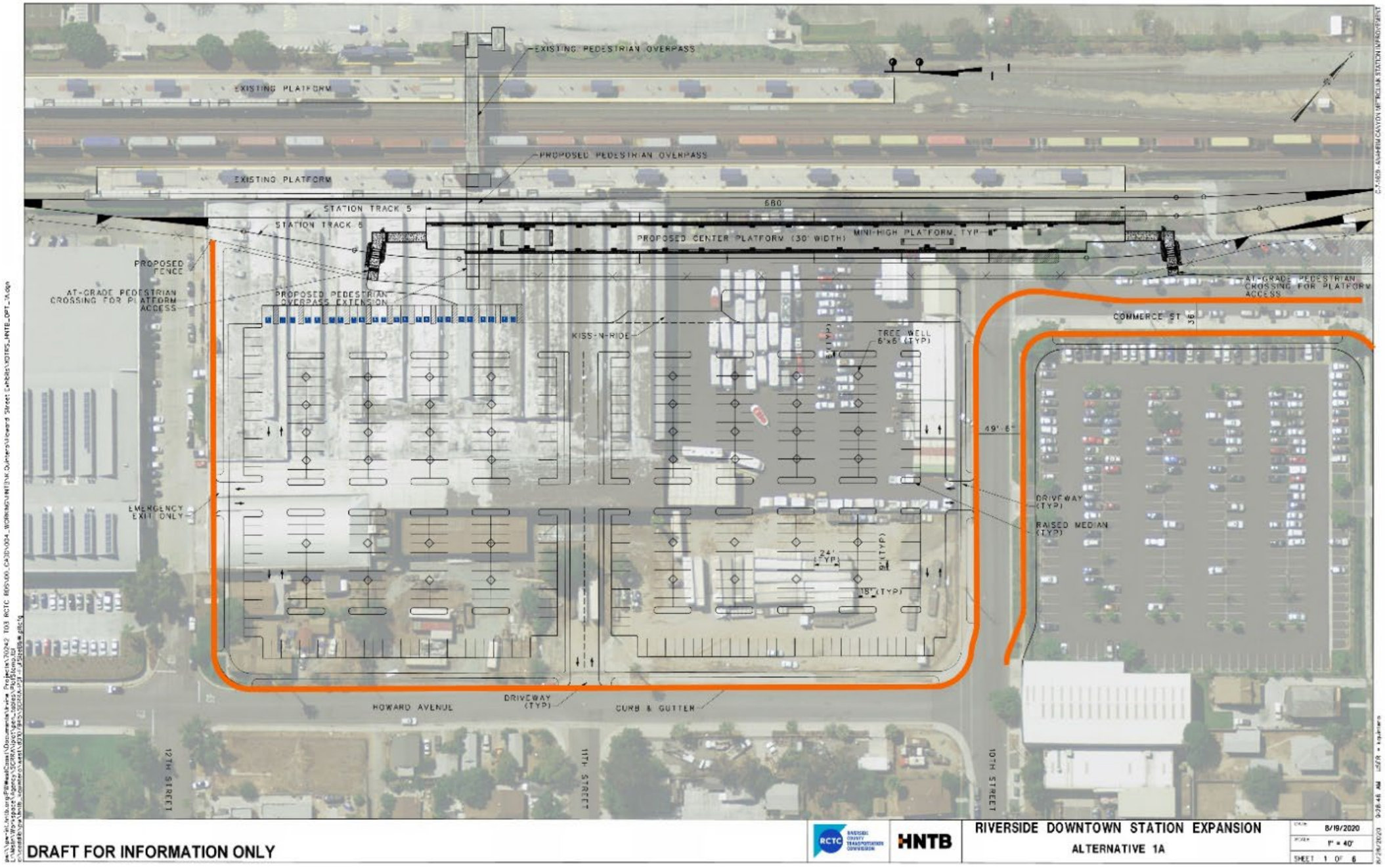

Figure 2-3. Build Alternative with Parking Option 1A

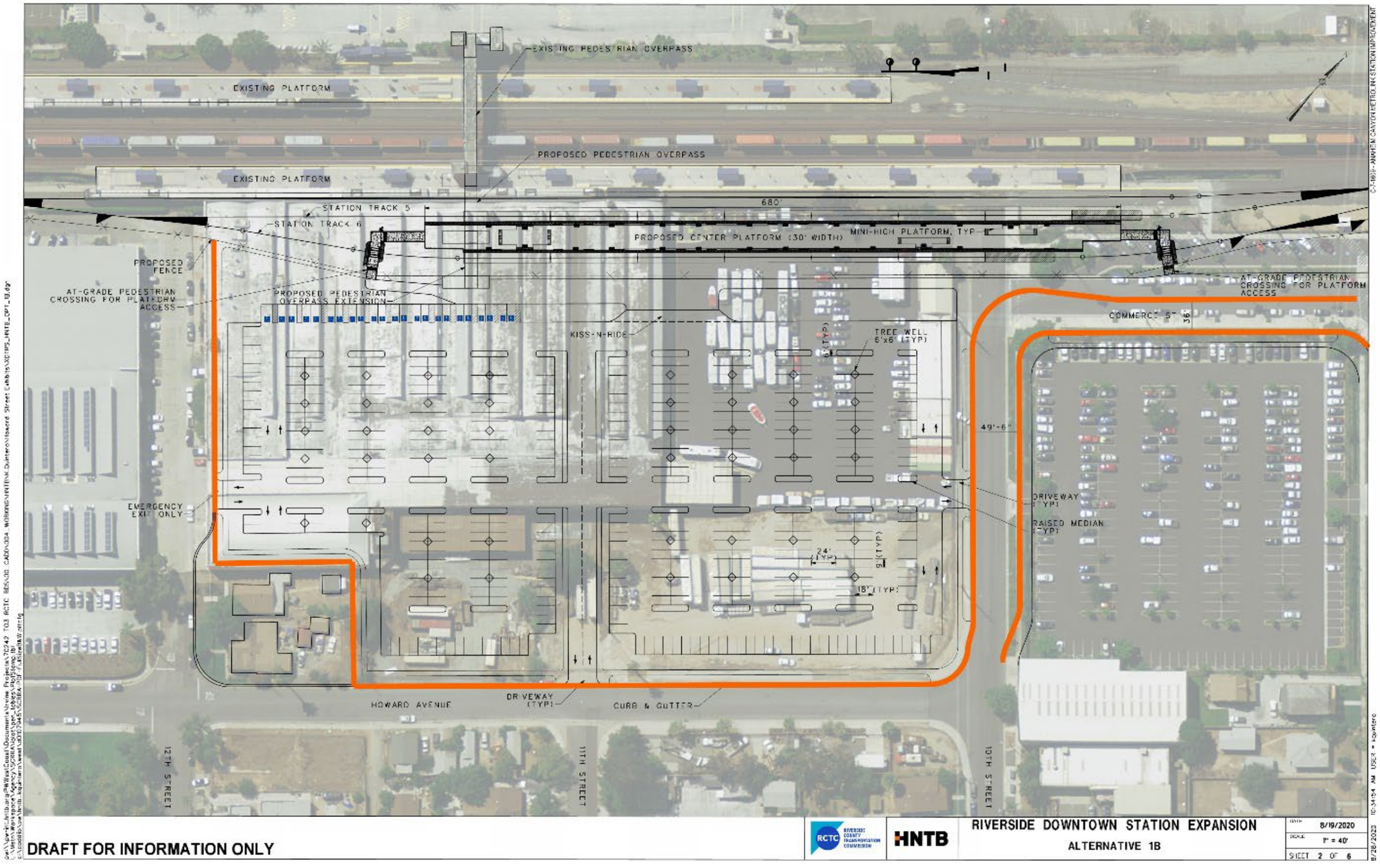

Figure 2-4. Build Alternative with Parking Option 1B

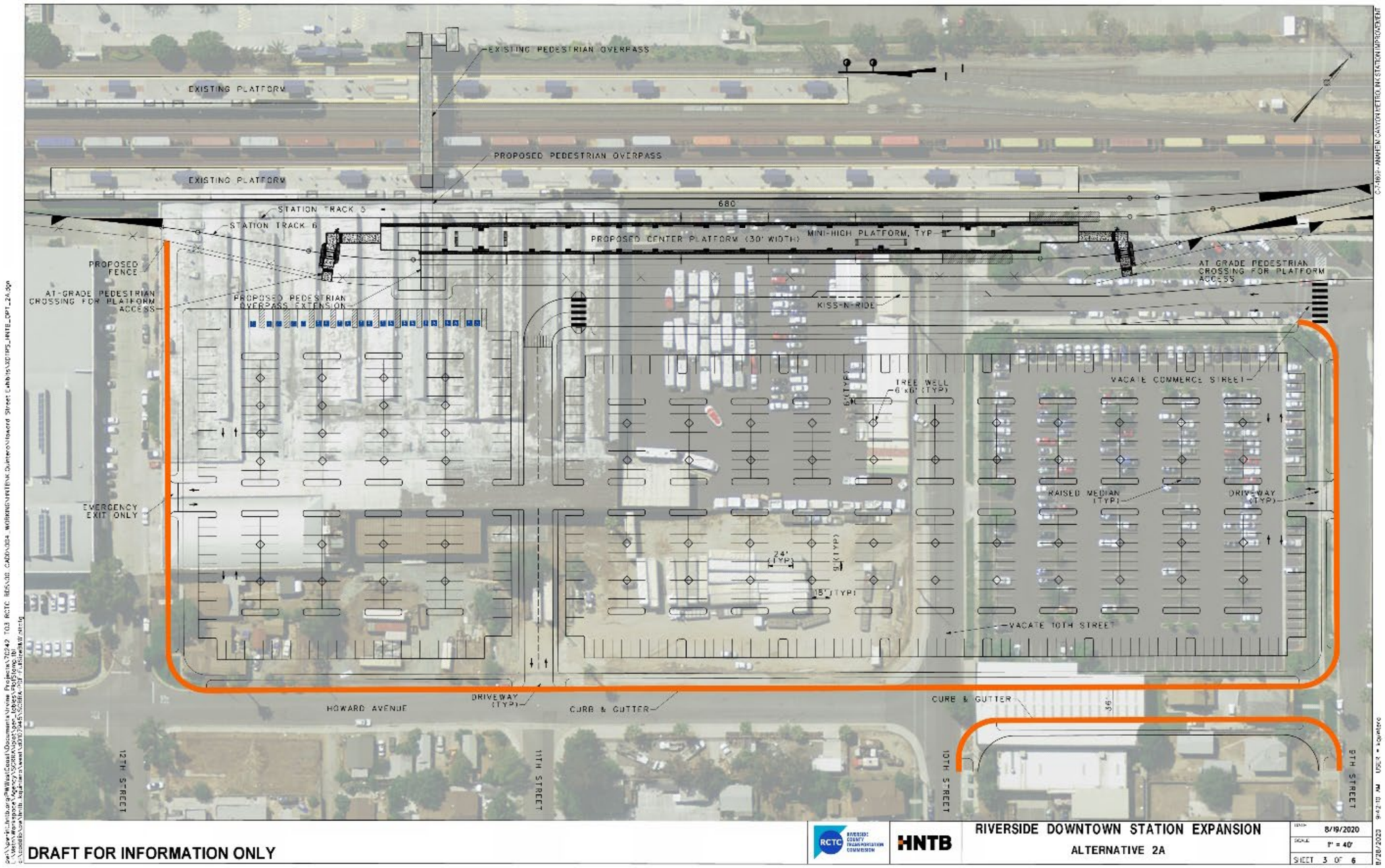

Figure 2-5. Build Alternative with Parking Option 2A

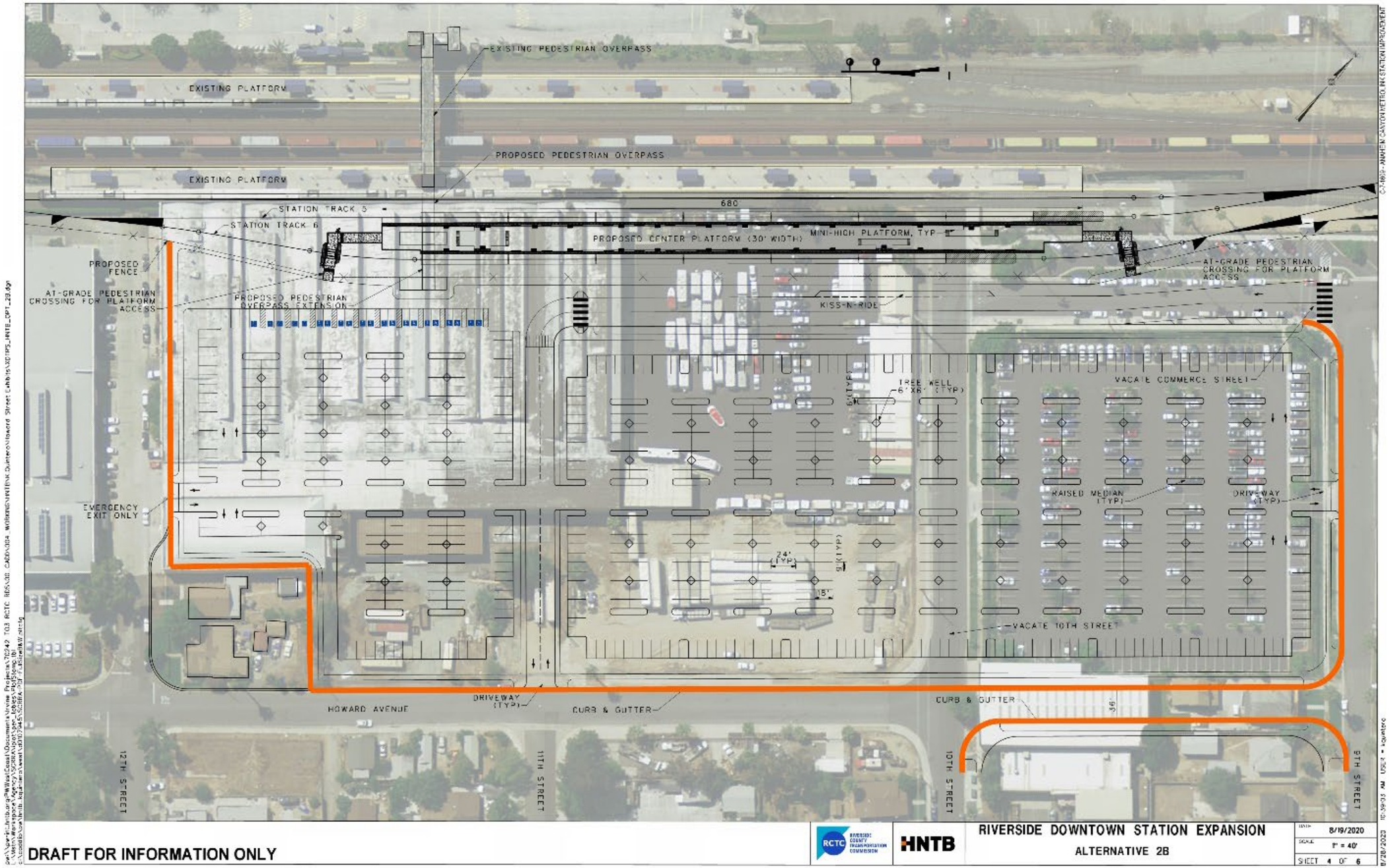

Figure 2-6. Build Alternative with Parking Option 2B

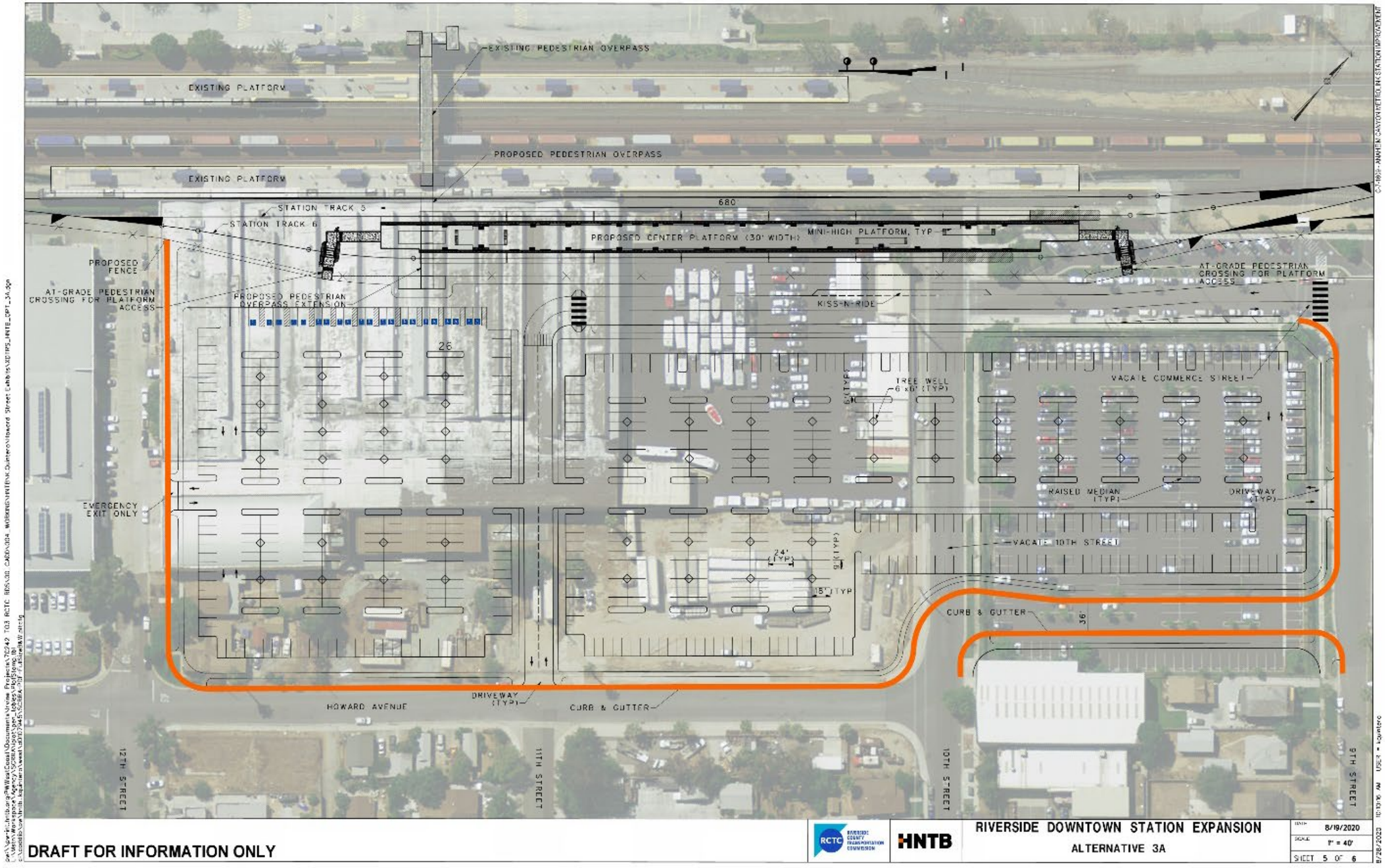

Figure 2-7. Build Alternative with Parking Option 3A

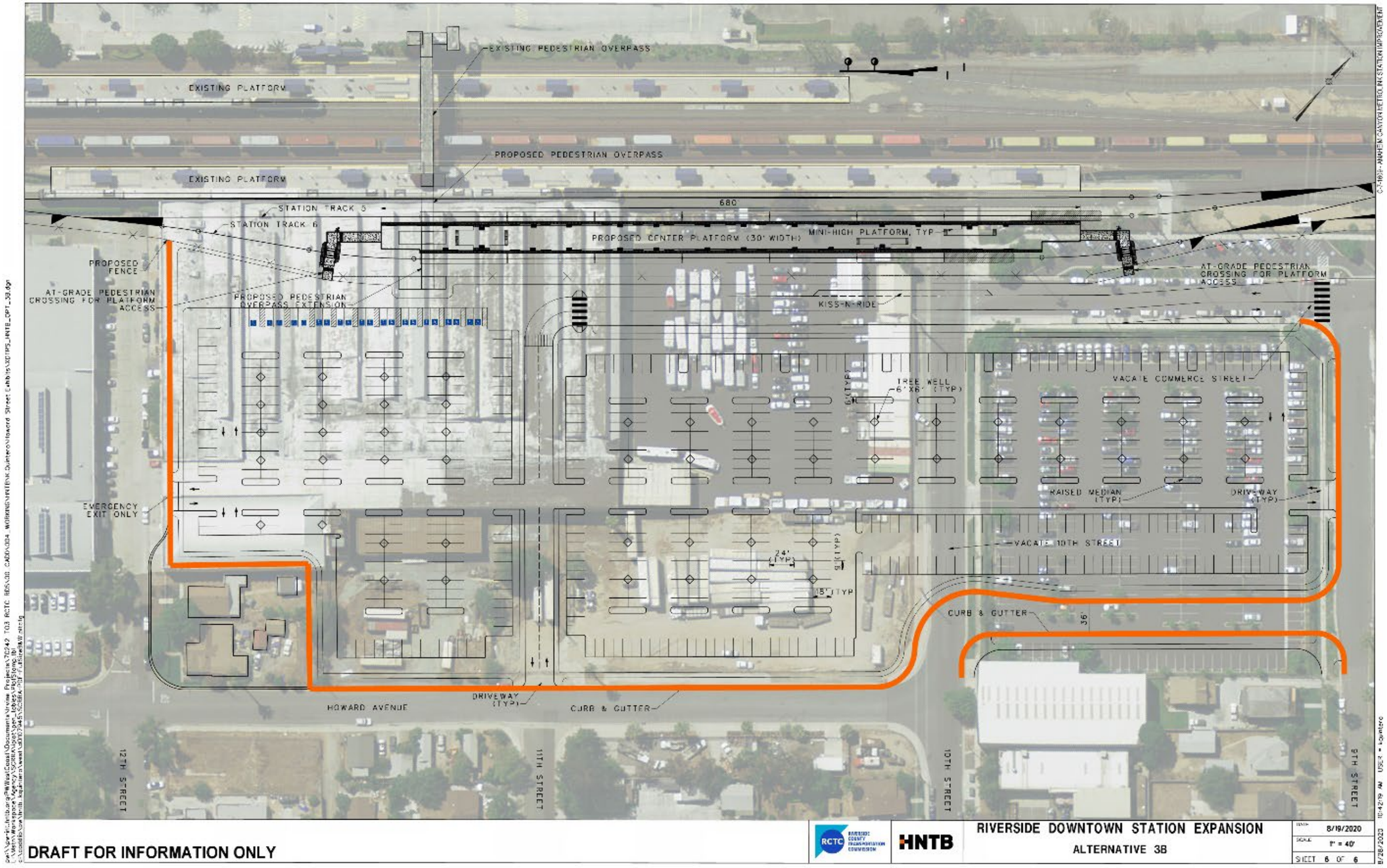

Figure 2-8. Build Alternative with Parking Option 3B

Figure 3-1. Area of Potential Effects with Historic Resources

No.	APN
1	211122001
2	211122002
3	211122003
4	211122019
5	211122020
6	211122021
7	211191004
8	211191005
9	211191021
10	211191026
11	211191028
12	211191030
13	211191031
14	211191032
15	211191033
16	211201002
17	211201004
18	211201006
19	211201007
20	211201008
21	211201026
22	211201027
23	211201028
24	211201029
25	211201030
26	211201036
27	211201037
28	211201039
29	211201040
30	211203009
31	211231001
32	211231010
33	211231024
34	211231025
35	213322014
36	213322015
37	213322021
38	215143017
39	215143018
40	215143024
41	211231026

Figure 3-2. Section 4(f) Properties within the APE

Figure 5-1. Avoidance Alternative 1 New Platform and Tracks on the West Side of the Existing Station

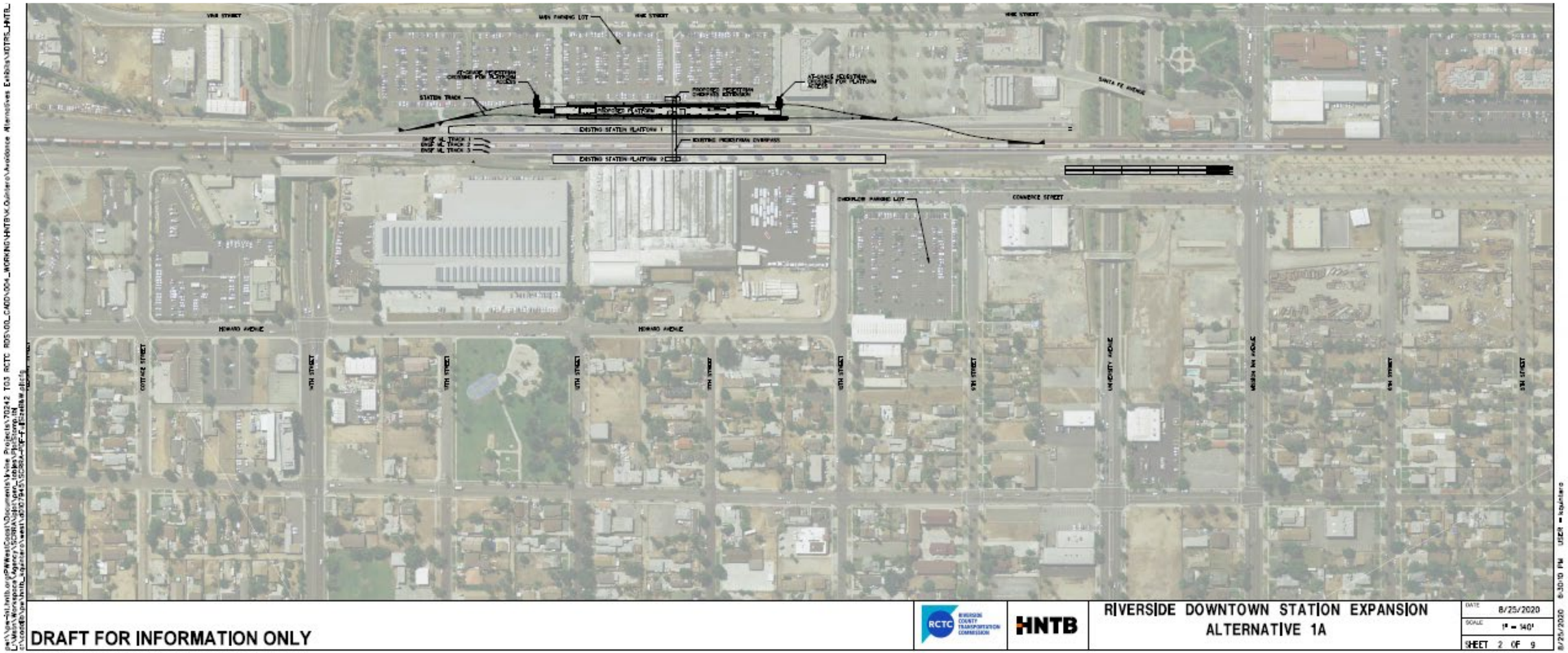

Figure 5-2. Avoidance Alternative 2

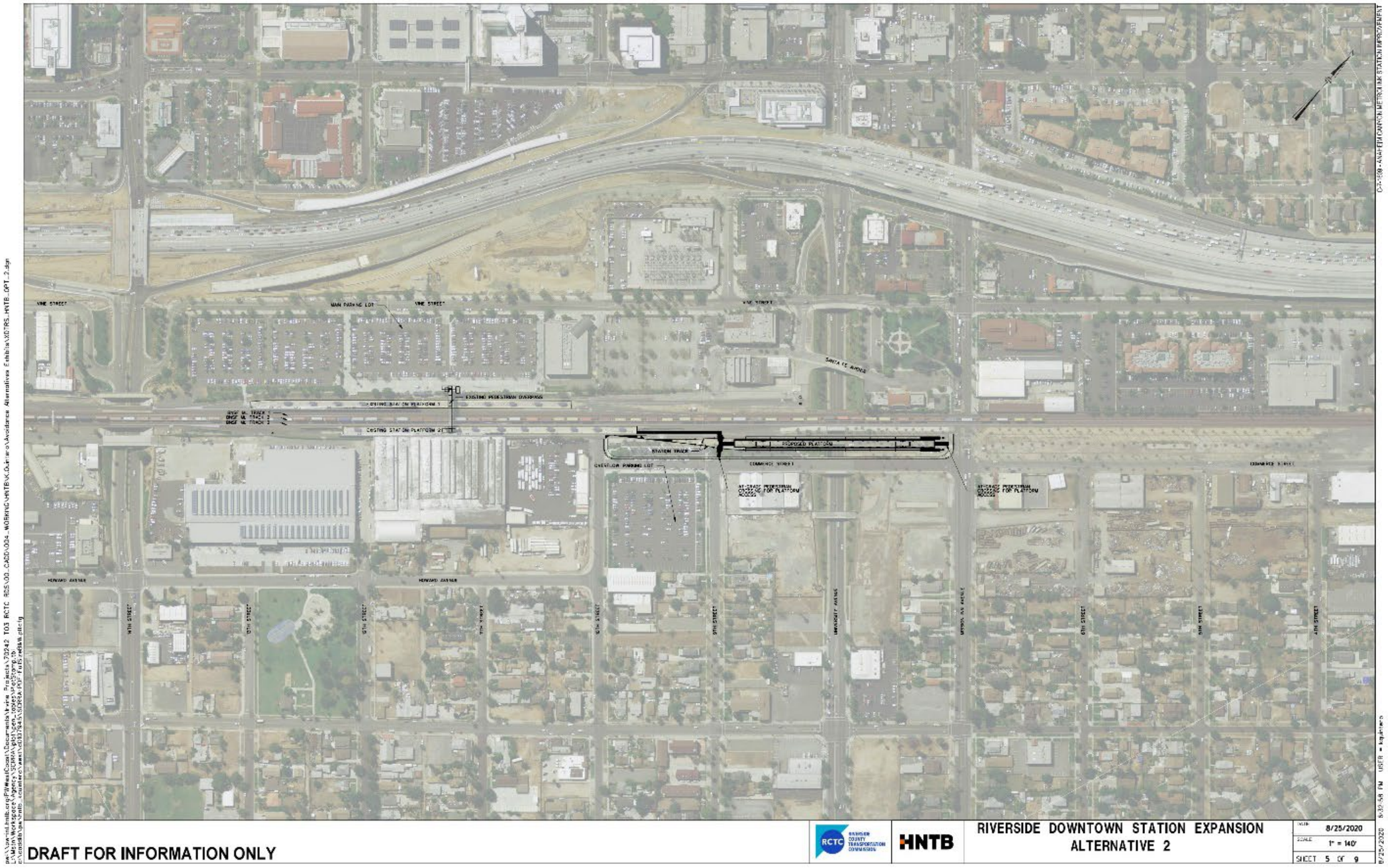

Figure 11-1. Avoidance Alternative 2

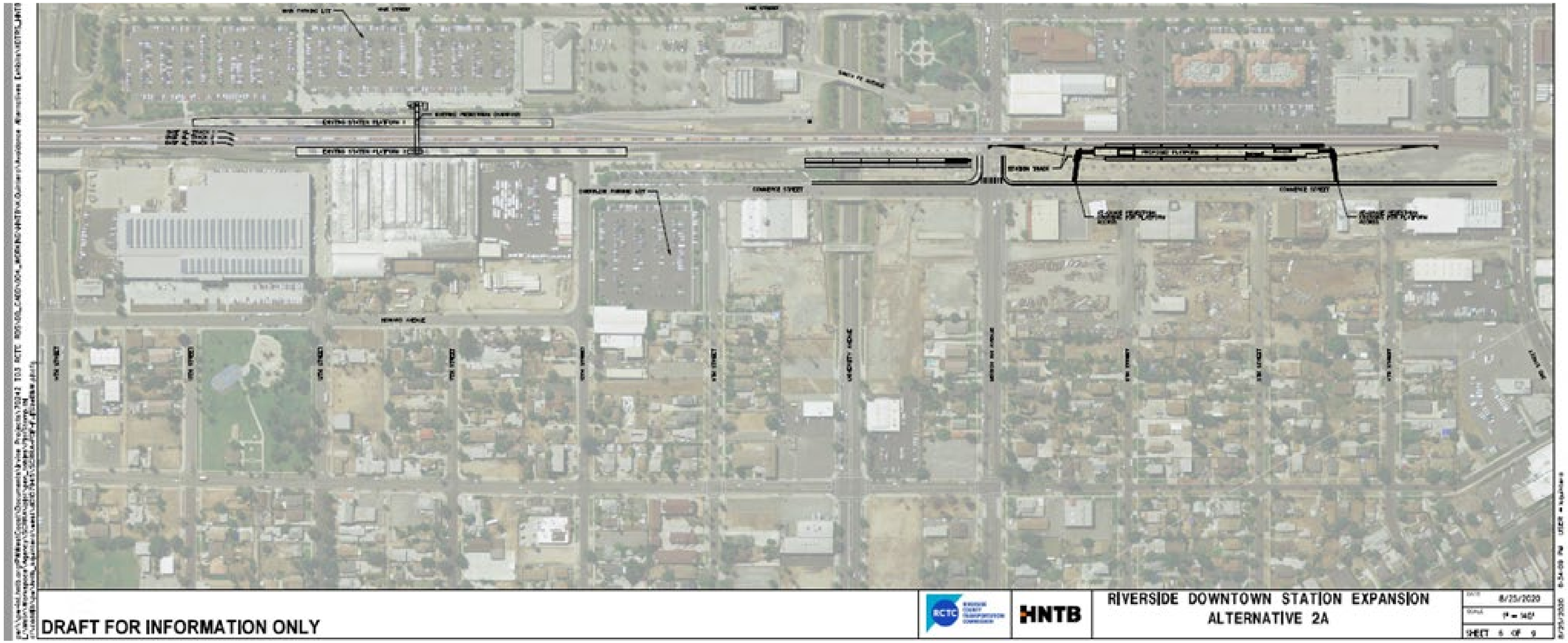

Figure 11-2. Avoidance Alternative 2A

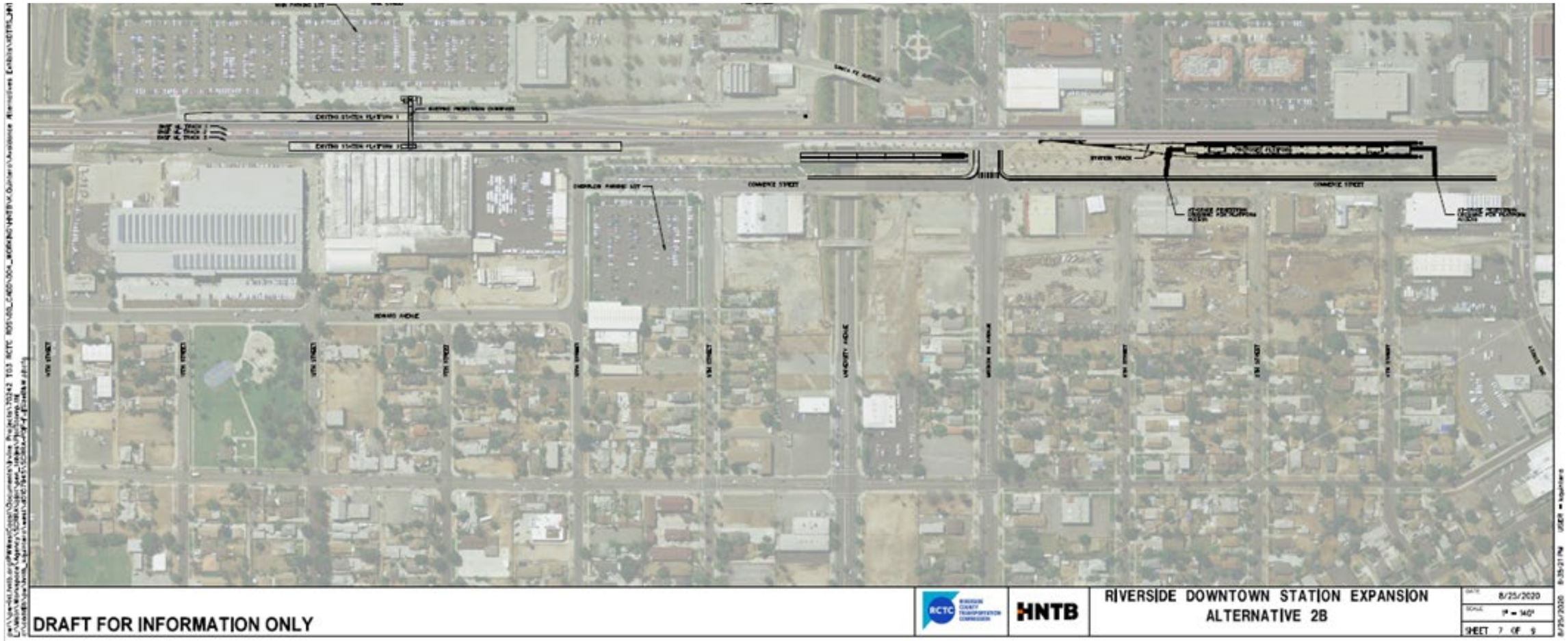

Figure 11-3. Avoidance Alternative 2B

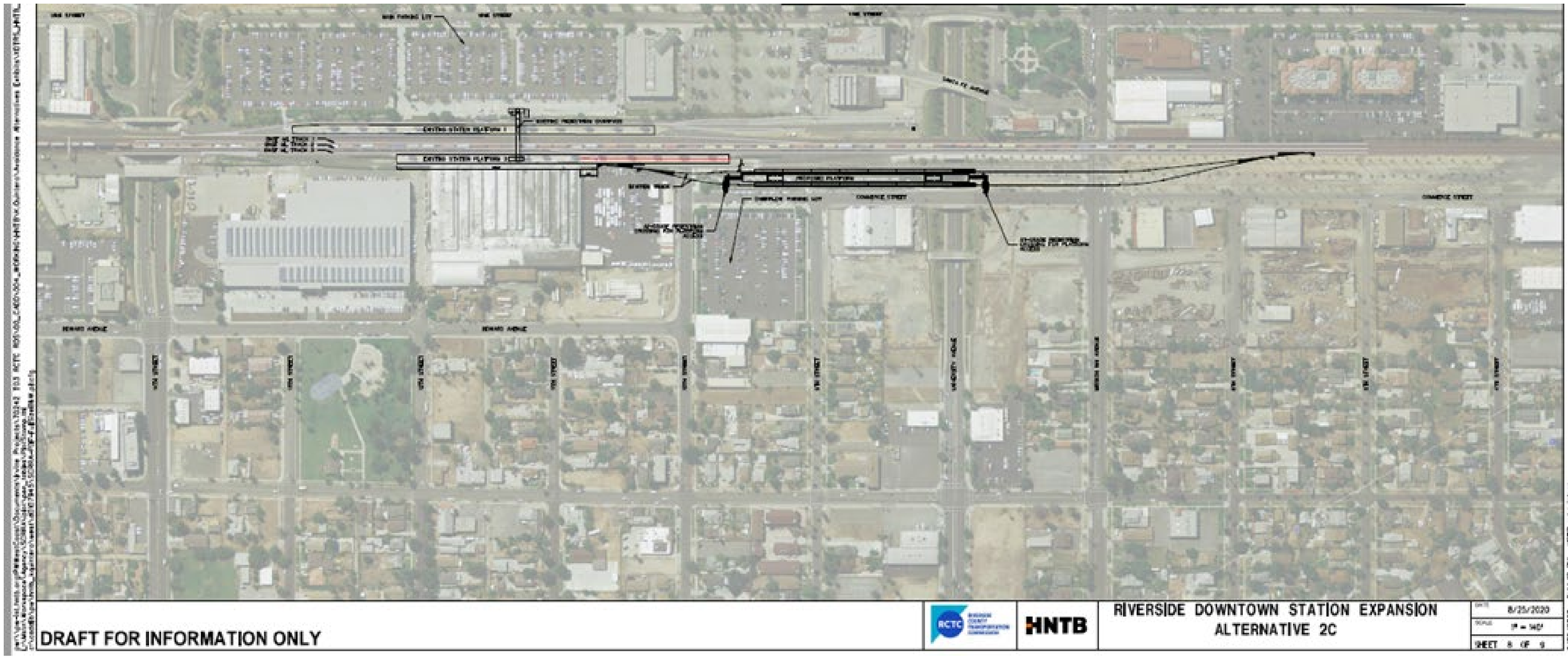

Figure 11-4. Avoidance Alternative 2C

Figure 11-5. Avoidance Alternative 3