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1.0 SECTION 4(f) EVALUATION OVERVIEW

A preliminary inventory of Section 4(f) properties and their Section 4(f) use was conducted as a part of the previous Alternatives Analysis evaluation for this Project. For the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR), a more detailed analysis was done to further identify resources and strategies that would avoid or, in the case where avoidance is not possible and the use is not de minimis, minimize the use of Section 4(f) resources. Subsequent to the Draft EIS/EIR, avoiding or minimizing the use of Section 4(f) properties continued. This Section 4(f) Evaluation describes how the Locally Preferred Alternative (LPA) would use Section 4(f) resources. For such resources, a brief description (for full description refer to the Historic Resources Properties Supplemental Survey Report and the Archaeological Resources Supplemental Survey Report) and an overview of Section 4(f) use is provided. Where there is a direct use, a description of avoidance alternatives, measures to minimize harm, and mitigation measures that have been considered follows. There are 14 parks and recreation areas and 41 historic resources (39 individual properties plus two historic districts) within the 9-mile long project study area. The LPA would have a direct use of only one Section 4(f) resource in the area of potential effect.

1.1 Section 4(f) “Use” Definitions

According to 49 USC 303(c), Section 4(f) of the US Department of Transportation Act of 1966 (as amended and recodified in 1983), the FTA “may approve a transportation program or project ... requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site) only if (1) there is no prudent and feasible alternative to using that land; and (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.”

As defined in 23 CFR 774.17, the “use” of a protected Section 4(f) property occurs when any of the conditions described in the following sections are met.

1.1.1 Direct Use

A direct use of a Section 4(f) resource occurs when property is permanently incorporated into a proposed transportation project (23 CFR Section 774.17). This may occur as a result of partial or full acquisition of the Section 4(f) property, permanent easements, or temporary easements that exceed regulatory limits noted below.

1.1.2 Temporary Use

A temporary use of a Section 4(f) resource occurs when there is a temporary occupancy of a property that is considered adverse in terms of the preservationist purpose of the Section 4(f) statute. Under FTA regulations (23 CFR Section 774.13), a temporary occupancy of a property does not constitute a use of a Section 4(f) resource when all the following conditions are satisfied:

- Duration is temporary (i.e., less than the time needed for construction of the project), and there should be no change in ownership of the land;
- Scope of work is minor (i.e., both 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 restored (i.e., the property must be returned to a condition that is at least as good as that which existed prior to the project); and

- There must be documented agreement of the official(s) having jurisdiction over the Section 4(f) resource regarding the above conditions.

1.1.3 Constructive Use

A constructive use of a Section 4(f) resource occurs when a transportation project does not permanently incorporate land from a resource, but the proximity of the project results in effects (e.g., noise, vibration, visual, and property access) so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only if the protected activities, features, or attributes of the resource are substantially diminished (23 CFR 774.15).

1.1.4 De Minimis

The requirements of Section 4(f) would be considered satisfied if it is determined 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 agencies with jurisdiction must concur in writing with the determination. De minimis impact is defined in 23 CFR 774.17 as follows:

- For parks, recreation areas, and wildlife and 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

- For historic sites, de minimis impact means that the FTA has determined, in accordance with 36 CFR Part 800, that no historic property is affected by the project or the project would have “no adverse effect” on the property in question.

To arrive at this determination in accordance with 36 CFR 800, effects to all identified eligible, determined eligible, or listed historic properties were evaluated within the current context and setting of the property, with regard to the identified historic significance and level of retention of historic integrity, and in relation to changes to the property or within its vicinity that the LPA would or may cause. An adverse effect determination was made when the LPA would alter, directly or indirectly, any of the characteristics of the historic property that qualify the property for inclusion in the National Register of Historic Places (NRHP) in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration was given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the NRHP.
Using the criteria of adverse effect established in 36 CFR 800.5(a)(1) and guidance found in the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, each historic property was evaluated to determine if implementation of the LPA would alter any historically significant characteristics or features of a historic property by diminishing relevant aspects of that property’s historic integrity. For some eligible or listed resources within the Area of Potential Effect (APE), certain aspects of integrity are not critical to the reasons that a property was determined to be eligible for listing. For each historic property, one of the following findings was made regarding the LPA’s affect on each aspect of integrity: no effect, no adverse effect, or adverse effect.
2.0 PROJECT DESCRIPTION

On October 28, 2010, the Metro Board selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft EIS/EIR) as the Locally Preferred Alternative (LPA) for further discussion in the Final EIS/EIR. This alternative would extend HRT, in subway, from the existing Metro Purple Line Wilshire/Western Station to a Westwood/VA Hospital Station (Figure 2-1).

The LPA would best meet the Purpose and Need to improve mobility and provide fast, reliable, high-capacity, and environmentally sound transportation solutions in the study area. The separated right-of-way is all in a tunnel, with the top of the tunnel at least 30 to 70 feet below the ground surface.

The LPA tunnel alignment would be between 8.6 and 8.8 miles in length from the Wilshire/Western Station to the Westwood/VA Hospital Station (plus tail tracks) depending on the alignment between Wilshire/Rodeo and Westwood/VA Hospital. This alignment would serve numerous activity centers across the Westside of Los Angeles. The extension would include a total of seven new stations, each serving major activity and employment centers on the Westside of Los Angeles:

- **Wilshire/La Brea Station** would be located in a commercial and residential area and would serve as a key transit connection. The entrance would either be located on the northwest or the southwest corner of the Wilshire Boulevard and La Brea Avenue intersection.

- **Wilshire/Fairfax Station** would offer access to a major cultural and tourism hub, and provide access to the nearby Farmer’s Market, shops along West 3rd Street and Beverly Boulevard, and The Grove. The entrance would either be located immediately west of Johnie’s Coffee Shop on the northwest corner of Wilshire Boulevard and Fairfax Avenue, in LACMA West (the former May Company Building) on the northeast corner of Wilshire Boulevard and Fairfax Avenue, or on the south side of Wilshire Boulevard, between Ogden Drive and Orange Grove Avenue.

- **Wilshire/La Cienega Station** would provide access to a mixture of commercial, residential, and restaurant uses. The entrance would be located on the northeast corner of the Wilshire Boulevard and La Cienega Boulevard intersection at the current site of the CitiBank building.

- **Wilshire/Rodeo Station** would serve the Beverly Hills “Golden Triangle,” a local and regional shopping destination as well as a hub for tourists visiting the famous Rodeo Drive and shops along Wilshire Boulevard, Beverly Drive, and other streets. The entrance would either be located on the southwest corner of Wilshire Boulevard and Reeves Drive at the current site of the Ace Gallery, on the northwest corner of Wilshire Boulevard and Beverly Drive (adjacent to the Bank of America Building), or on the southeast corner of the Wilshire Boulevard and El Camino Drive intersection at the current site of the Union Bank Building.
Figure 2-1: Westside Subway Extension
- **Century City Station** would serve a high-density commercial, employment, and residential center. As part of the LPA selection, the Metro Board decided to continue to evaluate two station locations in Century City (Santa Monica Boulevard and Constellation Boulevard). The location of the Century City Station would affect the tunnel alignment to the east and west of the station.

  - **Century City Santa Monica** would be a modified version of the Century City Santa Monica Station that was in the Draft EIS/EIR. Based on the results of the further studies of the Santa Monica Fault, the Century City Santa Monica Station was shifted to the east to the Century Park East intersection to avoid locating the station box on the Santa Monica Fault. The entrance would be located on the southwest corner of Santa Monica Boulevard and Century Park East.

  - **Century City Constellation** would be located underneath Constellation Boulevard from west of Avenue of the Stars to just west of Century Park East. The entrance would be located either at the northeast corner of Constellation Boulevard and Avenue of the Stars or at the southwest corner of Constellation Boulevard and Avenue of the Stars near the Century Plaza Hotel.

- **Westwood/UCLA Station** would serve as a major hub station for tourists, UCLA and medical center users, students, professors, and employees. As part of the LPA selection, the Metro Board decided to continue to study two station locations at Westwood/UCLA (Off-Street and On-Street). Two entrances would be constructed given the high ridership projections at this station.

  - **Westwood/UCLA Off-Street** would be located underneath UCLA Lot 36, north of Wilshire Boulevard between Gayley Avenue and Veteran Avenue. The entrances would be on the northwest corner of the Wilshire Boulevard and Gayley Avenue intersection and the northeast corner of the Wilshire Boulevard and Veteran Avenue intersection.

  - **Westwood/UCLA On-Street** would be located under Wilshire Boulevard, extending just west of Westwood Boulevard to west of Gayley Avenue, almost to Veteran Avenue. Either both station portals would be located on the north side of Wilshire Boulevard (the northwest corner of Wilshire Boulevard and Gayley Avenue and the northwest corner of Wilshire Boulevard and Westwood Boulevard) or the entrance at the Wilshire Boulevard and Westwood Boulevard intersection would be split between the north and south sides of Wilshire Boulevard.

- **Westwood/VA Hospital Station** would serve veterans, visitors, and workers using the VA campus and provide connections to the West LA, Brentwood, and Santa Monica communities. As part of the LPA selection, the Metro Board decided to continue to study two station locations at Westwood/VA Hospital.

  - **Westwood/VA Hospital South** would be located at the northern edge of the VA Hospital parking lot, adjacent to Wilshire Boulevard. The entrance would be located on the Bonsall level, beneath the bus drop-off area to the north of the VA Hospital parking lot. To accommodate the grade separation at this site, additional stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard. A parking structure providing both permanent and temporary replacement parking would be located in the existing physician’s parking lot, east of the VA Hospital.
Westwood/VA Hospital North would locate the Westwood/VA Hospital Station on the north side of Wilshire Boulevard. The entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level. As with the South station, to accommodate the grade separation at this site, stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard.

The estimated one-way running time would range from approximately 14 minutes, 26 seconds to 15 minutes, 21 seconds from the Wilshire/Western Station to the Westwood/VA Hospital Station depending on the alignment between the Wilshire/Rodeo and Westwood/VA Hospital Stations. The LPA is expected to operate seven days per week, 365 days per year, with hours of operation from 4:30 a.m. to 1:30 a.m. Peak-period headways of 4 minutes would be in effect during weekday non-holidays, from 6:00 a.m. to 9:00 a.m. and from 3:00 p.m. to 7:00 p.m. Off-peak headways of 10 minutes would be in effect during the remaining weekday hours of operation and on weekends.

Construction staging and laydown areas would be necessary for station, tunnel, portal, crossover structures and traction power substations (TPSS) excavation as well as the launch and retrieval of the tunnel boring machines (TBMs) and would be located at each station area. Additional construction staging and laydown sites would be located at Wilshire/Western and Wilshire/Crenshaw.

Metro is planning several enhancements to the Division 20 Maintenance and Storage Facility, including new storage tracks, new turnback platforms and turnback tracks and increased capacity at Division 20 for major repairs, wheel truing, service and inspection, and blow down operations, in addition to other associated facilities such as storage, offices, and amenities (Figure 2-2).

Based on the current 30/10 funding schedule, the Project is expected to be operational to Westwood/VA Hospital in 2022 with construction beginning in 2013. As currently planned, the parallel construction of portions of the alignment and stations would allow the entire Project to be open and operational at the same time and not in phases. In the event that accelerated Federal funding is not secured, the Project would be constructed in three sequential phases. The first phase to the Wilshire/La Cienega Station would open in 2022, the second phase to the Century City Station would open in 2025, and the final phase to Westwood/VA Hospital Station would open in 2035.
Figure 2-2: Division 20 Maintenance and Storage Facility
3.0 DESCRIPTION OF SECTION 4(f) PROPERTIES

This section describes Section 4(f) properties that were considered for evaluation. Properties subject to Section 4(f) consideration include historic resources of local, state, or national significance, whether privately or publicly owned, as well as publicly owned parks, recreation areas, and wildlife refuges of national or local significance.

3.1 Historic Resources

This section identifies eligible properties that are subject to Section 4(f) and describes the architectural styles that form the basis of the evaluation. Prior to completing the Section 4(f) evaluation, a Section 106 analysis was completed to identify historical and archaeological resources in the APE and to determine their significance. Refer to the Historic Resources Properties Supplemental Survey Report and the Archaeological Resources Supplemental Survey Report. The purpose of the Section 106 analysis was to identify cultural resources that are eligible or listed on the NRHP and that may be affected by the LPA.

Under Section 106, when a federally funded project will affect a historic property, the agency must apply the criteria of adverse effect to determine if the effect will be adverse or negative. Adverse effect is defined in 36 CFR § 800.5(a)(1) as an action that may:

"...alter, directly or indirectly, any of the characteristics that qualify the property for inclusion in the National Register in a manner that will diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Adverse effects may include reasonably foreseeable effects caused by the project that may occur later in time, be farther removed in distance or be cumulative."

Adverse effects include, but are not limited to, demolition; alteration; removal of a property from its original setting; neglect; abandonment; or the introduction of visual, atmospheric, or audible elements.

With regard to Section 4(f), in the event a historic property has been identified within the APE that is eligible for the NRHP, the property was evaluated for use.

Historic and archival research was undertaken to determine the presence of previously identified historic properties eligible for the NRHP. In addition, a historic architectural survey was completed for the APE for the LPA to further identify and evaluate properties that are historically significant and meet the criteria for eligibility for listing on the NRHP. Properties within the APE that have a determination of eligibility for the NRHP as a result of the Section 106 process, as summarized in Appendices B and C. Appendix C describes historic properties identified within the station APE and historic properties within the alignment APE. Appendix C also describes historic properties that are contributors to historic districts but were considered not individually eligible. The properties listed have a determination of eligibility for the NRHP by prior studies and through evaluation in support of the current LPA. The architectural distinctions, known associations with important historic persons or events, and/or other historic features of each eligible property are discussed in the Historic Resources Properties Supplemental Survey Report.
Properties were determined to be eligible if they meet at least one of the following NRHP criteria:

- Criterion A—resource is associated with events that have made a significant contribution to the broad patterns of our history
- Criterion B—resource is associated with the lives of persons significant in our past
- Criterion C—resource embodies the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
- Criterion D—resource has yielded, or may be likely to yield, information important in prehistory or history
- Criterion Consideration G—a property achieving significance within the past 50 years if is of exceptional importance

Section 4(f) protects historic resources that are on or eligible for the NRHP under Criteria A, B, and C. The LPA may result in a Section 4(f) use of several eligible historic properties as shown in Figure 3-1 through Figure 3-4 and are discussed in more detail in the following sections. The FTA has finalized determination of eligibility through consultation with the State Historic Preservation Office (SHPO) (see letter from SHPO in Appendix D of the Final EIS/EIR). Appendix B presents effects to these historic properties as established by current consultation.

In addition, the NRHP specifies the following criteria when resources do not meet the above criteria.

- In general, cemeteries, birthplaces, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; properties primarily commemorative in nature; and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:
  - A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
  - A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
  - A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his/her productive life.
  - A cemetery which derives its primary significance from graves of persons of transcendent importance from age, from distinctive design features, or from association with historic events; or
  - A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
  - A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
  - A property achieving significance within the past 50 years if it is of exceptional importance.
Figure 3-3: Section 4(f) Resources (Century City Station to Westwood/VA Hospital Station)
Figure 3-4: Section 4(f) Resources (Division 20 Maintenance Yard)
### Table 3-1: Park and Recreation Areas on or Adjacent to Westside Subway Extension LPA Alignment or within One-quarter Mile of a Station or Maintenance Facility

| Alternative/Option | Resource Name | On or Immediately Adjacent to Station? | Publically Owned? | Major Purpose for Park or Recreational Activities? | Direct Use? | Tunnel Under—No Use?
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>LPA: Wilshire/Crenshaw Construction Laydown</td>
<td>Wilshire Park Elementary School</td>
<td>Yes</td>
<td>Adjacent</td>
<td>No</td>
<td>Wilshire/Western 0.30 miles (1,584 feet) west and 0.16 miles (444 feet) east of Crenshaw construction laydown. Yes Owned by the Los Angeles Unified School District</td>
<td>No</td>
</tr>
<tr>
<td>LPA: Wilshire/La Brea Station</td>
<td>John Burroughs Middle School</td>
<td>Yes</td>
<td>Adjacent</td>
<td>No</td>
<td>0.25 miles (7,320 feet) east of Wilshire/La Brea Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the Los Angeles Unified School District</td>
<td>No</td>
</tr>
<tr>
<td>LPA: Wilshire/Fairfax Station</td>
<td>Hancock Park</td>
<td>Yes</td>
<td>Adjacent</td>
<td>No</td>
<td>Park is located 150 feet east of Wilshire/Fairfax Station. No No use</td>
<td>No</td>
</tr>
<tr>
<td>LPA: Wilshire/La Cienega Station</td>
<td>La Cienega Park</td>
<td>No</td>
<td>17 miles (approximately 880 feet)</td>
<td>No</td>
<td>0.18 miles (950 feet) south of the Wilshire/La Cienega Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the City of Beverly Hills</td>
<td>Yes</td>
</tr>
<tr>
<td>LPA: Wilshire/La Cienega Station</td>
<td>La Cienega Tennis Center</td>
<td>No</td>
<td>18 miles (approximately 850 feet)</td>
<td>No</td>
<td>0.18 miles (950 feet) south of the Wilshire/La Cienega Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the City of Beverly Hills</td>
<td>Yes</td>
</tr>
<tr>
<td>LPA: Wilshire/La Cienega Station</td>
<td>Horace Mann Elementary School</td>
<td>No</td>
<td>02 miles (Approximately 100 feet)</td>
<td>No</td>
<td>0.26 miles (737 feet) southwest of the Wilshire/La Cienega Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the Beverly Hills Unified School District</td>
<td>No</td>
</tr>
<tr>
<td>LPA: Wilshire/Rodeo Station</td>
<td>Reeves Park</td>
<td>Yes</td>
<td>Adjacent</td>
<td>Yes</td>
<td>Park would be adjacent to the Wilshire/Rodeo Ace Gallery Station entrance. Construction laydown for the station and any of the 3 entrances would occur on the Ace gallery property immediately top the north. Yes Owned by the City of Beverly Hills</td>
<td>Yes</td>
</tr>
<tr>
<td>LPA: Wilshire/Rodeo Station</td>
<td>Crescent Park</td>
<td>No</td>
<td>04 miles (Approximately 211 feet)</td>
<td>No</td>
<td>0.11 miles (600 feet) northeast of Wilshire/Rodeo Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the City of Beverly Hills</td>
<td>Yes</td>
</tr>
<tr>
<td>LPA: Wilshire/Rodeo Station</td>
<td>Beverly Canon Gardens</td>
<td>No</td>
<td>04 miles (Approximately 211 feet)</td>
<td>No</td>
<td>0.11 miles (600 feet) north of Wilshire/Rodeo Station. Facility is not adjacent to surface-disturbing construction areas. Yes Owned by the City of Beverly Hills</td>
<td>Yes</td>
</tr>
</tbody>
</table>

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Section 4(f) Evaluation Technical Report

3.0—Description of Section 4(f) Properties

Westside Subway Extension Project

March 2012
Table 3-1: Park and Recreation Areas on or Adjacent to Westside Subway Extension LPA Alignment or within One-quarter Mile of a Station or Maintenance Facility (continued)

<table>
<thead>
<tr>
<th>Alternative/Option</th>
<th>Resource Name</th>
<th>On or Immediately Adjacent to Tunnel Alignment?</th>
<th>On or Immediately Adjacent to Station?</th>
<th>Publically Owned?</th>
<th>Major Purpose for Park or Recreational Activities?</th>
<th>Direct Use</th>
<th>Tunnel Under—No Use</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPA: Wilshire/Rodeo</td>
<td>Beverly Vista Elementary School</td>
<td>No</td>
<td>1 mile (Approximately 1,600 feet)</td>
<td>No</td>
<td>0.15 miles (800 feet) east of Wilshire/Rodeo Station. Facility is not adjacent to surface disturbing construction areas.</td>
<td>Yes</td>
<td>Owned by the Beverly Hills Unified School District</td>
</tr>
<tr>
<td>LPA: Century City Station</td>
<td>Beverly Gardens Park</td>
<td>Yes</td>
<td>0.02 mile (Approximately 170 feet)</td>
<td>No</td>
<td>0.25 mile (1,320 feet) east of the Century City (Santa Monica Boulevard) Station</td>
<td>Yes</td>
<td>Owned by the City of Beverly Hills</td>
</tr>
<tr>
<td>LPA: Century City Station</td>
<td>El Rodeo School</td>
<td>No</td>
<td>0.19 miles (Approximately 1,003 feet)</td>
<td>No</td>
<td>0.25 miles (1,320 feet) northeast of Century City Santa Monica Station. Facility is not adjacent to surface disturbing construction areas.</td>
<td>Yes</td>
<td>Owned by the Beverly Hills Unified School District</td>
</tr>
<tr>
<td>LPA: Century City Constellation</td>
<td>Beverly Hills High School</td>
<td>Yes</td>
<td>Tunnel under for Century City—Constellation Station</td>
<td>No</td>
<td>0.21 miles (1,101 feet) east of Century City (Constellation Boulevard) Station</td>
<td>Yes</td>
<td>Owned by the Beverly Hills Unified School District</td>
</tr>
<tr>
<td>LPA: Westwood/UCLA Station</td>
<td>Westwood Recreation Center</td>
<td>No</td>
<td>0.22 miles (1,160 feet) northeast of the Westwood/UCLA Station. Facility is not adjacent to surface disturbing construction areas.</td>
<td>Yes</td>
<td>Owned by the City of Los Angeles</td>
<td>Yes</td>
<td>Swimming pool, tennis courts, recreation center</td>
</tr>
</tbody>
</table>


1 Where tunneling will occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, Section 4(f) will apply only if the tunneling:
1) Disturbs any archaeological sites on or eligible for the NRHP that warrant preservation in place, or
2) Causes disruption that would permanently harm the purposes for which the park, recreation, wildlife or waterfowl refuge was established, or
3) Substantially impairs the historic values of the historic site.
3.2 Public Parks and Recreational Resources

Since the LPA is a subway, the study area established for the evaluation of Section 4(f) parks and recreational resources is 500 feet on each side of the alignments. The study area around the stations is one-quarter-mile (1,320 feet) study area used as reported in the *Parks and Community Facilities Technical Report*. Public parks and recreational areas inventoried within the study area are shown in Figure 3-1 through Figure 3-4 and listed on Table 3-1, which includes all parks and recreational resources publically owned and available for public use, and all schools with recreational facilities available for public use.

Eight public parks and recreation areas and six public schools (with public recreational facilities) are located immediately on, adjacent to or within 500 feet of the LPA alignment or within one-quarter mile of a station (see *Parklands and Other Community Facilities Supplemental Report*).
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4.0 DIRECT USE OF SECTION 4(f) PROPERTIES

A direct use of a Section 4(f) resource occurs when property is permanently incorporated into a proposed transportation project (23 CFR Section 774.17). This may occur as a result of partial or full acquisition of the Section 4(f) property, permanent easements, or temporary easements that exceed regulatory limits noted below (23 CFR Section 774.17).

In addition, according to Section 4(f) Policy Paper (March 2005), where tunneling would occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling:

- Disturbs any archaeological sites on or eligible for the NRHP that warrant preservation in place, or
- Causes disruption that would permanently harm the purposes for which the park, recreation, wildlife or waterfowl refuge was established, or
- Substantially impairs the historic values of the historic site. “

4.1 Historic Resources

Section 4(f) protects historic resources that are on or eligible for the NRHP under Criteria A, B, and C. FTA, with SHPO concurrence, has made a determination under Section 106 of “No Adverse Effect” (see Appendix B) for 38 of the 39 individual properties and the two historic districts. Only one of the individual historic properties within the LPA APE has a determination of Adverse Effect, the Ace Gallery. Table 4-1 shows the historic properties that would have a use under Section 4(f).

Appendix B, Architectural Historic Resources within the APE, provides a more detailed list of historic Section 4(f) properties. Of the 39 historic properties and two historic districts, 4 historic properties would be de minimis use. Only one of the 41 total properties would have a direct use, the Ace Gallery.

The properties discussed in greater detail in the following section were identified as having a use by the LPA under Section 4(f). The discussion of historic resources is discussed by station and associated alignment options. It includes those historic structures located at the Wilshire/La Brea and Wilshire/Fairfax Stations, followed by those at the Wilshire/La Cienega, Wilshire/Rodeo Station, Century City, Westwood/UCLA Stations and finally at the Westwood/VA Hospital Station.

In addition, one archaeological site, CA-LAN-2610, a remnant of the circa 1893 cobblestone street and street car tracks associated with the La Grande Railroad Station that was adjacent to the Los Angeles River at the former eastern extent of the Little Tokyo Historic District, is within the APE. Since this resource is situated beneath developed areas, direct examination of its condition, horizontal extent, and integrity is prohibited. It will be avoided by construction for the LPA at the Division 20 maintenance yard and, therefore, has no use under Section 4(f).
### Table 4-1: Historic Properties and Archaeological Sites with Section 4(f) Use in the Study Area

<table>
<thead>
<tr>
<th>Historic Properties with Section 4(f) Use</th>
<th>Station</th>
<th>Direct Use</th>
<th>de minimis</th>
<th>No Use¹</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Individual Properties</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wiltern Theater (WSE 30)</td>
<td>Wilshire/Western</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Pierce National Life (WSE 31)</td>
<td>Wilshire/Western</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Los Altos Hotel and Apartments (WSE 29)</td>
<td>Wilshire/Crenshaw</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Tidewater (Getty) Oil building (WSE 28)</td>
<td>Wilshire/Crenshaw</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Security National Bank Building/Zephyr Club (WSE 90)</td>
<td>Wilshire/La Brea</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Art Deco-style Commerical Building (WSE 27)</td>
<td>Wilshire/La Brea</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Darkroom Photography Store Façade (WSE 26)</td>
<td>Wilshire/La Brea</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Art Deco-style Commerical Building (WSE 25)</td>
<td>Wilshire/La Brea</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Clem Wilson/Mutual of Omaha Building (WSE 94)</td>
<td>Wilshire/La Brea</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Johnie’s Coffee Shop (WSE 23)</td>
<td>Wilshire/Fairfax</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>May Company Wilshire/LACMA West (WSE 24)</td>
<td>Wilshire/Fairfax</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Beverly Hills Porsche Dealership (WSE 89)</td>
<td>Wilshire/La Cienega</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Fox Wilshire Theater (WSE 21)</td>
<td>Wilshire/La Cienega</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Fine Arts Theater (WSE 18)</td>
<td>Wilshire/La Cienega</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Unoccupied (WSE 96)</td>
<td>Wilshire/La Cienega</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>California Bank Building – Sterling Plaza (WSE 17)</td>
<td>Wilshire/Rodeo</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Ace Gallery Building (WSE 15)</td>
<td>Wilshire/Rodeo</td>
<td>LPA—building demolished</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Union Bank Building (WSE 14)</td>
<td>Wilshire/Rodeo</td>
<td>LPA—Station entrance may be inside garage, alteration west end wall</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Glendale Federal Savings Building (Commercial Capital Bank) (WSE 16)</td>
<td>Wilshire/Rodeo</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Wilshire-Beverly Centre Building (Bank of America) (WSE 88)</td>
<td>Wilshire/Rodeo</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Beverly Wilshire Hotel (WSE 13)</td>
<td>Wilshire/Rodeo</td>
<td></td>
<td></td>
<td>No Use</td>
</tr>
<tr>
<td>Perpetual Savings Bank (WSE 56)</td>
<td>Wilshire/Rodeo</td>
<td></td>
<td></td>
<td>No Use¹</td>
</tr>
<tr>
<td>Los Angeles Country Club (South Course) (WSE 97)</td>
<td>Century City—Santa Monica Boulevard</td>
<td></td>
<td></td>
<td>No Use¹</td>
</tr>
<tr>
<td>Beverly Hills High School (WSE 55)</td>
<td>Century City—Constellation Boulevard</td>
<td></td>
<td></td>
<td>No Use¹</td>
</tr>
<tr>
<td>Historic Properties with Section 4(f) Use</td>
<td>Station</td>
<td>Direct Use</td>
<td>de minimis</td>
<td>No Use¹</td>
</tr>
<tr>
<td>-----------------------------------------</td>
<td>---------</td>
<td>------------</td>
<td>------------</td>
<td>---------</td>
</tr>
<tr>
<td><strong>Century Plaza Hotel (WSE 11)</strong></td>
<td>Century City—Constellation Boulevard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Century Park Towers (WSE 12)</strong></td>
<td>Century City—Constellation Boulevard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>AAA Building (WSE 87)</strong></td>
<td>Century City—Constellation Boulevard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>The Barn (WSE 54)</strong></td>
<td>Century City—Constellation Boulevard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Ralph’s Grocery Store (WSE 44)</strong></td>
<td>Westwood/UCLA—Off-Street</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Glendon Arcade Shops (WSE 45)</strong></td>
<td>Westwood/UCLA—Off-Street</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Lindbrook Village (WSE 46)</strong></td>
<td>Westwood/UCLA—Off-Street</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Courtyard Apartment Complex (WSE 47)</strong></td>
<td>Westwood/UCLA—Off-Street</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>University Bible Building (WSE 49)</strong></td>
<td>Westwood/UCLA—Off-Street</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Westwood Federal Building (WSE 43)</strong></td>
<td>Westwood/VA Hospital—South</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Linde (Westwood) Medical Plaza (WSE 10)</strong></td>
<td>Westwood/UCLA—On-Street</td>
<td>LPA—Removal of section of wall between garage and main structure for entrance</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Catholic-Protestant Chapel/Wadsworth Chapel (WSE 42)</strong></td>
<td>Westwood/VA Hospital—North</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>1st Street Viaduct (WSE 91)</strong></td>
<td>Division 20 Maintenance Yard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>4th Street Bridge (WSE 92)</strong></td>
<td>Division 20 Maintenance Yard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>6th Viaduct (WSE 93)</strong></td>
<td>Division 20 Maintenance Yard</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Historic Districts

<table>
<thead>
<tr>
<th>Historic Districts</th>
<th>Station</th>
<th>Direct Use</th>
<th>de minimis</th>
<th>No Use¹</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Westwood-UCLA District (HD 1)</strong></td>
<td>Westwood/UCLA</td>
<td>No Use</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Veterans Administration Medical Center Historic District (WSE 41)</strong></td>
<td>Westwood/VA Hospital</td>
<td>LPA—Station entrance, cut-and-cover construction, tree removal</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


¹ Where tunneling will occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, Section 4(f) would apply only if the tunneling:

1) Disturbs any archaeological sites on or eligible for the NRHP that warrant preservation in place, or
2) Causes disruption that would permanently harm the purposes for which the park, recreation, wildlife or waterfowl refuge was established, or
3) Substantially impairs the historic values of the historic site.

¹ Includes WSE 46, WSE 47, WSE 49 and WSE 61 as contributing element.
4.1.1 Wilshire/La Brea Station

This station box would be located beneath Wilshire Boulevard from Detroit Street to just east of Orange Drive. Two locations for the station entrance are under consideration:

- North of Wilshire Boulevard - The first option would locate the station entrance on the northwest corner of the Wilshire Boulevard and La Brea Avenue intersection on Metro-owned property, at the current site of the Metro Customer Center.

- South of Wilshire Boulevard - Alternatively, the station entrance would be located on the southwest corner of the Wilshire Boulevard and La Brea Avenue intersection, at the current location of the Bank of America building.

Wilshire/La Brea would also be a launch site for tunnel boring machines (TBMs) and the location for the equipment needed to support the operation of the TBMs in addition to typical station excavation activities. Therefore, approximately three acres of construction staging and laydown area would be needed at Wilshire/La Brea Station. As shown in Table 4-1 and Figure 3-1, five historic properties are located within the APE for the Wilshire/La Brea Station. These are:

- Security National Bank Building/Zephyr Club—WSE 90 (5209 Wilshire Boulevard)
- Clem Wilson/Mutual of Omaha Building—WSE 94 (5217 Wilshire Boulevard)
- Art Deco-style Commercial Building—WSE 25 (5350 Wilshire Boulevard)
- Darkroom Photography Store Façade—WSE 26 (5366 Wilshire Boulevard)
- Art Deco-style Commercial Building—WSE 27 (5400 Wilshire Boulevard)

The five properties are completely avoided or untouched by the LPA and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

4.1.2 Wilshire/Fairfax Station

The Wilshire/Fairfax Station box would be located under Wilshire Boulevard from just west of Fairfax Avenue to just east of Orange Grove Avenue. With the Wilshire/Fairfax Station, three entrances are under consideration—one adjacent to Johnie’s Coffee Shop, one within May Company Wilshire/LACMA West, and one at the southeast corner of Wilshire Boulevard and Orange Grove Avenue. The latter site would also serve as a construction staging and laydown area regardless of the station entrance selected. Only one station entrance would be constructed at the Wilshire/Fairfax Station as part of the LPA. As shown in Table 4-1 and Figure 3-2, two historic properties are located within the APE for the Wilshire/Fairfax Station:

- Johnie’s Coffee Shop—WSE 23 (6101 Wilshire Boulevard)
- May Company Wilshire/LACMA West—WSE 24 (6067 Wilshire Boulevard)

Johnie’s Coffee Shop is completely avoided or untouched by the LPA and there are no impairments to the property due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of Johnie’s Coffee Shop, refer to the Historic Resources Properties Supplemental Survey Report.
4.1.2.1 May Company Wilshire/LACMA West (1939-1940) WSE 24

Description and Significance of Property

APN 5508017007, 6067 Wilshire Boulevard, Los Angeles

WSE 24 is a Streamline Moderne-style commercial building (May Company Wilshire/LACMA West) designed by Albert C. Martin and Samuel A. Marx and constructed in 1939-40. It occupies the southwest corner of the lot and has a southwest-facing orientation. It is four stories with a generally square plan. The building features a flat roof. The southwest corner contains a massive gold, round column that rises from the second story to the roof and is backed by a curved black tile surround. The ground level window bays are steel frame fixed pane glass window walls, which are tucked beneath a cantilevered roof that curves around the southeast corner. The window bays on the top story are narrow horizontal bands, slightly protruding from the wall, that are filled with metal frame, fixed, single pane sashes. The walls are coated in stucco. The primary façade is generally symmetrical with a main entry on the northwest corner filled with metal frame, fixed glass pane, standard commercial doors. The building appears to be minimally altered and is in good condition. Based on observation, the storefront window sashes and doors may be new construction.

Application of Section 4(f) — De Minimis

The station entrance would be on the northeast corner of the Wilshire/Fairfax intersection (Figure 4-1). The entrance would be located within the lobby of the May Company Wilshire/LACMA West building with two sets of stairs and escalators leading to the basement level where there would be a connection into the station box. Station elevators would be located within the building lobby, connecting to the basement level. For further discussion of the May Company Wilshire/LACMA West building, refer to the Historic Resources Properties Supplemental Survey Report.

Figure 4-1: Wilshire/Fairfax Station—May Company Wilshire/LACMA West

4.1.3 FTA, with SHPO concurrence on the May Company Wilshire/LACMA West, has determined the proposed activity (undertaking) of the property would result in a “no adverse...
effect” in accordance with Section 106 consultation (36 CFR Part 800). Under 4(f) regulations, de minimis impact findings for a historic site can be made following a determination that the project will have “no adverse effects” on the historic property. As a result, FTA has determined the proposed Wilshire/Fairfax Station and alignment would have a de minimis impact on the May Company Wilshire/LACMA West. Wilshire/La Cienega Station

The station box would be located beneath Wilshire Boulevard from La Cienega Boulevard to Tower Drive. The station entrance would be located on the northeast corner of the Wilshire Boulevard and La Cienega Boulevard intersection at the current site of the CitiBank building. Approximately 1 acre of construction staging and laydown area would be needed at the Wilshire/La Cienega Station, principally for construction of the station. In addition to the construction staging and laydown area surrounding the station entrance, a construction staging and laydown area would be located on the northwest corner of the Wilshire Boulevard and Gale Drive intersection, at the current location of an office building and a residential structure.

As shown in Table 4-1 and Figure 3-2, four historic properties are located within the APE for the Wilshire/La Cienega Station. These are:

- Unoccupied—WSE 96 (8400 Wilshire Boulevard)
- Fox Wilshire Theater—WSE 21 (8430 Wilshire Boulevard)
- Beverly Hills Porsche Dealership—WSE 89 (8423 Wilshire Boulevard)
- Fine Arts Theater—WSE 18 (8554 Wilshire Boulevard)

The four properties are completely avoided or untouched by the Project and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

4.1.4 Wilshire/Rodeo Station

This station would be under the center of Wilshire Boulevard, extending between El Camino Drive on the west and just past Canon Drive on the east. Three locations for the station entrance at the Wilshire/Rodeo Station are under consideration: on the northwest corner of the Wilshire/Beverly intersection (Bank of America site), on the southwest corner of the Wilshire/Reeves intersection (Ace Gallery site), and on the southeast corner of the Wilshire/El Camino intersection (Union Bank site). Only one station entrance will be constructed at the Wilshire/Rodeo Station as part of the LPA. The Ace Gallery Building site is the recommended site.

In addition to the construction activity around a station entrance, approximately 1 acre of construction staging and laydown area would be needed to support construction of the Wilshire/Rodeo Station. The recommended construction staging areas would be located at the southwest corner of Wilshire Boulevard and Reeves Drive at the site of the Ace Gallery Building and on the northeast corner of Wilshire Boulevard and Canon Drive. All existing structures on the identified properties would be demolished and businesses would be relocated to accommodate construction activities. The construction staging and laydown areas would be the same regardless of the location of the station entrance, with the exception of construction activities surrounding the station entrance.
As shown in Table 4-1 and Figure 3-2, seven historic properties are located within the APE for the Wilshire/Rodeo Station. These are:

- Ace Gallery Building—WSE 15 (9430 Wilshire Boulevard)
- Glendale Federal Savings Building—WSE 16 (9450 Wilshire Boulevard)
- Union Bank Building—WSE 14 (9460 Wilshire Boulevard)
- Beverly Wilshire Hotel—WSE 13 (9504 Wilshire Boulevard)
- Wilshire Beverly Centre Building (Bank of America)—WSE 88 (9461 Wilshire Boulevard)
- California Bank Building/Sterling Plaza—WSE 17 (9429 Wilshire Boulevard)
- Perpetual Savings Bank—WSE 56 (9720 Wilshire Boulevard)

Four historic properties, the Glendale Federal Savings Building, the Beverly Wilshire Hotel, the Wilshire Beverly Centre Building (Bank of America Building), and the California Bank Building/Sterling Plaza are completely avoided or untouched by the LPA and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

One property, Perpetual Savings Bank, would require an easement for the tunnel under the property between the Wilshire/Rodeo Station and the Century City Constellation Station. Where tunneling would occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling ... substantially impairs the historic values of the historic site” (Section 4(f) Policy Paper). There are no impairments to the property due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the property, refer to the Historic Resources Properties Supplemental Survey Report.

If the Union Bank Building property is selected as a station entrance, the effect on the property is expected to meet the Secretary of Interior Standards for Rehabilitation. FTA, with SHPO concurrence on the Union Bank Building under Section 106, has determined that selection of the Union Bank Building for a station entrance would result in a “no adverse effect. Following the Section 106 determination, FTA has determined under Section 4(f) that a Wilshire/Rodeo Station entrance at the Union Bank Building would have a de minimis finding. Following the discussion of the direct use of Ace Gallery, there is a brief discussion of the de minimis finding for the Union Bank Building.

The Ace Gallery Building, the recommended station entrance site, would require demolition of the existing building. FTA, with SHPO concurrence on the Ace Gallery Building under Section 106, has determined that selection of the Ace Gallery Building as a station entrance would result in an “adverse effect.” Following the Section 106 determination, FTA has determined under Section 4(f) that a Wilshire/Rodeo Station at the Ace Gallery Building will have a “Direct Use.” The following sections first briefly describe the Ace Gallery and its significance (for further discussion of the property refer to the Historic Resources Properties Supplemental Survey Report) then applies Section (4) for the Ace Gallery Building’s use as a station entrance followed by the application of Section 4(f) for the Ace Gallery Building’s use as a construction staging site.
4.1.4.1 Ace Gallery Building (1957) WSE 15

Description and Significance of Property

APN 4331001045, 9430 Wilshire Boulevard, Beverly Hills

The Ace Gallery Building is a commercial building located on the southwest corner of Wilshire Boulevard and Reeves Drive. The original building on the site was a commercial restaurant building dating from 1932 that was enveloped by the new façade that was designed in the Brutalism style of architecture on the front (north) and east side elevations when Bank of America purchased and rehabilitated the building in 1950. It occupies the majority of the lot and has a north-facing orientation.

Ace Gallery possesses the requisite significance to be eligible for listing on the NRHP and CRHR, or considered a historical resource for purposes of CEQA under Criterion C of the NRHP and Criterion 3 of the CRHR, as a building that significantly embodies the distinctive characteristics of the New Formalist architectural style. For a more detailed description refer to Appendix B in this report and the Historic Resources Properties Supplemental Survey Report.

Application of Section 4(f)—Direct Use as a Station Entrance

A station entrance on this site (Figure 4-2) would require demolition of the Ace Gallery Building.

Avoidance Alternatives

The following discusses avoidance alternatives. The discussion begins with the No Build Alternative, then the development of the overall project alternatives, and concludes with the selection of the station locations.

No Build Alternative

Under the No Build Alternative, no new infrastructure would be built within the Study Area, aside from projects currently under construction or projects funded for construction, environmentally cleared, planned to be in operation by 2035, and identified in the adopted Metro LRTP. The purpose of the Westside Subway Extension Project is to improve transit travel time, provide more reliable
transit service to the transit riders who access the Study Area today, and provide an alternative to the automobile for current and future transit riders. All alternatives, with the exception of the No Build Alternative, meet the Purpose and Need of the Project to some degree.

The No Build Alternative, unlike the Build Alternatives, fails to meet all the Project purposes and was dropped from further consideration as a prudent alternative.

**Alignment and Station Box Location Development in Alternatives Analysis**

In October 2007 an Early Scoping process was used to help define the appropriate range of issues and alternatives to be addressed in the AA Study. Two principal alignment alternatives were presented to the public. These two corridors (Wilshire Boulevard and Santa Monica Boulevard) were the recommended routes for the Westside Subway Extension Project based on previous corridor alignment studies conducted in the 1980s, 1990s, and early 2000s, and represented street rights-of-way that would reasonably be used in an at-grade, elevated, or subway configuration. The public provided comments on station locations along the two principal routes, as well as in those areas not located along those routes. Based on public input and an evaluation of alternatives to meet the project goals and objectives, 17 representative Build Alternatives were developed for further evaluation in the AA Study. More details regarding project goals and the screening process can be found in the *Westside Transit Corridor Alternatives Analysis Study*.

In the 2009 AA Study objectives and measures were developed and applied to assess the extent to which each alternative met each goal. Based on the pros and cons of the 17 conceptual alternatives (through an evaluation that applied technology carrying capacity and the goals and objectives—all of which responded to the Project’s Purpose and Need), alternatives were either dropped from further consideration or carried forward for additional screening. The *Westside Transit Corridor Alternatives Analysis Study* provides details on the evaluation results.

After further comparative analysis as to what would be the best performing Wilshire alignment and the best performing “combined” Wilshire-Santa Monica alignment, the remaining alternatives were then reduced to heavy rail subway alignment alternatives. Two alternatives, including a station box location on Wilshire Boulevard near Rodeo Drive, were recommended in the *Westside Transit Corridor Alternatives Analysis Study* to be carried forward for more detailed analysis in the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR). Station locations were selected approximately one-mile apart and with consideration of existing and future land uses and walkability along the alignment. The Wilshire/Rodeo Station would serve the Beverly Hills “Golden Triangle,” a local and regional shopping destination and a hub for tourists visiting the famous Rodeo Drive and shops along Beverly Drive.

Prior to the start of the Alternatives Analysis Study, the City of Beverly Hills appointed a Mass Transit Committee and retained consultants to advise the Committee on the best possible location for stations in the City of Beverly Hills. The Committee studied traffic flows and land uses and published a final report in January 2007. The Committee strongly recommended stations at Wilshire/Beverly and Wilshire/La Cienega intersections. Later work by Metro during the Alternatives Analysis Study confirmed these locations, which have been carried forward into the more detailed environmental studies.
Alignment and Station Location Development in the Draft EIS/EIR

With the approval by the Metro Board of Directors of the Westside Transit Corridor Alternatives Analysis Study and the recommended alternatives, Metro initiated the Draft EIS/EIR phase. During the scoping process for this phase, Metro presented the public with the two recommended alternatives at a series of meetings to solicit further public input on the alternatives.

After the public scoping meetings, Metro redefined the two Build Alternatives as five Build Alternatives that included alignment and station options based on public comments, design considerations, and avoidance and minimization of impacts. These Build Alternatives generally extended in subway, from the existing Metro Purple Line Wilshire/Western Station to either a Westwood Station (Westwood/VA Hospital Station or Westwood/UCLA Station) and/or a Hollywood/Highland Station. All the Build Alternatives that extended the subway on Wilshire Boulevard beyond the Wilshire/La Cienega Station included a Wilshire/Rodeo Station.

Having determined the general station location, the more specific location of the station box and station entrance options was further analyzed. Locations for stations and station entrances were further developed, continuing to consider land use, engineering, and environmental constraints as well as linkages to existing transit, bicycles, and pedestrian access, employment and activity centers, and neighborhoods.

The Wilshire/Rodeo Station as studied in the Draft EIS/EIR would be under the center of Wilshire Boulevard, beginning just west of South Canon Drive and extending to El Camino Drive (Figure 4-3). Five potential station entrances were considered in the Draft EIS/EIR at the following locations: on the northwest corner of the Wilshire/Canon intersection (Bank of the West), on the northeast corner of the Wilshire/Beverly intersection (within the Sterling Plaza Building), on the northwest corner of the Wilshire/Beverly intersection (within the Bank of America Building), on the southwest corner of the Wilshire/Reeves intersection (Ace Gallery), and on the southeast corner of the Wilshire/El Camino Union Bank) intersection. Only one station entrance is needed as part of the Westside Subway Extension.

Figure 4-3: Wilshire/Rodeo Station as Shown in the Draft EIS/EIR
Station Location Development in the Final EIS/EIR

On October 28, 2010, the Metro Board approved the Draft EIS/EIR and selected Draft EIS/EIR Alternative 2 as the Locally Preferred Alternative (LPA). The LPA will extend the existing Purple Line in subway from the existing Wilshire/Western Station to a Westwood/VA Hospital Station with seven new stations spaced at approximately one-mile intervals, including the Wilshire/Rodeo Station. Based on the selection of Alternative 2 as the LPA, the Metro Board authorized preparation of this Final EIS/EIR to further evaluate the No Build Alternative and the LPA. Chapter 2 of this report provides a general overview of the LPA.

These refinements resulted from public comments received, follow-up agency consultation, and further engineering. The changes include refinements to the proposed entrance locations and construction staging and laydown areas (Figure 4-4).

Figure 4-4: Wilshire/Rodeo Station—Ace Gallery

Metro convened a Station Area Advisory Groups (SAAG) that met between February and June 2011 to consider specific questions concerning station entrance locations. The SAAG was comprised of station area property owners, stakeholders, and representatives from the Beverly Hills Planning and Transportation Departments and the City Planning Commission. Major themes coming out of the SAAG meetings were that the station box should be located as far to the west as possible in order to be close to Rodeo Drive, but not farther west than El Camino Drive so as to minimize construction impacts on the Beverly Wilshire Hotel and the shops and businesses at Rodeo Drive.

Shifting the station to the east to avoid impacts was not encouraged by the SAAG because this would move the station entrance too far from Rodeo Drive. The SAAG preferred station entrances at the west end of the station box, but these entrances at Beverly and El Camino were determined to be difficult to construct given the existing buildings and the need to maintain them, with the resulting conclusion that the Ace Gallery site was the only site among the three that should be advanced into Preliminary Engineering. The SAAG requested that a knockout panel be provided at the west end of the station box so that a smaller, secondary entrance could be provided at some time in the future at Beverly Drive. If the station box were moved farther to the east, this future entrance would not be possible.


**Station Entrance Alternatives**

Eight properties along the north and south sides of Wilshire Boulevard are adjacent to or in close proximity of the subway station platform area. The recommended station entrance location is the Ace Gallery site. For the eight properties refer to Figure 4-5. The following is a summary of the Ace Gallery site as a station entrance and the avoidance alternatives considered.

- **Ace Gallery Building** (southwest corner of Wilshire Boulevard and Reeves Drive)—The Ace Gallery site (refer to Figure 4-5, site #2) is the recommended site for the Wilshire/Rodeo Station entrance. This property is adjacent to the subway station platform area and would accommodate a full station entrance (escalator and stairs). This site, as recommended, would also accommodate construction staging. This site also was the SAAG station entrance recommendation.

The two-story Ace Gallery Building has been determined eligible for the National Register of Historic Places (NRHP).

The construction of the station entrance would be accomplished preserving a portion of the exterior façade or demolishing the entire structure. However, there would be additional construction costs to maintain the façade (the interior and a portion of the exterior would be gutted) and to use another site for construction staging as this site with preservation of a portion of the façade would not be able to accommodate the construction staging function, which would increase costs. The preservation of the façade would limit any future development of the site.

As compared to other alternatives considered, this is a relatively small structure to acquire with only one tenant. The cost of property acquisition and construction without preserving a portion of the building façade is approximately $24 million\(^1\) (approximately $15 million\(^1\) is for property acquisition). The cost of the station entrance within a portion of the existing façade would increase the total cost to $45 million due to the costs of underpinning, seismic underpinning, and supporting the existing structure in place. The construction staging area needs are further discussed in the next section under avoidance alternatives for the Ace Gallery as a construction staging area.

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\(^1\) The right-of-way budget is composed of costs for appraisal, title and escrow, acquisition (purchase price of land, improvements and fixtures and equipment), environmental site assessment, relocation benefits, and loss of goodwill. Cost estimates for property acquisition were developed during the Draft EIS/EIR phase. MTA appraisal staff provided preliminary unit values for various classes of real estate based on land use and location and calculating the area of each proposed take. The unit values were then multiplied by the individual take areas based on the preliminary right-of-way drawings, experience with the local real estate market, and inspection of the proposed take areas. An estimate for buildings and other improvements, damages to remaining property, loss of goodwill, and estimated relocation benefits was added to the land value. This provided the base figures for the acquisition and relocation budget. The budget for acquisition and relocation-related services also considered previous acquisition and relocation-related expenses experienced with other projects and previous experience in acquiring parcels for other transit projects. Some acquisition services costs (such as title and escrow services) were derived as a percentage of the acquisition cost; some were based on contracts for similar services on comparably sized projects or scopes of work. The cost for the relocation consultant services is based on the consultant cost proposal for completing the Relocation Plan and providing relocation services. The Project real estate budget will be updated as actual appraisal data become available. A contingency amount of 24.2 percent was applied to the total acquisition and relocation costs.
Figure 4-5: Wilshire/Rodeo Station Adjacent Properties

Legend:
- White: Underground Station
- Red: Full Take
- Yellow: Permanent Basement

1. Wilshire Blvd
2. S. El Camino Dr
3. S. Beverly Dr
4. S. Rodeo Dr
5. N. Canon Dr
6. S. Canon Dr
7. Wilshire Blvd
8. Wilshire/Century Building

- 1. Bank of the West Tower
- 2. S. Rodeo Dr
- 3. S. El Camino Dr
- 4. N. Canon Dr
- 5. Wilshire Blvd

Information:
- Wilshire Blvd: 2400 Wilshire Blvd
- S. El Camino Dr: 9420 Wilshire Blvd
- S. Beverly Dr: 9430 Wilshire Blvd
- S. Rodeo Dr: 9460 Wilshire Blvd
- N. Canon Dr: 10400 Wilshire Blvd
- S. Canon Dr: 20400 Wilshire Blvd

- Station Entrance and Passageway Connection
- North
Rolex Building (southwest of Wilshire Boulevard between Reeves Drive and Canon Drive)—This property (refer to Figure 4-5, site #1) is not adjacent to the subway station platform area and, therefore, would not accommodate a full station entrance (escalator and stairs) as a 150 foot long pedestrian tunnel walkway and additional easement and property acquisition would be required to make such a connection. The SAAG did not recommend this site as a station entrance (Appendix E).

The five-story Rolex Building has been determined not eligible for the NRHP. The 1950s, 46,420 square-foot office and retail building was redeveloped by Architect Richard Keating in 1998. This 46,000-square foot project is a renovation of two existing buildings that were combined to create a five-story office and retail space for the lead tenant, Rolex International. The ground floor provides office space and a watch repair facility. The building earned first place awards for outstanding renovation from the Los Angeles Business Council and the City of Beverly Hills.

The building would require closure during construction of the station entrance with the permanent loss of basement parking as well as ground-floor tenants. The Rolex Building currently has five tenants with some additional space for the business tenants available. The full parking requirements for the building would not be met once construction was concluded. In addition, there would be additional costs for easements and property acquisition to the west (Ace Gallery) for the connecting facility since the property is not immediately adjacent to the station platform area. An open-cut excavation would be needed within the footprint of the Ace Gallery driveway and also Reeves Drive.

The cost of property acquisition is approximately $43 million. The cost construction and an easement on the Ace Gallery property for the station entrance access to the platform would add approximately $24 million, increasing the total construction cost to $67 million.

The Rolex Building was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

Glendale Federal Savings and Loan Building (southeast corner of Wilshire Boulevard and Beverly Drive)—This property (refer to Figure 4-5, site #3) is adjacent to the subway station and would accommodate a full station entrance (escalator and stairs). This site would not accommodate construction staging unless the 12-story building was demolished. The SAAG did not recommend this site as a station entrance (Appendix E).

The 12-story Glendale Federal Savings and Loan Building, also known as the Commercial Capital Tower, has been determined eligible for the NRHP. The use of the Glendale Federal Savings and Loan Building property as a station entrance would not avoid the use of an historic property.

As compared to the Ace Gallery Building, this is a larger (12-story) structure with multiple business tenants. Furthermore, the Glendale Federal Savings and Loan Building has a multi-story underground parking garage that includes parcels to the south of the building. The cost of property acquisition is approximately $86 million. The building would require closure during construction of the station entrance with the permanent loss of some parking as well as ground-floor tenants; therefore, acquisition would be required to complete construction. The full parking requirements for the building would not be met once construction is concluded.
Given the high costs and its eligibility for the NRHP, the Glendale Federal Savings and Loan Building was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

- **Union Bank Building** (southwest corner Wilshire/Beverly)—This property (refer to Figure 4-5, site #4) is adjacent to the subway station and would accommodate a full station entrance (escalator and stairs). This site would not accommodate construction staging unless the nine-story building was demolished. The SAAG did not recommend this site as a station entrance (Appendix E).

The nine-story Union Bank Building and associated parking has been determined eligible for the NRHP.

As compared to the Ace Gallery Building, this is a larger (nine-story) structure with multiple business tenants. The Union Bank tower would remain untouched, but underground parking would be relocated during construction to accommodate station entrance construction and then partially restored at the completion of construction. Since this parking is tied to the office tower and replacement parking immediately adjacent to the building is not available, this would require the acquisition of the full property, both the office tower and the parking garage (approximately $46 million for property acquisition and an approximate total of $69 million including construction). In addition, the full parking requirements for the building would not be met once construction ends due to the reconfiguration of the garage required for the station entrance.

The Union Bank building was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

- **Wilshire Beverly Centre (Bank of America) Building** (northwest corner Wilshire Boulevard and Beverly Drive)—This property (refer to Figure 4-5, site #5) is adjacent to the subway station platform area and would accommodate a full station entrance (escalator and stairs). However, the Wilshire Beverly Centre (Bank of America) station entrance option would place two half portals (up and down escalators separated by access points) end-to-end along Beverly Drive at the northwest corner of Wilshire Boulevard and Beverly Drive resulting in traffic and parking impacts. This site would not accommodate construction staging. The SAAG did not recommend this site as a station entrance at this time; however, the SAAG did recommend a knockout panel to provide for a second future entrance (Appendix E).

This station entrance option would require the following modifications to Beverly Drive between Dayton Way and Wilshire Boulevard:

- Widen the sidewalk on the western side to 15 feet
- Removal of the southbound right-turn lane
- Removal of three metered parking spaces and one loading zone space on the western (southbound travel direction) side
- Removal of up to 13 metered parking spaces on the eastern side (northbound travel direction) side
- Removal of the mid-block curb extension on the eastern side
Removal of the mid-block northbound and southbound left-turn pockets that serve commercial development

A traffic impact analysis was conducted to assess the localized impacts resulting from reduced southbound capacity of Beverly Drive. In addition to Wilshire Boulevard and Beverly Drive being assessed for impacts, 16 intersections (comprising those within the Wilshire/Rodeo Station area) were also assessed for impacts due to the potential for a traffic shift to occur when lane capacity is reduced.

The results indicate that a Wilshire Beverly Centre (Bank of America) station entrance option at the Wilshire/Rodeo Station would result in a significant impact at the intersection of Wilshire Boulevard and Beverly Drive if the project were built under future conditions. Average intersection delay would increase 25 seconds in the a.m. peak hour and 50 seconds in the p.m. peak hour. Approach delay in the southbound direction would increase by 147 seconds in the a.m. peak hour and 281 seconds in the p.m. peak hour. The analysis found that no other Study Area intersections would be impacted. The entrance at the Ace Gallery Building and the other avoidance alternatives would not result in any traffic impacts and would avoid all traffic impacts associated with the Wilshire Beverly Centre (Bank of America) station entrance.

The eight-story Wilshire Beverly Centre (Bank of America) building and associated parking has been determined eligible for the NRHP. The use of the Wilshire Beverly Centre (Bank of America) building property as a station entrance would not avoid the use of an historic property. The cost for an easement on the property to construct a full station entrance would be approximately $11 million plus seismic upgrades to the existing structure at approximately $10 million. Including construction costs of approximately $27 million, the total cost would be $47 million.

The Wilshire Beverly Centre (Bank of America) was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

- **Bank of California/Sterling Plaza** (northeast corner Wilshire Boulevard and Beverly Drive)—The Bank of California/Sterling Plaza building (refer to Figure 4-5, site #6) is adjacent to the subway station platform area; however, the building does not have sufficient room to meet the space requirements of a full station entrance (escalator and stairs). This site would not accommodate construction staging. The SAAG did not recommend this site as a station entrance.

  The seven-story Bank of California/Sterling Plaza building has been determined eligible for the NRHP. The use of the Bank of California/Sterling Plaza building property as a station entrance would not avoid the use of an historic property. Therefore, the Bank of California/Sterling Plaza building was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance due to the feasibility of construction on the property due to its size and its status as a property eligible for the NRHP.

- **Bank of the West Tower** (northwest corner Wilshire Boulevard and Canon Drive)—The Bank of the West Tower (9401 Wilshire Building) (refer to Figure 4-5, site #7) is partially located adjacent

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to the subway station platform area and would accommodate a full station entrance (escalator and stairs) in the plaza area with a pedestrian tunnel to provide access to the location of the entrance within the site. There is insufficient room in the interior of the Bank of the West Tower to place a full station entrance (escalator and stairs). This site would not accommodate construction staging. The SAAG did not recommend this site as a station entrance (Appendix E).

The 12-story Bank of the West Tower has been determined not eligible for the NRHP.

The 12-story Bank of the West Tower pedestrian tunnel reaches the site from the platform area to an area where, with some loss of underground parking, the station entrance would open onto the plaza. The loss of some underground parking and building closure during construction would require property acquisition. The cost of property acquisition is approximately $46 million. The pedestrian tunnel, approximately 80 feet in length, would increase costs due to the distance from the station box to the station entrance with construction costs at approximately $18 million. The total cost of property acquisition and construction is approximately $64 million.

The Bank of the West Tower was dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

- **Coldwell Banker Site** (northeast corner of Wilshire Boulevard and Canon Drive) — The Coldwell Banker site (three parcels) (refer to Figure 4-5, site #8) is not located adjacent to the subway station platform area; however, it would accommodate a full station entrance (escalator and stairs) if tunnel access were provided. The site would be used for a portion of the construction staging regardless of the station entrance selected. The SAAG did not recommend this site as a station entrance (Appendix E).

The three structures at the Coldwell Banker site have been determined not eligible for the NRHP.

The acquisition of these three properties combined, including relocation, would be $15 million, but there would be additional construction costs to provide a long pedestrian tunnel entrance to the station platform access and some acquisition and easements at the Bank of the West Tower as well as some loss of parking at that tower. The tunnel length would be approximately 320 feet. Construction costs of approximately $22 million combined with property acquisition brings the total costs to approximately $54 million.

The three structures/three parcels at the Coldwell Banker site were dropped from further consideration as a prudent alternative to the Ace Gallery Building as a station entrance.

**Summary**

While all alternatives meet the Purpose and Need for the Project, the Ace Gallery remains the prudent alternative as a station entrance. The site has sufficient room to include a full station entrance (escalator and stairs) either by maintaining the existing façade at greater overall Project cost or demolishing the existing structure. Given it is a two-story building with a single tenant, there is less community impact and no loss of parking. The Ace Gallery Building can accommodate both a station entrance and construction staging area at a much lower cost than the other alternatives.
Application of Section 4(f)—Direct Use as a Construction Staging Site

The recommended construction staging site for the Wilshire/Rodeo Station (Figure 4-6) would require demolition of the Ace Gallery Building. The Ace Gallery was identified as one of two construction staging sites required for station construction immediately adjacent to the station box. The combination of both properties is approximately 1 acre. Under Section 106, FTA, with SHPO concurrence, has determined that the demolition of the Ace Gallery for construction staging would result in an “adverse effect.” Under Section 4(f), the Ace Gallery as a construction staging site would be a “Direct Use.” For additional details on the avoidance alternatives, such as their NRHP status, refer to the previous discussion on their potential use as station entrances.

Figure 4-6: Wilshire/Rodeo Station—Ace Gallery

Avoidance Alternatives

The following discusses the use of the Ace Gallery site for construction staging and avoidance alternatives. Refer to the discussion under the Avoidance Alternatives for use of the Ace Gallery as the Wilshire/Rodeo Station entrance and for No Build Alternative and overall project alternatives development.

Construction Staging Location Development in the Draft EIS/EIR

Construction staging areas were identified during the alignment and station location development process for the Draft EIS/EIR. The need for construction staging sites on the Westside Subway Extension varies between 1 to 3 acres for each subway station site, depending upon the types of construction activities and whether or not tunnel boring machine (TBM) activities are being initiated at each site. The Wilshire/Rodeo Station would not support TBM facilities; therefore, only 1 acre would be needed. Initially, the construction laydown areas would be used to support advance works associated with the relocation of utilities within the station footprint, street modifications, and to store the materials and equipment used for installing the temporary shoring and street decking.

The laydown areas are required to be directly adjacent to the station excavation to store materials and equipment used to construct the station excavation and decking and for “access adits” into the shaft from the laydown areas that would allow the contractor to freely move personnel, materials, and equipment between the laydown area and the station excavation beneath the decked street without need to close traffic lanes. During the station excavation, the “access adit” would allow excavated materials to be removed without disruption to traffic. It would allow concrete pumps and concrete trucks to be set up off street and work without interruption to traffic and to be able to work through peak traffic periods without lane closures. The laydown area also would allow excavated materials to
be temporarily stockpiled so that haulage can be scheduled for off-peak traffic hours while excavation and construction work can continue on regularly scheduled shift times.

Once the tunnel excavation is completed, the laydown area would also be used to receive and store the rebar and concrete formwork needed for the station structural concrete and later for architectural materials and mechanical and electrical equipment.

In the Draft EIS/EIR potential construction sites were proposed for the property on the southwest corner of the Wilshire/Reeves intersection (within the Ace Gallery site) and on the southeast corner of the Wilshire/El Camino intersection within the one-story podium and parking structure of the Union Bank Building.

Construction Staging Site Development in the Final EIS/EIR

In addition to the construction activity around the station entrance, approximately 1 acre of construction staging and laydown area would be needed at the Wilshire/Rodeo Station site to support construction of the Wilshire/Rodeo Station. Construction staging areas were further considered and recommended at the southwest corner of Wilshire Boulevard and Reeves Drive at the site of the Ace Gallery and on the northeast corner of Wilshire Boulevard and Canon Drive. All existing structures on the identified properties would need to be demolished to accommodate construction activities.

The construction staging sites adjacent to the station box were continually reviewed during project development to select the site that best served construction needs and minimized impacts. The recommended construction staging plan is to acquire the two separate sites in order to provide 0.7 acre for construction staging, which is less than the 1 acre criteria. In order to make this work, certain functions, such as contractor field offices and parking, would be located at an adjacent station site. There are no vacant sites in the immediate station vicinity. Beyond these two recommended sites, no further acquisitions are recommended.

Station construction will take between four and six years. Wilshire Boulevard is one of the most congested arterials in Los Angeles, particularly in the “Golden Triangle.” Other streets in the immediate vicinity also experience congestion. Outside of some periodic lane closures, full construction staging sites within the city streets has been ruled out for this project. The traffic impacts as a result of full lane closure for multiple years would result in extraordinary community disruption.

Eight properties located along the north and south sides of Wilshire Boulevard are contiguous to the station subway box and were reviewed for possible construction staging sites. All of these properties when used as construction staging sites support the overall project Purpose and Need and all properties (some in combination with a second site to assemble the area necessary) would meet the size requirements of approximately 1 acre. The following is a summary of construction staging considerations for the eight properties shown in Figure 4-5, proceeding on the south side from east to west and then on the north side from west to east. Also refer to Table 4-2, which provides a brief comparison of the eight properties.

- **Ace Gallery Building** (southwest corner of Wilshire Boulevard and Reeves Drive)—The two-story Ace Gallery (refer to Figure 4-5, site #2) is optimally located for combining construction staging

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and a station entrance as it is adjacent to the station box and station platform area. The property is approximately 0.38 acre in size. This combined with the 0.38 acre at the Coldwell Banker properties yields slightly less than 1 acre, meeting the general criteria of the area required for a construction staging site without a TBM machine drop location. The cost of property acquisition of the Ace Gallery property is approximately $15 million. If this site were used as a station entrance and construction staging site in conjunction with the Coldwell Banker site, the total cost, as previously mentioned, would be approximately $34 million. One business tenant would be displaced as would three business tenants on the three combined Coldwell Banker properties.

Table 4-2: Properties Adjacent to the Wilshire/Rodeo Station for Construction Staging

<table>
<thead>
<tr>
<th>No.</th>
<th>Property</th>
<th>Avoids Properties on or Eligible for the NRHP</th>
<th>Suitable for Construction Staging</th>
<th>Suitable for Station Entrance (Adjacent to Station Platform)</th>
<th>Avoids Construction Staging Adjacent Hotel Property</th>
<th>Avoids Multiple Business Tenant Displacement</th>
</tr>
</thead>
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<tr>
<td>1</td>
<td>Rolex Building</td>
<td>❅</td>
<td>❅</td>
<td>❅</td>
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<td>❅</td>
</tr>
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<td>2</td>
<td>Ace Gallery</td>
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<td>❅</td>
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<td>❅</td>
</tr>
<tr>
<td>7</td>
<td>Bank of the West Tower</td>
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<td>❅</td>
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<td>8</td>
<td>Coldwell Banker Site</td>
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<td>❅</td>
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<td>❅</td>
</tr>
</tbody>
</table>

1 NRHP—National Register of Historic Places

During the Metro Station Area Advisory Committee workshops (refer to Appendix E), which included representatives of the City of Beverly Hills, this site was recommended for use as a construction staging site because it would be less disruptive to traffic at the intersection of Beverly Drive and Wilshire Boulevard. This property would also accommodate a full station entrance (escalator and stairs), which many of the Wilshire/Rodeo Station sites cannot fully accommodate (see previous discussion).

- **Rolex Building** (southwest of Wilshire Boulevard between Reeves Drive and Canon Drive) — The Rolex Building property (refer to Figure 4-5, site #1) was reviewed and not recommended as a construction staging site for the following reasons.
The property is comprised of an office building and an adjacent parking lot. In order for either the parking lot or the land under the office building to be used for construction staging, it would need to be acquired in its entirety (0.7 acre) as the visitor parking lot is tied to meeting the parking requirements for the building and, therefore, cannot be acquired separately as a portion of the construction laydown area needed. Parking is limited in this area of Beverly Hills and the building’s parking structure cannot accommodate additional parking to make up for the visitor parking loss. Property acquisition (two parcels: building at $28 million\(^6\) plus visitor parking lot at $12 million\(^4\)) including relocation costs would be approximately $40 million\(^4\). However, because the property is not adjacent to the station platform area, additional property would be required for a station entrance. (For station entrance property acquisition costs, refer to the previous discussion on avoidance alternatives for the station entrance location).

The need for a station entrance at a site other than that used for construction staging would increase the costs of property acquisition and construction. This separation of the construction staging area from the station entrance site would also add additional construction disruption to the community and businesses. For example, if the recommended station entrance remains at the Ace Gallery property, the cost of the Ace Gallery is currently estimated at approximately $15 million\(^1\), excluding station construction costs, which would bring the total property acquisition cost for this station with the Ace Gallery and Rolex Building to approximately $55 million. This is well above the comparable cost of the Ace Gallery and Coldwell Banker sites property acquisition combined, at approximately $34 million.

- **Glendale Federal Savings and Loan Building** (southeast corner of Wilshire Boulevard and Beverly Drive)— The use of the Glendale Federal Savings and Loan Building property (refer to Figure 4-5, site #3) as a construction staging site requires the demolition of the building and, therefore, would not avoid the use of an historic property; therefore, the Glendale Federal Savings and Loan Building is not under consideration as a viable avoidance alternative for use as a construction staging site.

- **Union Bank Building** (southwest corner Wilshire/Beverly)—The 9-story Union Bank Building and associated parking has been determined eligible for the National Register of Historic Places (NRHP). The use of the Union Bank Building property (refer to Figure 4-5, site #4) as a construction staging site, which would necessitate the demolition of the building, would not avoid the use of an historic property; therefore, the Union Bank Building property is not under consideration as a viable avoidance alternative for use as a construction staging site.

- **Wilshire Beverly Centre (Bank of America) Building** (northwest corner Wilshire Boulevard and Beverly Drive)— The use of the Wilshire Beverly Centre (Bank of America) building property (refer to Figure 4-5, site #5) as a construction staging site, which would necessitate the demolition of the building, would not avoid the use of an historic property; therefore, the Wilshire Beverly Centre (Bank of America) building is not under consideration as a viable avoidance alternative for use as a construction staging site.

- **Bank of California/Sterling Plaza** (northeast corner Wilshire Boulevard and Beverly Drive)— The use of the Bank of California/Sterling Plaza building property (refer to Figure 4-5, site #6) as a

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\(^6\) Acquisition Cost pdf, Metro 2011.
construction staging site, which would necessitate the demolition of the building, would not
avoid the use of an historic property; therefore, the Bank of California/Sterling Plaza building is
not under consideration as a viable avoidance alternative for use as a construction staging site.

- **Bank of the West Tower** (northwest corner Wilshire Boulevard and Canon Drive)—The 12-story
  Bank of the West Tower (refer to Figure 4-5, site #7) with underground parking would require
  acquisition and demolition of the existing structure to facilitate its use as a construction staging
  site. The cost of property acquisition is approximately $67 million. There would be displacement
  of multiple tenants as well as significant increased costs of acquisition as compared to the
  combined Ace Gallery and Coldwell Banker sites.

- **Coldwell Banker Site** (northeast corner of Wilshire Boulevard and Canon Drive)—Three parcels
  (refer to Figure 4-5, site #8) comprise this site for a total of 0.36 acre. There are a total of three
  tenants and two property owners. These parcels currently have Coldwell Banker, Winnie Couture
  and the Shanghai Grill as tenants—a single tenant on each parcel. The structures on these
  parcels are 1-2 stories in height. While not sufficient on their own to make up the size necessary
  for a construction staging site, these properties would comprise almost half the amount needed
  for construction staging. The acquisition of these three properties combined, including
  relocation, would be $19 million. When combined with the Ace Gallery property this would
  constitute sufficient property to serve as the construction laydown site at much lower cost than
  the acquisition of other properties as discussed above. However, the properties would not also
  serve as a station entrance because they are not contiguous to the station platform.

Based on additional study to optimize the Westside Subway Extension operations since the
Section 4(f) Evaluation in the draft phase, a double crossover was added to the east end of the
station box. Given the location of the Beverly Wilshire Hotel, to the west it was determined early
on that the station box location would need to be to the east of Beverly Drive; therefore the
additional length was to the east. This additional easterly length created access to additional
properties adjacent to the station box and created the opportunity to use property on the
northeast corner of Wilshire Boulevard and Canon Drive.

**Summary**

The use of the Union Bank Building, Glendale Federal Savings and Loan, Wilshire Beverly Centre
(Bank of America) Building, and Bank of California/Sterling Plaza for construction staging would
not avoid the use of historic resources for construction. Therefore, they were eliminated from further
consideration. The use of the Rolex Building property would necessitate the acquisition of the Rolex
Building, displacing five business tenants. Since the Rolex Building is not adjacent to the station
platform, a property easement or acquisition for use as a station entrance would still have been
required elsewhere. As described above, this would almost double, at a minimum, the cost of
property acquisition for just this station. Bank Tower of the West, also necessitating demolition of a
12-story structure and displacement of multiple business tenants, as well as its location next to the
Montage Hotel, would present extraordinary costs and community disruption for this single station.

Therefore, the combination of the Ace Gallery Building and the Coldwell Banker sites (site comprises
three total properties) would best serve as the construction laydown site. One of the two sites is not
an historic property, thereby minimizing the need to use other historic properties to make up the 1-
acre site. The location of the Ace Gallery adjacent to the station platform allows for its combined use
as a construction staging site and station entrance to minimize costs for this station. These are the only properties with single business tenants in each of the properties, thereby minimizing tenant displacement and relocation costs.

**Measures to Minimize Harm**

All efforts were made during the development and design of the Wilshire/Rodeo Station to minimize harm to Section 4(f) resources; however, given the constrained nature of the corridor, the need to have a construction staging site immediately adjacent to the station box, the cost of using other properties and the number (6) of properties in the area that are historic, the acquisition and demolition of one historic property, the Ace Gallery Building, is the prudent alternative. Measures to minimize harm were incorporated into the Memorandum of Agreement (MOA) signed and executed by FTA, Metro, and the SHPO.

- **HABS/HAER Documentation**—The adverse effects of the project on the Ace Gallery will be resolved by FTA by requiring Metro to implement and complete National Park Service Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) documentation, pursuant to Section 110(b) of the National Historic Preservation Act for the adversely affected property. Prior to any action, the photo-recordation and documentation consistent with the standards of the National Park Service HABS or HAER will be prepared by a Secretary of Interior qualified professional architectural historian or historic architect. Whenever possible, HABS/HAER documentation Level 2 would be employed whenever measured drawings for a property are available. If measured drawings are not available, HABS/HAER documentation Level 1 would be employed.

The HABS/HAER documentation will be forwarded by Metro to the FTA and SHPO for review. The FTA, in consultation with Metro and SHPO, will approve the materials and permit Metro to proceed with demolition of the adversely affected property.

Following approval of the HABS/HAER documentation, Metro will ensure that the materials are placed on file with Metro and Responsible Agencies, historical societies and preservation groups, local university and community libraries, and other appropriate national and local repositories and archives, as identified by Metro.

- **Public Website Development.** In connection with HABS/HAER documentation, Metro will develop a public website linked to Metro’s website concerning the history of the Ace Gallery. The website would be based on the photographs produced as part of the HABS/project and historic documentation. A public website, which provides historic and documentary information regarding historic properties that would be that would be substantially altered or demolished as a result of the project, will be prepared and maintained for a ten-year period.

4.1.4.2  **Union Bank Building (1957) WSE 14**

**Description and Significance of Property**

*APN 4328033001, 9460 Wilshire Boulevard, Beverly Hills*

WSE 14 is the Union Bank Building, an International style commercial building constructed in 1957. The building appears to be minimally altered and is in good condition. For a more detailed
description of the property refer to Appendix B in this report and the Historic Resources Properties Supplemental Survey Report.

Application of Section 4(f)—De Minimis

A station entrance was considered for the southeast corner of the Wilshire/El Camino intersection for the Wilshire/Rodeo Station. The Union Bank tower would remain untouched, but underground parking would be relocated during construction to accommodate station entrance construction and then partially restored at the completion of construction (Figure 4-5). Since this parking is tied to the office tower, this would require the acquisition of the full property; both the office tower and the parking garage.

FTA, with SHPO concurrence on the Union Bank Building, has determined the proposed activity (undertaking) of the property would result in a “no adverse effect” in accordance with Section 106 consultation (36 CFR Part 800). Under 4(f) regulations, de minimis impact findings for a historic site can be made following a determination that the project will have “no adverse effects” on the historic property. As a result, FTA has determined the proposed Wilshire/Rodeo Station and alignment would have a de minimis impact on the Union Bank Building.

The Union Bank Building is not recommended as either a station entrance or a construction staging site.

4.1.5 Century City Station—Santa Monica Boulevard

If this station is selected, the station box would extend from just west of Moreno Drive to just west of Century Park East. Double crossover tracks would be located east of the station. The station entrance would be located on the southwest corner of Santa Monica Boulevard and Century Park East. The station entrance would be oriented to the west and would consist of two sets of stairs and escalators. The Century City Santa Monica Station would also serve as a launch site for TBMs and the location for the equipment needed to support the operation of the TBMs. Approximately 3 acres of construction staging and laydown area would be needed at this station. Two alternatives for the construction staging and laydown area have been identified.

As shown in Table 4-1 and Figure 3-3, one historic property is located within the APE for the Century City Station—Santa Monica Boulevard. This is:

- Los Angeles Country Club (South Course)—WSE 97 (10101 Wilshire Boulevard)

The alignment would require an easement for the tunnel under the Los Angeles Country Club (South Course). Where tunneling would occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling ... substantially impairs the historic values of the historic site” (Section 4(f) Policy Paper). There is no impairment to the property due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the Historic Resources Properties Supplemental Survey Report

4.1.6 Century City Station—Constellation Boulevard

If this station is selected, the Century City Constellation Boulevard Station Option would be located underneath Constellation Boulevard from west of Avenue of the Stars to just west of Century Park East. This station location has two construction staging and station entrance location options: the northeast corner or the southwest corner of Constellation Boulevard and Avenue of the Stars. The
Century City Constellation Boulevard Station would serve as a launch site for the tunnel boring machines (TBMs) and the location for the equipment needed to support operation of the TBMs. Approximately 3 acres of construction staging and laydown area would be needed for this station.

As shown in Table 4-1 and Figure 3-3, five historic properties are located within the APE for the Century City Station—Constellation Boulevard and alignment option. These are:

- Century Park Towers—WSE 12 (2029 Century Park East)
- Century Plaza Hotel—WSE 11 (2025 Avenue of the Stars)
- Beverly Hills High School—WSE 55 (241 Moreno Drive)
- AAA Building—WSE 87 (1950 Century Park East)
- The Barn—WSE 54 (10300 Santa Monica Boulevard)

Two of the five properties (Century Park Towers and Century Park Hotel) are completely avoided or untouched by this alignment and there would be no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the Historic Resources Properties Supplemental Survey Report.

The alignment would require an easement for the tunnel under three of the five properties: Beverly Hills High School, AAA Building, and The Barn. Where tunneling would occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling ... substantially impairs the historic values of the historic site” (Section 4(f) Policy Paper). There would be no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the Historic Resources Properties Supplemental Survey Report.

4.1.7 Westwood/UCLA Station

As part of the LPA selection, the Metro Board decided to continue to study two station locations at Westwood/UCLA (Off-Street and On-Street). As shown in Table 4-1 and Figure 3-3, seven historic properties are located within the APE for the Westwood/UCLA Station and alignment option. These are:

- Ralph’s Grocery Store—WSE 44 (1142 Westwood Boulevard)
- Glendon Arcade Shops—WSE 45 (1139 Glendon Avenue)
- Lindbrook Village—WSE 46 (10830,10836 Lindbrook Drive)
- Courtyard Apartment Complex—WSE 47 (10840 Lindbrook Drive)
- University Bible Building—WSE 49 (10801 Wilshire Boulevard)
- Westwood/UCLA Historic District—(includes WSEs 46, 47, 49)
- Linde (Westwood) Medical Plaza—WSE 10 (10921 Wilshire Boulevard)

4.1.7.1 Westwood/UCLA Station (Off-Street)

Six of the seven properties, including the Westwood/UCLA Historic District, listed above are only associated with the Westwood/UCLA Station (Off-Street) Station. Two of the six properties associated
with the Westwood/UCLA Station (Off-Street) (Ralph’s Grocery Store and Glendon Arcade Shops) are completely avoided or untouched by the LPA and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the Historic Resources Properties Supplemental Survey Report.

The alignment would require an easement for the tunnel under four of the six properties associated with the Westwood/UCLA Station (Off-Street): Lindbrook Village, Courtyard Apartment Complex, University Bible Building, and Westwood/UCLA Historic District. Where tunneling would occur under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling ... substantially impairs the historic values of the historic site” (Section 4(f) Policy Paper). There are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the Historic Resources Properties Supplemental Survey Report.

4.1.7.2 Westwood/UCLA Station (On-Street)

The Westwood/UCLA On-Street Station box would be located under Wilshire Boulevard, extending just west of Westwood Boulevard to west of Gayley Avenue, almost to Veteran Avenue. Two options for the station entrance locations are under consideration at this location. A station entrance on the northwest corner of Wilshire Boulevard and Westwood Boulevard would potentially be located in the Linde (Westwood) Medical Plaza building, a resource eligible for the NRHP.

Linde (Westwood) Medical Plaza (1962-1963) WSE 10

Description and Significance of Property

APN 4363023032, 10921 Wilshire Boulevard, Los Angeles

The Linde Medical Plaza is an International-style commercial building constructed in 1962/1963. The building appears to be minimally altered and in good condition. An attached parking garage was designed in conjunction with the building, and allows for parking atop the roof of the pedestal portion of the building. For a more detailed description refer to Appendix B in this report and the Historic Resources Properties Supplemental Survey Report.

Application of Section 4(f)—De Minimis

The Westwood/UCLA Station box would be located under Wilshire Boulevard, extending just west of Westwood Boulevard to west of Gayley Avenue, almost to Veteran Avenue. Two station entrances would be constructed given the high ridership projections at this station. In both options for the two on-street station entrances, one of the entrances would be in the Linde (Westwood) Medical Plaza building (Figure 4-7 and Figure 4-8).

- North of Wilshire Boulevard—in the first option, both station entrances would be located on the north side of Wilshire Boulevard. One station entrance would be located at the north side of Wilshire Boulevard between Gayley Avenue and Veteran Avenue in Lot 36, and the other would be located on the northwest corner of the Wilshire Boulevard and Westwood Boulevard intersection. The station entrance at the Wilshire Boulevard and Westwood Boulevard
intersection would be retrofitted into the Linde (Westwood) Medical Plaza. The station entrance would be designed to enter the Linde (Westwood) Medical Plaza building within the parking garage along Westwood Boulevard to avoid impacting the historic façade of the building along Wilshire Boulevard.

- **North and South of Wilshire Boulevard**—In the second option, the station entrance on the northwest corner of Wilshire Boulevard and Gayley Avenue in Lot 36 would be in the same location, but the station entrance at the Wilshire Boulevard and Westwood Boulevard intersection would be split between the north and south sides of Wilshire Boulevard. The two station entrances near Westwood Boulevard would be “half-station entrances,” consisting of only one set of escalators and stairs each, as well as one elevator adjacent to each station entrance. The station entrance on the north side of Wilshire Boulevard in the Linde (Westwood) Medical Plaza building would be oriented toward the north, and the station elevator would be located to the west of the station entrance, along Wilshire Boulevard.

4.1.8 Although this historic property would be a station entrance, the effect by the LPA is expected to meet the Secretary of Interior Standards for Rehabilitation. FTA, with SHPO concurrence on the Linde (Westwood) Medical Plaza, has determined the proposed activity (undertaking) of the property would result in a “no adverse effect” in accordance with Section 106 consultation (36 CFR Part 800). Under 4(f) regulations, *de minimis* impact findings for a historic site can be made following a determination that the project will have “no adverse effects” on the historic property. As a result,
FTA has determined the proposed Westwood/UCLA On-Street Station and alignment would have a *de minimis* impact on the Linde (Westwood) Medical Plaza. Westwood/VA Hospital Station

As part of the LPA selection, the Metro Board decided to continue to study two station locations at Westwood/VA Hospital (South of Wilshire Boulevard and North of Wilshire Boulevard). The north station option would locate the Westwood/VA Hospital Station on the north side of Wilshire Boulevard. The end of the station box would begin east of Bonsall Avenue, west of the I-405 on-ramp, and end just to the south of the Wadsworth Theater.

The south station would be located on VA and California Department of Transportation (Caltrans) property, south of Wilshire Boulevard. The station box would be located at the northern edge of the VA Hospital parking lot and would be adjacent to Wilshire Boulevard. The station box would begin at the northern tip of the cloverleaf for the I-405 on/off-ramp on the east, and extend to just west of Bonsall Avenue on the west (Figure 4-9 and Figure 4-10).

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**Figure 4-9: Westwood/VA Hospital North Station**
As shown in Table 4-1 and Figure 3-3, two historic properties and an historic district are located within the APE for the Westwood/VA Station and alignment options. This includes the following:

- **Westwood Federal Building**—WSE 43 (11000 Wilshire Boulevard)
- **Catholic-Protestant Chapel/Wadsworth Chapel**—WSE 42
- **VA Medical Center Historic District**—WSE 41 (11301 Wilshire Boulevard)

The Catholic-Protestant Chapel/Wadsworth Chapel is avoided by either station entrance and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there would be no use under Section 4(f). For further discussion of the properties refer to the **Historic Resources Properties Supplemental Survey Report**.

The alignment would require an easement for the tunnel under the Westwood Federal Building. Where tunneling occurs under a publicly owned park, recreation area, wildlife or waterfowl refuge, or historic site and an easement is required, “Section 4(f) would apply only if the tunneling ... substantially impairs the historic values of the historic site” (**Section 4(f) Policy Paper**). There is no impairment to the property due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties refer to the **Resources Properties Supplemental Survey Report**.

The Westwood/VA Hospital North Station Option would be within the VA Medical Center Historic District. A portion of the Westwood/VA Hospital South Station Option would be within the VA Medical Center Historic District. The following discusses the use of the VA property and the **de minimis** finding.
4.1.8.1 Veterans Administration Medical Center District WSE 41

Description and Significance of Property

The Los Angeles Veterans Administration Medical Center District is a thematic historic district, which is comprised of properties related in time and historical significance through an established theme, in this case, Veterans Administration facilities. The NRHP district nomination describes the boundaries as irregular shaped, bounded by roadways and other physical land features within the San Diego Freeway to the east, Federal Avenue to the west, and remaining Veterans Affairs land to the north and south (Figure 4-11). Wilshire Boulevard runs through the southern portion of the district.

The boundary line for the NRHP-eligible VA Center Historic District includes the Protestant Chapel/Wadsworth Chapel, the Wadsworth Theater, and contributing landscape within the district. A grove of large ficus trees near the Wadsworth Theater, and a palm garden on the east side of Bonsall Avenue are located in the “cut-and-cover” area of the station APE. For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

Application of Section 4(f)—de minimis

The Westwood/VA Hospital North Station is within the VA Medical Center Historic District. This station option would locate the Westwood/VA Hospital Station on the north side of Wilshire Boulevard. However, the access road from Wilshire Boulevard to Bonsall Avenue would need to be reconfigured on the north and south sides of Wilshire Boulevard to accommodate the station entrance and access features. The access road would be reconfigured both east and west of Bonsall Avenue on the north side of Wilshire Boulevard and only east of Bonsall Avenue on the south side of Wilshire Boulevard.

Although this historic property would be used as a temporary construction laydown area, the effect of the North Station Option is expected to meet the Secretary of Interior Standards for Rehabilitation. FTA, with SHPO concurrence has determined that a station entrance and subsurface tunneling within the VA Medical Center Historic District would result in a “no adverse effect.” As a result, FTA has determined the proposed Westwood/VA Hospital North Station and alignment would have a de minimis impact on the VA Medical Center Historic District.
The portion of the Westwood/VA Hospital South Station Option is within the VA Medical Center Historic District. This station option would locate the Westwood/VA Hospital Station on the south side of Wilshire Boulevard. The access road from Wilshire Boulevard to Bonsall Avenue would need to be reconfigured on the north and south sides of Wilshire Boulevard to accommodate the proposed station entrance and access features.

4.1.9 Although this historic property would be used as a temporary construction laydown area and some property would be used for cut-and-cover tunneling (less than 300 feet), the effect of the South Station Option is expected to meet the Secretary of Interior Standards for Rehabilitation. FTA, with SHPO concurrence has determined that a station entrance and subsurface tunneling within the VA Medical Center Historic District would result in a “no adverse effect.” As a result, FTA has determined the proposed Westwood/VA Hospital South Station and alignment would have a de minimis impact on the VA Medical Center Historic District.

As shown in Table 4-1 and Figure 3-4, three historic properties are located within the APE for the Division 20 Maintenance Yard. These include the following:

- 1st Street Viaduct—WSE 91 (Los Angeles River Bridge 53C1166)
- 4th Street Viaduct—WSE 92 (Los Angeles River Bridge 553C0044)
- 6th Street Viaduct—WSE 93 (Los Angeles River Bridge 553C1880)
The 1st, 4th, and 6th Street Viaducts are avoided by the LPA for the Division 20 Maintenance Yard and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the *Historic Resources Properties Supplemental Survey Report*.

In addition, one archaeological site, CA-LAN-2610, will be avoided by construction for the LPA at the Division 20 maintenance yard. The site will be avoided and, therefore, no use under Section 4(f).

### 4.1.10 Wilshire/Western Construction Staging and Laydown Site

At Wilshire/Western, a shaft would be constructed to retrieve the two TBMs tunneling to Wilshire/Western from Wilshire/La Brea. A construction staging and laydown area would be required adjacent to the shaft to store materials and equipment used to construct the shaft and decking and for access into the shaft from the laydown area that would allow the contractor to freely move personnel, materials, and equipment between the laydown area and the shaft beneath the decked street without the need to close traffic lanes. There are two options for the location of this construction staging and laydown area. The first option for the site is at the northeast corner of Wilshire Boulevard and Manhattan Place (Figure 4-12). Alternatively, the construction staging and laydown area would be located on the south side of Wilshire Boulevard between Western Avenue and St. Andrews Place (Figure 4-13).

**Figure 4-12: Wilshire/Western Station—Transitional Structure and Construction Staging and Laydown—North of Wilshire**

![Figure 4-12: Wilshire/Western Station—Transitional Structure and Construction Staging and Laydown—North of Wilshire](image1)

**Figure 4-13: Wilshire/Western Station—Transitional Structure and Construction Staging and Laydown—South of Wilshire**

![Figure 4-13: Wilshire/Western Station—Transitional Structure and Construction Staging and Laydown—South of Wilshire](image2)
As shown in Table 4-1 and Figure 3-1, two historic properties are located within the APE for the Wilshire/Western construction staging and laydown site. These include the following:

- Wiltern Theater—WSE 30 (3780 Wilshire Boulevard)
- Pierce National Life—WSE 31 (3807 Wilshire Boulevard)

The Wiltern Theater and Pierce National Life buildings are avoided by the LPA for either station entrance and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

### 4.1.11 Wilshire/Crenshaw Construction Staging and Laydown Site

Properties on the south side of Wilshire Boulevard between Lorraine Boulevard and Crenshaw Boulevard would be used for construction staging (Figure 4-14).

As shown in Table 4-1 and Figure 3-1, two historic properties are located within the APE for the Wilshire/Crenshaw staging construction staging and laydown site. This includes the following:

- Tidewater (Getty) Oil Building—WSE 28 (4201 Wilshire Boulevard)
- Los Altos Hotel and Apartments—WSE 29 (4121 Wilshire Boulevard)

The Tidewater (Getty) Oil Building and Los Altos Hotel and Apartments are avoided by the LPA for either station entrance and there are no impairments to the properties due to noise, vibration, or visual quality; therefore, there is no use under Section 4(f). For further discussion of the properties, refer to the Historic Resources Properties Supplemental Survey Report.

### 4.2 Public Park or Recreational Resources

The LPA would not result any Section 4(f) use of any park or recreational resource in the vicinity of or adjacent to the stations or alignments (Table 3-1).
5.0 DETERMINATION OF SECTION 4(f) USE AND LEAST OVERALL HARM

This section summarizes Section 4(f) properties affected by the LPA.

5.1 Historical Resources

Of the 39 historic properties and two historic districts in the approximately 9-mile corridor 36 historic properties, including one historic district would have “no use”. Four (4) historic properties, including one historic district would have a de minimis use. For these 4 historic properties, FTA, with SHPO concurrence has made a determination under Section 106 of “No Adverse Effect” (see Appendix B). Only one property in the Westside Subway Expansion study area would have a direct use. The Ace Gallery on the southwest corner of Wilshire/Reeves at 9430 Wilshire Boulevard would be demolished for use as a construction laydown area and station entrance. Table 4-1 shows the historic properties that would have a use under Section 4(f). Appendix B, List of Historic Resources within the APE, provides a more detailed list of historic Section 4(f) properties.

5.2 Public Park or Recreational Resources

The LPA would not have a direct use of Section 4(f) parks or recreational facilities.

5.3 Least Overall Harm

In situations where all Build Alternatives use Section 4(f) properties, “the Administration may approve only 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 factors:

■ The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property

■ The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection

■ The relative significance of each Section 4(f) property

■ The views of official(s) with jurisdiction over each Section 4(f) property

■ The degree to which each alternative meets the Purpose and Need for the project

■ After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f)

■ Substantial differences in costs among the alternatives (23 CFR 774.3(c) I)

The purpose of the Westside Subway Extension Project is to improve transit travel time, provide more reliable transit service to the transit riders who access the Study Area today, and provide an alternative to the automobile for current and future transit riders. All alternatives, with the exception of the No Build Alternative, meet the Purpose and Need to some degree.

The use of the Union Bank Building, Glendale Federal Savings and Loan, Wilshire Beverly Centre (Bank of America) Building and Bank of California/Sterling Plaza for construction staging would not
avoid the use of historic properties for construction staging and were dropped from further consideration. The use of the Rolex Building property would necessitate the acquisition of the Rolex Building, displacing five business tenants. Since the Rolex Building is not located adjacent to the station platform, property easement or acquisition for use as a station entrance is required elsewhere. This would result in a substantial difference in the costs to use of the Rolex Building property as compared to the costs for the use of the Ace Gallery and Coldwell Banker site with the additional community disruption due to the need for an additional site for a station entrance. Bank Tower of the West also displaces multiple business tenants, is located next to the Montage Hotel and has a very limited area to use as a station entrance. These factors would have adverse impacts that present unique problems.

Therefore, the combination of the Ace Gallery property and the Coldwell Banker site (site comprises three total properties) would best serve as the construction laydown site. One of the two sites is not an historic property; therefore, minimizing the need to use other historic properties to make up the 1-acre site. The location of the Ace Gallery adjacent to the station platform allows for its combined use as a construction staging site and station entrance minimizing costs. Finally these are the only properties with single business tenants in each of the properties minimizing tenant displacement and relocation costs.

Based on the above, there is no prudent and feasible alternative to the use of the Ace Gallery. The proposed project includes all possible planning to minimize harm to the Section 4(f) property.
6.0 AGENCY COORDINATION AND CONSULTATION

Metro has coordinated with SHPO through meetings (August 2009) and correspondence to resolve issues on methodology, APE definition, and documentation content throughout the Project. The APE was presented to personnel from SHPO on June 22, 2009, via a notification letter from FTA to the SHPO. On August 17, 2009, Metro and its consultant team met with SHPO personnel to further discuss the proposed project, methods for identification of historic properties, and documentation standards (see the Historic Resources Properties Supplemental Survey Report and the Archaeological Resources Supplemental Survey Report). For correspondence refer to Appendix D. Initial findings were presented for public and agency review in the Draft EIS/EIR. The FTA, with concurrence of the SHPO, made determinations of eligibility and effects. See discussions in Chapter 4 and in Appendix D. The SHPO letters of concurrence can be found in Appendix D of this Final EIS/EIR.

In addition to ongoing consultation with the SHPO for the Section 106 process, there is ongoing consultation with local agencies, jurisdictions, and historical societies/preservation groups, including the following:

- City of Los Angeles
- City of Beverly Hills
- Los Angeles Conservancy
- Los Angeles City Historical Society
- Beverly Hills Historical Society

The Draft Section 4(f) Evaluation was presented in the Draft EIS/EIR circulated for public and agency review in September 2010. Recipients of the document included the Department of Interior (DOI) and local jurisdictions. No specific comments were received on the Section 4(f) Evaluation.

Metro conducted “Station Area Information Meetings” in October and November 2009 to discuss topics such as station box locations; station access points; locations for pick up/drop off; bicycle and pedestrian access; transit connections; and other issues that relate to the facilities at or near station entrances.

A key component of the station area planning for the Project is the urban design process. The urban design process initiated in the AA phase was continued during the Conceptual Engineering phase with the formation of the Urban Design Working Group (UDWG). The UDWG is composed of key staff from the Cities of Los Angeles, Beverly Hills, Santa Monica, and West Hollywood. The goals of the UDWG are as follows:

- Facilitate discussion about the vision and identity of the Westside Subway Extension and how individual station areas would be designed to fit within this framework
- Provide a forum for critical analysis of how the Project should approach considerations of land use, design, and linkages between stations along the line and their urban neighborhoods
- Propose design considerations for station areas so they would fit appropriately within the surrounding urban context
- Involve stakeholders and the Westside Extension planning team in a comprehensive station planning process
Facilitate discussion about sensitive areas to assist in the station location decision-making process so that alternative station locations can be resolved, if necessary

Help ensure that planning for the Project corridor considers and builds upon the needs, desires, and policies of the Westside cities

Assist in establishing guidelines and standards that may be helpful for future Metro transit corridor initiatives

The UDWG participated in workshops discussing station location, urban design and station entrance station entrance locations that were closely coordinated with the Public Outreach effort. The UDWG participated in an initial urban design workshop on July 15, 2008, with a follow-up meeting on September 4, 2008, to discuss the urban design concepts and station location options. The UDWG examined local issues, urban design guidelines, or specific geographic concerns regarding station locations and station design. The workshops were part of the public outreach effort during the AA phase and have been part of the continuing design process for the station area planning process in future phases of the Project.

During the Final EIS/EIR phase of the Project, the UDWGs evolved into “Station Area Advisory Groups” (SAAGs) that met three times before the conclusion of this final planning stage of the Westside Subway Extension.

The purpose of the SAAGs was to provide community input to Metro subway planners and city planners on urban design and other features at each proposed station during the Final EIS/EIR and Preliminary Engineering (PE) phases of the Westside Subway Extension. Topics included station entrance locations and station design within the context of an Urban Design Station Planning Toolkit framework and station design parameters developed by Metro during this phase of the Project. The SAAGs also informed communities about the status of station planning and design.

SAAGs were formed for six of the seven stations. Membership on each SAAG was comprised of stakeholders representative of key community groups in the neighborhood of the station. This includes area residents and representatives of homeowner and residential associations, commercial property owners, area merchants, and key institutions. SAAG membership was by invitation with city officials and staff providing input about who to invite to participate. Nevertheless, meetings were open to the public to ensure that the process remained transparent. City staff and other elected officials or their representatives were not officially members of the groups but were encouraged to attend meetings to hear the SAAG’s input both about the stations and the areas beyond. Meetings were noticed to the entire project database, posted on the project website and Facebook page, and noticed through press releases and Twitter.

Since the Westwood/VA Hospital Station would affect federally owned property, a SAAG was not formed for that group. Planning discussions have instead occurred directly with VA representatives. Chapter 8 in the Final EIS/EIR lists SAAG meetings and provides additional details.
References

Metro 2008  Los Angeles County Metropolitan Transportation Authority (Metro). 2008. *2008 Long Range Transportation Plan (LRTP).*


References


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