

April 26, 2022

VIA E-MAIL

Alan Tabachnick
Historic Preservation Specialist
Office of Environmental Analysis
Surface Transportation Board
395 E. Street, S.W.
Washington, DC 20423-001
alan.tabachnick@stb.gov

Re: *City of Los Angeles – Abandonment Exemption – in Los Angeles County, Cal., Docket No. AB 1094X*

Dear Mr. Tabachnick:

On May 18, 2021, the City of Los Angeles, a municipal corporation acting through its Board of Harbor Commissioners (the “City”) filed a verified notice of exemption in the above-captioned proceeding for abandonment of a 2.6 mile line of railroad in Los Angeles County, CA, from Milepost 4.00 to the end of the line at Milepost 6.60, comprising a portion of a line known as the San Pedro Subdivision that is located within the Port of Los Angeles (the “Line”). The notice of exemption, which was published in the Federal Register on June 7, 2021 (86 Fed. Reg. 30,349), became effective on July 7, 2021.

In the Draft Environmental Analysis associated with the abandonment, the Board’s Office of Environmental Analysis (“OEA”) recommended three conditions be imposed on any decision granting abandonment authority. On July 6, 2021, the Board issued a decision (the “Board Decision”) imposing these three conditions, which are:

- (a) The City shall consult with the California Coastal Commission (“Coastal Commission”) and obtain any necessary state coastal management consistency certification, and it shall report the results of these consultations in writing to OEA. The City shall not file its consummation notice or initiate any salvage activities related to abandonment, including removal of tracks and ties, until the Board has removed this condition.
- (b) The City shall notify National Geodetic Survey (“NGS”) at NGS.Infocenter@noaa.gov at least 90 days prior to beginning abandonment-related salvage activities.

- (c) The City shall retain its interest in, and take no steps to alter, the historic integrity of all historic properties including sites, buildings, structures, and objects within the project right-of-way that are eligible for listing or are listed in the National Register until the Section 106 process of the National Historic Preservation Act, 54 U.S.C. § 306108, has been completed. The City shall report to OEA any consultations with the State Historic Preservation Office (“SHPO”) and the public. The City shall not file its consummation notice or initiate any salvage activities related to abandonment, including removal of tracks and ties, until the Section 106 process has been completed and the Board has removed this condition.

Pursuant to the above conditions, and in preparation for filing timely consummation of abandonment, the City through this letter reports back on further consultation with the Coastal Commission, the NGS, and the State Historic Preservation Office.

A. Verification of Consultation with California Coastal Commission.

The City has consulted with the Coastal Commission and received confirmation that “no consistency certification is needed.” A copy of the e-mail communication conveying this confirmation is attached hereto as Appendix A.

In light of the City’s consultation with Coastal Commission and receiving confirmation that “no consistency certification is needed,” the City respectfully requests that the Board remove condition (a) in order to allow for consummation to proceed.

B. Verification of Compliance with Notification to the National Geodetic Survey.

The City has provided additional notification to NGS of its plan to abandon the Line, and has obtained acknowledgement. The City attaches this correspondence at Appendix B.

In light of the City’s notification to NGS within 90 days prior to beginning abandonment-related salvage activities, the City respectfully requests that this Board find that condition (b) has been completed sufficiently to allow for consummation to proceed.

C. Verification of Compliance with Section 106 of the National Historic Preservation Act.

In the process of pursuing consultation with the SHPO pursuant to condition (c), the City located in its counsel’s files a determination from the SHPO with respect to this abandonment that had been sought and obtained by the City in 2016 (“2016 SHPO Letter”). The 2016 SHPO Letter had been received as part of earlier preparations to file for abandonment of the Line in 2016, which preparations were put on hold until the notice of exemption was filed in 2021. The letter, attached hereto as Appendix C, reflects that the City complied with the required consultation in 2016 and that the SHPO found that the Section 106 process had been completed for this abandonment at that time. The SHPO letter attached at Appendix C states in part:

Mr. Alan Tabachnick

April 26, 2022

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The enclosed Historic Report identified that no structures over 50 years of age have been identified within the proposed abandonment area or right-of-way and no known sites or structures meet the criteria for listing on the National Register of Historic Places (NRHP). The Report states that there are sites or structures near the right-of-way that meet the criteria for listing on the NRHP but the proposed abandonment will have no effect on these historic properties as these properties will be incorporated by the proposed Project.

The 2016 SHPO letter was inadvertently omitted from the City's filing in 2021, and not discovered by undersigned attorney (who took over this matter from the previous attorney when she left the Firm in late September 2021) until late December 2021. In February 2022, counsel notified the SHPO representative with whom he had been communicating of the City's discovery and intent to submit the 2016 SHPO Letter to the Board in order to provide the SHPO representative with an opportunity to respond with concerns. The SHPO did not respond to this notification. These communication are also attached to Appendix C.

In light of the City's verification that the Section 106 process of the National Historic Preservation Act, 54 U.S.C. § 306108, has been completed, the City respectfully requests that this Board remove condition (c) in order to allow consummation of this abandonment to proceed.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christian Alexander", is written over a horizontal line.

Christian Alexander

Counsel for City of Los Angeles

Enclosures

Appendix A

Communications with the California Coastal Commission

Appendix A

From: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Sent: Thursday, April 7, 2022 10:08 AM
To: Christian L. Alexander
Cc: Desai, Milind/SCO; W. Eric Pilsk; Leon, Laura
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Christian,

No consistency certification is needed. Thank you for your patience.

dani

From: Christian L. Alexander <calexander@kaplankirsch.com>
Sent: Friday, March 25, 2022 3:56 PM
To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Cc: Desai, Milind/SCO <Milind.Desai@jacobs.com>; W. Eric Pilsk <epilsk@kaplankirsch.com>; Leon, Laura <LEon@portla.org>
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Dani,

To follow up, and based on further consultation with my client, please find the discussion below and documentation attached further explaining the rail line abandonment authorization in relation to issuance of CDPs.

The Port Master Plan (available here: https://kentico.portoflosangeles.org/getmedia/adf788d8-74e3-4fc3-b774-c6090264f8b9/port-master-plan-update-with-no-29_9-20-2018) was certified by the California Coastal Commission and authorizes the Port to issue CDPs within its jurisdiction. The Port Master Plan does not expressly discuss the regulatory authorization to abandon the line, although abandonment of the line is consistent with and may be implied from the resulting land uses approved in the Plan (see e.g. p. 27). Indeed, continued rail use of this line would appear to be inconsistent with the Master Plan.

The Port's procedure is to evaluate and issue CDPs for the individual projects undertaken in conformance with and in furtherance of the Port Master Plan. The Port has issued CDP's for several projects that specifically impact the abandoned rail line, including (1) the San Pedro Waterfront -Harbor Blvd./7th Street/ Sampson Way Roadway Improvements project (CDP No. 11-08, attached); (2) the San Pedro Waterfront POC Promenade and Town Square Project (CDP No. 17-10, attached) and (3) the San Pedro Waterfront- Harbor Blvd. from Miner Street to SP Slip Roadway Improvements Project (also covered in CDP No. 17-10). In addition, the Port is currently evaluating another project impacting the abandoned rail line for which a CDP would need to be issued, the Harbor Blvd Parkway Improvements Project. The EIR addendum for this project is also attached.

As indicated by the supporting documentation regarding the granted and anticipated CDPs, reference to abandoned rail uses and facilities are made, and rail line abandonment is implied in the development and activities covered under the CDP, although the regulatory authorization to abandon the line is not expressly mentioned. These types of development activities are anticipated under and consistent with the Master Plan.

As noted previously, the abandonment authority being granted by the federal Surface Transportation Board does not itself necessarily trigger any physical changes and is consistent with previously approved and permitted land uses,

including the Master Plan (as indicated above, continue rail use would be inconsistent with the Master Plan). To the extent there are physical changes or proposals to develop the property, those are considered by the Port under the authority granted to it to approve CDPs within its jurisdiction. The Port has and will consider such proposals and changes impacting the abandoned rail line through project-specific CDP processes.

I hope this helps clarify the situation further. I'm happy to discuss more at your convenience.

Thank you
Christian

Christian L. Alexander
Attorney at Law
He/ Him/ His



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From: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Sent: Tuesday, March 22, 2022 10:59 PM
To: Christian L. Alexander <calexander@kaplankirsch.com>
Cc: Desai, Milind/ SCO <Milind.Desai@jacobs.com>; W. Eric Pilsk <epilsk@kaplankirsch.com>
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Thank you.

Also, was the abandonment described/ discussed in the CDP issued by the Port for the SP Waterfront Project? If so, can you provide me a copy that calls out those findings? Thank you.

dani

From: Christian L. Alexander <calexander@kaplankirsch.com>
Sent: Tuesday, March 22, 2022 11:45 AM
To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Cc: Desai, Milind/ SCO <Milind.Desai@jacobs.com>; W. Eric Pilsk <epilsk@kaplankirsch.com>
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Dani,

Thanks for following up. The STB's abandonment authority only covers the regulatory authority to stop operating rail lines as part of interstate common carrier service (practically speaking, rail operations on this segment ceased many years ago). The abandonment authority itself does not touch upon physical changes or property/contractual rights, and there are no new proposals to change any physical elements or property/contractual aspects. Abandonment is being sought to conform the federal regulatory status with existing approved uses and plans.

Let me know if you have any other questions.

-Christian

Christian L. Alexander

Attorney at Law

He/Him/His



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From: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>

Sent: Tuesday, March 22, 2022 2:27 PM

To: Christian L. Alexander <calexander@kaplankirsch.com>

Cc: Desai, Milind/ SCO <Milind.Desai@jacobs.com>; W. Eric Pilsk <epilsk@kaplankirsch.com>

Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Christian,

Quick question: does “abandonment” include the paper transaction(s) and/or demolition of the existing rail development?

I'm sorry things are slow on our end too, but I am close to getting you an answer.

dani

From: Christian L. Alexander <calexander@kaplankirsch.com>
Sent: Wednesday, February 23, 2022 7:55 AM
To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Cc: Desai, Milind/SCO <Milind.Desai@jacobs.com>; W. Eric Pilsk <epilsk@kaplankirsch.com>
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Dani,

Apologies for the prolonged delay in responding, I needed to check with the client before answering your question, and it took a little longer to coordinate than I expected. I can confirm that there is no specific development currently proposed or approved within the footprint of the railway abandonment area other than the general uses already reflected in the Amended Master Plan for the Port and the San Pedro Waterfront EIR certified in September 2009. These documents can be found in the Port of Los Angeles website (<https://www.portoflosangeles.org/environment/environmental-documents>).

If you could confirm that state coastal management consistency certification is not required we would appreciate it.

Happy to discuss more if needed.

Kind Regards,
Christian

Christian L. Alexander
Attorney at Law
He/Him/His



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From: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Sent: Thursday, December 23, 2021 9:03 PM
To: Christian L. Alexander <calexander@kaplankirsch.com>
Subject: RE: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Christian,

Do you know the details regarding what development is proposed or has been approved within the footprint of the railway abandonment area?

dani

From: Christian L. Alexander <calexander@kaplankirsch.com>
Sent: Wednesday, December 22, 2021 12:13 PM
To: Ziff, Dani@Coastal <dani.ziff@coastal.ca.gov>
Subject: Follow up on Port of Los Angeles railroad segment abandonment consultation

Hi Dani,

Thanks again for your return call regarding abandonment of a segment of rail line at the Port of Los Angeles. As requested, I'm attaching a map of the abandoned segment. Abandonment is necessary in order to proceed with approved development of the San Pedro Waterfront Project and is consistent with all existing plans for the Port. The segment, which is owned by the Port, has been out of service since 2016, and the Port has obtained authority from the Surface Transportation Board ("STB") to abandon the segment (STB Docket No. AB 1094X), subject to conditions including consultation with the CCC to determine that a state coastal management consistency certification is not required.

If you could please review and provide your assessment we would appreciate it. We must report back the results of our consultation to the STB's Office of Environmental Analysis.

Please feel free to reach out with any additional questions you may have. Thank you in advance for your time and attention to this matter.

Kind Regards,
Christian

Christian L. Alexander
Attorney at Law
He/Him/His



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Appendix B

NGS Confirmation for City of Los Angeles–Abandonment Exemption–In Los Angeles County, Cal., STB Docket No. AB 1094X

Sherry H. Edmonds

From: "Christian L. Alexander"
Sent: Monday, November 8, 2021 10:06 AM
To: NGS.infocenter@noaa.gov
Cc: W. Eric Pilsk; Milind.Desai@jacobs.com
Subject: NGS confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X
Attachments: 20211105 Letter to Natl Geodetic Survey.PDF

Good Morning,

My office represents the City of Los Angeles, which has obtained authority from the Surface Transportation Board to abandon a short segment of rail line at the Port of Los Angeles, subject to further consultation with your office in the event that the City undertakes salvage activities. We kindly request your attention regarding the attached letter, which we have also sent to you by registered mail.

Please don't hesitate to contact me if you would like to discuss further. I can be reached by telephone at (202) 955-5600.

Kind Regards,

November 5, 2021

Deborah Brooks
National Geodetic Survey
Geodetic Services Division SSMC3 #9340
1315 East-West Highway
Silver Spring, MD 20910-3282
NGS.infocenter@noaa.gov

Re: *City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB
Docket No. AB 1094X*

Dear Ms. Brooks:

In a letter dated March 22, 2021, the City of Los Angeles (the “City”) notified your office of its plan to abandon 2.6 miles of rail line in Los Angeles County, California between Milepost 4.00 (north of Front Street and east of the Gaffey Street Lead) to Milepost 6.60 (at West 22nd Street and Miner Street), situated within U.S. Postal ZIP code 90731 (the “Line”). With the letter, the City provided an Environmental and Historic Report, pursuant to 49 C.F.R. § 1105.7, which was submitted to the Surface Transportation Board.

The Surface Transportation Board desires verification that the City will notify the National Geodetic Survey at NGS.infocenter@noaa.gov at least 90 days’ prior to beginning abandonment-related salvage activities. At this time, the City has no plans to engage in any ground disturbing activities related to the line. If the City determines that salvage is necessary, the City will notify the National Geodetic Survey 90 days’ prior to beginning any salvage activities. If you have any questions, please contact me at calexander@kaplankirsch.com or via telephone at 202-955-5600.

Sincerely,



Christian L. Alexander

Daniel Jaynes

From: deborah.brooks <ngs.infocenter@noaa.gov>
Sent: Tuesday, November 9, 2021 6:03 PM
To: Christian L. Alexander
Subject: [JIRA] (IMOV-8639) NGS confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

A comment is added on your issue:

Re: NGS confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X
Spoke with Atty. Alexander to get clarity of this submitted letter as to if any action was required of NGS.
This is a Courtesy Copy. No Action Required.

National Geodetic Survey

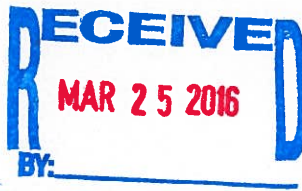
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Appendix C

Concurrence Letter – March 21, 2016

**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

1725 23rd Street, Suite 100
SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov



March 21, 2016

Reply To: STB_2016_0302_001

Allison I. Fultz
Kaplan Kirsch Rockwell
1001 Connecticut Ave., N.W, Suite 800
Washington, DC 20036

Re: City of Los Angeles – Notice of Exemption – Abandonment in Los Angeles County,
CA (San Pedro Subdivision) – STB Docket No. AB 1094X

Dear Ms. Fultz:

You are seeking my comments on behalf of the STB pursuant to 36 CFR 800 regulations implementing Section 106 of the National Historic Preservation Act regarding the above referenced undertaking.

As I presently understand it, the City of Los Angeles, acting through its Board of Harbor Commissioners (City) and Pacific Harbor Line, Inc. (PHL) will be filing a Joint Notice of Exemption with the Surface Transportation Board (STB) for the abandonment and discontinuance of service on 2.6 miles of rail line in Los Angeles County between Milepost 6.60 (at West 22nd St and Miner St.). The City as the Line's owner is abandoning the Line and PHL is discontinuing its freight rail common carrier obligation over the Line, in conjunction with the proposed San Pedro Waterfront Project.

The enclosed Historic Report identified that no structures over 50 years of age have been identified within the proposed abandonment area or right-of-way and no known sites or structures meet the criteria for listing on the National Register of Historic Places (NRHP). The Report states that there are sites or structures near the right-of-way that meet the criteria for listing on the NRHP but the proposed abandonment will have no effect on these historic properties as these properties will be incorporated by the proposed Project.

A Memorandum of Agreement between the Advisory Council on Historic Preservation, the State Historic Preservation Officer and the City was executed on April 15, 2011 for the effects under the proposed Project (Undertaking).

I can concur that your responsibilities under Section 106 of the NHPA are complete.

If you have any questions, please contact Michelle C. Messinger, State Historian II of my staff at (916) 445-7005 or e-mail at Michelle.Messinger@parks.ca.gov.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line extending to the right.

Julianne Polanco
State Historic Preservation Officer

Sherry H. Edmonds

From: "Christian L. Alexander"
Sent: Wednesday, February 23, 2022 10:55 AM
To: Lindquist, Natalie@Parks
Cc: Carlton.Parker@parks.ca.gov; Alicia.Perez@parks.ca.gov; Info.calshpo@parks.ca.gov; Calshpo.ohp@parks.ca.gov; Desai, Milind/SCO; W. Eric Pilsk
Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X
Attachments: SPW_ROD_AppendixD_Executed NHPA MOA_2011.PDF; 2016 03 21 SHPO concurrence with Historic Report, AB 1094X.PDF

Dear Ms. Lindquist,

Thank you for your message from December, and apologies for the delayed response. Your questions required additional coordination and review of applicable files, and that took a little longer than I had expected to undertake this.

We have located the Memorandum of Agreement from 2011 that you requested. Additionally, in the course of our additional review we also located a 2016 concurrence from your office regarding this abandonment. A little explanation: We had previously initiated this process for the subject right-of-way in 2016 and had proceeded very far along in the process, including seeking and obtaining this concurrence from your office, but we ultimately did not complete the process at the STB at that time because of some issues regarding property ownership that came up between the Port of LA and the Port of Long Beach. These issues, which have nothing to do with the historic review and did not change any aspect of the abandonment, were eventually resolved, leading us to renew the process last year. Unfortunately, somehow this concurrence letter was overlooked when we initially filed and reached out to your office. Now that we have located it, we intend to submit it to the STB with this explanation. I apologize for this not being brought to your attention earlier.

Happy to discuss more if you would like.

Kind Regards,
Christian

From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Sent: Wednesday, December 22, 2021 5:49 PM
To: Christian L. Alexander <calexander@kaplankirsch.com>
Subject: Re: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

Thank you for the additional information. I am curious as to whether or not the railroad tracks were evaluated as part of the Section 106 documentation for the Corps permit? In particular I'm interested in whether or not the tracks were considered as part of the Bethlehem Shipyard Historic District.

Beyond all of that I would like more information with regards to what the STB considers to be the "undertaking" with regards to Section 106. If the tracks were part of the Bethlehem Shipyard District, are there any conditions imposed as part of the abandonment that will limit actions that can be taken to the tracks?

Basically what I am lacking right now is tangible information on the tracks themselves, whether or not something in their historic context might make them historically significant, and if they are significant, what potential effects might this abandonment have on the tracks.

Natalie Lindquist
natalie.lindquist@parks.ca.gov
Historian II
California Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, CA 95816-7100
(916) 445-7014 (916) 445-7053--FAX

From: Christian L. Alexander <calexander@kaplankirsch.com>
Sent: Wednesday, December 22, 2021 1:59 PM
To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>
Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

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Dear Ms. Lindquist,

Thanks very much for your response. Per your request, I am attaching the DEIS figure and the DEIS Historical Built Environment Report containing photos referenced in the rail abandonment's Combined Environmental and Historic Report. I will need to get back to you regarding the Memorandum of Agreement as I do not have it readily available.

As you can see from the attached Historical Built Environment Report that was part of the original DEIS, a comprehensive historic review was conducted by qualified professionals of the entire site proposed for development as part of the San Pedro Waterfront Project, including the right-of-way now subject to abandonment. This review included evaluation of eligibility for listing on the National Register of Historic Places ("NRHP"), and resulted in no structures within the right-of-way being determined to meet the NRHP criteria, although structures outside of the right-of-way (and not subject to this abandonment) were identified.

Thank you again for your time and attention to this matter.

Kind Regards,
Christian

Christian L. Alexander
Attorney at Law
He/Him/His



○ 202.955.5600 | F 202.955.5616

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From: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>

Sent: Wednesday, December 22, 2021 1:24 PM

To: Christian L. Alexander <calexander@kaplankirsch.com>

Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

Hello. Sorry for my delayed response. I took a look at the submitted materials. In reviewing the *Combined Environmental and Historic Report* there are references to maps and photographs in a DEIS. Would it be possible to get a copy of this report? Or preferably the referenced portions of the report. There is also mention of a signed Memorandum of Agreement, I'm assuming for another project. It would be helpful to have a copy of that as well. Electronic copies sent to this email are preferred.

The other question I have is whether or not the railroad tracks that are being abandoned have been evaluated for the National Register of Historic Places? If they have not, then pursuant to 36 CFR 800.4(c), I will need to see an evaluation of the railroad tracks in order to determine whether or not they are a historic property for the purposes of Section 106. If they are determined to be eligible then someone who meets the Secretary of the Interior's Standards for Historians/Architectural Historians should assess whether or not the proposed abandonment will have an adverse effect on the property.

If you have any question please contact me at Natalie.Lindquist@parks.ca.gov.

Natalie Lindquist

natalie.lindquist@parks.ca.gov

Historian II

California Office of Historic Preservation

1725 23rd Street, Suite 100

Sacramento, CA 95816-7100

(916) 445-7014

From: Christian L. Alexander <calexander@kaplankirsch.com>

Sent: Monday, December 13, 2021 10:58 AM

To: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>

Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

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Hi Ms. Lindquist,

I hope this finds you well. I just tried your number, and your voicemail message said the best way to reach you is by email. I wanted to follow up in regard to the railroad abandonment discussed below (STB_2021_0322_001 STB Docket No. AB 1094X). For your convenience I've attached a couple of documents regarding this matter that I would like to discuss with you at your earliest convenience. If you could please let me know a good time that works for you for a call this week I would appreciate it.

I look forward to hearing from you soon.

Kind Regards,
Christian

Christian L. Alexander

Attorney at Law

He/Him/His



O 202.955.5600 | F 202.955.5616

1634 Eye (I) Street, NW | Suite 300 | Washington, DC 20006

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From: Christian L. Alexander

Sent: Monday, December 13, 2021 10:34 AM

To: Parker, Carlton@Parks <Carlton.Parker@parks.ca.gov>

Cc: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>

Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

Mr. Parker,

Thank you for your response and for the information. I will follow up with Ms. Lindquist later today.

Kind Regards,
Christian

From: Parker, Carlton@Parks <Carlton.Parker@parks.ca.gov>

Sent: Friday, December 10, 2021 5:33 PM

To: Christian L. Alexander <calexander@kaplankirsch.com>

Cc: Lindquist, Natalie@Parks <Natalie.Lindquist@parks.ca.gov>; Perez, Alicia@Parks <Alicia.Perez@parks.ca.gov>

Subject: RE: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

Hi Mr. Alexander,

Any questions regarding this should be directed to State Historian Natalie Lindquist, who is the assigned reviewer for STB projects. Our number and name for it is **STB_2021_0322_001 STB Docket No. AB 1094X Abandon 2.6 miles line between MP 4.00 & MP 6.60 Los Angeles County.**

Hopefully, she can assist you with this.

Carlton Angelo Parker

Office Technician

Office of Historic Preservation

1725 23rd Street, Suite 100

Sacramento, CA 95816

Carlton.Parker@parks.ca.gov

From: Christian L. Alexander <calexander@kaplankirsch.com>

Sent: Friday, December 10, 2021 2:10 PM

To: Parker, Carlton@Parks <Carlton.Parker@parks.ca.gov>

Subject: FW: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

You don't often get email from calexander@kaplankirsch.com. [Learn why this is important](#)

Dear Mr. Parker,

Thank you for your prompt call-back, and apologies that we were not able to connect when you called. Our receptionist Ossie provided me with your email and said that you requested that I follow up by email. I am forwarding an email that I sent to your office last month. I am also including the relevant STB filing and decision, in case it is helpful.

Looking forward to hearing from you at your earliest convenience.

Kind Regards,
Christian

Christian L. Alexander

Attorney at Law

He/Him/His



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From: "Christian L. Alexander"
Sent: Monday, November 8, 2021 10:06 AM
To: Info.calshpo@parks.ca.gov; Calshpo.ohp@parks.ca.gov
Cc: W. Eric Pilsk <epilsk@kaplankirsch.com>; Milind.Desai@jacobs.com
Subject: SHPO confirmation for City of Los Angeles—Abandonment Exemption—In Los Angeles County, Cal., STB Docket No. AB 1094X

Good Morning,

My office represents the City of Los Angeles, which has obtained authority from the Surface Transportation Board to abandon a short segment of rail line at the Port of Los Angeles, subject to your confirmation that there are no outstanding Section 106 issues regarding the abandonment. We kindly request your attention regarding the attached letter, which we have also sent to you by registered mail.

Please don't hesitate to contact me if you would like to discuss further via my email or at (202) 955-5600. We look forward to hearing from you at your earliest convenience.

Kind Regards,

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**OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION**

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SACRAMENTO, CA 95816-7100
(916) 445-7000 Fax: (916) 445-7053
calshpo@parks.ca.gov
www.ohp.parks.ca.gov

**RECEIVED**

APR 19 2011

REGULATORY DIVISION
LOS ANGELES OFFICE

April 15, 2011

In Reply Refer To: COE090701A

Attn: Stephen Dibble

David J. Castanon
Chief, Regulatory Division
Department of the Army
Los Angeles District, Corps of Engineers
P.O. Box 532711
Los Angeles, California 90053-2325

Re: Execution of Memorandum of Agreement for the San Pedro Waterfront
Redevelopment Project, Los Angeles County, California

Dear Mr. Castanon:

Enclosed is one copy of the executed *Memorandum of Agreement between the U.S. Army Corps of Engineers and the California Historic Preservation Officer Regarding the San Pedro Waterfront Redevelopment County Project, Los Angeles County, California* (MOA). Please provide my office with a copy of the fully executed MOA when it has been signed by the concurring parties. If you require further information, please contact William Soule, Associate State Archeologist, at phone 916-445-7022 or email wsoule@parks.ca.gov.

Sincerely,

A handwritten signature in cursive script, reading "Susan H. Stratton for".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

Enclosure (1)