

Appendix A

Historical Resources Technical Memorandum

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Mid-City/Exposition Light Rail Transit Project

Historical Resources Technical Report for the Improvements at Farmdale Avenue and Exposition Boulevard



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Acronyms

CEQA	California Environmental Quality Act
CPRC	California Public Resources Code
CPUC	California Public Utilities Commission
California Register	California Register of Historical Resources
CFR	Code of Federal Regulations
Expo	Exposition Construction Authority
Expo LRT	Mid-City/Exposition Light Rail Transit
FTA	Federal Transit Authority
FEIS/EIR	final environmental impact statement/environmental impact report
LRT	light rail transit
Metro	Los Angeles County Metropolitan Transportation Authority
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
National Register	National Register of Historic Places
OHP	Office of Historic Preservation
ROD	Record of Decision
ROW	right-of-way
SHPO	State Historic Preservation Officer
USC	United States Code

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Mid-City/Exposition Light Rail Transit Line

Historical Resources Technical Report for the Improvements at Farmdale Avenue and Exposition Boulevard

1.0 Introduction

ICF Jones & Stokes prepared this historical resources technical report for submission to and consideration by the California Public Utilities Commission (CPUC) and the Federal Transit Administration (FTA). Its purpose is to evaluate the improvements proposed under the Mid-City/Exposition Light Rail Transit (Expo LRT) project at Farmdale Avenue and Exposition Boulevard and compare the impacts of those improvements against the impacts discussed in the previously certified Final Environmental Impact Statement/ Environmental Impact Report (FEIS/EIR) for the Expo LRT project. This analysis will help the CPUC to determine whether an additional California Environmental Quality Act (CEQA) document is required before the CPUC can consider or approve the proposed project.

The Farmdale Avenue crossing is the final crossing to be considered by the CPUC for the Expo LRT line, and is the subject of an amended application filed with the CPUC on July 29, 2009. All other crossings requiring CPUC approval have been approved, and much of the Expo LRT line is currently under construction.

This study examines the Exposition Construction Authority's (Expo's) original plan for an at-grade crossing, as modified in the course of this proceeding, including acquisition of approximately 5,000 square feet of property on the northeastern edge of Dorsey High School as part of the construction of a pedestrian plaza, and a new station with near-side platforms east and west of Farmdale Avenue, at which all LRT vehicles would come to a full stop on approach to the Farmdale Avenue crossing. In addition, a property at 4523 West Exposition Boulevard would be acquired and all existing structures would be demolished to construct a Los Angeles Unified School District (LAUSD) staff parking lot. A stop-and-proceed procedure may be used until the proposed station is constructed.

The proposed project was assessed for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA), as amended in 2004, as well as CEQA. FTA is the lead federal agency for compliance with NEPA and Section 106 of NHPA. The CPUC is the responsible agency and is taking the lead role in the preparation of the CEQA documents for the Farmdale Avenue crossing.

In December 2004, the State Historic Preservation Officer (SHPO) concurred with a Section 106 finding of “no adverse effect” for the original design of the Expo LRT, including the original at-grade crossing near Dorsey High School. Dorsey High School is a historic property, and the current proposed at-grade station platform and pedestrian plaza would involve the acquisition of approximately 5,000 square feet of the 862,488 square foot school property. Therefore the SHPO will be informed of this change to the undertaking and that the original “no adverse effect” finding is still being made. Because SHPO concurred with the original Section 106 finding of “no adverse effect,” no Memorandum of Agreement (MOA) was prepared in 2004.

The FEIS/EIR was prepared to evaluate Phase I of the Expo LRT project, including the proposed at-grade crossing at Farmdale Avenue and Exposition Boulevard, and determine whether the proposed project would create significant new impacts that would require further environmental review under CEQA and NEPA. This historical resources study is intended to serve as a supporting technical report to the environmental documentation for the proposed project.

2.0 Project Description

2.1 Background

The FEIS/EIR for the Expo LRT project, certified by the Los Angeles County Metropolitan Transportation Authority (Metro) in 2005, evaluated Phase I of the project (downtown Los Angeles to Culver City), including the at-grade crossing proposed at Farmdale Avenue and Exposition Boulevard. The FEIS/EIR was used as CEQA documentation by the CPUC in its December 2007 decision approving all of the at-grade crossings for the Expo LRT project except the proposed at-grade crossings at Farmdale Avenue near Dorsey High School and at Harvard Boulevard near the Foshay Learning Center. The FEIS/EIR was also used as CEQA documentation by the CPUC in its February 25, 2009, decision approving the construction of the Expo LRT project over the existing pedestrian tunnel crossing at Harvard Boulevard.

Members of the public have safety concerns regarding the proposed Farmdale Avenue at-grade LRT crossing. Of particular concern to LAUSD and local residents is the proximity of Dorsey High School, with a population of more than 2,000 students, to the at-grade crossing. Other issues include potential visual impacts, reduced access for vehicles, and noise.

This analysis is being prepared for submission to the CPUC in response to the commission's February 25, 2009, decision regarding the proposed at-grade crossing at Farmdale Avenue and in response to subsequent discussions between Expo and LAUSD. In its February 25 decision, the CPUC denied Expo's application for a proposed at-grade crossing at Farmdale Avenue. After considering various options for the Farmdale Avenue crossing, the CPUC found that a pedestrian overcrossing with Farmdale Avenue closed to traffic was a practicable alternative to the at-grade crossing as proposed at that time. Accordingly, the CPUC left the proceeding open to allow Expo to file an amended application or a new application. The CPUC decision also stated that the commission is a responsible agency under CEQA and that the CPUC, as a responsible agency, may act in a lead role for conducting any necessary future environmental review with respect to the Farmdale Avenue crossing if such review involves either a supplemental EIR or an addendum to the existing FEIS/EIR. The decision stated that the CPUC would not act as a responsible agency should a subsequent EIR be required.

Subsequent to the CPUC decision, Expo filed an amended application with the CPUC, suggesting several possible options for the crossing at Farmdale Avenue, including a pedestrian overcrossing with Farmdale closed, an at-grade crossing subject to a stop-and-proceed requirement for all trains, construction of an LRT station in conjunction with an at-grade crossing at the intersection of Farmdale Avenue and Exposition Boulevard, and an at-grade crossing subject to an interim stop-and-proceed requirement with later construction of an LRT station. The CPUC held a prehearing conference on the amended application on September 30, 2009, and at the direction of the Administrative Law Judge, the parties initiated a discussion of issues in hopes of achieving a safe solution that would be

acceptable to the parties and capable of more expeditiously resolving the proceeding. These discussions indicated that the construction of a near-side LRT station in conjunction with an at-grade crossing at the intersection of Farmdale Avenue and Exposition Boulevard would provide a safe solution that might also facilitate a more expeditious resolution of this proceeding.

Given the foregoing discussion, this CEQA analysis is submitted for the CPUC's consideration in evaluating the proposed project.

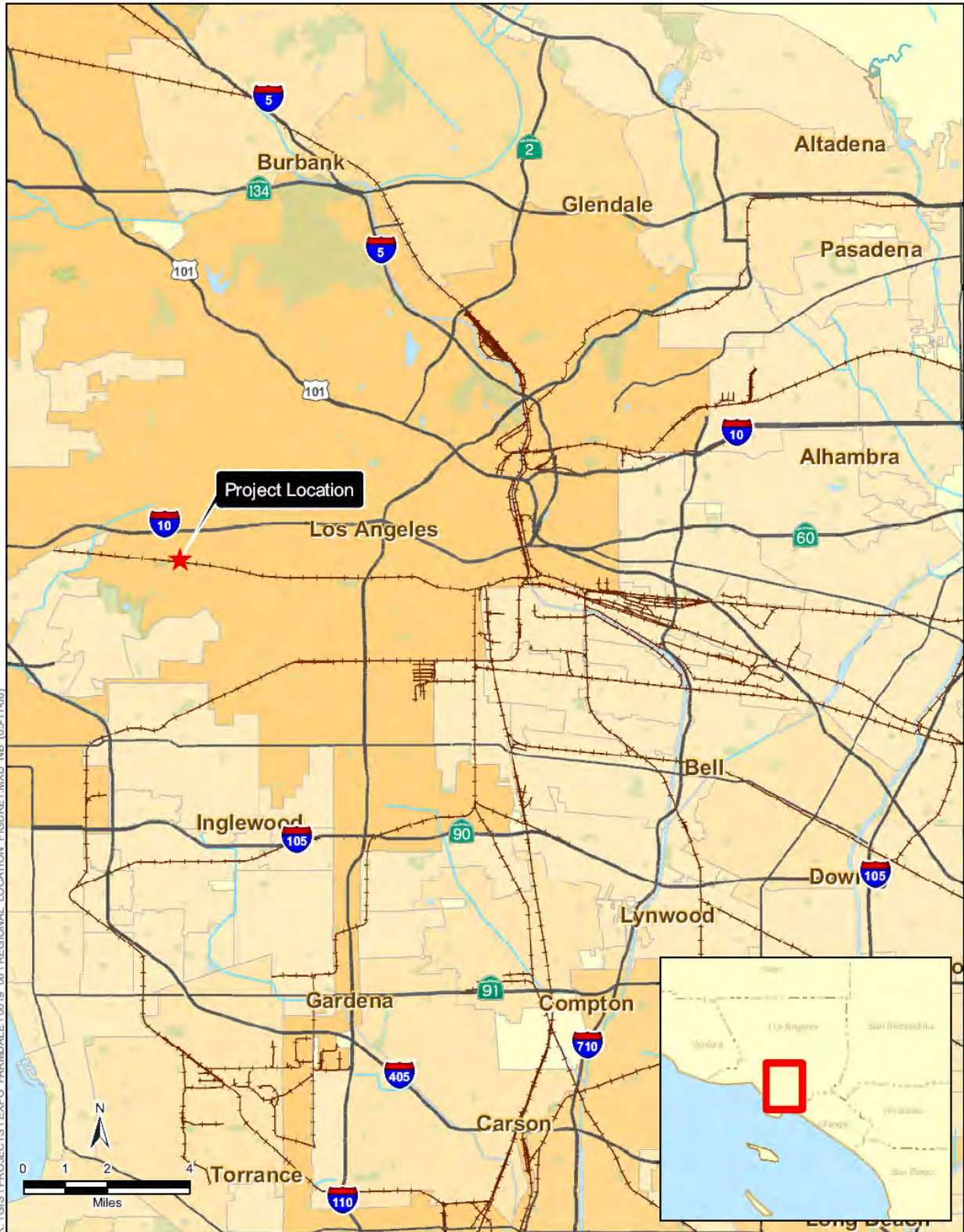
This report is also prepared according to NEPA Section 106 guidelines for submissions to FTA. It provides technical support to the environmental assessment (EA) for the proposed project.

2.2 Project Location and Study Area

The project study area is located in the midwestern portion of the City of Los Angeles, approximately 7 miles southwest of downtown Los Angeles, within the West Adams–Baldwin Hills–Leimert Community Plan area (City of Los Angeles 2001), and encompasses the intersection of Farmdale Avenue and the proposed Expo LRT tracks along Exposition Boulevard and the immediate surrounding area. The Expo LRT line follows the existing Exposition Boulevard, which is a two-lane bi-directional street aligned along an east–west orientation. To the west of its intersection with Farmdale Avenue, Exposition Boulevard runs along the northern side of the Expo LRT project ROW. Dorsey High School is located at the southwest corner of the Farmdale Avenue intersection with Exposition Boulevard. Continuous blocks of low-scale light industrial buildings are located northwest of the intersection along the northern side of Exposition Boulevard.

To the east of the intersection, the Expo LRT ROW forms a wide median strip along Exposition Boulevard. To the north of this median, Exposition Boulevard has bi-directional traffic, as does Exposition Boulevard South to the south of the median. This area includes a number of low- to medium-height trees that help define the ROW as open space. However, many of these trees have been removed subsequent to the FEIS/EIR to prepare for the construction of the Expo LRT project. To the east of Farmdale Avenue, the primary surrounding land uses are single-family homes. The existing ROW is visible from some of the adjacent homes (Appendix A: Map of Viewpoints).

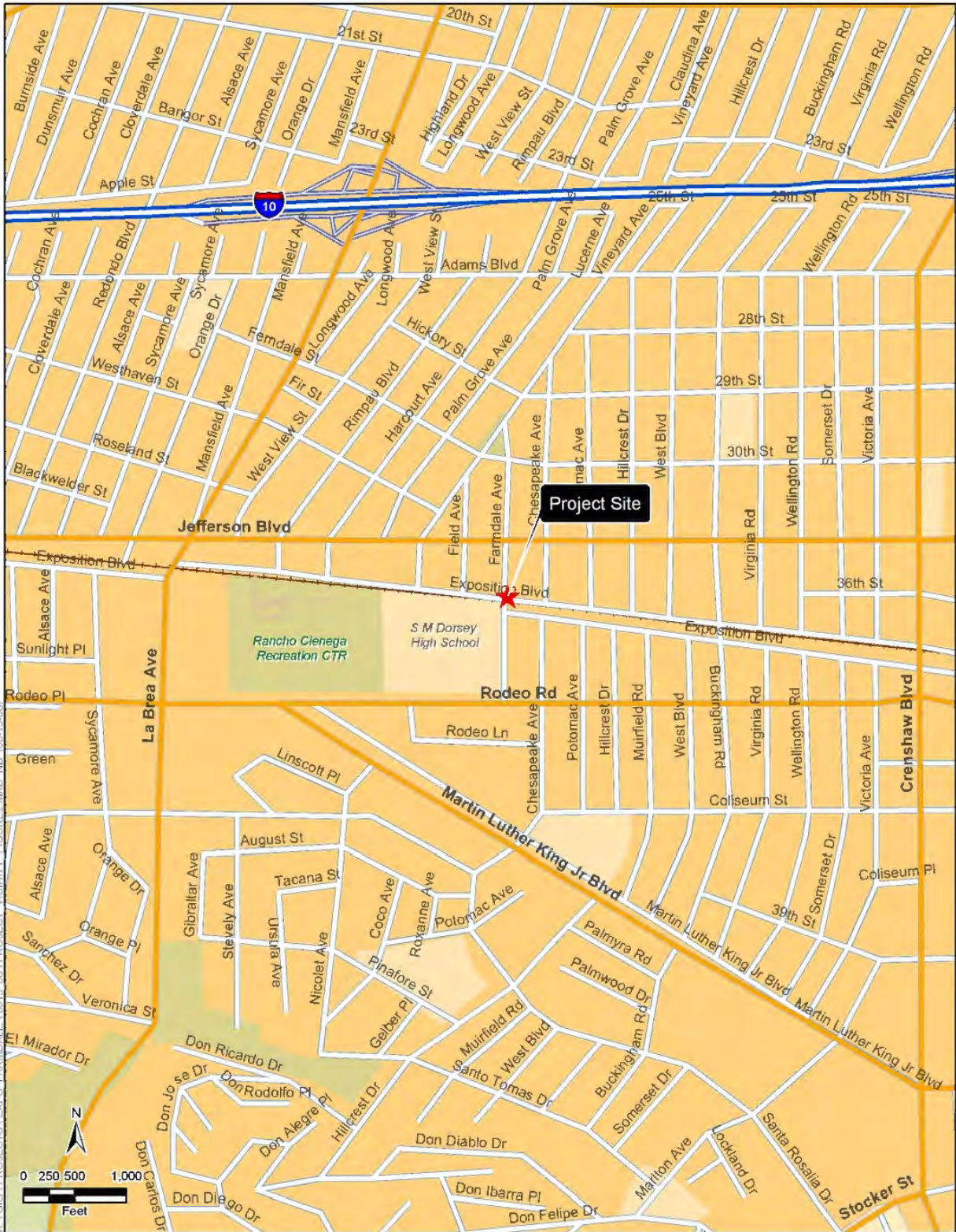
Farmdale Avenue is a two-lane bi-directional street that runs along a north–south orientation for approximately 0.5 mile from Vineyard Avenue to Rodeo Road between La Brea Avenue and Crenshaw Boulevard (see Figure 1, Regional Location Map, and Figure 2, Project Vicinity).



K:\GIS\PROJECTS\EXPO_FARMDALE\0019_08\REGIONAL_LOCATION.FIGURE1.MXD NB (05-11-08)

SOURCE: ESRI Streetmap USA (2007)

Figure 1
Regional Location



SOURCE: ESRI Streetmap USA (2007)

Figure 2
Project Vicinity

2.3 Proposed Project

Construction of an LRT Station at the Intersection of Farmdale Avenue and Exposition Boulevard

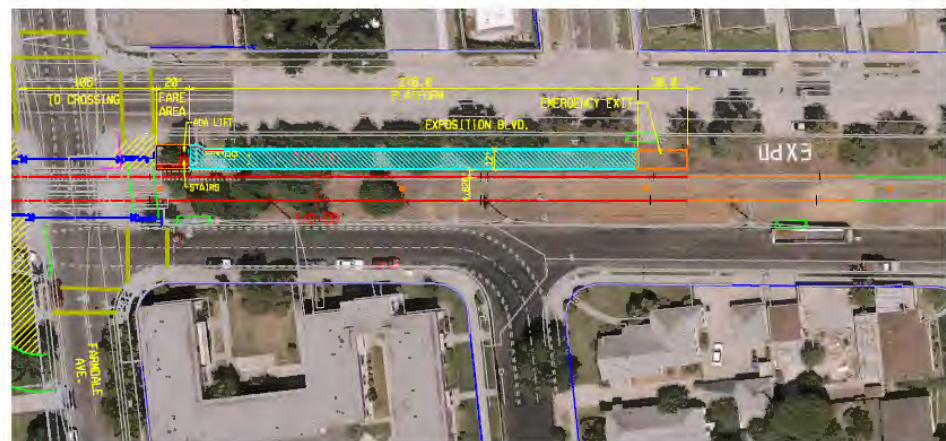
The proposed project would involve the construction of a passenger station at the intersection of Farmdale Avenue and Exposition Boulevard (see Figures 3a and 3b). Farmdale Avenue would remain open to crossing vehicular and pedestrian traffic at Exposition Boulevard, and crossing gates and signals would be employed, similar to the design proposed for the at-grade crossing at Farmdale Avenue under the original Expo LRT project.

Figure 3a: Proposed LRT Passenger Station Plan with At-grade Crossing – Eastbound Platform, West of Farmdale Avenue



Source: Expo Construction Authority 2009.

Figure 3b: Proposed LRT Passenger Station Plan with At-grade Crossing – Westbound Platform, East of Farmdale Avenue



Source: Expo Construction Authority 2009.

To ensure pedestrian safety, the passenger station would be constructed with a near-side split-platform configuration at the intersection of Farmdale Avenue and Exposition Boulevard. The split-platform configuration would require trains to stop at each platform prior to reaching the vehicular and pedestrian crossings at Farmdale Avenue. Each station platform would be 12 feet wide and 270 feet long, with a 12-foot-wide, 20-foot-long fare collection area adjacent to Farmdale Avenue and an emergency exit on the far end of each platform. Westbound Expo trains would stop at the platform east of Farmdale Avenue, and passengers would ingress/egress trains from the north side of the Expo LRT tracks, within the existing right-of-way. Eastbound Expo trains would stop at the platform to the west of Farmdale Avenue, and passengers would ingress/egress trains from the platform on the south side of the Expo LRT tracks. Once passengers embark or disembark, trains would not leave the station until the train operator verifies that the at-grade crossing is clear of both pedestrians and vehicles. A small train control and communications building would be located east of the station along Exposition Boulevard.

Approximately 5,000 square feet of property would be acquired from Dorsey High School for construction of the eastbound platform on the south side of the Expo LRT right-of-way (approximately 2,500 square feet) and the pedestrian plaza for the at-grade crossing at the northeast corner of the Dorsey High School campus (approximately 2,500 square feet). The eastbound platform would be partially within an existing staff vehicle parking area on LAUSD property at Dorsey High School and would require the relocation or reconfiguration of approximately 32 existing parking spaces, with a net loss of approximately 19 spaces. A 10,963-square-foot property on the northeast corner of the intersection of Exposition Boulevard and Farmdale Avenue would be acquired, and all structures would be demolished, including the Expo Inn, a residency motel located at 4523 West Exposition Boulevard. To compensate for the loss of parking spaces within the existing Dorsey High School staff parking lot for the construction of the proposed eastbound Expo LRT station platform, a new 26-space paved parking lot would be constructed on this acquired property.

To the west of Farmdale Avenue, construction of the eastbound platform would require existing Los Angeles Department of Water and Power (LADWP) overhead utility lines to be relocated underground along the right-of-way as well as the relocation of an electrical transformer at the northeast corner of Dorsey High School. Overhead catenary power lines would be constructed along the Expo LRT alignment, including at this station, to provide electrical power to the Expo LRT trains.

The at-grade crossing would also include realignment of the existing Dorsey High School driveway at the northeast corner of the school property to accommodate the pedestrian plaza for the at-grade pedestrian crossing. Pedestrians would be directed across the crossing when it is safe. The other side of the crossing, on the north side of Exposition Boulevard, would include a smaller pedestrian plaza, including swing gates, pedestrian gates, and traffic signals to control pedestrian and vehicle traffic.

Figures 4a and 4b, below, illustrate the proposed station and the proposed parking lot in relation to Dorsey High School.

Figure 4a. LRT Passenger Station with At-grade Crossing and LAUSD Staff Parking Area, Northeast View



Source: Expo Construction Authority 2009.

Figure 4b. LRT Passenger Station Plan with At-grade Crossing, LAUSD Staff Parking Area, and Dorsey High School in Background, Southwest View



Source: Expo Construction Authority 2009.

Expo may decide to use an interim stop-and-proceed procedure until the station is constructed. During the initial interim phase, operating the at-grade crossing with a stop-and-proceed operation variation would not result in any physical modifications to the Farmdale Avenue crossing beyond those already evaluated in the FEIS/EIR and thus would not result in any environmental changes or new potentially significant environmental impacts beyond those evaluated in the FEIS/EIR.

Previously Considered Options

The following options were previously considered and evaluated but are no longer being proposed as a result of the CPUC decision dated February 25, 2009,

and subsequent discussions among the parties conducted at the suggestion of the Administrative Law Judge to this proceeding to identify an option that could provide a basis for a more expeditious resolution to this proceeding. Accordingly, these options are not evaluated in this initial study.

- At-grade Expo LRT crossing at Farmdale Avenue.
- Stop and proceed for Expo LRT trains at the at-grade crossing at Farmdale Avenue.
- Pedestrian overcrossing and closure of Farmdale Avenue at Exposition Boulevard.
- Pedestrian overcrossing, with Farmdale Avenue remaining open at Exposition Boulevard.
- Train overcrossing at Farmdale Avenue.
- Train undercrossing at Farmdale Avenue.

2.4 Purpose of This Analysis

The purpose of this analysis is to compare the environmental impacts of the proposed action to the environmental impact analysis set forth in the previously certified FEIS/EIR, and to determine if there are any significant new impacts and whether these impacts can be mitigated to a less than significant impact.

Federal Criteria

This report is being prepared in accordance with NEPA, the Department of Transportation (DOT) Environmental Regulations (23 Code of Federal Regulations [CFR] Part 711), and the provisions of Section 106 guidelines (36 CFR Part 800). The federal lead agency is required to seek and review information on historic properties in the APE, identify those that are listed in or meet the criteria for listing in the National Register of Historic Places (National Register), and request concurrence with the identification of historic properties from the State Historic Preservation Officer (SHPO).

State Criteria

This report is being prepared in accordance with the provisions of CEQA to identify properties that may be eligible for inclusion in the National Register and listed in the California Register of Historical Resources (California Register) under Section 15064.5(a) of the CEQA Guidelines.

2.5 Potential Impacts of Development

The Dorsey High School complex has been formally determined eligible for listing in the National Register by the FTA and SHPO and is listed in the California Register. Constructed in 1937 and designed by Los Angeles

architecture firm Gogerty and Norenberg, the Streamline Moderne style one-and two-story complex of buildings has been determined eligible for listing in the National Register under Criterion C. No other historic properties were identified within the Area of Potential Effects (APE).

The proposed project would construct an LRT passenger station in a near-side split-platform configuration at the intersection of Farmdale Avenue and Exposition Boulevard, close to the Dorsey High School complex, and leave Farmdale Avenue open to vehicular and pedestrian traffic, similar to what was proposed for the at-grade crossing in the FEIR/EIS for the Expo LRT project.

The criteria for listing in the National Register and California Register were used to evaluate the significance of the historical resource under Section 106, NEPA, and CEQA.

3.0 Applicable Regulations

3.1 Federal Regulations

Identification of Historic Resources under NEPA

To establish the significance of a property, the National Register of Historic Places (National Register) criteria for evaluation set forth in 36 CFR Part 60.4 must be applied. The following criteria are designed to guide the states, federal agencies, and the Secretary of the Interior in evaluating potential entries for the National Register. A significant property is considered a “historic property.”

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and at least one of the following:

- a. that are associated with events that have made significant contribution to the broad patterns of our history; or
- b. that are associated with the lives of persons significant in our past; or
- c. that embody 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; or
- d. that have yielded, or may be likely to yield, information important in prehistory or history.

If a particular resource meets one of these criteria, it is considered as an eligible “historic property” for listing in the National Register. Additionally, unless exceptionally significant, a property must be at least 50 years old to be eligible for listing.

Section 106

The proposed action is subject to compliance with Section 106 of the National Historic Preservation Act as amended (16 USC 470f, henceforth Section 106) and its implementing guidelines (36 CFR Part 800). To ensure compliance with these requirements, historical resources were evaluated for importance under the criteria for listing in the National Register of Historic Places (36 CFR §60) (henceforth National Register).

3.2 State Regulations

Definition of Historical Resources under CEQA

The proposed action is subject to compliance with CEQA PRC Section 21084.1 and *State CEQA Guidelines* Section 15064.5, which require an analysis of the project's potential impact on cultural resources. As defined under state law in Title 14 CCR §4850, the term "historical resource" means "Any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or which is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural history of California." For the purposes of CEQA, "historical resource" is further defined under PRC §15064.5 as a "resource listed in, or determined eligible for listing in, the California Register."

Properties formally determined eligible for listing in the National Register are automatically listed in the California Register.¹

4.0 Current Status of Subject Property

On December 8, 2004, ICF Jones & Stokes submitted a Section 106 Criteria of Adverse Effects Finding Memorandum regarding the FTA/MTA Mid-City Corridor Exposition Branch Light Rail Transit project to the SHPO. The Section 106 Memorandum presented findings that the Dorsey High School complex was eligible for the National Register under Criterion C at the local level of significance because of the Streamline Moderne style of the one- and two-story complex of buildings, built in 1936–1937 and designed by the Los Angeles architectural firm of Gogerty and Norenberg. The SHPO concurred with the findings of the letter, determining the complex eligible for the National Register under Criterion C. The formal determination of Dorsey High School's National Register eligibility automatically listed the complex in the California Register. Therefore, the Dorsey High School complex is a "historical resource" under CEQA, given the determination of its eligibility for the National Register and listing on the California Register.

¹ California Public Resources Code, Section 5024.1(c).

4.1 Components That Contribute to the Significance of the Site

Documentation regarding the significance of the Dorsey High School complex was presented to the SHPO in the December 8, 2004, Section 106 Criteria of Adverse Effect Finding, with additional information regarding the setting of the resource and related architectural significance findings submitted on May 19, 2008. The following sections present this latest information establishing the significance of the Dorsey High School complex in terms of ingenious engineering achievements in structural design, employed on the site in one of the first responses in school building to the Field Act following the Long Beach earthquake of 1933. In addition, Dorsey High School complex's sense of pleasant openness and strong connection to the community and surrounding urban fabric was found to be, in part, a response to earthquake safety, seen in the innovative layout of the school's contributing freestanding buildings, each tailored to a specific use and immediately accessible to the ground plane.

Setting, Engineering, and Layout—Dorsey High School Complex

Dorsey High School was developed by the City of Los Angeles Board of Education on the site of the 1932 Olympic Village. All of the main school structures, including classrooms, field house, gymnasium, auditorium, and administration buildings, exhibit a high quality of design in architecture, site design, and ingenious and cost-effective engineering.

The setting around Susan Miller Dorsey High School, completed in 1937, is a mixture of low-rise buildings of one to three stories, with small industrial shops of an informal character on the north side of Exposition Boulevard and west of Farmdale Avenue and low-scale residential buildings, both freestanding single-family homes and low-rise apartment dwellings. A notable feature of the immediate setting is the sense of pleasant openness around the school, which serves to integrate the historic resource into its surrounding urban fabric in terms of building massing and scale and contributes to its feeling and association. This feature of openness is enhanced by its landscaping, green lawns, and mature trees, which also further the school's urban role as a transitional "hinge" on an east-west axis between Rancho Cienega Park to the west, characterized by well-tended lawns, mature trees, playing fields, tennis courts, baseball and picnic areas, and the denser residential and commercial fabric to the east. The school also plays a similar transitional role on a north-south axis, between the low-scale, individually owned light industrial shops and service centers north of the historic property (along the north side of Exposition Boulevard and west of Farmdale Avenue) and the more heavily traveled Rodeo Road to the south.

Recent research serves to strengthen the property's significance as established in 2004 documentation. The complex demonstrates one of the earliest architectural responses to earthquake concerns on behalf of public schools following the 1933 Long Beach Earthquake, when 70 schools were destroyed and 120 damaged, in

most cases because these multi-story buildings, modeled on 19th century Victorian-era schools, were constructed of unreinforced masonry. The subsequent Field Act, enacted 1 month later, defined new earthquake standards for certain categories of public buildings, including schools.

Except for the reinforced concrete for the Administration Building, the architects devised lightweight steel trusses and cantilevered, hinged, or pinned arches with engineering configurations tailored to each contributing building. For example, a series of three-hinge steel truss arches were employed for both sides of the auditorium (located on the south side of the campus), freeing up more interior space. The arches, clad in shotcrete, are extant and expressed outside the auditorium's envelope as 1930-style "flying buttresses." Similar ingenuity is employed for the five double-loaded classroom buildings, where central piers support long-span steel trusses and eliminate the need for perimeter structure, allowing whole walls of glass to daylight the classrooms. The field house gymnasium is very rare in Los Angeles; this extruded half-cylinder, open at both ends, combines slip joints on rollers and hinged arches to permit lateral motion caused by earthquakes.² All of these buildings appear to be well-maintained and retain their integrity.

In addition, beyond specific engineering resolutions for specific buildings, the school layout itself responds to earthquake concerns. The layout consists of many low-rise, relatively narrow buildings with immediate access to the ground, in contrast to the older template for schools, a single large unreinforced and multi-story building, which by late 1933 was an unacceptable model. The specific radial siting of long, freestanding classroom buildings, open at either end, distributed evenly in a half-circle west of the administration building, provides opportunities for visual surveillance, opportunities to assist others more quickly, and easier emergency egress. The layout also provides proximity to nature, a Modernist tenet,³ and adjacent play areas. The architectural resolution of all these concerns reveals a multivalent approach to ensuring the longevity of the buildings and the safety of students and teachers.

Overall, the buildings are close to one another but carefully sited to give the property a relaxed, open feeling.

4.2 Historic Context

Susan Miller Dorsey High School is a complex of one-and two-story Streamline Moderne style buildings built in 1936–1937. The complex is 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. Dorsey High School 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

² *The Architectural Record*, September 1938, p. 40–47.

³ Although proximity to nature was also important in the 19th century, it was also a specific Modernist tenet espoused by many early Modernists.

building, classrooms, and auditorium, the field house also exhibits a high quality of design.

A median that runs along Exposition Boulevard and bisects Farmdale Avenue historically contained railroad tracks that served the freight traffic of the Southern Pacific Railroad and the passenger service of the Pacific Electric Railway. The Los Angeles and Independent Railway and the Pacific Electric's Santa Monica Air Line provided passenger service from downtown Los Angeles to Santa Monica. The lines traveled down the full length of the Exposition Corridor. Railroad service along Exposition Boulevard existed for 78 years, from 1875 to 1953. The line was electrified in 1908 and provided passenger service until 1953, when the overhead trolley wire was removed and diesel locomotives took over all freight movements. After daily freight rail service was suspended in the mid-1980s,⁴ the line was purchased by Metro.

Overall, railroad service on the Expo ROW existed for more than 100 years. Thus, a precedent for an at-grade crossing of an electric railway carrying passengers adjacent to the school (completed in 1937) existed for 26 years, and "rail transit facilities, equipment and operations are compatible with the property's historic setting, and would not diminish its integrity of feeling or association."⁵ Elements of the project, therefore, have the potential to support rather than detract from the historic context of the Corridor and the Dorsey High School complex at the intersection of Farmdale Avenue and Exposition Boulevard.

5.0 Effects/Impacts Analysis

5.1 Federal NEPA/Section 106 Criteria

Section 106 of NHPA, as amended (Section 106, 16 United States Code [USC] 470f), requires that impacts on significant cultural resources, hereafter called historic properties, be taken into consideration in any federal undertaking. "Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization that meet the National Register criteria" [36 CFR Section 800.16(1)].

⁴ Exposition Construction Authority. 2009. Available: <http://www.buildexpo.org/phase1_overview.php>. Accessed: March 11, 2008; Electric Railway Historical Association of Southern California. n.d. Available: <<http://www.erha.org/pewal.htm>>. Accessed: March 12, 2008.

⁵ Letter to Mr. Milford W. Donaldson from the U.S. Department of Transportation, Federal Transit Administration, December 8, 2004.

Cultural resources studies for the undertaking are subject to the procedures and review of FTA and CUPC in consultation with SHPO. These studies are shaped by Advisory Council on Historic Preservation regulations (36 CFR Part 800) for implementing Section 106. Section 106 studies provide the information necessary to satisfy legal requirements for environmental documents under NEPA. The SHPO acts as a coordinator in the Section 106 process, but the final responsibility to carry out this regulation belongs to FTA, the designated lead federal agency.

To comply with Section 106 of NHPA, any effects of the proposed undertaking on properties listed in or determined eligible for inclusion in the National Register must be analyzed by applying the Criteria of Adverse Effect [36 CFR Part 800.5(a)], as follows:

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.

Part 800.5 (a) (1) describes additional adverse effects, including but not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (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;
- (iii) Removal of the property from its historic location;
- (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;
- (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property that 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; and
- (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.

5.2 State CEQA Criteria

Under CEQA, the potential impacts of a project on historical resources must be considered. The purpose of CEQA is to evaluate whether a proposed action may have a significant adverse effect on the environment and, if so, whether that effect can be reduced or eliminated by pursuing an alternative course of action or through mitigation measures. Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: a determination of whether the resource is historically significant and a determination of whether the project will result in a “substantial adverse change” in the significance of the resource. For purposes of this section, an historical resource is a resource listed in, or determined to be eligible for listing in, the California Register. The fundamental test under CEQA is whether a project affects the eligibility of the physical characteristics, or character-defining features, that make the historical resource significant.

As stated in Section 21084.1 of the California Public Resources Code (CPRC), a project that may cause a “substantial adverse change” in the significance of a historical resource is a project that may have a significant effect on the environment.

The CRPC further defines a “substantial adverse change” as “demolition, destruction, relocation, or alteration such that the significance of an historical resource would be impaired.”⁶

It also defines a “substantial adverse change” as the material impairment of the resource “or its immediate surroundings.”⁷ As such, the setting of a resource must be taken into account in that it too may contribute to the significance of the resource. Projects will result in significant adverse change if they result in a change in the character of the historical resource’s setting through the introduction of visual, atmospheric, or audible elements that are not in conformance with the Secretary’s Standards, and result in material impairment of the setting.

The California Code of Regulations further defines a “substantial adverse change” as the material impairment of the resource “or its immediate surroundings.”⁸ Material impairment occurs when a project demolishes or materially alters in an adverse manner those physical characteristics that convey a resource’s historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register.⁹

Upon identification of a historical resource under CEQA, the regulations identify the Secretary of the Interior’s Standards as the measure to be used to determine whether a new development project adversely affects a “historical resource.” Section 15064.5(b)(3) states:

Generally, a project that follows the Secretary of the Interior’s *Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* or the

⁶ California Public Resources Code, Section 5020.1(q).

⁷ 14 California Code Regulations, Section 15064.5(b)(1).

⁸ Ibid.

⁹ 14 California Code Regulations, Section 15064.5(b)(2).

Secretary of the Interior's *Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings* (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.

5.3 Assessment of Effects of the Proposed Project

NEPA/Section 106

The historic property evaluated is the entire Dorsey High School complex, including the innovative layout of the campus and the Streamline Moderne buildings with their noted engineering solutions. As noted, most of the contributing buildings in the school complex face east on Farmdale Avenue with the exception of the field house/gymnasium, located northwest of the Administration building, and three one-story classrooms located radially and perpendicular to the administration building, which is oriented north-south and faces east on Farmdale Avenue.

The contributing buildings alternate between freestanding two-story or double-height communal spaces and long one-story banks of connected classrooms. Considered individually, these distinctive components of the school complex would be unaffected by the proposed action.

However, in considering the complex in its entirety, both physically and visually the school has long been an integral part of the fabric of the community and is well integrated into its surroundings. It plays a pivotal role as a transitional "hinge" both between the larger scale, multi-family residences to the south and the eclectic mix of low-scale residential and industrial buildings to the north, as well as between the large, landscaped Rancho Cienega Park to the west and the much denser low-scale residential area to the east.

The most important vantage points for viewing the Dorsey High School complex are directly in front of the school, looking west from across Farmdale Avenue; from Rodeo Road, south of the campus; and from the intersection of Farmdale Avenue and Exposition Boulevard.

Construction of an LRT Station at the Intersection of Farmdale Avenue and Exposition Boulevard

Under the proposed project, approximately 5,000 square feet of property would be acquired from Dorsey High School for construction of the eastbound platform on the south side of the Expo LRT right-of-way (approximately 2,500 square feet) and the pedestrian plaza for the at-grade crossing at the northeast corner of the Dorsey High School campus (approximately 2,500 square feet). The school encompasses approximately 19.8 acres (or 862,488 square feet), therefore, the acquisition would be limited to approximately 0.58 percent of the total school property. The proposed acquisition would not include or alter any contributing elements of the historic property or their setting.

The north elevation of Dorsey High School, along Exposition Boulevard, is not and has never been the principal view of the school, whose primary façade, comprised of the buildings that contribute to its property's significance, faces east on Farmdale Avenue. The north end of the campus includes only one of the 10 contributing buildings, which is located well south of Exposition Boulevard and whose rear elevation is the only elevation which originally could be seen from the boulevard. Today, even this view is inaccessible because of landscaping, smaller ancillary structures and mature landscaping.

Historically, existing important views of the school in its historical setting have always been available from three areas: (1), directly along Farmdale Avenue; (2), the southern and southeast portion of the campus along Rodeo Road, which is anchored by the striking contributing building, the Auditorium; and (3), the view available traveling west along Exposition Boulevard at the intersection of Farmdale Avenue. With the retention of open thoroughfares at the corner of Farmdale Avenue and Exposition Boulevard, there would be no visual interruption of the school's historic visual connection to the surrounding community and urban fabric which contribute to the property's setting, feeling and association.

The Expo Inn, a residency motel located at 4523 West Exposition Boulevard, would be demolished to compensate for the loss of parking spaces from the existing Dorsey High School staff parking lot, which would be displaced by the eastbound station platform. The Expo Inn was constructed in 1981 and is not a historic property.

Additionally, to the west of Farmdale Avenue, due to the construction of the eastbound LRT passenger station platform on the south side of the Expo LRT tracks, the existing overhead electrical lines would be placed underground. This change would not contribute to potential adverse changes, but rather may serve to enhance views of the school in its original setting and are noted here as part of this review.

Although the two mature redwood trees, and two mature street trees which would be replaced by a driveway realignment on the northeast side of the campus would be removed, the removal of these trees would not affect the integrity of the historic resource. Nonetheless, in order to ensure that such impacts do not cumulatively contribute to significant impacts, the following mitigation is proposed:

H-4 Two mature redwood trees near the northeast corner of Dorsey High school shall be assessed for viability, and removed and placed under the care of a licensed arborist during construction. Replanting or replacement of these mature trees shall be considered on the Dorsey High School campus or at a nearby suitable location. Consistent with the City of Los Angeles policy, any removed street trees shall be replaced in the local vicinity at a 2:1 ratio. All replanting or replacement of trees shall be performed in accordance with the Landscape Element of the Mid-City/Exposition Transit Parkway plan, as described in the FEIS/EIR.

Archaeology

Previous Research: As was noted in the December 8, 2004 analysis performed in support of the FEIS/EIR, railroad service along the Exposition ROW existed for 78 years, from 1875 to 1953. This portion of the Expo LRT project was evaluated as having a low potential for encountering intact prehistoric cultural resources because no prehistoric resources were known in this area of the project, and project construction as then proposed would occur within the previously disturbed Pacific Electric right-of-way at shallow depths below the ground surface. Thus, no intact prehistoric resources were likely to be encountered.

Additionally, the potential for historical archaeological deposits was evaluated as low. Since urbanization took place after the Santa Monica Air Line was already in place, no structures or hollow fill features would exist within the areas of the APE are likely to be disturbed by construction. For this reason, monitoring for historic resources was not recommended for this portion of the project area.

To mitigate adverse effects on significant resources for the entire Metro Exposition Line project, a Cultural Resources Monitoring and Mitigation Plan (CRMMP) has been prepared prior to this change to the project. This document was prepared according to the requirements of the California State Historic Preservation Officer (SHPO) letter of 8 December 2004. The CRMMP was developed to guide and facilitate the mitigation monitoring, identification and treatment of cultural resources located during project construction in an effort to eliminate adverse effects on significant resources. If any archaeological or paleontological resources would be excavated during construction, construction would be halted and the mitigation measures detailed in the CRMMP would be adhered to.

Archaeological resources may be discovered during construction. However, with application of the CRMMP described in the FEIS/EIR, no adverse effect would result.

Finding, Section 106 of the National Historic Preservation Act

Before and after mitigation, the proposed project would not result in an adverse effect under Section 106 of the NHPA.

Other Potential Effects of Proposed Action

Under the proposed project, no other adverse effects on the historic property would occur because:

- (1) There would be no physical destruction or damage to Dorsey High School.
- (2) There would be no alteration of Dorsey High School.
- (3) Dorsey High School would not be removed from its historic location.
- (4) Dorsey High School would continue to be used as a high school.

- (5) No atmospheric or audible elements would be introduced (railroad and trolley activity is part of the school's historic setting).
- (6) Dorsey High School would not be neglected because of the proposed action.
- (7) Dorsey High School is not under federal ownership or control.

CEQA

The historical resource evaluated is the entire Dorsey High School complex, including the innovative layout of the campus and the Streamline Moderne buildings with their noted engineering solutions. As noted, most of the contributing buildings in the school complex face east on Farmdale Avenue with the exception of the field house/gymnasium, located northwest of the Administration building, and three one-story classrooms located radially and perpendicular to the administration building, which is oriented north-south and faces east on Farmdale Avenue.

The contributing buildings alternate between freestanding two-story or double-height communal spaces and long one-story banks of connected classrooms. Considered individually, these distinctive components of the school complex would be unaffected by the proposed action.

However, in considering the complex in its entirety, both physically and visually the school has long been an integral part of the fabric of the community and is well integrated into its surroundings. It plays a pivotal role as a transitional "hinge" both between the larger scale, multi-family residences to the south and the eclectic mix of low-scale residential and industrial buildings to the north, as well as between the large, landscaped Rancho Cienega Park to the west and the much denser low-scale residential area to the east.

The most important vantage points for viewing the Dorsey High School complex are directly in front of the school, looking west from across Farmdale Avenue; from Rodeo Road, south of the campus; and from the intersection of Farmdale Avenue and Exposition Boulevard.

Construction of an LRT Station at the Intersection of Farmdale Avenue and Exposition Boulevard

Under the proposed project, approximately 5,000 square feet of property would be acquired from Dorsey High School for construction of the eastbound platform on the south side of the Expo LRT right-of-way (approximately 2,500 square feet) and the pedestrian plaza for the at-grade crossing at the northeast corner of the Dorsey High School campus (approximately 2,500 square feet). The school encompasses approximately 19.8 acres (or 862,488 square feet). Therefore, the acquisition would be limited to approximately 0.58 percent of the total school property. The proposed acquisition would not include or alter any contributing elements of the historic property or their setting.

The north elevation of Dorsey High School, along Exposition Boulevard, is not and has never been the principal view of the school, whose primary façade,

comprised of the most prominent of the buildings that contribute to the property's significance, faces east on Farmdale Avenue. The north end of the campus includes only one of the property's 12 contributing buildings; this support building is located well south of Exposition Boulevard and faces south into the interior of the campus, so that its rear elevation faces Exposition Boulevard. Today, even this view is obscured because of the presence of an original staff parking lot, smaller ancillary structures, and mature landscaping.

Historically, existing important views of the school in its historic setting have always been available from three areas: (1), directly along Farmdale Avenue; (2), the southern and southeast portion of the campus along Rodeo Road, which is anchored by the striking contributing building, the Auditorium; and (3), the view available coming west along Exposition Boulevard at the intersection of Farmdale Avenue. The existing open thoroughfares at the corner of Farmdale Avenue and Exposition Boulevard would be retained and there would be no visual interruption of the school's historic visual connection to the surrounding community and urban fabric, which in turn help to establish the property's setting, feeling and association.

The Expo Inn, a residency motel located at 4523 West Exposition Boulevard, would be demolished to compensate for the loss of parking spaces from the existing Dorsey High School staff parking lot, which would be displaced by the eastbound station platform. The Expo Inn was constructed in 1981 and is not a historic property.

Additionally, the existing overhead electrical lines would be placed underground. This change would not contribute to potential adverse changes, but rather may serve to enhance views of the school in its original setting and are noted here as part of this review.

Although the two mature redwood trees, and two mature street trees which would be replaced by a driveway realignment on the northeast side of the campus would be removed, removal of these trees would not affect the integrity of the historic resource. Nonetheless, in order to ensure that such impacts do not cumulatively contribute to significant impacts, specific mitigation measures would be necessary (mitigation measure H-4).

As discussed above, archaeological resources may be discovered during construction. However, with application of the Cultural Resource Mitigation Monitoring Plan (CRMMP) described in the FEIS/EIR, no adverse effect would result..

Finding, California Environmental Quality Act

Before and after mitigation, the proposed project would not create a substantial adverse change and would not have a significant effect on the environment.

5.4 Summary of Findings

Dorsey High School is a historic property under NHPA and a historical resource under CEQA, determined eligible for listing in the National Register under Criterion C by the SHPO in 2004 and thereby listed in the California Register. The proposed project would not physically change the complex itself.

The Dorsey High School complex has been determined significant for a variety of character-defining features related to the individual buildings, the complex as a whole, and the setting of the complex within the community. The proposed project would have no adverse effect or significant impact on Dorsey High School.

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———. 2008. Section 106 Findings Memorandum. December 8.

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7.0 List of Preparers

Rick Starzak, Senior Architectural Historian. M.A. Architecture, University of California Los Angeles. Thirty years of experience in historic preservation and architectural history.

Barbara Lamprecht, Senior Architectural Historian, M.Arch., California State Polytechnic University, Pomona, Architecture. B.A. History and German, Bucknell University, Lewisburg, Pennsylvania. Twenty years of experience in architectural history.

Appendix A Map of Viewpoints



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Appendix B
Photos: Site Location/Views



Image 1. View of northeastern corner of Dorsey High School.



Image 2. View facing north along the center of Farmdale Avenue, adjacent to Dorsey High School, looking toward the intersection of Farmdale Avenue and Exposition Boulevard.



Image 3. View facing north along the west side of Farmdale Avenue from the northeastern corner of Dorsey High School.



Image 4. View facing north along the east side of Farmdale Avenue, from the northeast corner of the property of Dorsey High School, looking toward the proposed action location.



Image 5. View facing south along the center of Farmdale Avenue, immediately north of the intersection of Farmdale Avenue and Exposition Boulevard. Dorsey High School is along the right side of the road, and is mostly obscured by mature trees and vegetation.



Image 6. View facing north, looking across Exposition Boulevard from the northern edge of Dorsey High School, to the west of the intersection of Farmdale Avenue and Exposition Boulevard.



Image 7. View facing south, looking across Exposition Boulevard toward the northern edge of Dorsey High School, to the west of the intersection of Farmdale Avenue and Exposition Boulevard.



Image 8. View facing west, looking along the Expo LRT ROW, from the intersection of Farmdale Avenue and Exposition Boulevard.



Image 9. View facing east, looking along the Expo LRT ROW, from the intersection of Farmdale Avenue and Exposition Boulevard.



Image 10. View facing south, looking along Farmdale Avenue, toward the intersection of Farmdale Avenue and Exposition Boulevard.



Image 11. View facing northwest, looking across Exposition Boulevard, toward the Metro-owned parcel on the northwest corner of the intersection of Farmdale Avenue and Exposition Boulevard.



Image 12. View facing northeast, looking across Exposition Boulevard, toward the Expo Inn Motel on the northeast corner of the intersection of Farmdale Avenue and Exposition Boulevard.

Appendix C
**Photos: Identification of Dorsey High School as a Historic
Property/Historical Resource**



Image 13. Looking southwest at school's (east-facing) primary façade from Exposition Boulevard. Photo taken along Farmdale Avenue facing south.

Image demonstrates innovation in distributing school as a group of free-standing low-rise buildings rather than as a single taller building, an innovative architectural response applied to public schools after the Field Act and the Long Beach Earthquake, both 1933.



Image 14. School's entrance to Administration Building, part of (east-facing) primary façade. Photo taken along Farmdale Avenue facing south.

Image illustrates retention of integrity from its period of significance, 1937.



Image 15. School's entrance to Administration Building, part of (east-facing) primary façade. Photo taken along Farmdale Avenue facing southwest.

Image illustrates retention of integrity from its period of significance, 1937.



Image 16. West-facing housing (single family and low-rise multi-plex) across from School's primary façade. Photo taken along Farmdale Avenue facing southeast.

Image illustrates original and extant integration of low-rise school, a complex of free-standing one- and two-story buildings, into surrounding low-rise urban fabric.



Image 17. Southern end of the east-facing primary façade of the Administration Building. Photo facing northwest from the corner of Farmdale Avenue and Rodeo Road.

Image illustrates retention of integrity from its period of significance, 1937.



Image 18. Auditorium's east façade. This free-standing building is south of and separated by the Administration Building by a sequence of one-story classrooms; the roofs of these wide-span rooms employ unusual cantilevered trusses. The Auditorium visually anchors the south end of the primary façade. Photo taken looking northwest from Farmdale Avenue.

Image illustrates retention of integrity from its period of significance, 1937.



Image 19. Auditorium's south façade facing Rodeo Road. This view shows extant and original "fins" of vertically oriented stucco-clad steel trusses bracing the sides of the Auditorium. Photo taken looking north from Rodeo Road.

Image illustrates retention of integrity from its period of significance, 1937, and demonstrates ingenuity in engineering within the Streamline Moderne Style.



Image 20. The west façade of the Gymnasium, an important contributing building to this resource, located behind (west of) the other contributing buildings along Farmdale Avenue. Photo taken looking east toward Farmdale Avenue from Rancho Cienega Playground.

Image illustrates retention of integrity from its period of significance, 1937, and demonstrates ingenuity in engineering (hinged, pin and slip joint arches for gymnasium's seismic resilience) within the Streamline Moderne Style.

Appendix D

Letter to SHPO

and

Response from SHPO

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

REGION IX
Arizona, California,
Hawaii, Nevada, Guam

201 Mission Street
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APR 30 2010

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

Attention: Ms. Natalie Lindquist

Re: Exposition Light Rail Transit project: Request for
Concurrence on Finding of No Adverse Effect and
Proposed *De Minimis* Impact Finding Under
Section 4(f) of the DOT Act; Dorsey High School
and Farmdale Avenue Station

Dear Mr. Donaldson:

The purpose of this letter is to inform you of modifications to the Exposition Light Rail Transit (LRT) Project in proximity to the Susan Miller Dorsey High School, a historic property identified during our consultation in 2004. The Federal Transit Administration (FTA) is the lead Federal agency for compliance with the Section 106 of the National Historic Preservation Act and for the National Environmental Policy Act (NEPA). A Final Environmental Impact Statement/ Environmental Impact Report (FEIS/EIR) for the Exposition LRT project was completed in 2005. At this time FTA is preparing a Supplemental Environmental Assessment (SEA) to address the NEPA requirements for the proposed project modifications.

In December 2004, you concurred with our original Section 106 Finding of “no adverse effect” with regard to the original at-grade crossing near Dorsey High School. The current project modifications are located at the Falmdale Avenue crossing on the Exposition LRT project alignment and involve the acquisition of approximately 5,000 square feet of Dorsey High School property for the Federal undertaking for the construction of a new eastbound at-grade station platform and a pedestrian plaza.

Other modifications not located on the school property include; a complimentary westbound at-grade station, the demolition of Expo Inn to compensate for the above proposed property acquisition which results in lost parking spaces from the existing Dorsey High School staff parking lot, and a realigned driveway entrance that will would be added to the existing parking lot.

This letter is to inform you of this proposed change and to request written concurrence with FTA's finding of no adverse effect for the proposed modifications. FTA intends to use your written concurrence to support a *de minimis* impact finding under Section 4(f) of the Department of Transportation (DOT) Act (49 CFR Part 622). We are also requesting that for any archaeological resources that may be discovered during construction related to the project modifications, application of the existing project Cultural Resources Monitoring and Mitigation Plan (CRMMP) would result in no adverse effect with standard mitigation.

National Register Eligibility and 2004 Findings of Effect – Dorsey High School

Our December 8, 2004 letter presented our findings regarding the identification of historic properties and undertaking's effects. In that letter, FTA determined that the Dorsey High School complex was eligible for the National Register under Criterion C at the local level of significance. The Dorsey High School complex is an example of Streamline Moderne style. The property was designed by the Los Angeles architectural firm of Gogerty and Norenberg and built in 1937.

In our review of the previously proposed at-grade crossing near Dorsey High School, we considered the "extremely large" school campus and the Exposition LRT's potential visual effect on the buildings or their setting. We ultimately determined that the Exposition LRT project "would not substantially obstruct views to or alter Dorsey High School and would not diminish its integrity of location, design, materials, or workmanship." [FTA/MTA Mid-City Corridor: Exposition Branch Light Rail Transit, NHPA Section 106 Criteria of Adverse Effect Finding, see Dorsey High School sections.]

FTA received your concurrence with our findings on December 14, 2004. These findings were included in the 2005 FEIS/EIR.

Relationship of Historic Property to Project Site

The Exposition LRT follows the former Southern Pacific right-of-way along Exposition Boulevard, running from east to west. Dorsey High School is located on the southwest corner of the project site, at the intersection of Exposition Boulevard and Farmdale Avenue (see Figure 1). The school's ten contributing buildings are all located south of Exposition Boulevard. The primary facades and principal contributing buildings (administration, some classrooms and auditorium) are mostly grouped in linear fashion facing east on Farmdale Avenue, with a second important facade on the south that is visually accessible from Rodeo Road, a principal east-west road which defines the school's southern property line. Other contributing buildings such as classrooms and the gymnasium are located west of the buildings facing Farmdale Avenue.

Figure 1: Aerial View of Proposed at-grade LRT Passenger Station showing the relationship to the ten Dorsey High School buildings constructed in 1937.



Also shown is the building at 4523 Exposition Boulevard (Expo Inn) that was constructed in 1981 and is not a historic property.

Proposed Option

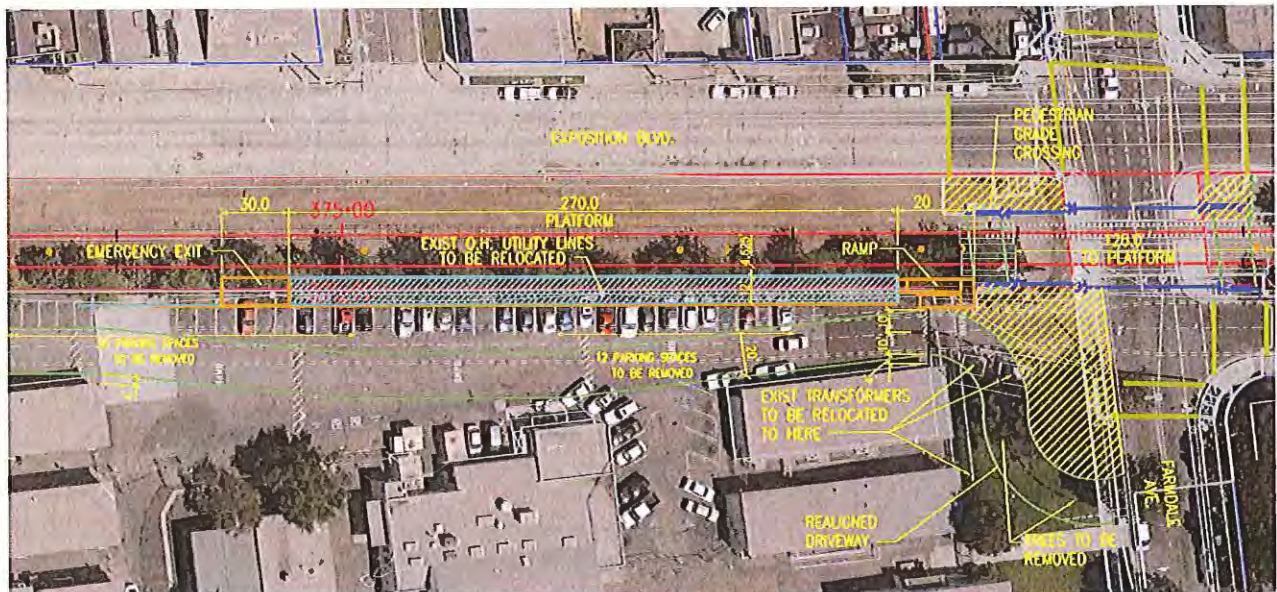
Under the current proposal, approximately 5,000 square feet of property would be acquired for the Federal undertaking from Dorsey High School. This would include approximately 2,500 square feet along the edge of the property line for construction of the eastbound station platform on the south side of the Exposition LRT right-of-way and approximately 2,500 square feet for construction of a pedestrian plaza for the at-grade crossing at the northeast corner of the Dorsey High School campus (see Figure 2). The proposed acquisition will primarily consist of the northern edge of the Dorsey High School campus that currently serves as an asphalt parking lot with two temporary buildings and an original 1937 school building which faces south. All of the buildings would remain following land acquisition and construction, and a new driveway entrance would be added to the existing parking lot.

Also as a part of the proposed option, the Expo Inn, a residency motel located at 4523 West Exposition Boulevard, will be demolished in order to compensate the lost parking spaces from the existing Dorsey High School staff parking lot to be displaced by the proposed eastbound station platform (see Figure 3). The Expo Inn was constructed in 1981 and is not a historic property (see Attachment).

Effects Analysis

The station platform would not result in an adverse effect because the station is at grade and would not pose a visual impact or destruction of the historic school buildings. The proposed acquisition would not include or alter any contributing elements of the historic property or their setting. In addition, the proposed option will not result in an adverse effect because the station platform is at-grade and a new driveway entrance will be connected to the existing asphalt parking lot.

Figure 2: Plan View of Proposed LRT Passenger Station with At-grade Crossing – Eastbound Platform West of Farmdale Avenue



Dorsey High School property is located in the lower portion of the frame: all of the displayed buildings are temporary, except for the central building; its rear elevation faces the station and driveway.

The driveway entrance will be constructed off Farmdale Avenue, on the northeastern corner of the property, in front of the two temporary buildings. The most important vantage points for viewing Dorsey High School are either directly in front of the school, looking west from across Farmdale Avenue; or from Rodeo Road, south of the campus. The north end of the campus includes only one of the ten contributing buildings and one that is not a primary contributor.

Additionally, this building is located well south of Exposition Boulevard and its rear elevation is the only elevation that originally could be seen from Exposition Boulevard. Today, even this view is obscured because of the existing and original staff parking lot, smaller ancillary structures and mature landscaping. With the retention of open thoroughfares at the corner of Farmdale Avenue and Exposition Boulevard, there would be no visual interruption of the school's historic visual connection to the surrounding community and urban fabric which contribute to the property's setting, feeling and association.

Figure 3: Plan View of Proposed LRT Passenger Station with At-grade Crossing and acquired parcel with parking lot – View southwest, facing Dorsey High School. On the school property, the temporary buildings are displayed in the center background of this figure.



Proposed Minimization and Mitigation Measures

Two mature redwood trees near the northeast corner of Dorsey High school would need to be removed for driveway realignment on the northeast side of the campus. These trees shall be assessed for viability, and removed and placed under the care of a licensed arborist during construction. The mature redwood trees would be relocated on the school property. Their removal and relocation would not affect the integrity of historic property and would not lead to an adverse effect.

Prior to the proposed project modifications, a Cultural Resources Monitoring and Mitigation Plan (CRMMP) was prepared according to the requirements of the California State Historic Preservation Officer (SHPO) to mitigate adverse effects on significant resources for the entire Exposition LRT project in the event they were encountered. The CRMMP was developed to guide and facilitate the mitigation monitoring, identification and treatment of cultural resources located during project construction in an effort to mitigate any unforeseen adverse effects on significant resources. Accordingly, if any archaeological or paleontological resources are excavated during construction related to the project modifications, construction would be halted and the mitigation measures detailed in the CRMMP would be adhered to. In 2004, you concurred with the original Section 106 finding of “no adverse effect,” and therefore, no Memorandum of Agreement (MOA) was prepared when the CRMMP was submitted for your review. Before and after mitigation, the proposed project modifications which include the option of a new at-grade station at Palmdale Avenue would not result in an adverse effect under Section 106 of the NHPA.

Finding for the Proposed Option: No Adverse Effect on Dorsey High School

At this time, the FTA requests your concurrence with the following findings:

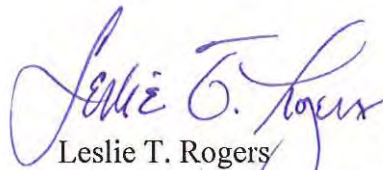
- that for Dorsey High School, construction of an at-grade station at the intersection of Farmdale Avenue and Exposition Boulevard, would have *no adverse effect*, consistent with the finding you concurred with in 2004.
- that for archaeological resources that may be discovered during construction, application of the existing project CRMMP would result in *no adverse effect with standard mitigation*, which is consistent with the finding you concurred with in 2004.

Based on your written concurrence to a No Adverse Effect finding, the FTA Regional Administrator will consider making a *de minimis* impact finding for Section 4(f) of the DOT Act for this historic resource. If appropriate, after the 30 day public review and comment period on the current Draft Supplemental Environmental Assessment (SEA), FTA will finalize the SEA including the public hearing transcript, and make the *de minimis* finding.

Thank you for your cooperation and attention to this matter, and we look forward to your concurrence with our findings presented above. For your convenience, we are providing a concurrence signature block to this letter.

If you have any questions, please feel free to contact Mr. Ray Tellis of our Los Angeles Metropolitan Office at (213) 202-3956.

Sincerely,



Leslie T. Rogers
Regional Administrator

cc: Mr. Carl Ripaldi, LACMTA
Mr. Eric Olson, Exposition Metro Line Construction Authority

Attachment

I CONCUR

Milford Wayne Donaldson, SHPO

Date

State of California X The Resources Agency
DEPARTMENT OF PARKS AND RECREATION
PRIMARY RECORD

Primary # _____
HRI # _____
Trinomial _____
NRHP Status Code 6Z
Other Listings _____
Review Code _____ Reviewer _____ Date _____

Page 1 of 1 *Resource Name or #: (Assigned by recorder) 4523 Exposition Boulevard

*P1. Other Identifier: Expo Inn

*P2. Location: Not for Publication Unrestricted

*a. County Los Angeles and (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

*b. USGS 7.5' Quad _____ Date _____ T _____; R _____; 3 of _____ 3 of Sec _____; B.M. _____

c. Address 4523 Exposition Boulevard City Los Angeles Zip 90016

d. UTM: (Give more than one for large and/or linear resources) Zone 11 S, 375744.53 mE 3765656.23 mN

e. Other Locational Data: (e.g., parcel #, directions to resource, elevation, etc., as appropriate) Assessor Parcel Number: 5046-009-048. TR=7823* (EX OF ST) LOT 239.

*P3a. Description: (Describe resource and its major elements. Include design, materials, condition, alterations, size, setting, and boundaries)

4523 Exposition Boulevard is a two-story motel that is designed in the Post-Modern style. L-shaped in plan, the building is clad in a rough textured stucco finish and displays a medium-pitched cross-gable roof with overhanging eaves and composition shingles. The window fenestration is composed of aluminum sliding with metal security bars. An asphalt parking lot is located on the northeast corner of the parcel. The building abuts the sidewalks to the south and west on Exposition Boulevard and Farmdale Avenue, respectively.

This building was surveyed as a part of the Mid-City/Exposition Light Rail Transit Project: Improvements at Farmdale Avenue and Exposition Boulevard and is proposed for demolition.

P5a. Photograph or Drawing (Photograph required for buildings, structures, and objects.)



*P3b. Resource Attributes: (List attributes and codes) HP6 1-3
story commercial building

*P4. Resources Present:

Building Structure Object
Site District Element of a District
 Other (Isolates, etc.)

*P5b. Description of Photo: (view, date, accession #) Southwest
elevation, view northeast,
March 5, 2008.

*P6. Date Constructed/Age and

Source: Historic Prehistoric
 Both
1981, LA County Assessor

*P7. Owner and Address: _____
Amrat & Ramilla Patel

4523 Exposition Boulevard
Los Angeles, CA 90016

*P8. Recorded by: (Name, affiliation, and address) Elizabeth Hilton
ICF Jones & Stokes

811 W 7th Street, Suite 800 Los Angeles, CA 90017

*P9. Date Recorded: December 7, 2009

*P10. Survey Type: (Describe) Intensive Level Survey, CEQA Analysis, P - Project Review

*P11. Report Citation: (Cite survey report and other sources, or enter "none.") Mid-City/Exposition Light Rail Transit Project: Improvements at Farmdale Avenue and Exposition Boulevard

*Attachments: NONE Location Map Continuation Sheet Building, Structure, and Object Record

Archaeological Record District Record Linear Feature Record Milling Station Record Rock Art Record

Artifact Record Photograph Record Other (List): _____

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

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1 June 2010

Reply To: FTA041202A

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

Re: Section 106 Consultation for proposed change in the Exposition Light Rail Transit project, Los Angeles County, CA

Dear Mr. Rogers:

Thank you for your letter of 30 April 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. You are notifying me of a change in the design for the project and have requested I review the proposed changes and concur with your determination of no adverse effect.

As I presently understand it, the project will require modifications at the Farmdale Avenue crossing near Dorsey High School. Approximately 5,000 square feet of Dorsey High School property will be acquired for the construction of a new eastbound at-grade station platform and pedestrian plaza. Other modifications not located on the Dorsey High School property include: a complimentary westbound at-grade station, the demolition of Expo Inn to compensate for the above proposed property acquisition which results in lost parking spaces from the existing Dorsey High School staff parking lot, and a realigned driveway entrance that would be added to the existing parking lot.

Dorsey High School is eligible for inclusion on the NRHP under Criterion C at the local level for its streamline design. FTA has determined the proposed project changes will not adversely affect the historic property. I concur with this determination.

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,

A handwritten signature in cursive script that reads "Susan H. Stratton for".

Milford Wayne Donaldson, FAIA
State Historic Preservation Officer

MWD:ab

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