

APPENDIX G
SHPO Historic Resources Evaluation



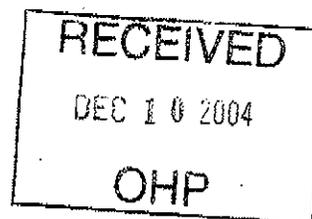
U.S. Department
of Transportation
**Federal Transit
Administration**

REGION IX
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San Francisco, CA 94105-1838
415-744-3133
415-744-2726 (fax)

December 8, 2004

Mr. Milford W. Donaldson
State Historic Preservation Officer
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001



Attention: Dr. Hans Kreutzberg

Re: Exposition Light Rail Transit Project

Dear Mr. Donaldson:

We are writing to you with regard to Section 106 requirements of the National Historic Preservation Act as they relate to the above Los Angeles County Metropolitan Transportation Authority (LACMTA) project for the proposed construction of a light rail transit line in the Exposition Corridor. As stated in our letter to you dated September 17, 2004, the Exposition Light Rail Transit (LRT) project consists of the design and construction of a predominantly at-grade light rail transit system to link the downtown Los Angeles area with the southwesterly portions of the City of Los Angeles and Culver City. At this time, FTA is requesting your concurrence with the identification of historic properties and assessment of potential effects on them in accordance with 36 CFR §800.4 and §800.5, which are summarized below and are described in more detail in the enclosures included with this letter.

IDENTIFICATION OF HISTORIC PROPERTIES, 36 CFR §800.4

Area of Potential Effects: In accordance with 36 CFR §800.4, an Area of Potential Effects (APE) was delineated and discussed with the State Historic Preservation Officer (SHPO). In a meeting on October 14, 2004; an electronic version of the boundary and location of historic properties was reviewed. The APE used for this project is consistent with that used for previous LACMTA rail projects. For archaeological resources, the APE is the area that would be disturbed during construction of the undertaking. For historic and architectural resources, the APE includes all structures within the first tier of parcels adjacent to the project alignment, stations, open cut construction areas, or areas proposed for acquisition, and within a reasonable view shed of elevated structures. Whenever reasonable, property lines or street rights-of-way were used to establish the APE boundary. The APE map is included with this letter in electronic format on CD-ROM.

Identification of Historic Properties: As a result of a review of previous surveys and inventories, and a field visit by a qualified architectural historian, ten historic properties were identified within the APE. The following information regarding the ten historic properties identified within the APE was presented to SHPO and discussed in a meeting on October 14, 2004. Details of the ten properties briefly described below are included with this letter in electronic format on CD-ROM.

1) Young Apartments, 1621 South Grand Ave.; 301-309 W. 17th St., Los Angeles. Young Apartments was determined eligible for the National Register on June 26, 1986, through the federal tax certification process, presumably under Criterion C for the quality of its Classical Revival design by architect Robert Brown Young, at the local level of significance, period of significance 1911.

2) Olympic Auditorium, 1801 South Grand Avenue, Los Angeles. Olympic Auditorium appears eligible for the National Register under criterion A for its association with the 1932 Olympics (Games of the Xth Olympiad) as the indoor events arena, at the local level of significance, period of significance 1925-1932.

3) Saint John's Episcopal Church, 514 West Adams Boulevard, Los Angeles. Saint John's Episcopal Church was determined eligible for the National Register on September 15, 1982, presumably under Criterion C for the quality of its Northern Italian Romanesque design by architects Pierpont and Walter S. Davis, at the local level of significance, period of significance 1923.

4) Industrial Exchange Bldg., 155-161 W. Washington Blvd.; 1840-50 S. Hill St., Los Angeles. The Industrial Exchange Building appears eligible for the National Register under criterion C for the quality of its Gothic Revival design by architects Meyer & Holler (Milwaukee Building Company), at the local level of significance, period of significance 1926.

5) Bridge Memorial Hall (USC), 675 Exposition Blvd.; 3664 University Ave., Los Angeles. Bridge Memorial Hall was formally determined eligible for the National Register in 1994 (HIST.RES.;DOE-19-94-0001-0008;06/29/94), apparently as a contributing building in the University of Southern California (USC) historic district.

6) Mudd Memorial Hall (USC), 801 Exposition Blvd.; 3709-3715 University Ave., Los Angeles. Mudd Memorial Hall was formally determined eligible for the National Register by SHPO on June 29, 1994, as part of the USC Historic District, under Criterion C as an excellent example of the Lombardy Romanesque style at the state level of significance.

7) Harris Hall (USC), 823-829 Exposition Blvd.; 824 West 37th St., Los Angeles. Harris Hall of Architecture and Fine Arts was formally determined eligible for the National Register by SHPO on June 29, 1994 as a contributing building in the University of Southern California (USC) historic district.

8) Exposition Park Historic District, 700-900 Exposition Blvd. between Figueroa St. & Menlo Ave., Los Angeles. The Exposition Park Historic District was determined eligible for the National Register on June 15, 1993, as a result of the California Museum of Science and Industry Master Plan EIR, and this status was confirmed in March 2001 as a result of the Section 106 process for

the California Science Center/African American Museum Parking Structure project. Two of the District's contributing elements along the Exposition Boulevard frontage, the Rose Garden (#8a) and the Natural History Museum (#8b), are individually listed in the National Register. The Exposition Boulevard entrance (#8c) to the Rose Garden opposite USC, consists of a series of concrete features that were installed for the 1932 Olympic Games in Los Angeles (the Xth Olympiad), including memorial torches, benches, and bas-relief panels of Ancient and Modern Olympic athletes. The fourth contributing element of the District along Exposition Boulevard, the California State Armory Building (#8d) has now undergone an adaptive re-use into a school building, and there is a modern addition separating the historic building from Exposition Building.

9) Southern Pacific Railroad/Pacific Electric Railway/(Santa Monica Air Line), 1000 to approximately 6000 Exposition Boulevard; from Vermont Avenue to Ballona Creek Bridge, Los Angeles and Culver City. The alignment of the Southern Pacific Railroad/Pacific Electric Railway (SP/PE, a.k.a., Santa Monica Air Line) between Vermont Avenue and Ballona Creek was determined eligible for inclusion in the National Register of Historic Places under Criterion A by FHWA/LACMTA on March 20, 2000, as a result of the Section 106 process for the Exposition Boulevard Regional Bikeway project. The National Register eligibility finding concurred with by SHPO on April 18, 2000, was based on the Historic Resource Evaluation Report prepared for the Bikeway project in July 1999 by Greenwood & Associates (Greenwood HRER), which provided the following statement of significance:

"The significance of the Exposition Line lies in that it was a major force in providing for the creation and development of the City of Santa Monica, played a critical role to determine which port in southern California would serve Los Angeles, and thirdly as part of the Pacific Electric Company" (Greenwood HRER, page 21).

The period of significance was stated as follows:

"The period of significance is between 1875 and 1900 for the development of Santa Monica and 1911-1930 when Santa Monica and adjacent cities developed and grew into self-sustaining communities" (Greenwood HRER, page 23).

The Ballona Creek Bridge was found to be a contributing feature of the historic property, however, no date of its construction was provided in the Greenwood HRER. In fact, the Ballona Creek Bridge was constructed in 1938, after the period of significance of the historic property that was stated in the Greenwood HRER. However, in the meeting on October 14, 2004, SHPO pointed out that the Ballona Creek Bridge still exceeds the 50-year age criterion of the NRHP, and requested that contextual information be provided about other bridges once used by the Pacific Electric Railway. The requested information was submitted to SHPO on November 2, 2004, and is included in this letter in electronic format on CD-ROM.

10) Dorsey High School, 3537 Farndale Avenue, Los Angeles. Susan Miller Dorsey High School is a complex of 1- and 2-story Streamline Moderne style buildings built in 1936-1937. The complex appears eligible for the National Register under Criterion C, at the local level of significance, for the quality of its architectural design by the Los Angeles architectural firm of Gogerty and Norenberg.

No other historic properties are known to exist in the APE, and no comments on historic properties were received from interested parties or Native American tribes as a result of our environmental

qualify the Pacific Electric Railway alignment for inclusion on the NRHP. FHWA is to be commended for providing a transportation alternative for the railroad alignment that enhances its continued use by the public in a safe and efficient manner." The changes within the historic railroad right-of-way (i.e., removal of existing tracks, ties and railroad equipment) proposed for the Exposition LRT are nearly identical to the Bikeway Project, and are therefore, anticipated not to have a significant effect on the "alignment" or the property's eligibility under NRHP Criterion A. All of the LRT equipment would be located within the railroad right-of-way, and no catenary wires would be attached to any buildings.

FINDINGS

FTA now requests SHPO concurrence with the following findings:

1. There are ten historic properties within the APE, which are listed above.
2. The proposed undertaking would have no effect on nine of the ten historic properties.
3. The proposed undertaking would have no adverse effect on historic property #9, the SP/PE Santa Monica Airline, if Option C of the La Cienega Boulevard Overcrossing is constructed to avoid demolition of a character defining feature, the Ballona Creek Bridge.

CONDITIONS

As agreed to in a telephone conversation with the SHPO on December 1, 2004, if Option C is not constructed, FTA would have to reinitiate consultation to determine if another alternative would result in an adverse effect on the Ballona Creek Bridge and SP/PE Santa Monica Airline. Under separate cover, FTA will ensure that LACMTA submits to you the results of the phased identification effort and a Cultural Resource Monitoring and Mitigation Plan (CRMMP). The CRMMP shall establish protocol for data recovery, site monitoring and identifying, curating, and cataloging of discovered archaeological or historic resources.

Thank you for your cooperation and attention to this matter. We look forward to your concurrence with our findings presented above. For your convenience, we are attaching a concurrence signature block to this letter. If you have any questions, please contact Ray Tellis of our Los Angeles Metropolitan Office at (213) 202-3956.

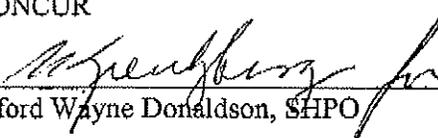
Sincerely,

for 
Leslie T. Rogers
Regional Administrator

Enclosure

cc. Mr. Carl Ripaldi, LACMTA

I CONCUR

 , Date: 12/14/2004
Milford Wayne Donaldson, SHPO

FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit NHPA Section 106 Criteria of Adverse Effect Finding

Historic Property: **Young Apartments**
1621 South Grand Avenue; 301-309 W. 17th Street, Los Angeles
CHRS Code 2S3

Statement of National Register Eligibility: Young Apartments was determined eligible for the National Register on 6/26/1986, through the federal tax certification process, presumably under criterion C for the quality of its Classical Revival design by architect Robert Brown Young, at the local level of significance, period of significance 1911. It is also locally designated as City of Los Angeles Historic-Cultural Monument #182, and was recorded in surveys for the City of Los Angeles Community Redevelopment Agency for the Central Business District (1983).



Young Apartments, view of 17th Street and Grand Avenue elevations, facing northwest, October 2004.

Description of Proposed Project near the Historic Property:

The Exposition Branch LRT (Hill Street Mitigation Option) would be in an at-grade configuration, with one part of a couplet running within the 17th Street right-of-way, along the southern (primary) elevation of Young Apartments. The setting to the south of 17th Street was substantially changed by the construction of the I-10 Santa Ana Freeway in the late 1950s, which is elevated at this location. Historically, the closest streetcar lines to Young Apartments were the Los Angeles Railway Yellow Coaches and Cars which ran north-south on Grand Avenue, along the east (primary entrance) elevation of the Young Apartments.

Application of the Section 106 Criteria of Adverse Effect

Each aspect of the NHPA Section 106 Criteria of Adverse Effect (36 CFR 800.5(a)) is stated below, followed by a discussion of their applicability with respect to the proposed project and the historic property.

(1) Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

The proposed Light Rail Transit line within the 17th Street right-of-way would not obstruct views to or alter the Classical Revival architectural character of Young Apartments and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the east side of Young Apartments within Grand Avenue, so rail transit facilities, equipment, and operations

**FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit
NHPA Section 106 Criteria of Adverse Effect Finding**

are compatible with the Young Apartment's historic setting, and would not diminish its integrity of feeling or association.

(2) *Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:*

(i) *Physical destruction of or damage to all or part of the property;*

The proposed project would be constructed at-grade within the 17th Street right-of-way, so no destruction of the property would occur. Catenary wires would not be attached to Young Apartments, therefore no damage to the property would occur.

(ii) *Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;*

No alteration of Young Apartments would occur as a result of the proposed project.

(iii) *Removal of the property from its historic location;*

The location of Young Apartments would not change as a result of the proposed project.

(iv) *Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;*

The proposed project would be constructed at-grade within the 17th Street right-of-way. Grand Avenue, 17th Street, and the I-10 Santa Ana Freeway are all heavily traveled thoroughfares that influence the property's use; and the re-introduction of light rail transit operations would have a negligible change on the residential use of the property. The 17th Street right-of-way does not contribute to the property's historic significance, and the introduction of light rail tracks and equipment would be consistent with those that historically existed within Grand Avenue along the east side of the Young Apartments.

(v) *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;*

The property's significant historic features are related to its Classical Revival architecture. The proposed Light Rail Transit line at-grade within the 17th Street right-of-way would not obstruct views to or alter the Classical Revival architectural character of Young Apartments and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the east side of Young Apartments within Grand Avenue, so rail transit facilities, equipment, and operations are compatible with the Young Apartments' historic setting, and would not diminish its integrity of feeling or association.

(vi) *Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization;*

No neglect of the property would be caused by construction or operation of the proposed project.

(vii) *Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long term preservation of the property's historic significance.*

The historic property is privately, and not federally owned.

Finding for which SHPO concurrence is requested

No historic properties affected No Adverse Effect Adverse Effect

FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit NHPA Section 106 Criteria of Adverse Effect Finding

Historic Property:

Olympic Auditorium

1801 South Grand Avenue, Los Angeles

CHRS Code 3S (2S2, pending SHPO concurrence with FTA finding)

Statement of National Register Eligibility: Olympic Auditorium appears eligible for the National Register under criterion A for its association with the 1932 Olympics (Games of the Xth Olympiad) as the indoor events arena, at the local level of significance, period of significance 1925-1932. Of additional interest, it was here on stage on August 9, 1964, that heavyweight boxing champion Cassius Clay, announced that he was joining the Nation of Islam and was changing his name to Muhammad Ali. Olympic Auditorium was constructed in 1925 for \$185,000, and was designed by the important Los Angeles architect Gilbert Stanley Underwood. Underwood's other designs include Desmond's Department Store at 5518-28 Wilshire Boulevard (Miracle Mile, 1928), E. Brooks Randall & Sons stores, 5901-5909 Sunset Boulevard (1935), the U.S. Post Office Terminal Annex, 900 N. Alameda Street (1938), and his most important design, the U.S. Federal Building and Courthouse, 312 North Spring Street (1938-1940). The Olympic Auditorium does not meet National Register criterion C because of exterior wall treatments over the years, and alteration of the main entrance and parapet, which have diminished its integrity of materials and design, although it appears to have undergone some recent restoration efforts.



Olympic Auditorium, view of Grand Avenue and 18th Street elevations, facing southwest, (left) October 2004 and (right) as it appeared in 1938 (Source LAPL no. 00015420).

Description of Proposed Project near the Historic Property:

The Exposition Branch LRT (Hill Street Mitigation Option) would be in an at-grade configuration, with one part of a couplet running within the 18th Street right-of-way, along the northern (secondary) elevation of Olympic Auditorium. The setting to the north of 18th Street was substantially changed by the construction of the I-10 Santa Ana Freeway in the late 1950s, which is elevated at this location. Historically, the closest streetcar lines to Olympic Auditorium were the Los Angeles Railway Yellow Coaches and Cars which ran north-south on Grand Avenue, along the east (primary entrance) elevation of the Olympic Auditorium.

Application of the Section 106 Criteria of Adverse Effect

Each aspect of the NHPA Section 106 Criteria of Adverse Effect (36 CFR 800.5(a)) is stated below, followed by a discussion of their applicability with respect to the proposed project and the historic property.

(1) Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

**FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit
NHPA Section 106 Criteria of Adverse Effect Finding**

The proposed Light Rail Transit line within the 18th Street right-of-way would not obstruct views to or alter the Olympic Auditorium and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the east side of Olympic Auditorium within Grand Avenue, so rail transit facilities, equipment, and operations are compatible with the Olympic Auditorium's historic setting, and would not diminish its integrity of feeling or association.

(2) *Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:*

(i) *Physical destruction of or damage to all or part of the property;*

The proposed project would be constructed at-grade within the 18th Street right-of-way, so no destruction of the property would occur. Catenary wires would not be attached to Olympic Auditorium, therefore no damage to the property would occur.

(ii) *Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;*

No alteration of Olympic Auditorium would occur as a result of the proposed project.

(iii) *Removal of the property from its historic location;*

The location of Olympic Auditorium would not change as a result of the proposed project.

(iv) *Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;*

The proposed project would be constructed at-grade within the 18th Street right-of-way. Grand Avenue, 18th Street, and the I-10 Santa Ana Freeway are all heavily traveled thoroughfares that influence the property's use; and the re-introduction of light rail transit operations would have a negligible change on the recreational/event use of the property. The 18th Street right-of-way does not contribute to the property's historic significance, and the introduction of light rail tracks and equipment would be consistent with those that historically existed within Grand Avenue along the east side of the Olympic Auditorium.

(v) *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;*

The property's significant historic features are related to the events that occurred inside the building, and its association with the 1932 Olympics. The proposed Light Rail Transit line at-grade within the 18th Street right-of-way would not obstruct views to or alter the Olympic Auditorium and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the east side of Olympic Auditorium within Grand Avenue, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association.

(vi) *Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization;*

No neglect of the property would be caused by construction or operation of the proposed project.

(vii) *Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long term preservation of the property's historic significance.*

The historic property is privately, and not federally owned.

Finding for which SHPO concurrence is requested

No historic properties affected No Adverse Effect Adverse Effect

FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit NHPA Section 106 Criteria of Adverse Effect Finding

Historic Property:

Saint John's Episcopal Church
514 West Adams Boulevard, Los Angeles
CHRS Code 2S2

Statement of National Register Eligibility: Saint John's Episcopal Church was determined eligible for the National Register on 9/15/1982, presumably under criterion c for the quality of its Northern Italian Romanesque design by architects Pierpont and Walter S. Davis, at the local level of significance, period of significance 1923. It is also locally designated as Los Angeles Historic-Cultural Monument #516, and was recorded in for the City of Los Angeles Department of City Planning of the Southeast Los Angeles District Plan for the City of Los Angeles Community Redevelopment Agency Hoover Redevelopment Area (1985), listed in An Architectural Guidebook Angeles, by Gebhard & Winter (2003, #4).



Adams and Figueroa Street elevations, facing southeast, October 2004.

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St. John's
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Description of Proposed Project near the Historic Property:

The Exposition Branch LRT (Locally Preferred Alternative) would be in an at-grade configuration, running within the Flower Street right-of-way, along the eastern (secondary) elevation of St. John's Episcopal Church. The LRT tracks would be approximately 150 feet from the closest point of the Adams Boulevard (primary) elevation, and approximately 100 feet from the closest point of the Flower Street (secondary) elevation. The historic setting to the west of St. John's was substantially changed by the construction of the I-110 Harbor Freeway in the late 1950s just east of Flower Street. Historically, the closest street car lines to St. John's were the Los Angeles Railway Line 49 "Yellow Coaches" which ran north-south on Figueroa Street, along the west (secondary) elevation of St. John's, and parallel to Flower Street.

Application of the Section 106 Criteria of Adverse Effect

Each aspect of the NHPA Section 106 Criteria of Adverse Effect (36 CFR 800.5(a)) is stated below, followed by a discussion of their applicability with respect to the proposed project and the historic property.

(1) *Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.*

The proposed Light Rail Transit line within the Flower Street right-of-way would not obstruct views to or alter the Romanesque architectural character of St. John's Episcopal Church and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the west side of St. John's within Figueroa Street, so rail transit facilities, equipment, and operations are compatible with the Church's historic setting, and would not diminish its integrity of feeling or association.

(2) *Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:*

**FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit
NHPA Section 106 Criteria of Adverse Effect Finding**

(i) *Physical destruction of or damage to all or part of the property;*

The proposed project would be constructed at-grade within the Flower Street right-of-way, therefore no destruction of the property would occur. Catenary wires would not be attached to St. John's Episcopal Church, therefore no damage to the property would occur.

(ii) *Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;*

No alteration of St. John's Episcopal Church would occur as a result of the proposed project.

(iii) *Removal of the property from its historic location;*

The location of St. John's Episcopal Church would not change as a result of the proposed project.

(iv) *Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;*

The proposed project would be constructed at-grade within the Flower Street right-of-way. Flower Street, Figueroa Street, and the I-110 Harbor Freeway are all heavily traveled thoroughfares that influence the property's use; the re-introduction of light rail transit operations have a negligible change on Church use. The Flower Street right-of-way does not contribute to the property's historic significance, and the introduction of light rail tracks and equipment would be consistent with those that historically existed within Figueroa Street on the other side of the Church.

(v) *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;*

The property's significant historic features are related to its Romanesque architecture. The proposed Light Rail Transit line at-grade within the Flower Street right-of-way would not obstruct views to or alter the Romanesque architectural character of St. John's Episcopal Church and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the west side of St. John's within Figueroa Street, so rail transit facilities, equipment, and operations are compatible with the Church's historic setting, and would not diminish its integrity of feeling or association.

(vi) *Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization;*

No neglect of the property would be caused by construction or operation of the proposed project.

(vii) *Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long term preservation of the property's historic significance.*

The historic property is privately, and not federally owned.

Finding for which SHPO concurrence is requested

No historic properties affected No Adverse Effect Adverse Effect

FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit NHPA Section 106 Criteria of Adverse Effect Finding

Historic Property:

Industrial Exchange Building

155-161 West Washington Boulevard; 1840-1850 South Hill Street, Los Angeles
CHRS Code 3S (2S2, pending SHPO concurrence with FTA finding)

Statement of National Register Eligibility: The Industrial Exchange Building appears eligible for the National Register under criterion C for the quality of its Gothic Revival design by architects Meyer & Holler (Milwaukee Building Company), at the local level of significance, period of significance 1926. Some alterations have occurred, primarily to the first floor windows and wall surface, but the upper floors and windows of the 11-story building appear to be unaltered, and retain all aspects of integrity. Meyer & Holler was an important Los Angeles architectural firm, starting out in the early 1900s as the Milwaukee Building Company (until 1923), designers of some of the finest Craftsman style homes in the City. Their most important works were completed in the 1920s, when they designed Graumann's Egyptian Theatre at 6708 Hollywood Boulevard (1921-22), the Hollywood Athletic Club at 6625-35 Sunset Boulevard, the Petroleum Securities Building at 1001-1017 S. Flower Street (1924), Graumann's Chinese Theatre at 6915-6927 Hollywood Boulevard (1926-27), Hollywood First National Building at 6777-6781 Hollywood Boulevard (1927), and the E. Clem Wilson Building at 5225-5231 Wilshire Boulevard (Miracle Mile, 1929)



Industrial Exchange Building, view of Hill Street and Washington Boulevard elevations, facing northeast, October 2004.

Description of Proposed Project near the Historic Property:

The Exposition Branch LRT (Hill Street Mitigation Option) would be in an at-grade configuration, running within the Hill Street right-of-way, along the western (secondary) elevation of the Industrial Exchange Building. The setting along Washington Boulevard has already been changed by the re-introduction of light rail service with the Blue Line in the late 1980s. Historically, the closest streetcar line to the Industrial Exchange Building, was the Los Angeles Railway Yellow Car "W Line" which ran east-west on Washington Boulevard, essentially the route of the Blue Line, along the south (primary) elevation of the building.

Application of the Section 106 Criteria of Adverse Effect

Each aspect of the NHPA Section 106 Criteria of Adverse Effect (36 CFR 800.5(a)) is stated below, followed by a discussion of their applicability with respect to the proposed project and the historic property.

(1) Criteria of adverse effect. An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's

FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit NHPA Section 106 Criteria of Adverse Effect Finding

eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

The proposed Light Rail Transit line within the Hill Street right-of-way would not obstruct views to or alter the Industrial Exchange Building and would not diminish its integrity of location, design, materials, or workmanship. Historically, streetcars ran along the south side of the building within Washington Boulevard, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association.

(2) *Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:*

(i) *Physical destruction of or damage to all or part of the property;*

The proposed project would be constructed at-grade within the Hill Street right-of-way, so no destruction of the property would occur. Catenary wires would not be attached to the Industrial Exchange Building, therefore no damage to the property would occur.

(ii) *Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's standards for the treatment of historic properties (36 CFR part 68) and applicable guidelines;*

No alteration of the Industrial Exchange Building would occur as a result of the proposed project.

(iii) *Removal of the property from its historic location;*

The location of the Industrial Exchange Building would not change as a result of the proposed project.

(iv) *Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;*

The proposed project would be constructed at-grade within the Hill Street right-of-way. Light rail transit operations have already been reintroduced with the Long Beach Blue Line, which follows the historic route along Washington Boulevard of the Los Angeles Railway Yellow Car "W Line," to the south of the primary elevation of the Industrial Exchange Building. There would be no change on the commercial use of the property. The Hill Street right-of-way does not contribute to the property's historic significance, and the introduction of light rail tracks and equipment would be consistent with those that presently and historically existed within Washington Boulevard, along the south side of the Industrial Exchange Building.

(v) *Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;*

The property's significant historic features are related to its Gothic Revival architecture. The proposed Light Rail Transit line at-grade within the Hill Street right-of-way would not obstruct views to or alter the Gothic Revival architectural character of the Industrial Exchange Building and would not diminish its integrity of location, design, materials, or workmanship. Historically and presently, streetcars operated along the south side of the Industrial Exchange Building within Washington Boulevard, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association.

(vi) *Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization;*

No neglect of the property would be caused by construction or operation of the proposed project.

(vii) *Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long term preservation of the property's historic significance.*

The historic property is privately, and not federally owned.

Finding for which SHPO concurrence is requested

No historic properties affected No Adverse Effect Adverse Effect

Bridge Memorial Hall

**675 Exposition Boulevard; 3664 University Avenue (USC), Los Angeles
CHRS Code 2D2**

Bridge Memorial Hall was formally determined eligible for the National Register in 1994 (HIST.RES.;DOE-19-94-0001-0008;06/29/94), apparently as a contributing building in the University of Southern California (USC) historic district. The 4-story Lombardy Romanesque style building was designed by prominent Los Angeles architect John Parkinson, and was built in 1928.

The Exposition Branch LRT would be in an at-grade configuration running within the landscaped median in Exposition Boulevard. Historically, the median contained the railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. The proposed project would also have a station within the LRT right-of-way opposite Bridge Memorial Hall, which is situated at an angle from Exposition Boulevard. Historically, the Pacific Electric Railway also had a passenger stop at this same location, serving both USC and Exposition Park.

No alteration of Bridge Memorial Hall would occur as a result of the proposed project. The proposed Light Rail Transit line and station within the Exposition Boulevard right-of-way would not substantially obstruct views to or alter Bridge Memorial Hall and would not diminish its integrity of location, design, materials, or workmanship. Historically, freight railroad and streetcars ran along the median of Exposition Boulevard in exactly the same configuration as the proposed project, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association. Therefore, there would be no Section 4(f) direct use, temporary use, or constructive use of this historic property as a result of the proposed project.

Colonel Seeley Mudd Memorial Hall of Philosophy

**801 Exposition Boulevard; 3709-3715 University Avenue (USC), Los Angeles
CHRS Code 2D2**

Mudd Memorial Hall was formally determined eligible for the National Register by SHPO on 6/29/94, as part of the USC Historic District, under criterion C as an excellent example of the Lombardy Romanesque style at the state level of significance. The 2-story Lombardy Romanesque style building was designed by was built in 1929 and designed by architect Ralph C. Flewelling, who also designed Harris Hall at USC and the City of Beverly Hills U.S. Post Office.

The Exposition Branch LRT would be in an at-grade configuration running within the landscaped median in Exposition Boulevard. Historically, the median contained the railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. The proposed project would also have a station within the LRT right-of-way opposite the secondary elevation of Mudd Memorial Hall, which is situated at an angle from Exposition Boulevard, with its primary elevation along University Avenue. Historically, the Pacific Electric Railway also had a passenger stop at this same location, serving both USC and Exposition Park.

No alteration of Mudd Memorial Hall would occur as a result of the proposed project. The proposed Light Rail Transit line and station within the Exposition Boulevard right-of-way would

not substantially obstruct views to or alter Mudd Memorial Hall and would not diminish its integrity of location, design, materials, or workmanship. Historically, freight railroad and streetcars ran along the median of Exposition Boulevard at exactly the same configuration as the proposed project, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association. Therefore, there would be no Section 4(f) direct use, temporary use, or constructive use of this historic property as a result of the proposed project.

Harris Hall of Architecture and Fine Arts

**823-829 Exposition Boulevard; 824 West 37th Street (USC), Los Angeles
CHRS Code 2D2**

Harris Hall of Architecture and Fine Arts was formally determined eligible for the National Register by SHPO on 6/29/94 as a contributing building in the University of Southern California (USC) historic district. The 2-story Northern Italian Romanesque style building was built in 1938-1939, and was designed by architect Ralph C. Flewelling, who also designed Mudd Hall at USC and the City of Beverly Hills U.S. Post Office.

The Exposition Branch LRT would be in an at-grade configuration running within the landscaped median in Exposition Boulevard. Historically, the median contained the railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. The proposed project would also have a station within the LRT right-of-way opposite Harris Hall, which is situated at an angle from Exposition Boulevard. Historically, the Pacific Electric Railway also had a passenger stop at this same location, serving both USC and Exposition Park.

No alteration of Harris Hall would occur as a result of the proposed project. The proposed Light Rail Transit line and station within the Exposition Boulevard right-of-way would not substantially obstruct views to or alter Harris Hall and would not diminish its integrity of location, design, materials, or workmanship. Historically, freight railroad and streetcars ran along the median of Exposition Boulevard at exactly the same configuration as the proposed project, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association. Therefore, there would be no Section 4(f) direct use, temporary use, or constructive use of this historic property as a result of the proposed project.

Exposition Park Historic District

**700-900 Exposition Boulevard, between Figueroa St. and Menlo Ave., Los Angeles
CHRS Code 2S2**

The Exposition Park Historic District was determined eligible for the National Register on 6/15/93, as a result of the California Museum of Science and Industry Master Plan EIR, and this status was confirmed in March 2001 as a result of the Section 106 process for the California Science Center/African American Museum Parking Structure project. Two of the district's contributing elements along the Exposition Boulevard frontage, the Rose Garden and the Natural History Museum, are individually listed in the National Register. The Exposition Boulevard entrance to the Rose Garden opposite USC, consists of a series of concrete features that were installed for the 1932 Olympic Games in Los Angeles (the Xth Olympiad), including memorial

torches, benches, and bas-relief panels of Ancient and Modern Olympic athletes. The fourth contributing element of the district along Exposition Boulevard, the California State Armory Building has now undergone an adaptive reuse into a school building, and there is a modern addition separating the historic building from Exposition Building.

The Exposition Branch LRT would be in an at-grade configuration running within the landscaped median in Exposition Boulevard. Historically, the median contained the railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. The proposed project would also have a station within the LRT right-of-way opposite the 1932 Olympic Games entrance, but would not alter it or the Park in any way. Historically, the Pacific Electric Railway also had a passenger stop at this same location, serving both USC and Exposition Park.

No alteration of the Exposition Park Historic District or any of its contributing elements would occur as a result of the proposed project. The proposed Light Rail Transit line and station within the Exposition Boulevard right-of-way would not substantially obstruct views to or from the Exposition Park Historic District or its contributing elements, and would not diminish their integrity of location, design, materials, or workmanship. Historically, freight railroad and streetcars ran along the median of Exposition Boulevard in exactly the same configuration as the proposed project, including a passenger stop, so rail transit facilities, equipment, and operations are compatible with the properties' historic setting, and would not diminish their integrity of feeling or association. Therefore, there would be no Section 4(f) direct use, temporary use, or constructive use of this historic property as a result of the proposed project.

Southern Pacific Railroad/Pacific Electric Railway/ (Santa Monica Air Line)

**1000 to approximately 6000 Exposition Boulevard; from Vermont Avenue to Ballona Creek Bridge, Los Angeles and Culver City
CHRS Code 2S2**

The portion of the Southern Pacific Railroad/Pacific Electric Railway (Santa Monica Air Line) between Vermont Avenue and Ballona Creek was determined eligible for inclusion in the National Register of Historic Places under Criterion A by FHWA/LACMTA on March 3/20/2000 as a result of the Section 106 process for the Exposition Boulevard Regional Bikeway project.

In a meeting on October 14, 2004, the proposed changes to the railroad facilities and equipment in the right-of-way were discussed with the SHPO. The changes were informally determined not to be significant, with the exception of the demolition of the Ballona Creek Bridge. In subsequent communications from FTA to SHPO in a letter dated December 8, 2004, the following information for the remainder of the five mile long linear resource was provided.

“Your concurrence letter dated April 18, 2000, made it clear that the railroad right-of-way “alignment” of the SP/PE Santa Monica Air Line was eligible under criterion A and not criterion C, as follows: “This alignment also retains a number of features that are reminiscent of its historic period such as its lightweight tracks, signal devices, switches, telephone station, and plate/girder bridge. These components, when functional, were key elements in the operation of the electric train system as a transportation option in Los Angeles. However, the non-operational status of these items, plus the removal of other key components associated with the system at various locations along the alignment serve to diminish the integrity of the property sufficiently to

remove it for consideration under Criterion C as defined in 36 CFR §60.4.” In summary, the alignment (route) would be considered historic, but not the remnant components that lie within the right-of-way.

In the same letter, you made the following determination about the conversion of the railroad to a bikeway: “The proposed work will not significantly alter or change those characteristics that qualify the Pacific Electric Railway alignment for inclusion on the NRHP. FHWA is to be commended for providing a transportation alternative for the railroad alignment that enhances its continued use by the public in a safe and efficient manner.” The changes within the historic railroad right-of-way (i.e., removal of existing tracks, ties and railroad equipment) proposed for the Exposition LRT are nearly identical to the Bikeway Project, and are therefore, anticipated not to have a significant effect on the “alignment” or the route’s eligibility under NRHP Criterion A. All of the LRT equipment would be located within the railroad right-of-way, and no catenary wires would be attached to any buildings.”

“The only potentially adverse effect on the SP/PE Santa Monica Airline was the demolition of a contributing element of the five-mile long corridor, the Ballona Creek Bridge. To avoid the demolition of the bridge, LACMTA’s engineers redesigned Option C of the La Cienega Boulevard Overcrossing so that it would span the Ballona Creek Bridge without resulting in its demolition. Based on information presented to your office on November 11 and November 24, 2002, you concluded in a telephone conversation on December 1, 2004, that if Option C is constructed to avoid demolition of the Ballona Creek Bridge, then there would be no adverse effect on the SP/PE Santa Monica Airline. If, however, Option C is not constructed, FTA would have to reinitiate consultation to determine if another alternative would result in an adverse effect on the Ballona Creek Bridge and SP/PE Santa Monica Airline.”

Because the SHPO has concluded that Option C would result in a finding of no adverse effect, there would be no Section 4(f) constructive use pursuant to 23 CFR 771.135(p)(5)(i), which states the following: “The Administration has reviewed the following situations and determined that a constructive use does *not* occur when (i) compliance with the requirements of section 106 of the National Historic Preservation Act and 36 CFR part 800 for proximity impacts of the proposed action, on a site listed on or eligible for the National Register of Historic Places, results in an agreement of ‘no adverse effect.’”

If Option C was constructed to avoid demolition of the Ballona Creek Bridge, there would be no Section 4(f) direct use, temporary use, or constructive use. If Option C were not constructed, and the Ballona Creek Bridge were to be demolished, a Section 4(f) direct use would occur. Inasmuch as Option C is a prudent and feasible alternative, and avoids direct use of a Section 4(f) resource, FTA would not be able to approve the project under Options A or B.

Dorsey High School

3537 Farmdale Avenue, Los Angeles

CHRS Code 3S (2S2, pending SHPO concurrence with FTA finding)

Susan Miller Dorsey High School is a complex of 1- and 2-story Streamline Moderne style buildings built in 1936-1937. The complex appears eligible for the National Register under criterion C, at the local level of significance, for the quality of its architectural design by the Los Angeles architectural firm of Gogerty and Norenberg. It was built by the City of Los Angeles Board of Education on the site of the 1932 Olympic Village. In addition to the main school building, classrooms, and auditorium, the field house also exhibits a high quality of design.

The Exposition Branch LRT would be in an at-grade configuration running within the railroad right-of-way in Exposition Boulevard. Historically, the median contained the railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. Railroad tracks, ties, and equipment are still visible along this location, although all would have been installed by Southern Pacific sometime after the Pacific Electric Railway ceased operations on this line in 1953, as part of routine maintenance, weathering, and wear. The Dorsey High School buildings front on Farmdale Avenue, and the school property is extremely large, so the visual effect on the buildings or their setting is negligible.

No alteration of Dorsey High School would occur as a result of the proposed project. The proposed Light Rail Transit line within the Exposition Boulevard right-of-way would not substantially obstruct views to or alter Dorsey High and would not diminish its integrity of location, design, materials, or workmanship. Historically, freight railroad and streetcars ran along the median of Exposition Boulevard at exactly the same configuration as the proposed project, so rail transit facilities, equipment, and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association. Therefore, there would be no Section 4(f) direct use, temporary use, or constructive use of this historic property as a result of the proposed project.