Westside Subway Extension Project — Locally Preferred Alternative (LPA)

Supplemental Archaeological Report in support of Final EIS/EIR for LPA
Cogstone Project No. 2068

Native American Contact List
accompanying
NAHC letter dated September 8, 2010

Groups/Individuals not previously listed on NAHC letter of June 3, 2009 and thus not previously contacted for this project (see URS 2010: Appendix A):

<table>
<thead>
<tr>
<th>Native American Group/Individual</th>
<th>Date(s) of 1st Contact Attempt</th>
<th>Date(s) of Replies Rec’d</th>
<th>Date(s) of 2nd Contact Attempt</th>
<th>Date(s) of 3rd Contact Attempt</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Shoshoneon Gabrieleno Band of Mission Indians, Andy Salas</td>
<td>2/22/2011</td>
<td>None</td>
<td>3/17/2011</td>
<td>3/25/2011</td>
<td>On February 22, 2011 a letter and map detailing the project location were emailed to Mr. Salas. When no response was received, one email was sent on March 17, 2011 and a second email was sent on March 25, 2011 to Mr. Salas. No response was received.</td>
</tr>
<tr>
<td>Gabrieleno-Tongva Tribe, Linda Candelaria</td>
<td>2/22/2011</td>
<td>None</td>
<td>3/17/2011</td>
<td>3/25/2011</td>
<td>On February 22, 2011 a letter and map detailing the project location were emailed to Ms. Candelaria. When no response was received, one email was sent on March 17, 2011 and a second email was sent on March 25, 2011 to Ms. Candelaria. No response was received.</td>
</tr>
</tbody>
</table>
APPENDIX B—MEMORANDUM OF AGREEMENT AND SECTION 106 CORRESPONDENCE
MEMORANDUM OF AGREEMENT
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BETWEEN THE FEDERAL TRANSIT ADMINISTRATION
AND THE
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER

REGARDING THE LOS ANGELES WESTSIDE SUBWAY EXTENSION PROJECT,
LOS ANGELES COUNTY, CALIFORNIA

WHEREAS, the Federal Transit Administration (FTA) is considering providing funding to the Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro) for the Los Angeles Westside Subway Extension Project (Undertaking) within the cities of Los Angeles and Beverly Hills, as well as within unincorporated portions of Los Angeles County, pursuant to Federal transit law (49 USC Chapter 53); and,

WHEREAS, the Undertaking consists of extending the LACMTA heavy rail subway system for nearly nine (9) miles via Wilshire Boulevard from the current western terminus of the Metro Purple Line at the Wilshire/Western Station to a new western terminus near the West Los Angeles Veterans Affairs (VA) Hospital. The Undertaking may be built entirely in one phase or built in three consecutive construction phases. The Undertaking includes construction of seven (7) new stations and will provide direct connections from the west side of the county to all elements of the existing Metro system, improve transit travel time, and provide more reliable transit service to transit riders. Improvements are also planned for the existing Division 20 Maintenance and Storage Facility west of the Los Angeles River between E. 1st Street and Jesse Street. There are two station options for each of the Century City, Westwood/UCLA, and Westwood/VA Hospital stations; and,

WHEREAS, FTA has defined the Undertaking’s area of potential effect (APE) for archaeological resources as a radius of 100-feet along the potential subway alignment and maintenance facilities, including areas where the alignment veers outside the roadway right of way. FTA has defined the Undertaking's APE for architectural resources as extending one parcel past the limits of the above-ground project improvements for the stations, service areas, construction staging and laydown areas and any above-ground facilities; and,

WHEREAS, the FTA has determined that the project would constitute an Undertaking as per 36 CFR § 800.16(y), which requires compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended (16 USC § 470f); and,

WHEREAS, FTA will be the lead Federal agency for the Undertaking, with the LACMTA, a grant applicant, as required by FTA, and as an invited signatory to this MOA; and,
WHEREAS, FTA has consulted with the California Historic Preservation Officer (SHPO) pursuant to 35 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (16 USC § 470f) on eligibility and effects for properties within the APE; and, regarding the Undertaking’s potential to affect historic properties, has decided to prepare a Memorandum of Agreement (MOA) pursuant to 36 CFR §§ 800.4(b)(2) and 800.6(c); and,

WHEREAS, FTA, in consultation with SHPO, has determined that, pursuant to 36 CFR § 800.3, the Ace Gallery is eligible for inclusion in the National Register of Historic Places (NRHP); and pursuant to 36 CFR § 800.5(a), FTA, in consultation with SHPO has determined that the Undertaking will have an adverse effect on a historic property, the Ace Gallery; and,

WHEREAS, FTA, in consultation with SHPO, pursuant to 36 CFR § 800.5(a), has determined that the Undertaking would have no adverse effect on the thirty-eight (38) individual architectural historic properties and two (2) historic districts which are on or eligible for listing in the National Register of Historic Places, and mitigation measures are included in this MOA to minimize the effects on the historic properties within the APE.

WHEREAS, FTA, in consultation with SHPO, pursuant to 36 CFR § 800.5(a), has determined that the Undertaking would have no adverse effect on the one (1) identified archaeological historic property, CA-LAN-2610 or undocumented archaeological resources within the APE provided the measures in this MOA are implemented.

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with the required documentation and the ACHP has not chosen to participate in the consultation pursuant to 36 CFR § 800.5(a)(1)(iii); and,

WHEREAS, no Federally-recognized Indian tribes (as defined in 36 CFR § 800.16(m)) expressed an interest in consulting on the Undertaking; however, LACMTA, on behalf of the FTA, consulted with the Native American Heritage Commission and the local Native American community regarding the cultural sensitivity of the project area; and,

WHEREAS, LACMTA, on behalf of the FTA, has consulted with eighteen (18) local government offices, historical organizations, and individuals interested in historic preservation in Los Angeles County about the Undertaking and its effects on historic properties; and,

WHEREAS, this MOA was developed with appropriate public involvement (pursuant to 36 CFR §§ 800.2(d) and 800.6(a)) and the public was provided the opportunity to comment on the Undertaking and will hereafter be provided with further opportunities to comment on the Undertaking as stipulated further in this MOA; and,

WHEREAS, the FTA and the SHPO are signatories pursuant to 36 CFR § 800.6(c)(1) and LACMTA is an invited signatory pursuant to 36 CFR § 800.6(c)(2); and,
NOW, THEREFORE, all signatories agree that, upon FTA's decision to proceed with the Undertaking, FTA shall ensure that the Undertaking is implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties; and further agree that these stipulations shall govern the Undertaking and all of its parts until this MOA expires or is terminated.

STIPULATIONS

FTA will ensure that the terms of this MOA are carried out and will require, as a condition of any approval of Federal funding for the Undertaking, adherence by LACMTA to the stipulations set forth herein.

I. ARCHITECTURAL HISTORIC PROPERTIES

A. Treatment to Resolve Adverse Effect

1. HABS/HAER Documentation

The adverse effects of the Undertaking on the Ace Gallery will be resolved by FTA by requiring LACMTA 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-recording 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 the LACMTA to the FTA and SHPO for review. The FTA, in consultation with LACMTA and SHPO, will approve the materials and permit LACMTA to proceed with demolition of the adversely-affected property.

Following approval of the HABS/HAER documentation, LACMTA will ensure that the materials are placed on file with LACMTA 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 LACMTA.

2. Public Website Development

In connection with HABS/HAER documentation, LACMTA will develop a public website linked to LACMTA's website concerning the history of the Ace Gallery. The website would be based on the photographs produced as part of the HABS/HAER documentation, and historic archival research previously prepared as part of the Undertaking and historic documentation. A public website, which provides historic and documentary information regarding historic properties that would be substantially altered or demolished as a result of the Undertaking, will be prepared and maintained for a ten-year period.
B. Treatment to Avoid Adverse Effects

1. Design Phase Planning

The Undertaking would be designed in adherence to the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Rehabilitating Historic Buildings and the Guidelines for the Treatment of Cultural Landscapes at the following four historic properties that will be altered by either construction staging activities or station entrances to ensure there is no adverse effect to these properties:

- LACMA West May Company – WSE 24 (6067 Wilshire Boulevard)
- Union Bank Building—WSE 14 (9460 Wilshire Boulevard)
- Linde (Westwood) Medical Plaza - WSE 10 (10921 Wilshire Boulevard)
- VA Medical Center Historic District—WSE 41 (11301 Wilshire Boulevard) including the Wadsworth Theater and Contributing Landscape Elements

Designs will ensure the preservation of the character-defining features of the historic properties, and would avoid damaging or destroying materials, features, or finishes that are important to the property, while also considering economic and technical feasibility. LACMTA will ensure that the SHPO has opportunity to review the design by the architectural historian.

2. Design Review and Monitoring

LACMTA will retain the services of a qualified historic preservation consultant with experience in architectural preservation to review structural designs and construction activities, and will require onsite periodic construction monitoring by a historic preservation consultant to ensure protection of historic fabric and compliance with approved designs and the Secretary of the Interior’s Standards for the Rehabilitation of Historic Properties.

C. Construction Phase

1. Geotechnical Investigations

For the historic properties noted in Stipulation ILD.1, further geotechnical investigations will be undertaken to evaluate soil, groundwater, seismic, and environmental conditions along the alignment. This analysis will assist in the development of appropriate support mechanisms and measures for cut and fill construction areas. The subsurface investigation would also identify areas that could cause differential settlement as a result of using a tunnel boring machine (TBM) in close proximity to historic properties. An architectural historian or historical architect who meets the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61) will provide input and review of final design documents prior to implementation of the mechanisms and measures. The review will evaluate whether the geotechnical investigations and support measures for cut and fill, and measures to prevent differential settlement meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties. The evaluation of measures will be forwarded by the LACMTA to the FTA and SHPO for review. Then FTA, in consultation with the SHPO, upon the SHPO's concurrence, shall approve the evaluation and permit the LACMTA to proceed with construction.
D. Treatment to Avoid Adverse Effect to Historic District Contributing Historic Landscape Element

1. Pre-Construction Survey

LACMTA will develop a survey of the contributing landscape elements of the VA Medical Center Historic District located within twenty (20) feet of the Westwood/VA Hospital North and South Station portal-related cut-and-cover and construction staging areas during final design. The survey will be prepared by a qualified architectural historian and historic landscape architect and/or qualified arborist with the assistance of a technician/surveyor using high-resolution GPS equipment. The survey will establish an inventory of each mature historic tree species and the precise location of each individual tree in the survey area. The inventory survey will also assess the feasibility of temporarily removing and then replanting the extant trees in their original location, including how the trees should be moved and temporarily stored.

A report on the results of the inventory will be submitted to FTA, LACMTA and the SHPO for review and will be placed on file with LACMTA and supplied to other signatories to this MOA if requested.

2. Landscape Protection Measures

The results of the pre-construction survey will be used for marking trees to be avoided during construction, for implementation of relocation recommendations as necessary if avoidance of any of the trees is infeasible, and for onsite use during construction activities to ensure the historic trees remaining in place are protected.

Should any of the trees that are temporarily removed not survive a reasonable period after they are replanted, as determined by a qualified arborist, LACMTA will obtain and plant adult-aged replacement trees of the same species to rehabilitate the historic landscape.

3. Construction Monitoring

LACMTA will retain the services of a qualified historic preservation consultant with experience in the preservation of historic landscapes. The consultant will review the existing landscape designs and proposed construction activities, and develop a plan for onsite periodic construction monitoring to ensure protection of historic fabric and compliance with the Guidelines for the Treatment of Cultural Landscapes.
E. Reporting Reviews

1. SHPO Review and Comment

Upon completion of construction and any reports prepared for resolution of adverse effects, the SHPO shall have thirty (30) days to review the draft and comment on the level of effort, results, and eligibility recommendations; those comments shall be incorporated into the final technical report, as appropriate. If no response by the SHPO is received by the FTA and/or LACMTA within thirty (30) days, the FTA and LACMTA shall assume concurrence and authorize the final technical report and/or the historic architectural documentation.

2. Document Submittal

Within thirty (30) days of receipt of comments on any draft report, the FTA and LACMTA shall submit the final technical report and/or historic architectural documentation to the SHPO, the appropriate California Historical Resources Information System information center, and the appropriate Indian tribe(s), and shall make it available to other interested persons who meet the confidentiality requirements. Reports prepared with archaeological site information shall not be distributed to the general public, except in an abridged form that does not include sensitive information about archaeological site locations or human remains.

3. Report Standards

All reports generated as a result of this MOA shall be consistent with contemporary professional standards and the Secretary of the Interior’s guidelines.

II. ARCHAEOLOGICAL RESOURCES

This MOA accordingly sets forth the following measures to be implemented to reduce potential construction impacts within the APE to known archaeological historic properties and to undocumented archaeological resources, including human remains.

A. Consultation with Native American Individuals, Tribes and Organizations and Treatment of Cultural Remains and Artifacts.

1. The parties to this MOA agree that Indian burials and related items discovered during the implementation of the MOA and the Undertaking will be treated in accordance with the requirements of § 7050.5(b) of the California Health and Safety Code. If, pursuant to § 7050.5(c) of the California Health and Safety Code, the county coroner/medical examiner determines that the human remains are or may be of Native American origin, then the discovery shall be treated in accordance with the provisions of §§ 5097.98 (a) - (d) of the California Public Resources Code.

2. LACMTA will ensure that the expressed wishes of Native American individuals, tribes, and organizations are taken into consideration when decisions are made regarding the disposition of other Native American archaeological materials and records relating to Indian tribes.
B. Confidentiality

The signatories to this MOA acknowledge that archaeological historic properties covered by this MOA are subject to the provisions of § 304 of the National Historic Preservation Act of 1996 and § 6254.10 of the California Government Code (Public Records Act), relating to the disclosure of archeological site information, and having so acknowledged, will ensure that all actions and documentation prescribed by this MOA are consistent with § 304 of the National Historic Preservation Act.

C. Worker Training

Prior to initiating ground-disturbing activities, a qualified archaeologist will conduct a short cultural resources awareness training session for all construction workers and supervisory personnel. Each worker will learn the proper procedures to follow in the event cultural resources or human remains are uncovered during ground-disturbing activities.

D. Unanticipated Discoveries

If FTA and LACMTA determines, after any future construction of the Undertaking has commenced, that project activities will affect a previously unidentified property that may be eligible for the NRHP, or affect a known historic property in an unanticipated manner, FTA and LACMTA will address the discovery or unanticipated effect in accordance with 36 CFR § 800.13(b)(3). The LACMTA must notify the FTA and SHPO within forty-eight (48) hours of the discovery. FTA, at its discretion, may hereunder, and pursuant to 36 CFR § 800.13(c), assume any unanticipated discovered property to be eligible for inclusion in the NRHP.

For properties determined eligible or assumed to be eligible pursuant to Stipulation I.E., LACMTA will notify the FTA, ACHP, and SHPO of those actions that it proposes to avoid, minimize, or mitigate adverse effects. Consulting parties will have forty-eight (48) hours to provide their views on the proposed actions. The FTA will ensure that the timely-filed recommendations of consulting parties are taken into account prior to granting approval of the measures that the LACMTA will implement to resolve adverse effects. The LACMTA will carry out the approved measures prior to resuming construction activities in the location of the discovery.

III. ADMINISTRATIVE PROVISIONS

A. Standards

1. Definitions

The definitions set forth at 36 CFR § 800.16 are applicable throughout this MOA.
2. Professional Qualifications

LACMTA shall ensure that all historic preservation and archaeological work are performed by LACMTA under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary of the Interior's Professional Qualification Standards (48 CFR §§ 44738-44739) in those areas in which the qualifications are applicable for the specific work performed.

3. Documentation Standards

Written documentation of activities prescribed by Stipulations I, II of this MOA shall conform to Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation as amended and annotated (48 CFR §§ 44716-44740) as well as to applicable standards and guidelines established by the SHPO.

4. Curation and Curation Standards

LACMTA shall ensure that, to the extent permitted under §§ 5097.98 and 5097.991 of the California Public Resources Code, the materials and records resulting from the activities prescribed by this MOA curate in accordance with 36 CFR Part 79. FTA will ensure that, to the extent permitted by applicable law and regulation, the views of the Most Likely Descendant(s) are taken into consideration when decisions are made about the disposition of other tribal archaeological materials and records.

B. Dispute Resolution

Should any signatory or concurring party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, FTA shall consult with such party to resolve the objection. If FTA determines that such objection cannot be resolved, FTA will:

1. Forward all documentation relevant to the dispute, including the FTA's proposed resolution, to the ACHP. The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.

2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

3. FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.
C. Amendments

Any MOA party may propose that this MOA be amended, whereupon the MOA parties will consult for no more than thirty (30) days to consider such amendment. FTA may extend this consultation period. The amendment process shall comply with 36 CFR §§ 800.6(c)(1) and 800.6(c)(7). This MOA may be amended only upon the written agreement of the signatory parties. If it is not amended, this MOA may be terminated by any of the signatory parties in accordance with Section D of Stipulation III.

D. Termination

If any signatory to this MOA determines that its terms will not or cannot be carried out, that signatory shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation C of Stipulation III, above. If within thirty (30) days (or another time period agreed to by all signatories) agreement on an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories.

Once the MOA is terminated, and prior to work continuing on the Undertaking, FTA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FTA shall notify the signatories as to the course of action it will pursue.

E. Duration of the MOA

1. Unless terminated pursuant to Section D of Stipulation III above, or unless superseded by an amended MOA, this MOA will be in effect following execution by the signatory parties until FTA, in consultation with the other MOA parties, determines that all of its stipulations have been satisfactorily fulfilled. This MOA will terminate and have no further force or effect on the day that FTA notifies the other MOA parties in writing of its determination that all stipulations of this MOA have been satisfactorily fulfilled.

2. The terms of this MOA shall be satisfactorily fulfilled within twenty (20) years following the date of execution by the signatory parties. If FTA determines that this requirement cannot be met, the MOA parties will consult to reconsider its terms. Reconsideration may include the continuation of the MOA as originally executed, amendment of the MOA, or termination. In the event of termination, FTA will comply with Section D of Stipulation III, above, if it determines that the Undertaking will proceed notwithstanding termination of this MOA.

3. If the Undertaking has not been implemented within ten (10) years following execution of this MOA by the signatory parties, this MOA shall automatically terminate and have no further force or effect. In such event, FTA shall notify the other MOA parties in writing and, if it chooses to continue with the Undertaking, shall reinitiate review of the Undertaking in accordance with 36 CFR Part 800.
F. Effective Date

This MOA will take effect on the date that it has been fully executed by FTA, LACMTA, and SHPO.

G. Execution

Execution of this MOA by FTA, LACMTA, and SHPO, its transmittal by FTA to the ACHP in accordance with 36 CFR § 800.6(b)(1)(iv), and subsequent implementation of its terms, shall evidence, pursuant to 36 CFR § 800.6(c), that this MOA is an agreement with the ACHP for purposes of Section 110(1) of the NHPA, and shall further evidence that FTA has taken into account the effects of the Undertaking on historic properties and has afforded the ACHP an opportunity to comment on the Undertaking and its effects on historic properties.

SIGNATORY

Federal Transit Administration

By ____________________________ Date MAR 6 2012

Leslie T. Rogers
Regional Administrator
FTA Region IX

California State Office of Historic Preservation

By ____________________________ Date 3/7/12

Millard Wayne Donaldson
State Historic Preservation Officer
Office of Historic Preservation, Sacramento
INVITED SIGNATORY PARTY:

Los Angeles County Metropolitan Transportation Authority

By

[Signature]

Arthur T. Leahy
Chief Executive Officer
Los Angeles County Metropolitan Transportation Authority

Date 12-19-11
SECTION 106 CORRESPONDENCE
Mr. Milford Wayne Donaldson, F.A.I.A.  
State Historic Preservation Officer  
Office of Historic Preservation  
California State Department of Parks and Recreation  
Post Office Box 942896  
Sacramento, CA 94296-0001

Attention: Dr. Susan Stratton, Supervisor, Project Review Unit

Re: Metro Westside Extension Project

Dear Mr. Donaldson:

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (LACMTA or Metro), is pleased to initiate efforts in the identification of historic properties and the analysis of effects on those properties for various components of the proposed Metro Westside Extension Project within the Cities of Los Angeles, West Hollywood, Beverly Hills, and Santa Monica, as well as within unincorporated portions of Los Angeles County (near the West Los Angeles Veteran’s Administration Hospital). This letter is to request your review and concurrence with the Area of Potential Effects (APE) and to delegate the authority to consult directly with the LACMTA.

Cultural resources identification and analysis will be prepared in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended, as required by the Advisory Council on Historic Preservation, with regulations contained in 36 Code of Federal Regulations (CFR), Part 800, and applicable sections of the California Environmental Quality Act (CEQA).

Project Description
The Metro Westside Subway Extension would extend the Metro Rail heavy rail technology via Wilshire Boulevard from the current terminus of the Metro Purple Line at Wilshire/Western Station or possibly via a combined alternative that would extend the Metro Purple Line via Wilshire Boulevard and also extend the Metro Red Line from the Hollywood/Highland Station to the Westside, potentially as far as Santa Monica.

The purpose of the project is to address the mobility needs of residents, workers, and visitors traveling to, from, and within the highly congested Westside Extension Study Area by providing faster and more reliable high-capacity public transportation than existing services which operate in mixed-flow traffic. This proposed subway
improvement will bring about a significant increase in east-west capacity and improvement in person-mobility by reducing transit travel time. On a county-wide level, the project will strengthen regional access by connecting Metro bus, Metro rail, and Metrolink networks to a high-capacity transit serving the Study Area. The overall goal of the project is to improve mobility in the Westside Extension Transit Corridor by extending the benefits of the existing Metro Red/ Metro Purple Line rail and bus services beyond their current termini near Highland Avenue and/or Western Avenue in Los Angeles as far as Ocean Avenue in Santa Monica.

Alternatives
The Westside Transit Corridor Extension Alternative Analysis Report, prepared by LACMTA was completed in January 2009, and is available on the project website at www.metro.net/westside. This report identified four alternatives for further consideration in a Draft Environmental Impact Statement/Report (DEIS/DEIR). The four alternatives include the following two subway alignments alternatives plus the No Build and Transportation Systems Management (TSM) alternatives:

- **Wilshire Boulevard Alignment Heavy Rail Transit (HRT) Subway (Alternative 1):** This alternative alignment extends underground from the Metro Purple Line Wilshire/Western station to 4th Street and Wilshire Boulevard in Santa Monica (approximately 12.5-miles in length). It has 10 stations and 1 optional station (Refer to enclosed maps for station locations and names). The alignment is generally under Wilshire Boulevard with various route alignments between Century City and Santa Monica.

- **Wilshire/Santa Monica Boulevard Combined HRT Subway (Alternative 11):** This alignment alternative extends underground from the Metro Purple Line Wilshire/Western station and from the Metro Red Line at the Hollywood/Highland station to 4th Street and Wilshire Boulevard in Santa Monica (approximately 17-miles in length). It has 14 stations and 1 optional station (Refer to enclosed maps for station locations and names). This alternative has two alignment options in the Beverly Center area. One option follows San Vicente Boulevard from Santa Monica Boulevard to La Cienega Boulevard, where it curves south and then west to meet the Wilshire Boulevard alignment. The second option follows La Cienega Boulevard from Santa Monica Boulevard, past the Beverly Center, and curves west at Wilshire Boulevard.

- **No Build Alternative:** This EIS will also consider the No Build Alternative that includes all existing highway and transit services and facilities and the committed highway and transit projects in the current LACMTA Long Range Transportation Plan and the current 2008 Southern California Association of Governments’ Regional Transportation Plan. No new infrastructure would be built within the Study Area, aside from projects currently under construction, or funded for construction and operation by 2030 by the recently approved Measure R and identified in the LACMTA Long Range Transportation Plan. Proposed major highway improvements affecting the Westside Extension Transit Corridor
between now and 2030 include completing missing segments of high occupancy vehicle (HOV) lanes on Interstate 405 (I-405) Freeway. From a rail transit perspective, the No Build Alternative includes the Metro Purple and Metro Red Lines along the eastern and northeastern edges of the study area. This alternative also includes a rich network of local, express, and Metro Rapid bus routes that will continue to be provided, with both bus route and additions and modifications proposed.

- **Transportation System Management (TSM) Alternative:** The EIS will also consider the TSM Alternative which enhances the No Build Alternative and improves upon the existing Metro Rapid Bus service and local bus service in the Westside Extension Transit Corridor study area. This alternative emphasizes more frequent service and low cost capital and operations improvements to reduce delay and enhance mobility. Although the frequency of service is already very good, this alternative considers improved bus services during peak periods on selected routes.

For the most part, the various alternatives to be considered for the Metro Westside Extension project generally traverse Wilshire Boulevard from the Metro Purple Line Wilshire/Western station to 4th Street and Wilshire Boulevard in Santa Monica (Alternative 1), and a second line extending west from the Metro Red Line Hollywood/Highland Station via Santa Monica Boulevard to join the Wilshire Line in Beverly Hills (Alternative 11).

**Area of Potential Effects**

A proposed project-specific APE was established in accordance with 36 CFR Part 800.16 (d), which defines an APE as:

> The geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The proposed project-specific APE (see enclosed map) was delineated to ensure identification of significant historic and architectural resources that may be directly or indirectly affected by the proposed project and are listed in or eligible for inclusion in the National Register of Historic Places (National Register) and/or California Register of Historical Resources (California Register). The APE was established using methodology consistent with those of previous LACMTA projects, in addition to information and data obtained from the South Central Coastal Information Center (SCCIC), agency records (e.g., City of Los Angeles Office of Historic Resources, County of Los Angeles Assessor, Department of Water and Power), and through historical research (e.g., Sanborn Fire Insurance Maps).

For historic and architectural resources, the proposed built environment APE includes all parcels adjacent to both sides of the proposed project alignment, including stations,
subway or open cut construction areas, and areas proposed for acquisition. In addition, the APE includes areas that may be subject to potential project-related effects, including visual or audible effects, and settlement effects that may result from construction or implementation the proposed project. Additionally, the built environment APE includes the boundaries of seven known identified historic structures, and one historic district that have been listed in or evaluated and considered eligible for the listing on the National Register. The built environment APE generally will not consider properties set far back from the edge/boundary of their parcel (e.g., where there is a sliver impact); entire complexes or rows of structures on a parcel or multiple parcels (e.g., shopping center) - only the front row of structures are included in the survey area; properties elevated high above the alignment due to topographic features; and, properties separated from the Project improvements by frontage roads or large retaining/sound barrier walls. Very large linear properties will not be identified or evaluated beyond the area reasonably subject to effect by the Project. Rather, the identification and evaluation of these complex linear properties within the APE considered whether the segment in the APE would be a contributor or non-contributor to a larger significant property as a whole (should that larger property ever be determined eligible for inclusion to the National and California. For archaeological resources, the proposed APE includes the proposed at-grade and underground right-of-way and/or areas of direct ground disturbance. The APE also includes areas with permanent site improvements and areas for staging and temporary construction activities. Most Pleistocene Age sediments within the project area that have the potential to contain archaeological resources, in most areas, do not exceed a depth of 40 ft. However, due to geologic distortion, prehistoric sediment deposits, and early historic period disturbance (trenching, tunneling, or structural foundations), the potential for archaeological resources may be encountered at depths greater than 40 ft. Therefore, the proposed vertical APE for archaeological resources extends from the ground surface to approximately 100 feet below the existing ground surface. The proposed horizontal APE for archaeological resources extends from the edge of the existing ROW to 100 ft on either side of the ROW (100 ft radius), except in those areas where excavation, earth moving, or staging will occur beyond 100 feet; in which case, those areas will be included in the horizontal APE.

For purposes of this project, the survey identification efforts will be focused on parcels containing improvements constructed up until 1968. Information regarding the date of improvement will be obtained from Los Angeles County Assessor, historical research, and/or visual survey. Properties will be evaluated for National and California register eligibility as part of the project identification phase, as well as noting all previously identified historic properties and historical resources.

Consultation Coordination
To the extent that it facilitates the review and approval process, FTA has authorized certain experienced and knowledgeable agencies to consult directly with you in addressing Section 106 requirements. In permitting this arrangement, agencies have been instructed to keep FTA informed by forwarding copies of all transmittals to our attention, and immediately contacting FTA on matters deemed to be of significant importance. Until further notice, this authority is extended to the LACMTA for the Metro Westside Extension project.
Previous scoping efforts have taken place and are expected to continue over the next several months. On behalf of FTA, the LACMTA supported by its consultant Parsons Brinckerhoff and sub-consultant URS Corporation, is currently contacting local historic groups, Native American groups, and other stakeholders that may have an interest in the project. The LACMTA has met with the City of Los Angeles, Office of Historic Resources, and expects to meet with the other jurisdictional agencies and groups like the Los Angeles Conservancy to address their concerns.

Please let us know if you have comments on the project description, APE definition, methodology, or maps. If you or your staff is interested in a site visit of the corridor, we would be pleased to accommodate your request. The LACMTA appreciates your assistance in the preservation of cultural resources related to all aspects of their transit system. If you or any members of your staff have questions, please contact Mr. Ray Tellis of our Los Angeles Metropolitan Office at (213) 202-3956.

Sincerely,

[Signature]

Leslie T. Rogers
Regional Administrator

Enclosure: Draft Area of Potential Effects Map

cc: David Meiger, Project Manager, LACMTA
27 September 2010

Roger Martin
Transportation Planning Manager
Westside Area Planning Team
Los Angeles County
Metropolitan Transportation Authority
One Gateway Plaza
Los Angeles, CA 90012-2952

Re: Section 106 Consultation for the Westside Subway Extension DEIS/DEIR, Los Angeles County, CA

Dear Mr. Martin:

Thank you for your letter of 13 August 2010 initiating consultation for the Federal Transit Authority (FTA) for the above referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. FTA has delegated authority to consult directly with the Los Angeles County Metropolitan Transportation Authority (LACMTA) although FTA remains responsible for all findings. You are requesting at this time that I concur with the determination of the Area of Potential Effect (APE).

FTA established the APE as shown on the maps attached to your letter. For archaeological resources, the APE was defined as a radius of 100-feet along the potential subway alignment and maintenance facilities including areas where the alignment veers outside the roadway right away. For architectural resources, the APE extends one parcel past the limits of the above-ground project improvements for the stations, service areas, and any above-ground facilities. This includes the areas expected to be directly or indirectly affected by either construction or operation of the project, areas where property takes are required and areas that may be affected by noise and vibration from the construction and operation of the proposed project. I find the APE is satisfactory pursuant to 36 CFR 800.4(a)(1).

Thank you for considering historic properties in your planning process and I look forward to continuing consultation on this project. If you have any questions, please contact Amanda Blosser of my staff at (916) 654-7372 or e-mail at ablosser@parks.ca.gov.

Sincerely,

Susan W. Stratton for
Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

MWD:ab
Mr. Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer  
Office of Historic Preservation  
California State Department of Parks and Recreation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

RE: Westside Subway Extension Project,  
Los Angeles County, CA – Section 106 Consultation / 36 CFR Part 800

Attention: Ms. Amanda Blosser, Project Review Unit

Dear Mr. Donaldson:

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (LACMTA), is providing the California State Historic Preservation Office (SHPO) with a revised area of potential effect (APE), determination of eligibility, determination of effects and related information pursuant to our responsibilities for compliance with Section 106 of the National Historic Preservation Act (NHPA) as amended (36 CFR 800) for the Westside Subway Extension project in Los Angeles County.

Subsequent to your letter of concurrence on the APE dated September 27, 2010, the proposed project has been refined with the selection of the Locally Preferred Alternative (LPA), which consists of a nearly nine miles subway extension with seven new stations (see attached figures). The LPA is the only build alternative under consideration for the project. The revised APE for archeological resources comprises of 100 feet on both sides of the center line of the alignment, a 500-foot radius around all station locations, and a 100-foot radius around the Division 20 maintenance facility (see attached figures). For historic/architectural resources, the APE extends one property parcel beyond the limits of the above-ground LPA alignment for the station locations and the Division 20 maintenance facility (see attached figures).

The archaeological resources survey concluded that there are no prehistoric or archaeological resources present within the archaeological APE for the LPA. At the Division 20 facility (see Figure 7-2 of Archaeological Resources Technical Report), only site CA-LAN-2610, one of four previously recorded sites, is eligible for listing in the National Register of Historic Places (NRIIP) under Criteria D (see Table 7-1 of Archaeological Resources Technical Report). Site CA-LAN-2610 is located beneath Santa Fe Avenue and will be avoided by the project construction. As a result, FTA has determined that a “no adverse effect” is appropriate for this site.
Within the historic/architectural APE, 41 historic resources (39 individual properties and 2 historic districts) eligible for or listed on the NRHP were evaluated for project effect. Five of these properties are currently listed on the NRHP; 36 historic resources including two historic districts (VA Medical Center and Westwood/UCLA) have been determined eligible for inclusion on the NRHP. The following table provides a brief site description, eligibility status/recommendation, and effect determinations.

<table>
<thead>
<tr>
<th>WSE No.</th>
<th>Common Name</th>
<th>Brief Description</th>
<th>NRHP Eligibility/ Listing</th>
<th>NRHP Criteria</th>
<th>Impact/Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>WSE 41</td>
<td>VA Medical Center Historic District</td>
<td>Old Soldiers Home and VA Medical Center buildings; includes WSE 41a Wadsworth Theater, and WSE 41b historic landscape</td>
<td>Eligible</td>
<td>A, C</td>
<td>Protection or temporary removal and return of historic landscape and trees to original site; no impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>HD 1</td>
<td>Westwood/UCLA Historic District</td>
<td>Spanish Revival, Monterey Revival; Includes WSE 46, WSE 47, WSE 49, and contributor HD1a/WSE 61</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 10</td>
<td>Linde Medical Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Removal for station entrance of a section of meeting wall between attached, integrated garage and rear of main structure/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 11</td>
<td>Century Plaza Hotel</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 12</td>
<td>Century Park Towers</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>G, C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 13</td>
<td>Beverly Wilshire Hotel</td>
<td>Italian Renaissance</td>
<td>Listed</td>
<td>A, B, C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 14</td>
<td>Union Bank Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Alteration for station entrance of exterior wall on west end of 1st floor/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 15</td>
<td>Ace Gallery Building</td>
<td>Mid-Century Modern - Brutalism</td>
<td>Eligible</td>
<td>C</td>
<td>Demolish/ Adverse Effect</td>
</tr>
<tr>
<td>WSE 16</td>
<td>Glenendale Federal Savings Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 17</td>
<td>California Bank Building-Sterling Plaza</td>
<td>Art Deco Commercial</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 18</td>
<td>Fine Arts Theater</td>
<td>Art Deco</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 21</td>
<td>Fox Wilshire Theater</td>
<td>Art Deco</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 23</td>
<td>Johnnie's Coffee Shop</td>
<td>Googie style design</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 24</td>
<td>May Company Wilshire (LACMA West)</td>
<td>Streamline Moderne</td>
<td>Eligible</td>
<td>C</td>
<td>Station portal entrance will be constructed in the interior of the 1st floor, avoid alterations to the exterior of the building/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 25</td>
<td>Art Deco-style commercial building</td>
<td>Art Deco</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 26</td>
<td>Darkroom Photography Store façade</td>
<td>Streamline Moderne</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE No.</td>
<td>Common Name</td>
<td>Brief Description</td>
<td>NRHP Eligibility/Listing</td>
<td>NRHP Criteria</td>
<td>Impact/Determination</td>
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</tr>
<tr>
<td>WSE 27</td>
<td>Art Deco-style commercial building</td>
<td>Art Deco</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 28</td>
<td>Tikewar (Getty) Oil building</td>
<td>International style</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 29</td>
<td>Los Altos Hotel and Apartments</td>
<td>Spanish Revival</td>
<td>Listed</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 30</td>
<td>Wiltern Theater</td>
<td>Art Deco</td>
<td>Listed</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 31</td>
<td>Pierce National Life</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 42</td>
<td>Catholic-Protestant Chapels/ Wadsworth Chapel</td>
<td>1890 Chapel</td>
<td>Listed</td>
<td>A, C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 43</td>
<td>Westwood Federal Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>G, C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 44</td>
<td>Ralph's Grocery Store</td>
<td>Spanish Revival</td>
<td>Listed</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 45</td>
<td>Glendon Arcade Shops</td>
<td>Spanish Revival</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 46</td>
<td>Lindbrook Village</td>
<td>Spanish Revival</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 47</td>
<td>Courtyard Apartment Complex</td>
<td>Monterey Revival</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 49</td>
<td>University Bible Building</td>
<td>Gothic Revival</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 54</td>
<td>The Barn</td>
<td>Home and office of A.Q. Jones</td>
<td>Eligible</td>
<td>G, B</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 55</td>
<td>Beverly Hills High School</td>
<td>French Eclectic and Streamline</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 56</td>
<td>Perpetual Savings Bank Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 87</td>
<td>AAA Building</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 88</td>
<td>Wilshire Beverly Centric Building (Bank of America Building)</td>
<td>Mid-Century Modern</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 89</td>
<td>Beverly Hills Porsche Dealership</td>
<td>1920s Spanish Revival commercial</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 90</td>
<td>Security National Bank Building/Zephyr Club</td>
<td>Art Deco commercial</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 91</td>
<td>1st Street Viaduct</td>
<td>1920s concrete bridge</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 92</td>
<td>4th Street Bridge</td>
<td>1920s concrete bridge</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 93</td>
<td>6th Street Viaduct</td>
<td>1920s concrete bridge</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 94</td>
<td>Clan Wilson/ Mutual of Omaha Building</td>
<td>Art Deco and Gothic</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 96</td>
<td>[unoccupied]</td>
<td>Art Deco</td>
<td>Eligible</td>
<td>C</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 97</td>
<td>Los Angeles Country Club (South Course)</td>
<td>Private club established in 1897</td>
<td>Eligible</td>
<td>C</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
</tbody>
</table>
The VA Medical Historic District, WSE 41, includes the contributing landscape that would be in the “cut-and-cover” area associated with the construction of tunnels for the Westwood/VA Hospital Station. This would require the temporary removal of some ficus and palm trees near the Wadsworth Theater and the Palm Garden during construction. Following construction, the trees will be returned to their current location. A qualified Historic Landscape Architect will conduct on-site monitoring to ensure that the trees are properly removed and replaced. Additionally, measures will be taken to protect a large eucalyptus within the historic district (south side of Wilshire Boulevard). Therefore, FTA has determined a finding of “no adverse effect” for this resource.

The LPA would require the placement of station portals in two historic properties: Linde Medical Building (WSE 10) and Union Bank Building (WSE 14). The Westwood/UCLA station entrance (portal) would be placed in the attached, integrated parking garage, which would require the removal of a portion of the meeting wall between the garage and the interior of the Linde Medical Building. The Wilshire/Rodeo station portal would involve alteration of the exterior wall on the first level of the Union Bank Building (WSE 14). However, because the design and construction associated with these two buildings would comply with the Secretary of the Interior Standards for Rehabilitation; therefore, FTA has determined that there would be “no adverse effect” to these two historic properties.

The proposed Wilshire/Fairfax station entrance (portal) would be constructed within the interior of the first level of the May Company Building (WSE 24) and would use existing public entryways. The design and construction would be conducted in adherence to Secretary of the Interior’s Standards for the Treatment of Historic Properties, thus, not affecting the elements that contribute to the significance or integrity on the exterior of this building. As a result, FTA has determined a “no adverse effect” to the May Company building.

All other historic properties, except for the Ace Gallery, will be avoided by the project. Therefore, FTA has determined that there would be “no adverse effect” to these properties.

The LPA would require demolition of the Ace Gallery building to accommodate Wilshire/Rodeo station entrance (portal) and a construction staging area; FTA has determined a finding of “adverse effect” for the Ace Gallery. FTA recommends that a Memorandum of Agreement (MOA) be prepared to resolve the adverse effects on this building.

Please review the enclosed reports and the information provided in this letter. If you find the reports adequate, agree with FTA’s eligibility recommendations, determination of project effect, and recommendation for preparing a MOA to resolve any adverse effect the project would have on Ace Gallery, please respond within 30 days in accordance with 36 CFR Part 800.

We thank you for your attention to this critical project to the Los Angeles County metropolitan area. FTA will be contacting your office shortly after your receipt of this letter to address any concerns or answer any questions you may have regarding this project and schedule a meeting. If you have any questions or concerns, please contact Mr. Ray Tellis, Team Leader of our
Los Angeles Metropolitan Office, 213-202-3956 or ray.tellis@dot.gov. The staff contact person is Mr. Anthony Lee, Environmental Protection Specialist, at 212-668-2173 or 202-695-0846 or anthony.lee@dot.gov.

Sincerely,

[Signature]
Leslie T. Rogers
Regional Administrator

Copy to (by e-mail):

David Mieger, Los Angeles County Metropolitan Transportation Authority

Enclosures
01 November 2011

Leslie Rogers
Regional Administrator
Federal Transit Authority
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

Re: Section 106 Consultation for the Westside Subway Extension Project, Los Angeles County, CA

Dear Mr. Rogers:

Thank you for your letter of 16 October 2011 initiating consultation for the Federal Transit Authority (FTA) for the above referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. You are requesting at this time that I concur with the determinations of eligibility and finding of no effect.

Subsequent to the concurrence on the APE in September, the proposed project description was refined and the Locally Preferred Alternative (LPA) was selected. The LPA consists of nine miles of subway extension with seven new stations as shown in the maps attached to your report. The LPA is the only build option under consideration for this project.

FTA has defined the revised APE for archaeological resources as comprising 100 feet on both sides of the center line of the alignment, a 500-foot radius around the station locations, and a 100-foot radius around the Division 20 maintenance facility. For architectural resources, the APE extends one property parcel beyond the above-ground LPA alignment for the station locations and the Division 20 maintenance facility. The APE is shown in Appendix A of your attached report. I agree the revised APE is sufficient pursuant to 36 CFR 800.4(1)(a).

Within the APE for the project, 11 historic properties that were either listed or determined eligible for inclusion in the National Register of Historic Places (NRHP) were identified as well as a portion of one historic district. Five of those resources were newly identified as the result of field work for this undertaking. They are as follows:

- AAA Building, 1950 Century Park East, eligible under Criterion C
- Wilshire Beverly Center Building (Bank of America Building), 9461 Wilshire Blvd, eligible under Criterion C
- Beverly Hills Porsche, 8423 Wilshire Blvd, Salinas, eligible under Criterion C
- 8400 Wilshire Blvd, eligible under Criterion C
- Los Angeles Country Club (South Course), 10101 Wilshire Blvd, eligible under Criterion C

In addition, the stand of mature ficus and palm trees in the north-west quadrant of the Wadsworth Theater were determined to be a contributing feature to the VA Medical Center Historic District (11301 Wilshire Boulevard). The district was determined eligible for listing in
1981 by the Keeper of the National Register under Criteria A and C. Also, the segment of the AT&SF Railroad, previously recorded and determined eligible in 2000, no longer appears to retain sufficient integrity to convey its significance for inclusion in the NRHP. At this time, I am only able to concur with the determinations for the contributing landscape feature to the VA Medical Center Historic District and that the AT&SF segment is no longer eligible. Insufficient information was provided on the five other built environment resources precluding my ability to concur with the determination. For concurrence, I need the following information:

- AAA Building, a discussion of how the building significantly embodies the distinctive characteristics of a Modern-era architectural style including what those character defining features are. Also in Section B10 of the DPR 523B form, the building is referenced as the Ace Gallery Building which I believe is an error.
- Wilshire Beverly Center Building, again a discussion of the distinctive characteristics of the Modern-era architectural style. Also it would be useful to know whether this building was considered to eligible as a significant work of Victor Gruen.
- Beverly Hills Porsche, how does this building relate to other examples of automobile facilities for the era and what are the character-defining features of a Spanish Revival architectural style.
- 8400 Wilshire Blvd, a better discussion of the distinctive characteristics of Art Deco style and how this building embodies those characteristics.
- Los Angeles Country Club (South Course), define the distinctive characteristics of a golf course and significant golf course design and how this course represents those characteristics.

The properties listed in Table 6-3 were determined not eligible for inclusion in the NRHP. I concur with these determinations. Until we have resolved the additional determinations of eligibility I will not comment on the finding of effect.

Thank you for considering historic properties in your planning process and I look forward to continuing consultation on this project. If you have any questions, please contact Amanda Blosser of my staff at (916) 445-7048 or e-mail at ablosser@parks.ca.gov.

Sincerely,

Susan K. Stratton for

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

MWD:ab
8 December 2011

Leslie Rogers
Regional Administrator
Federal Transit Authority
201 Mission Street, Suite 1650
San Francisco, CA 94105-1839

Re: Section 106 Consultation for the Westside Subway Extension Project, Los Angeles County, CA

Dear Mr. Rogers:

Thank you for continuing consultation for the Federal Transit Authority (FTA) for the above referenced undertaking in order to comply with Section 106 of the National Historic Preservation Act of 1966 and its implementing regulation at 36 CFR Part 800. You are requesting at this time that I concur with the determinations of eligibility and finding of effect.

After our teleconference on November 4, 2011, it’s come to my attention that a total of 41 potential historic properties were identified in the APE for the undertaking and not 11 as mentioned in my previous letter. Thank you for forwarding information regarding the additional properties and the supplemental information regarding the 5 properties for which I specifically requested more information.

Five of the historic properties are listed on the NRHP and the remainder was determined eligible for inclusion in the NRHP as the result of this study. They are as follows:

15. Tidewater (Getty) Oil Building, 4201 Wilshire Boulevard, Criterion C, period of significance 1958.
18. Glendon Arcade Shops, 1139 Glendon Avenue, Criterion C, period of significance 1933.

The following contributors were identified in the APE for this project:

- Lindbrook Village, 10830, 10836 Lindbrook Drive
- Courtyard Apartment Complex, 10840 Lindbrook Drive
- University Bible Building, 10801 Wilshire Boulevard
- Dracker Apartments/Lindbrook Manor, 10824 Lindbrook Drive

20. The Barn, 10300 Santa Monica Boulevard, Criterion B, period of significance 1965-1979, meets Criterion Consideration G.
23. AAA Building, 1950 Century Park East, eligible under Criterion C
26. 8400 Wilshire Blvd, eligible under Criterion C, period of significance 1930-1940.
27. Los Angeles Country Club (South Course), 10101 Wilshire Blvd, eligible under Criterion C, period of significance 1897-1960.

After reviewing the information, I am able to concur that the above resources are eligible for inclusion in the NRHP. The properties listed in Table 6-3 were determined not eligible for inclusion in the NRHP. I also concur with these determinations.

FTA has determined the undertaking will have an adverse effect on one historic property: Ace Gallery Building. As the result of the project the building will be demolished to accommodate the Wilshire/Rodeo station entrance and construction staging. All of the other historic properties will not be adversely affected by the project. I concur with the determination of effect for the project.

Thank you for considering historic properties in your planning process and I look forward to continuing consultation on this project with preparation of an agreement document addressing the adverse effects. If you have any questions, please contact Amanda Blosser of my staff at (916) 445-7048 or e-mail at ablosser@parks.ca.gov.

Sincerely,
Milford Wayne Donaldson, FAIA
State Historic Preservation Officer
MWD:ab
Mr. John M. Fowler  
Executive Director  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC  20004

Attention: Louise D. Brodnitz, Program Analyst, ACHP

RE: Reissued  
Westside Subway Extension Project,  
Los Angeles County, CA;  
Notification of Adverse Effect

Dear Mr. Fowler:

The Federal Transit Administration (FTA), in coordination with the Los Angeles County Metropolitan Transportation Authority (LACMTA), proposes a subway extension project in Los Angeles County, CA. Pursuant to provisions of Section 106 of the National Historic Preservation Act, as amended (36 CFR Part 800.6), FTA is providing this letter to the Advisory Council on Historic Preservation (ACHP) as notification that this undertaking will have an adverse effect on a historic property (Ace Gallery building). The consulting parties for this undertaking include FTA, the State Historic Preservation Officer (SHPO) for the State of California, and the LACMTA (project sponsor).

The proposed project is an extension of the existing Metro Purple Line heavy rail transit subway system from its current western termini at Wilshire/Western Station to a new western terminus near the West Los Angeles Veterans Affairs (VA) Hospital. The extension will be nearly nine miles and will include seven new stations (see attached figures). The project will also include improvements at the Division 20 maintenance facility.

FTA has concluded that there are no prehistoric or archaeological resources present within the archaeological Area of Potential Effects (APE) for the Locally Preferred Alternative (LPA). At the Division 20 facility (see Figure 7-2 of Archaeological Resources Technical Report), only site CA-LAN-2610, one of four previously recorded sites, is eligible for listing in the National Register of Historic Places (NRHP) under Criteria D (see Table 7-1 of Archaeological Resources Technical Report). Site CA-LAN-2610 is located beneath Santa Fe Avenue and will be avoided by the project construction. As a result, FTA has determined that a “no adverse effect” is appropriate for this site. FTA’s consultation with the California SHPO is currently underway. While no official concurrence has been received to date, FTA anticipates agreement from the
California SHPO on both the adverse and no adverse effect findings based on conversations and emails to date.

Within the project’s historic/architectural APE, 41 historic resources (39 individual properties and 2 historic districts) were identified eligible for or currently listed on the NRHP. Detailed identification and eligibility determination process for historic resources can be found in the **Historic Properties Survey Technical Report**. These properties were evaluated for project effect.

As summarized in the following table, of the total of 41 historic properties, only one individual historic property, the Ace Gallery, has a determination of Adverse Effect.

<table>
<thead>
<tr>
<th>WSE No.</th>
<th>Common Name</th>
<th>Brief Description</th>
<th>Impact/ Determination</th>
</tr>
</thead>
<tbody>
<tr>
<td>WSE 41</td>
<td>VA Medical Center Historic District</td>
<td>Old Soldiers Home and VA Medical Center buildings; includes WSE 41a Wadsworth Theater, and WSE 41b historic landscape</td>
<td>Protection or temporary removal and return of historic landscape and trees to original site; no impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>HD 1</td>
<td>Westwood/UCLA Historic District</td>
<td>Spanish Revival, Monterey Revival; includes WSE 46, WSE 47, WSE 49, and contributor HD1a/WSE 61</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 10</td>
<td>Linde Medical Building</td>
<td>Mid-Century Modern</td>
<td>Removal for station entrance of a section of meeting wall between attached, integrated garage and rear of main structure/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 11</td>
<td>Century Plaza Hotel</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 12</td>
<td>Century Park Towers</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 13</td>
<td>Beverly Wilshire Hotel</td>
<td>Italian Renaissance</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 14</td>
<td>Union Bank Building</td>
<td>Mid-Century Modern</td>
<td>Alteration for station entrance of exterior wall on west end of first level/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 15</td>
<td>Ace Gallery Building</td>
<td>Mid-Century Modern - Brutalism</td>
<td>Demolish/ Adverse Effect</td>
</tr>
<tr>
<td>WSE 16</td>
<td>Glendale Federal Savings Building</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 17</td>
<td>California Bank Building-Sterling Plaza</td>
<td>Art Deco Commercial</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 18</td>
<td>Fine Arts Theater</td>
<td>Art Deco</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 21</td>
<td>Fox Wilshire Theater</td>
<td>Art Deco</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 23</td>
<td>Johnnie's Coffee Shop</td>
<td>Googie style design</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 24</td>
<td>May Company Wilshire (LACMA West)</td>
<td>Streamline Moderne</td>
<td>Station portal entrance will be constructed in the interior of the first level; avoid alterations to the exterior of the building/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 25</td>
<td>Art Deco-style commercial building</td>
<td>Art Deco</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE No.</td>
<td>Common Name</td>
<td>Brief Description</td>
<td>Impact/Determination</td>
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<td>-------------</td>
<td>-------------------</td>
<td>----------------------</td>
</tr>
<tr>
<td>WSE 26</td>
<td>Darkroom Photography Store façade</td>
<td>Streamline Moderne</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 27</td>
<td>Art Deco-style commercial building</td>
<td>Art Deco</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 28</td>
<td>Tidewater (Getty) Oil building</td>
<td>International style</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 29</td>
<td>Los Altos Hotel and Apartments</td>
<td>Spanish Revival</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 30</td>
<td>Wiltern Theater</td>
<td>Art Deco</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 31</td>
<td>Pierce National Life</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 42</td>
<td>Catholic-Protestant Chapels/ Wadsworth Chapel</td>
<td>1890 Chapel</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 43</td>
<td>Westwood Federal Building</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 44</td>
<td>Ralph's Grocery Store</td>
<td>Spanish Revival</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 45</td>
<td>Glendale Arcade Shops</td>
<td>Spanish Revival</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 46</td>
<td>Lindbrook Village</td>
<td>Spanish Revival</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 47</td>
<td>Courtyard Apartment Complex</td>
<td>Monterey Revival</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
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<tr>
<td>WSE 49</td>
<td>University Bible Building</td>
<td>Gothic Revival</td>
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<tr>
<td>WSE 54</td>
<td>The Barn</td>
<td>Home and office of A.Q. Jones architect</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 55</td>
<td>Beverly Hills High School</td>
<td>French Eclectic and Streamline Moderne</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 56</td>
<td>Perpetual Savings Bank Building</td>
<td>Mid-Century Modern</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 87</td>
<td>AAA Building</td>
<td>Mid-Century Modern</td>
<td>No impact by tunneling noise or vibration/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 88</td>
<td>Wilshire Beverly Centre Building (Bank of America Building)</td>
<td>Mid-Century Modern</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 89</td>
<td>Beverly Hills Porsche Dealership</td>
<td>1920s Spanish Revival commercial</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 90</td>
<td>Security National Bank Building/Zephyr Club</td>
<td>Art Deco commercial</td>
<td>Avoid/ No Adverse Effect</td>
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<tr>
<td>WSE 91</td>
<td>1st Street Viaduct</td>
<td>1920s concrete bridge</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 92</td>
<td>4th Street Bridge</td>
<td>1920s concrete bridge</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 93</td>
<td>6th Street Viaduct</td>
<td>1920s concrete bridge</td>
<td>Avoid/ No Adverse Effect</td>
</tr>
<tr>
<td>WSE 94</td>
<td>Clem Wilson/Mutual of Omaha Building</td>
<td>Art Deco and Gothic</td>
<td>Avoid/ No Adverse Effect</td>
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<td>WSE 96</td>
<td>[unoccupied]</td>
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<td>Avoid/ No Adverse Effect</td>
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<td>Common Name</td>
<td>Brief Description</td>
<td>Impact/Determination</td>
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<tr>
<td>---------</td>
<td>--------------------------------------</td>
<td>------------------------------------------</td>
<td>-----------------------------------------------</td>
</tr>
<tr>
<td>WSE 97</td>
<td>Los Angeles Country Club (South Course)</td>
<td>Private club established in 1897</td>
<td>No impact by tunneling noise or vibration/No Adverse Effect</td>
</tr>
</tbody>
</table>

The Ace Gallery building has been determined eligible for listing in the NRHP because it embodies the distinctive characteristics of the Brutalism architectural style. Demolition of the Ace Gallery building will be required to accommodate Wilshire/Rodeo station entrance (portal) and a construction staging area; FTA has determined a finding of **adverse effect** for the Ace Gallery (see attached SHPO letter dated September 16, 2011). Based on conversations to date with the California SHPO, FTA anticipates agreement from the California SHPO on both the adverse and no adverse effect findings.

FTA, in continued consultation with the California SHPO, will develop a Memorandum of Agreement (MOA) to resolve the adverse effects identified. FTA proposes, and expects the California SHPO to agree, that the basis for mitigating the adverse effects of this undertaking will include the following measures:

- Prior to construction, the National Park Service Historic American Building Survey (HABS) or Historic American Engineering Record (HAER) photo-recording and documentation of the Ace Gallery will be produced.
- A public website will be developed concerning the history of the Ace Gallery. The website would be based on the photographs produced as part of the HABS/HAER documentation, and historic archival research previously prepared as part of the Undertaking and historic documentation.

We are requesting that the ACHP review the information outlined in this letter and the attached documentation. If the ACHP chooses to participate in the consultation process of this undertaking, we would appreciate a response within 15 days of receipt of this letter. Should you require additional information, please contact Mr. Ray Tellis, Team Leader of our Los Angeles Metropolitan Office, at (213) 202-3956 or ray.tellis@dot.gov. The staff contact person is Mr. Anthony Lee, Environmental Protection Specialist, at (212) 668-2173 or (202) 695-0846 or anthony.lee@dot.gov.

Sincerely,

[Signature]

Leslie T. Rogers  
Regional Administrator

Enclosures:
Project Figures
Archeological Resources Survey Report
Historic Properties Survey Report
January 3, 2012

Mr. Leslie T. Rogers  
Regional Administrator  
Federal Transit Administrator, Region IX  
201 Mission Street, Suite 1650  
San Francisco, CA  94105-1839

Ref:  Proposed Westside Subway Extension Project  
Los Angeles County, California

Dear Mr. Rogers:

The Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the adverse effects of the referenced project on properties listed on and eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, “Protection of Historic Properties” (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the California SHPO, and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the opportunity to review this undertaking. If you have any questions, please contact Louise Brodnitz at 202-606-8527, or via email at lbrodnitz@achp.gov.

Sincerely,

Raymond V. Wallace  
Historic Preservation Technician  
Office of Federal Agency Programs
APPENDIX B
Architectural Historic Properties
THIS PAGE INTENTIONALLY LEFT BLANK
<table>
<thead>
<tr>
<th>INFORMATION for CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM (CHRS)</th>
</tr>
</thead>
</table>
| **Authors** | Pamela Daly, M.S.  
and  
Nancy E. Sikes, Ph.D., RPA |
| **Consulting Firm** | Cogstone Resource Management, Inc.  
1518 West Taft Avenue  
Orange, CA 92865  
714-974-8300 |
| **Report Date** | February 23, 2012 |
| **Report Title** | Historic Properties Supplemental Survey Report for the Westside Subway Extension Project, western Los Angeles County, California |
| **Submitted to Lead Agencies** | Federal Transit Administration  
888 S. Figueroa Street, Ste. 1850  
Los Angeles, CA 90017  
and  
Metro  
One Gateway Plaza  
Los Angeles, CA 90012 |
| **Submitted by** | Parsons Brinckerhoff  
777 S Figueroa Street, 11th Floor  
Los Angeles, CA 90027 |
| **Cogstone Project No.** | 2068 |
| **Acreage** | 614-acre Architectural APE |
| **Keywords** | Historic-period built environment survey, 39 individual qualified historic properties, VA Medical Center Historic District, Westwood Historic District, historic landscape, Los Angeles County, City of Beverly Hills, City of Los Angeles |
Abstract

Cogstone Resource Management Inc. conducted a supplemental survey, records and archival research, significance evaluations of newly identified or previously identified historic-period built environment properties and assessments to determine the effects on historic properties of construction activities by the Los Angeles County Metropolitan Transportation Authority (Metro) for the Westside Subway Extension Locally Preferred Alternative (LPA) and associated components. Located in western Los Angeles County, including portions of the Cities of Los Angeles and Beverly Hills, as well as portions of unincorporated Los Angeles County, the study was completed in compliance with Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA), with the Federal Transit Administration (FTA) acting as the lead federal agency. The study was also completed in support of the Final Environmental Impact Statement / Environmental Impact Report (EIS/EIR) for the undertaking.

A supplemental study was required because the project-specific Architectural Area of Potential Effects (APE) was revised to encompass the refined LPA alignment, including station options and associated staging and laydown areas not included in the prior study completed in 2010 in support of the Draft EIS/EIR for the Westside Subway Extension Alternatives analysis. A companion study (Cogstone 2012) covers the archaeological resources within a separate, refined Archaeological APE for the LPA alignment.

This study of the refined APE identifies a total of 41 eligible or listed historic properties (39 individual properties and two historic districts) that have been determined eligible by the FTA or prior determinations for National and California Register inclusion and are also considered historical resources for purposes of CEQA. Five of the historic properties are individually listed in the National Register; ten properties have been listed as City of Los Angeles Historic-Cultural Monuments. The two historic districts, portions of which are located within the APE, are the Veterans Administration (VA) Medical Center Historic District, which was determined eligible for National Register listing in 1981, and the Westwood/UCLA Historic District, which the FTA has determined is eligible for National Register listing.

The FTA determined that construction of the LPA, including proposed improvements at the Division 20 maintenance facility, will have No Adverse Effect on 40 of the 41 historic properties within the APE, including contributing elements to the two historic districts. Only one individual historic property (Ace Gallery) has a determination of Adverse Effect. The State Historic Preservation Officer has concurred with the historic property determinations and determination of effect made by the FTA.

Specific mitigation measures are presented that are designed to avoid and/or minimize adverse direct and/or indirect effects to historic properties/historical resources that may be affected by the LPA. Treatment to avoid adverse effects to four historic properties/historical resources that will be altered by either construction staging activities or station entrances, and to resolve the determination of Adverse Effect for the Ace Gallery are provided and are also addressed in a Memorandum of Agreement executed between the FTA and the State Historic Preservation Officer.

The supplemental survey also identified a military-themed mural painted on the walls of the Bonsall Avenue underpass and ramps near the VA Medical Center Historic District. Although the mural is
not a historic property or historical resource, Metro plans to ensure the cultural heritage artwork is protected from damage during construction activities in concert with implementation of the mitigation measure for periodic construction monitoring.

Copies of this report will be filed with Parsons Brinckerhoff, Metro, FTA, and the South Central Coastal Information Center at California State University, Fullerton. All project documents will be on file at Cogstone.
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**WESTSIDE SUBWAY EXTENSION PROJECT**

March 2012
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### Acronyms and Abbreviations

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<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<td>Advisory Council on Historic Preservation</td>
</tr>
<tr>
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<td>Area of Potential Effects</td>
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<tr>
<td>AIN</td>
<td>Assessor Identification Number</td>
</tr>
<tr>
<td>APN</td>
<td>Assessor Parcel Number</td>
</tr>
<tr>
<td>AT&amp;SF</td>
<td>Atchison Topeka &amp; Santa Fe</td>
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<tr>
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<td>Burlington Northern &amp; Santa Fe</td>
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<td>Code of Federal Regulations</td>
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<td>HABS</td>
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<td>Historic American Engineering Record</td>
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<tr>
<td>HALS</td>
<td>Historic American Landscape Survey</td>
</tr>
<tr>
<td>HOV</td>
<td>high-occupancy vehicle</td>
</tr>
<tr>
<td>HPOZ</td>
<td>historic preservation overlay zones</td>
</tr>
<tr>
<td>HRT</td>
<td>heavy rail transit</td>
</tr>
<tr>
<td>LACC</td>
<td>Los Angeles Country Club</td>
</tr>
<tr>
<td>LACMA</td>
<td>Los Angeles County Museum of Art</td>
</tr>
<tr>
<td>LAHCM</td>
<td>Los Angeles Historic-Cultural Monument</td>
</tr>
<tr>
<td>LPA</td>
<td>Locally Preferred Alternative</td>
</tr>
<tr>
<td>LRTP</td>
<td>Long Range Transportation Plan</td>
</tr>
<tr>
<td>Metro</td>
<td>Los Angeles County Metropolitan Transportation Authority</td>
</tr>
<tr>
<td>Acronym</td>
<td>Full Form</td>
</tr>
<tr>
<td>---------</td>
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</tr>
<tr>
<td>MOA</td>
<td>Memorandum of Agreement</td>
</tr>
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<td>MPO</td>
<td>Metropolitan Planning Organization</td>
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<td>NADB</td>
<td>National Archaeological Database</td>
</tr>
<tr>
<td>NAHC</td>
<td>Native American Heritage Commission</td>
</tr>
<tr>
<td>NEPA</td>
<td>National Environmental Policy Act (42 USC 4321-4347)</td>
</tr>
<tr>
<td>NHPA</td>
<td>National Historic Preservation Act of 1966 (16 USC 470)</td>
</tr>
<tr>
<td>NRHP</td>
<td>National Register of Historic Places</td>
</tr>
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<td>OHP</td>
<td>Office of Historic Preservation</td>
</tr>
<tr>
<td>OHR</td>
<td>Department of City Planning’s Office of Historic Resources, City of Los Angeles</td>
</tr>
<tr>
<td>PRC</td>
<td>State of California Public Resources Code</td>
</tr>
<tr>
<td>RCPG</td>
<td>Regional Comprehensive Plan and Guide</td>
</tr>
<tr>
<td>ROW</td>
<td>right-of-way</td>
</tr>
<tr>
<td>RPA</td>
<td>Registered Professional Archaeologist</td>
</tr>
<tr>
<td>RTP</td>
<td>Regional Transportation Plan</td>
</tr>
<tr>
<td>SCAG</td>
<td>Southern California Association of Governments</td>
</tr>
<tr>
<td>SCCIC</td>
<td>South Central Coastal Information Center</td>
</tr>
<tr>
<td>SHPO</td>
<td>State Historic Preservation Officer</td>
</tr>
<tr>
<td>SHRC</td>
<td>State Historical Resources Commission</td>
</tr>
<tr>
<td>TBM</td>
<td>Tunnel boring machine</td>
</tr>
<tr>
<td>TPSS</td>
<td>traction power substation</td>
</tr>
<tr>
<td>UPRR</td>
<td>Union Pacific Railroad</td>
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<td>United States Department of the Interior</td>
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<td>United States Geological Survey</td>
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<td>VA</td>
<td>Veterans Administration</td>
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<td>WSE</td>
<td>Westside Subway Extension</td>
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<tr>
<td>ZIMAS</td>
<td>Zoning Information and Map Access System</td>
</tr>
</tbody>
</table>
1.0 INTRODUCTION

This historic resources study was completed in support of the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension project proposed by the Los Angeles County Metropolitan Transportation Authority (Metro). The project area is located in western Los Angeles County and includes portions of the Cities of Los Angeles and Beverly Hills, as well as an unincorporated portion of Los Angeles County in the vicinity of the Greater Los Angeles Healthcare System-West Los Angeles Medical Center (formerly the Veterans Administration [VA] Medical Center).

The Metro Board selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft EIS/EIR) as the Locally Preferred Alternative (LPA) on October 28, 2010. A supplemental study was required because the project-specific Architectural Area of Potential Effects (APE) was revised to encompass the refined LPA alignment, including station options and associated staging and laydown areas.

This study included archival research, communication with local agencies, a windshield and intensive-level pedestrian survey of portions of the APE not encompassed by the surveys conducted in 2009 and 2010 (URS 2010a) in support of the Draft EIS/EIR (Metro 2010a), review of previously identified historic-period resources, significance assessments of newly identified built environment resources within the APE, and providing the LPA design team with options to preserve or avoid adverse effects to historic properties or historical resources.

This report also examines the effects of construction associated with the LPA alignment and associated maintenance facility on built environment historic properties. Construction and operation activities required to implement the LPA may result in direct or indirect effects to built environment historic properties. Appropriate mitigation measures are presented in this report to address the effects.

This study was completed in compliance with the provisions of Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA), with the Federal Transit Administration (FTA) acting as the lead federal agency.

Archaeological resources are not covered by this study. Those resources within the Archaeological APE for the LPA are discussed in a companion Archaeological Supplemental Survey Report (Cogstone 2012), which was also prepared in support of the Final EIS/EIR.
2.0 PROJECT DESCRIPTION

On October 28, 2010, the Metro Board selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft EIS/EIR; Metro 2010a) as the Locally Preferred Alternative (LPA) for further discussion in the Final EIS/EIR. This alternative would extend heavy rail transit (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 Station and Westwood/VA Hospital (North or South) Station. This alignment would serve numerous activity centers across the west side of Los Angeles. The extension would include a total of seven new stations, each serving major activity and employment centers on the west side 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.
Figure 2-1: Locally Preferred Alternative: Westwood/VA Hospital Extension
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.

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 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 Los Angeles, 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).

The construction schedule for the Project is partially dependent on the timing of Federal funding availability. Two LPA construction scenarios are considered in the Final EIS/EIR. Both scenarios contain the same elements with differences only in the timing of when they are built and operational. The first construction scenario assumes that under the America Fast Forward (30/10) Scenario (Concurrent Construction), the LPA would open in its entirety to the Westwood/VA Hospital Station in 2022 with the three construction segments built concurrently (Wilshire/Western to Wilshire/La Cienega, Wilshire/La Cienega to Century City and Century City to Westwood/VA Hospital). The second construction scenario assumes that under the Metro Long Range Transportation Plan (LRTP) Scenario (Phased Construction), the LPA would open in three consecutive phases (Phase 1 to Wilshire/La Cienega, Phase 2 to Century City, and Phase 3 to Westwood/VA Hospital), with the entire LPA operational to the Westwood/VA Hospital Station in 2036.

A detailed description of the LPA is provided in Chapter 2 of the Final EIS/EIR.
Figure 2-2: Division 20 Maintenance and Storage Facility Expansion
3.0 AREA OF POTENTIAL EFFECTS

An Area of Potential Effects (APE) is defined by 36 CFR Part 800.16(d) as:

...the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The Architectural APE was established in compliance with 36 CFR Parts 800.4(a) and 800.16(d) through guidance from the Office of Historic Preservation (OHP) personnel, methodologies consistent with previous Metro projects, by review of the project’s engineering drawings and ascertaining the areas to be disturbed by construction or operation activities, information and data obtained from record searches, local agency records, initial reconnaissance for built environment resources, and archival research. The goal was to propose an alignment designed to preserve and protect historic properties or historical resources that are eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Places (CRHR) by avoiding or minimizing, as much as feasible in the highly urbanized setting, placement of station portals, service areas, construction staging and laydown areas, or other facilities that may adversely affect the historic significance or integrity of such resources by direct or indirect physical, visual or auditory alteration of the characteristics qualifying such resources for NRHP or CRHR inclusion.

For built environment resources, the above-ground Architectural APE extends one parcel past the limits of the above-ground project improvements and/or direct impacts for the stations, service areas, construction staging and laydown areas, and any above-ground facilities. For parcels that contain entire complexes or rows of structures, only the front row of structures is included in the APE.

For the underground portions of the alignment located between the stations, the built environment APE includes the areas that are expected to be directly or indirectly affected by either construction or operation, areas where property takes are required, and areas that may be affected by noise and vibration from the construction and operation of the LPA. The project alignment thus contains underground construction easement areas, which will be located below existing properties at a depth of 30 to 70 feet or more and are not expected to cause temporary or permanent adverse effects to built environment historic properties. In areas where the underground portions of the LPA will be contained within the right-of-way, the APE does not consider adjacent properties and is limited to the existing roadway.

The built-environment APE generally considered the properties that met one or more of the following criteria and excluded them from more detailed analysis:

- Entire complexes or rows of structures on a parcel or multiple parcels (e.g., shopping center - only the front row of structures are included in the APE)
- Properties elevated high above the alignment due to topographic features
- Properties separated from the LPA alignment by frontage roads or large retaining/sound barrier walls
- Empty lots
• Surface parking lots
• Buildings built in or before 1968 that were altered beyond recognition since 1968 (definition of “altered beyond recognition” is provided in Section 5.7)
• Very large or linear properties beyond the area reasonably subject to effect by the undertaking (this study did consider whether the segment in the APE could be a contributor or non-contributor to a larger significant property as a whole, should that larger property be determined eligible)
• Parcels containing only buildings constructed after 1968

With selection of the LPA, the Architectural APE boundary was refined to reflect its current appearance as depicted on the project location map showing the LPA alignment and the Division 20 maintenance facility to the east (Figure 3-1 at 1:120,000 scale). The spaces shown on the figure between the APE segments along Wilshire Boulevard are connected by the underground tunnel alignment contained within the existing right-of-way, which is not part of the Architectural APE.

The refined Architectural APE defined by the FTA, in consultation with the OHP and Metro, was subsequently approved by the SHPO as sufficient pursuant to 36 CFR 800.4(1)(a) (Appendix C).

Additional aerial-based maps that show the Architectural APE at a scale of one inch equals 500 feet (1:7,000) are provided as Appendix A. Reference within the body of this report, including tables, to “Map Sheet” refer to Sheets 1 to 7 showing the LPA alignment and to Sheet 8 showing the Division 20 yard. The APE map sheets depict the following:

• LPA alignment (including tunnel alignment) and stations identified by name
• Station Plan Impact Areas that may be used as station portals, construction staging or laydown areas, and other infrastructure-uses (e.g., electrical boxes, air vents, etc.), including improvements at the Division 20 maintenance yard
• Historic properties located within the APE for the LPA identified by “WSE” (Westside Subway Extension) number (see Section 5.8)
• Location of VA Medical Center Historic District at the western terminus of the LPA

The 614-acre APE, including 69 acres within the Division 20 facility, is located within the sections and USGS 7.5-minute quadrangles (San Bernardino Base and Meridian) listed below in Table 3-1.

<table>
<thead>
<tr>
<th>LPA Component</th>
<th>USGS 7.5’ Quadrangle</th>
<th>Township</th>
<th>Range</th>
<th>Sections</th>
</tr>
</thead>
<tbody>
<tr>
<td>LPA Alignment</td>
<td>Beverly Hills, 1995</td>
<td>1S</td>
<td>15W</td>
<td>28, 27, 26, 25, 24, 23, 21</td>
</tr>
<tr>
<td>LPA Alignment</td>
<td>Beverly Hills, 1995</td>
<td>1S</td>
<td>14W</td>
<td>19, 20</td>
</tr>
<tr>
<td>LPA Alignment</td>
<td>Hollywood, 1966, Photorevised 1981</td>
<td>1S</td>
<td>14W</td>
<td>20, 21, 22, 23, 24, 25, 26, 27, 28</td>
</tr>
<tr>
<td>Division 20 Maintenance Yard</td>
<td>Los Angeles 1996, Photorevised 1981, Minor Revision 1994</td>
<td>1S</td>
<td>13W</td>
<td>27, 34</td>
</tr>
</tbody>
</table>
Figure 3-1: Project Location Map
4.0 REGULATORY FRAMEWORK

This section addresses pertinent Federal, State, and local historic preservation laws. Cultural resource regulations are also articulated in both regional and local plans, as well as local ordinances.

4.1 Federal Regulations

Since it is the intent of Metro to apply for federal funds from the FTA, this undertaking is considered a federal action and FTA is the lead Federal agency for the project. As a federally funded project, the Metro Westside Subway Extension requires conformance with the National Environmental Policy Act (NEPA). NEPA requires federal agencies to use all practicable means to preserve important historic, cultural, and natural aspects of our national heritage.

In addition to compliance with NEPA, the LPA Project is being prepared in conformance with Section 106 of the NHPA, as amended. Section 106 requires federal agencies with either direct or indirect jurisdiction over a proposed undertaking to take into account the effect of the undertaking on historic properties.

Historic properties are defined as prehistoric and historic sites, buildings, structures, districts, and objects included in, or eligible for inclusion in the National Register of Historic Places (NRHP), as well as artifacts, records, and remains related to such properties (NHPA Section 301[5]). Under 36 CFR 800.3, Section 106 of the NHPA requires federal agencies to consult with the State Historic Preservation Officer (SHPO) in a manner appropriate to the agency planning process for the undertaking and to the nature of the undertaking and its effects to historic properties. As part of the Section 106 process, agency officials apply the NRHP eligibility criteria to identify historic properties.

As established in the NHPA, to be listed in the NRHP, or to be determined eligible for listing, properties must meet certain criteria for historic or cultural significance. For cultural resources, a property is eligible for the NRHP if it is significant under one or more of the following criteria defined in 36 CFR 60.4 as follows: The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, association, and

- A—It is associated with events that have made a significant contribution to the broad patterns of our history
- B—It is associated with the lives of persons significant in our past
- C—It 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
- D—It has yielded, or may be likely to yield, information important in prehistory or history

Ordinarily, buildings and structures less than 50 years old are not considered eligible for listing in the NRHP. Under Criteria Consideration G, however, a property achieving significance within the past 50 years is eligible for NRHP inclusion if it is of “exceptional” importance (36 CFR 60.4).
An undertaking is considered to have an adverse effect to a historic property if the undertaking may alter, directly or indirectly, characteristics of a historic property that may qualify the property for inclusion in the NRHP in a manner that would diminish its aspects of historic integrity (36 CFR 800.5).

Table 4-1 summarizes the federal regulations addressing cultural resources that may be applicable to this project.

**Table 4-1: Summary of Federal Regulations**

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Environmental Policy Act of 1969, as amended, Public Law 91-190</td>
<td>NEPA requires the analysis of the effect of federal undertakings on the environment to include the effect on cultural resources.</td>
</tr>
<tr>
<td>National Historic Preservation Act of 1966 as amended, Public Law 102-575</td>
<td>Section 106 of the NHPA requires identification, evaluation, preservation, and mitigation of effects to historic properties that are listed or eligible for inclusion on the National Register of Historic Places.</td>
</tr>
<tr>
<td>Executive Order No. 11593: Protection And Enhancement Of The Cultural Environment, 1971</td>
<td>Requires Federal agencies to administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations, initiate measures necessary to direct their policies, plans, and programs in such a way that federally owned sites, structures, and objects of historical, architectural, or archaeological significance are preserved, restored, and maintained and institute procedures to assure that Federal plans and programs contribute to the preservation and enhancement of non-federally owned sites, structures, and objects of historical, architectural, or archaeological significance.</td>
</tr>
</tbody>
</table>

4.2 State Regulations

The cultural resources investigations and reports for the Westside Subway Extension were conducted in accordance with the CEQA, PRC, Section 21000 et seq., and the CCR, Title 14, Chapter 3, Section 15000. Consideration of significance as a “historical resource” is measured by cultural resource provisions considered under CCR Section 15064.5 and 15126.4. Generally, a historical resource is considered significant if it meets at least one of the criteria for listing on the California Register of Historical Resources (CRHR). These criteria are set forth in CCR Section 15064.5, and include resources that:

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

CCR Section 15064.5 and Section 21084.1 further state that a resource not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC Section 5020.1[k]), or identified in an historical resources survey can still be considered a historical resource (as defined in PRC Section 5020.1[j] and 5024.1) by a lead agency.
Under CCR Section 15064.5(b), a project would have significant impacts if it would cause a substantial adverse change in the significance of an historical resource (i.e., a cultural resource eligible to CRHR, or archaeological resource defined as a unique archaeological resource which does not meet CRHR criteria), or would disturb human remains. The types of substantial adverse changes include physical demolition, destruction, relocation, or alteration of the resource.

In many cases, determination of a resource’s eligibility to the NRHP or CRHR (or its uniqueness) can be made only through extensive research. As such, the best alternative to preserve historic resources is the no action alternative; however, because this alternative is not always feasible, any project should consider alternatives or mitigation measures to lessen the effects to these resources. Where possible and to the maximum extent possible, impacts to resources should be avoided. If the resource meets the criteria of eligibility to the CRHR, it will be formally addressed under CCR Section 15064.5 and 15126.4.

Table 4-2 summarizes state regulations addressing cultural resources that may be applicable to this project.

### Table 4-2: Summary of State Regulations

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>CEQA of 1970, as amended</td>
<td>Applies to discretionary projects causing a significant effect on the environment and a substantial adverse change in the significance of an historical or archaeological resource.</td>
</tr>
<tr>
<td>PRC Section 5020-5029.5</td>
<td>Establishes the CRHR criteria, creates the California Historic Resources Commission, details the responsibilities of the Office of Historic Preservation and State Historic Preservation Officer, and authorizes the Department of Parks and Recreation to designate registered Historical Landmarks and registered Points of Historical Interest; establishes criteria for the protection and preservation of historical resources.</td>
</tr>
<tr>
<td>Administrative Code, Title 14, Section 4307</td>
<td>States that no person shall remove, injure, deface, or destroy any object of paleontological, archaeological, or historical interest or value.</td>
</tr>
<tr>
<td>Penal Code, Title 14, Section 622.5</td>
<td>Provides for a misdemeanor offense for any person, other than the owner, who willfully damages or destroys archaeological or historic features on public or privately owned land.</td>
</tr>
<tr>
<td>PRC 5097-5097.6</td>
<td>Provides guidance for state agencies in the management of archaeological, paleontological, and historical sites affected by major public works project on state land.</td>
</tr>
</tbody>
</table>

### 4.3 Regional and Local Regulations

Cultural resource regulations are articulated in both regional and local plans. The Southern California Association of Governments (SCAG) defines cultural resources as well as principles for the treatment of identified resources.

SCAG serves as the Metropolitan Planning Organization (MPO) for the region. The SCAG Regional Transportation Plan (RTP), updated in 2008, and the Regional Comprehensive Plan and Guide (RCPG), updated in 2008, are tools used for identifying the transportation priorities of the Southern California region. The cultural resources mitigation program outlined in the SCAG RTP includes the following measures:

- Obtaining consultations from qualified cultural and paleontological resource experts to identify the need for surveys and preservation of important historical, archaeological, and paleontological resources.
- Implementing design and siting measures that avoid disturbance of cultural and paleontological resource areas, such as creating visual buffers/landscaping or capping/filling the site to preserve the contextual setting of the resource
- Consulting local tribes and the Native American Heritage Commission for project impacts to sacred lands and burial sites

Further, the SCAG RCPG identifies as a Best Practice that SCAG “should encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.”

At the local level, the Cities of Los Angeles and Beverly Hills, and the County of Los Angeles have specific policies related to cultural resources within their municipal codes and general plans. Table 4-3 summarizes local and regional regulations addressing cultural resources that may be applicable to this project.

Table 4-3: Summary of Regional and Local Regulations

<table>
<thead>
<tr>
<th>Regulation</th>
<th>Requirements</th>
<th>Jurisdiction</th>
</tr>
</thead>
<tbody>
<tr>
<td>SCAG Regional Transportation Plan (RTP) (2008)</td>
<td>Establishes the framework for a cultural resources mitigation program that applies to projects causing a significant effect on the environment and a substantial adverse change in the significance of an historical, archaeological, or paleontological resource.</td>
<td>SCAG Regional and Comprehensive Planning Department</td>
</tr>
<tr>
<td>SCAG Regional Comprehensive Plan and Guide (RCPG), Best Practices, OSN-6</td>
<td>Establishes the policy that SCAG should encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</td>
<td>SCAG Regional and Comprehensive Planning Department</td>
</tr>
<tr>
<td>City of Los Angeles General Plan, Conservation Element (2001)</td>
<td>Objective: Protect the City’s archaeological and paleontological resources for historical, cultural, research and/or educational purposes; and Objective: Protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes. Directs that the identification and protection of resources be achieved through the establishment of permit processing, monitoring, enforcement, and periodic revision of regulations and procedures by the departments of Building and Safety, City Planning, and Cultural Affairs; and through continued survey of buildings and structures of any age in neighborhoods throughout the City in order to develop a record that can be used in the present and future for evaluating their historic and cultural value as individual structures and within the context of the surrounding structures by the departments of Building and Safety, City Planning, Cultural Affairs, and the Community Redevelopment Agency.</td>
<td>Los Angeles City Planning Department</td>
</tr>
<tr>
<td>City of Los Angeles, Administrative Code, Division 22, Chapter 9, Article 1 (Ordinance No. 178,402) (1962)</td>
<td>The ordinance established the Cultural Heritage Commission to identify and protect architectural, historical, and cultural buildings, structures, and sites important to the city’s history and cultural heritage; and established significance criteria.</td>
<td>Los Angeles City Planning Department</td>
</tr>
<tr>
<td>City of Los Angeles, Municipal Code, Chapter I, Article 2, Section 12.20.3 (Ordinance No. 175891) (1979, amended 2004)</td>
<td>This code contains procedures for the designation and protection of new Historic Preservation Overlay Zones (HPOZs) for any area of the City of Los Angeles with buildings, structures landscaping, natural features or lots having historic, architectural, cultural, or aesthetic significance. It describes the powers and duties of HPOZ Boards and the review processes for projects within HPOZs.</td>
<td>Los Angeles City Planning Department</td>
</tr>
<tr>
<td>Regulation</td>
<td>Requirements</td>
<td>Jurisdiction</td>
</tr>
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<tr>
<td>City of Los Angeles, Municipal Code, Chapter I, Article 2, Section 13.08 (Ordinance No. 172032) (1998, amended 2000)</td>
<td>This section of the code contains procedures and guidelines for the establishment of Community Design Overlay Districts (CDOs) throughout the City of Los Angeles. A CDO may encompass all or a portion of a community plan, but may not encompass a designated HPOZ.</td>
<td>Los Angeles City Planning Department</td>
</tr>
<tr>
<td>City of Los Angeles, Miracle Mile CDO, Design Guidelines and Standards (Ordinance No. 176,331) (2005) (Permanent Q Conditions Ordinance Nos. 176,332, 176,333, and 176,334)(2005)</td>
<td>Provides guidelines and standards for public and private development projects in commercially zoned areas along the Miracle Mile, to which all projects within CDO boundaries should comply. Intent is to provide guidance and direction in design of new and rehabilitation of existing buildings and storefronts in order to improve the appearance, enhance the identity, and promote the pedestrian environment. Overall goal is preservation of unique Art Deco character of district. All projects will be reviewed for compliance with Design Guidelines and Standards prior to issuance of building permit. A project is defined as the “erection, construction, addition to, or exterior structural alteration of any building or structure, including, but not limited to, pole signs and/or monument signs located in a Community Design Overlay District” (Section 13.08.C.2).</td>
<td>Los Angeles City Community Planning Bureau of the Department of City Planning</td>
</tr>
<tr>
<td>City of Los Angeles, Cultural Heritage Master Plan (2000)</td>
<td>Establishes a citywide framework for developing public policies involving the preservation and care of the City’s cultural resources and contains numerous important policy recommendations on historic preservation in Los Angeles, many of which shaped the creation and early work of the Office of Historic Resources.</td>
<td>Los Angeles City Planning Department</td>
</tr>
</tbody>
</table>
Goal HC 2: Promotion of the City’s Historic Resources | City of Beverly Hills Planning Division |
| City of Beverly Hills, Municipal Code, Title 10, Chapter 3, Article 32 | Establishes the duties of the City Landmark Advisory Commission, significance criteria, powers and duties of the advisory commission, and procedures for notification of a landmark designation. | City of Beverly Hills Planning Division |
| County of Los Angeles, General Plan Update, Land Use Element (2007) | Objective: To encourage more efficient use of land, compatible with and sensitive to natural ecological, scenic, cultural and open space resources. Plan includes guidelines for review of any action that is proposed for designated historic sites or structures. | Los Angeles County Regional Planning |
| Los Angeles County Code of Ordinances, Chapter 3.30 | Establishes the Historical Landmarks and Resources Commission and specifies powers and duties. | Los Angeles County Regional Planning |
5.0 METHODOLOGY

The following sections discuss in detail the personnel, agency consultation, research methods, field methods, identification methods, and evaluation methods employed for this supplemental report on significant historic-period built environment resources within the Architectural APE for the refined LPA.

5.1 Personnel

All cultural resources work for this supplemental survey has been conducted by personnel who meet the Secretary of the Interior's Professional Qualification Standards in Architectural History, Archaeology, and Historic Architecture (36 CFR Part 61; National Park Service 1983).

Pamela Daly served as the Architectural Historian for the project, performed all site evaluations, reviewed project plans for adherence to the Secretary of the Interior’s Standards for the Treatment of Historic Properties, and is the primary author of this report. She is a 36 CFR 61 qualified architectural historian with over 15 years of experience in the evaluation of historic-period resources per Federal, State and local criteria, and she has extensive training to provide technical assistance in the form of historic structure assessment and conservation reports. Ms. Daly holds a Master of Science Degree in Historic Preservation from the University of Vermont and her Bachelor of Science Degree included a minor in History.

Nancy Sikes served as the Principal Investigator for the project, supervised all work, and is the second author of this report. Dr. Sikes is a Registered Professional Archaeologist (RPA) with a Ph.D. in Anthropology from the University of Illinois, Urbana-Champaign. She has more than 20 years of experience in archaeology, cultural resources management, and historic preservation.

Molly Valasik prepared the project location and APE map sheets. Ms. Valasik and Amy Glover performed the records search and contributed to the creation of tables for the records search portion of this report. Ms. Valasik is a RPA with a master’s degree in Anthropology from Kent State and more than eight years of experience in archaeology or geographic information systems (GIS). Glover has a bachelor’s degree in Anthropology from the University of California at Riverside and over five years of experience in southern California archaeology.

Ann Christoph served as the Landscape Architect and provided a study on the mature trees within the VA Medical Center Historic District landscape. She has been practicing landscape architecture in California for over 30 years, and received her Master of Landscape Architecture Degree from the University of Michigan after completing her Bachelor’s program at Arizona State University with a major in art.

Sherri Gust performed quality control review of this document. Ms. Gust is a RPA with 30 years of experience.

5.2 California Office of Historic Preservation

The Office of Historic Preservation (OHP) is the governmental agency primarily responsible for the statewide administration of the historic preservation program in California. The chief administrative officer for the OHP is the SHPO. The SHPO is also the executive secretary of the State Historical Resources Commission (SHRC). The mission of the OHP and the SHRC, in partnership with the
people of California and governmental agencies, is to preserve and enhance California’s irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations (OHP 2011).

In accordance with 36 CFR Part 800.3, FTA and Metro initiated the Section 106 process with the SHPO and OHP personnel on June 22, 2009, via a notification letter. Coordination included guidance on establishment of the Architectural APE, cultural resource identification methods, the effect the project may have on cultural resources, and mitigation measures to avoid or reduce project effects to historic properties.

In compliance with the Section 106 process (36 CFR Part 800), the FTA provided the SHPO with a revised APE for the refined LPA alignment, determination of eligibility, determination of effects and related information by letter dated September 16, 2011. The FTA also recommended a Memorandum of Agreement (MOA) be prepared to resolve the adverse effects by the LPA on one historic property.

By letters dated November 1, 2011, and December 8, 2011, the SHPO concurred with the historic property determinations and determination of effect made by the FTA. The letters from the SHPO to the FTA are provided here in Appendix C.

A MOA between the FTA and the SHPO specific to the refined LPA alignment was executed in January 2012, with Metro as an invited signatory. The MOA describes the treatment to avoid adverse effects to four historic properties that will be altered by either construction staging activities or station entrances, and the treatment to resolve the adverse effects on one historic property. A copy of the MOA is provided here in Appendix D.

5.3 Project Team Meetings

A kick-off meeting was held with FTA and Metro in December 2010 to discuss the preparation of the Final EIR/EIS and this supplemental report on historic properties within the Architectural APE for the LPA. Since initiation of the historic-period built environment studies in March 2009 for the Alternatives analysis, FTA and Metro have actively used Secretary of Interior qualified historic preservation professionals to survey and evaluate built environment resources.

After the kick-off meeting, qualified professional personnel provided continued historic preservation guidance throughout the design process to achieve the project goals while adhering to the nation’s best historic preservation treatment guidance (e.g., avoiding impacts to historic properties and application of the Secretary of Interior’s Standards for Rehabilitation [Weeks and Grimmer 1992], the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings [Weeks and Grimmer 1995], and the Guidelines for the Treatment of Cultural Landscapes (USDOI 1996).

Accordingly, there were subsequent meetings of the Metro-LPA team members, including planners, designers and engineers and historic preservation professionals, held at the project office in Los Angeles. At the meetings, Cogstone personnel provided Metro staff with critical data (e.g., field survey results, historic research materials [primary and secondary source information]) regarding the presence, location, and concentration of historic-period properties in proximity of the proposed LPA corridor and associated components, including the Division 20 maintenance yard.
These measures and meetings were critical to the study methodology in order to effectively avoid adverse effects to historic properties and significant impacts to historical resources.

5.4 Research Methods

In order to establish an evaluative historic context, background research was conducted at numerous repositories and through a range of primary and secondary sources. Overall, the research provided insight into the historic contexts and themes of the LPA corridor, and specific information concerning the properties within the APE (e.g., date of construction, architect/builder, and historic landownership). Research was conducted for this study as well as by the prior consultant team for the Alternatives analysis.

For preparation of the Final EIR/EIS, Metro identified the need to avoid permanent impacts to historic properties within the LPA, and requested that Architectural Historian Daly review each station APE to ascertain the location of buildings that had not been considered significant buildings by the prior study for the Alternatives analysis (URS 2010a). Metro personnel also provided a list of potential buildings to be demolished for staging or laydown areas or station entrances. Ms. Daly was tasked with evaluating all the buildings in the station plan impact areas (stations, portals, construction staging and laydown areas, infrastructure areas), including the Division 20 maintenance yard, and presenting a professional opinion as to which buildings could be removed or significantly altered without a determination of permanent adverse effects.

As part of initial reconnaissance activities, the following activities were completed:

- Reviewed prior research and results developed for the Draft EIR/EIS
- Reviewed record searches at the South Central Coastal Information Center (SCCIC)
- Reviewed data received from various municipalities, agencies, and preservation groups
- Obtained parcel data from Los Angeles County Assessor
- Obtained parcel data from the City of Los Angeles Department of City Planning, Zone Information Map Access Service (ZIMAS)
- Obtained building permit and alteration information from the City of Beverly Hills Building Department
- Performed research at southern California libraries, historical societies and preservation groups, and through numerous online (e.g., California Historic Topographic Map Collection) and printed sources (e.g., Sanborn Fire Insurance Company Maps)

Archaeologists, Amy Glover and Molly Valasik, conducted a records search on April 21 and 28, 2011, at the SCCIC located at California State University, Fullerton (CSUF). The SCCIC is a branch of the California Historical Resources Information System (CHRIS). The search supplemented the prior cultural resources record searches accomplished on May 14, 2008, and August, 20, 2009, in support of the Draft EIS/EIR (URS 2010a).

In addition to providing information on prior cultural resources investigations and previously recorded cultural resources, the SCCIC records searches provided information regarding built environment resources within the quarter-mile search radius listed in the following sources:
Individual parcel data was accessed from the Office of the Assessor website for the Los Angeles County (2011). The data provided from the website included Assessor Identification Numbers (AIN)/Assessor Parcel Numbers (APN), addresses, limited ownership data, parcel boundaries, and dates of construction and any substantial alterations/changes which affected the property value.

For parcels in the City of Los Angeles, the Zoning Information and Map Access System (ZIMAS 2011) provided more detailed parcel information than available on the Office of the Assessor website for the county.

The City of Beverly Hills does not have their property data available in an online format, so for information regarding dates of construction, name of architect and/or builder, and building construction details, a written request for archived building permits was submitted to city officials.

Electronic PDF versions of the 1906–1955 Sanborn Fire Insurance Maps for the proposed project station locations and project alignment areas were accessed online from the Los Angeles Public Library database. Sanborn Fire Insurance Maps provide an approximate construction date and types of changes that have been made to buildings and surrounding properties. The maps also assist in the identification of original, historic-period, and/or character defining features of a property being investigated.

In order to identify built resources recognized by city departments, local historical or archaeological societies, or other appropriate organizations within the quarter-mile search radius of the APE, project personnel coordinated with local agencies and jurisdictions on behalf of the FTA and Metro in support of the Draft EIR/EIS (URS 2010a). As shown in Table 5-1, additional sources were contacted in 2011 in order to augment prior information or to consult regarding the palm trees featured as part of the VA Medical Center Historic District contributing landscape, which was not recognized during the prior investigation for the Alternatives Analysis (URS 2010a).
Table 5-1. List of Local Agency and Historical Organizations Consulted

<table>
<thead>
<tr>
<th>Agency/Organization</th>
<th>Contact Person</th>
<th>Date(s) Contacted</th>
<th>Contacted by</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Beverly Hills, Community Development</td>
<td>Peter Noonan</td>
<td>3/9/2011</td>
<td>Cogstone</td>
</tr>
<tr>
<td>City of Beverly Hills</td>
<td>D. Reyes</td>
<td>7/20/09, 9/22/09</td>
<td>URS</td>
</tr>
<tr>
<td>City of Beverly Hills</td>
<td>Donna Jerex</td>
<td>9/22/09, 3/12/10</td>
<td>URS</td>
</tr>
<tr>
<td>City of Los Angeles (Office of Historic Resources)</td>
<td>Ken Bernstein</td>
<td>7/20/09, 3/12/10</td>
<td>URS</td>
</tr>
<tr>
<td>City of Los Angeles (Office of Historic Resources)</td>
<td>Edgar Garcia</td>
<td>7/20/09, 3/12/10, 8/18/11</td>
<td>URS, Cogstone</td>
</tr>
<tr>
<td>City of Los Angeles (Office of Historic Resources)</td>
<td>Lambert Giessinger</td>
<td>7/20/09, 3/12/10</td>
<td>URS</td>
</tr>
<tr>
<td>City of Los Angeles (Office of Historic Resources)</td>
<td>Janet Hansen</td>
<td>7/20/09, 9/22/09, 3/12/10</td>
<td>URS</td>
</tr>
<tr>
<td>City of Los Angeles (Department of Cultural Affairs, Division of Public Art)</td>
<td>Patricia Gomez</td>
<td>3/15/11</td>
<td>Cogstone</td>
</tr>
<tr>
<td>Community Redevelopment Agency-Los Angeles (CRA-LA)</td>
<td>Josh Romer</td>
<td>4/20/11</td>
<td>Cogstone</td>
</tr>
<tr>
<td>Veterans Administration</td>
<td></td>
<td>1/13/10</td>
<td>URS</td>
</tr>
<tr>
<td>Los Angeles Conservancy</td>
<td>Flora Chou</td>
<td>4/15/11</td>
<td>Cogstone</td>
</tr>
<tr>
<td>Los Angeles Conservancy</td>
<td>Marcello Vavala</td>
<td>11/8/2011</td>
<td>Cogstone</td>
</tr>
<tr>
<td>Los Angeles Conservancy</td>
<td></td>
<td>Between 7/20/09 &amp; 3/9/10</td>
<td>URS</td>
</tr>
<tr>
<td>Los Angeles City Historical Society</td>
<td></td>
<td>Between 7/20/09 &amp; 3/9/10</td>
<td>URS</td>
</tr>
<tr>
<td>Beverly Hills Historical Society</td>
<td></td>
<td>Between 7/20/09 &amp; 3/9/10</td>
<td>URS</td>
</tr>
<tr>
<td>Santa Monica Historical Society</td>
<td></td>
<td>Between 7/20/09 &amp; 3/9/10</td>
<td>URS</td>
</tr>
<tr>
<td>Hollywood Heritage</td>
<td></td>
<td>Between 7/20/09 &amp; 3/9/10</td>
<td>URS</td>
</tr>
<tr>
<td>Los Angeles County Museum of Art (LACMA)</td>
<td>Fred Goldstein, V.P.</td>
<td>9/13/2011</td>
<td>Cogstone</td>
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<tr>
<td>Palm Society of Southern California</td>
<td></td>
<td>5/20/11</td>
<td>Cogstone</td>
</tr>
</tbody>
</table>

* The Cities of Santa Monica and West Hollywood were also consulted during the Alternatives analysis (URS 2010a), but the refined LPA is not located within these city limits.

5.5 Survey Methods

5.5.1 Prior Surveys for Alternatives Analysis

The field work performed in support of the Alternatives analysis for the Draft EIR/EIS was conducted in 2009 and 2010 and included a reconnaissance-level windshield survey, followed by an intensive pedestrian-level field survey of built-environment resources (URS 2010a).

The results of the windshield survey were used by the team engineers, planners, and designers to facilitate the avoidance of impacts to potentially significant historic-period properties either through physical avoidance, or by the proposed implementation of the Secretary of Interior’s Guidelines for the Treatment of Historic Properties.

The subsequent intensive-level field survey investigated further those built-environment resources identified as having the potential to be determined significant resources. The survey was conducted on foot, with an Architectural Historian physically inspecting the properties. Significant built
environment resources identified during the surveys were formally recorded on California Department of Parks and Recreation (DPR) series 523 forms. The results of the prior investigations are reported in the Historic Property Survey Report prepared in support of the Alternatives Analysis for the Draft EIS/EIR (URS 2010a; also see URS 2010b).

5.5.2 Focused Survey for Refined LPA Alignment

Between December 2010 and May 2011, Metro continued to refine the LPA including the station options, construction staging and laydown areas, and tunnel alignment. As a result of this process, areas were included in the Architectural APE for the LPA that had not been intensively surveyed by the prior consultant team (URS 2010a, 2010b) as part of the Alternatives analysis in support of the Draft EIR/EIS (Metro 2010a).

For multiple meetings with Metro and their design team, each individual historic building within the refined LPA APE was assessed for discussion of the possible locations of station portals within buildings, and the restraints and guidelines that would have to be met to have the alterations of significant historic buildings meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties. Discussion included three significant buildings previously noted by the prior study (WSEs 10, 11 and 14; URS 2010a), one property listed as City of Los Angeles Historic-Cultural Monument (LAHCM) No. 566 (WSE 24) and also noted by the prior study, and two significant historic-period buildings within the refined LPA corridor (WSEs 87 and 88; see Section 6.4.3). Each of these six buildings is the work of a master architect and qualifies as a historic property/historical resource:

- Linde Medical Building/Westwood Medical Center (WSE 10) – Paul R. Williams, Architect
- Century Plaza Hotel (WSE 11) – Minoru Yamasaki, Architect
- Union Bank Building (WSE 14) – Sidney Eisenshtat and Associates, Architect
- May Company Wilshire (LACMA West) (WSE 24) – Albert C. Martin and Samuel A. Marx, Architects
- AAA Building (WSE 87) – Welton Becket and Associates, Architect

In order to consider the effects of the refined LPA alignment to historic properties, a thorough reconnaissance survey of the additional areas in the Architectural APE was completed by Architectural Historian Daly. The reconnaissance was followed by an intensive-level pedestrian survey to further investigate those built-environment resources identified as significant resources eligible for NRHP or CRHR inclusion. The survey included inspection of the interior of historic properties, as relevant.

The study included an intensive-level pedestrian survey of the established historic landscape and mature trees in the VA Medical Center Historic District. As noted in Section 5.6, the prior study (URS 2010a, 2010b) failed to identify the historic landscape even though the landscape was within the APE for the Alternatives analysis and is a contributing feature to the historic district.

All significant built environment resources newly identified during the survey were formally recorded on DPR series 523 forms. DPR updates on previously recorded properties were also
5.6 VA Medical Center Historic District Contributing Landscape

The VA Medical Center Historic District is located within an established landscape that is a distinctive, contributing feature of the historic fabric of the district, which was determined eligible for NRHP inclusion in 1981 and is listed on the CRHR. With the recognition that features of this historic landscape are present within the APE for the LPA, Architectural Historian Daly informed Metro that a licensed landscape architect with experience with historic landscapes should survey the area where project plans proposed the permanent removal of valuable historic greenscape.

Landscape architect Ann Christoph was then retained to conduct the survey with a licensed arborist (Greg Applegate) and to produce an inventory report to include recommended methods for the protection or removal, temporary storage and replanting of the mature trees that would be affected by construction activities. The report (Christoph 2011) is provided as Appendix B to this study and the results highlighted below in Section 6.4.7.

5.7 Identification and Evaluation Methodology

The LPA is expected to begin construction in 2013 with all major construction completed by 2019; therefore, historic property identification efforts within the Architectural APE focused on parcels containing improvements constructed in or before 1968 (2019-50 years = 1969, less an additional year to be conservative).

The guidelines set forth in 36 CFR Section 60.4, 14 CCR Section 15064.5(a), and the criteria outlined in PRC Section 5024.1 were used to evaluate properties in the Architectural APE for the LPA and associated component, the Division 20 maintenance facility. To manage the survey data, thresholds for architectural physical conditions were defined and field forms included representative photographs:

- **Unaltered**—The inventoried resource appears to be in its original configuration, or extremely minor alterations have occurred so early in the history of the resource as to be almost contemporary with the creation of the resource.

- **Minimally Altered**—The inventoried resource appears to be in close to its original configuration, or minor reversible alterations have occurred, or a few minor alterations have occurred that cumulatively do not alter the resource beyond its original design intent.

- **Heavily Altered**—The inventoried resource appears to no longer be close to its original configuration, or alterations have occurred that are not easily reversible, or several alterations have occurred that cumulatively obscure the resource beyond its original design intent. However, the overall original massing is discernible. Typical alterations include additions that do not match stylistically the original resource, or alterations that create a different style, and window replacements that do not coincide with the original openings.

- **Altered Beyond Recognition**—The inventoried resource appears to no longer be close to its original configuration and the overall original massing is no longer discernible.

Limited historical research was also conducted to confirm age, architect, building developer/owner and other information for properties that appeared eligible. Cogstone’s Architectural Historian prepared to record additional information about a resource. These forms are provided as Appendix E to this report.
conducted as-needed building permit research at the Cities of Los Angeles and Beverly Hills, and
developed construction chronologies for the significant historic-period properties that may be
affected by the LPA. The building permit research identified whether proposed uses and
improvements would affect original, historic-period, and/or character defining features of the
properties. This research assisted the application of the Criteria of Adverse Effect, codified as 36 CFR
Part 800.5(a).

5.8 Assignment of WSE Numbers to Significant Built Environment Resources

Each built environment resource that qualified as a historic property eligible for listing in the NRHP
and/or as a historical resource eligible for listing in the CRHR, including properties that are
contributing elements to existing or newly identified historic districts, was assigned a “WSE”
(Westside Subway Extension) inventory number. This inventory number was then used as the
“resource identifier” in tables and employed on the APE map sheets to show the location of the
individual properties.

This system was initially employed for the Alternatives Analysis, with properties assigned WSE
numbers 1 through 86 (URS 2010a, 2010b). This method of easily identifying resources and their
mapped location within the Architectural APE has been continued for this study for the refined LPA.
This study also continued to use “HD 1” as the short identifier for Historic District 1
(Westwood/UCLA Historic District).

Additional properties were assigned WSE numbers 87 through 97, and the practice of using WSE
numbers as the “resource identifier” in tables (see below) and APE map sheets (Appendix A: Map
Sheets 1-8) is followed in this study. This study also assigned subsets of WSE numbers (e.g., WSE
41a) to contributing elements to historic districts.