

4.0 SECTION 4(F) PROPERTIES

This section evaluates the potential short-term construction and long-term effects of the No Build Alternative and the Build Alternative on Section 4(f) resources, as detailed in **Appendix N** (Section 4[f] Evaluation).

4.1 Affected Environment

Section 4(f) protects publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, as well as land of a publicly or privately owned historic site of national, state, or local significance. These are evaluated separately using two distinctive sets of criteria and study areas.

Section 4(f) Study Areas

- **Historic Properties: APE**
 - Approximately 4.7 miles long
 - Includes proposed right-of-way and acquisition and construction areas, all parcels adjacent to permanent site improvements and facilities, and any parcels where the elevated structure may alter historic properties
 - Includes area where a project may alter the character or use of a historic property; determined by FTA in consultation with the SHPO; see **Section 3.5** and **Appendix K** (Historic, Archaeological and Tribal Resources)
- **Parks, recreation areas, refuges: 0.25 mile from the Build Alternative alignment, stations, parking facility, MSF, and construction areas**
 - Represents a reasonable walking distance and reasonable distance in which an impact could occur; see **Appendix H** (Community Impacts Assessment)

Regulations related to Section 4(f) resources applicable to the Project are summarized in **Appendix S** (Regulatory Setting Summary) and detailed in **Appendix N**. A review of SHPO consultation documents, historic resources inventories (e.g., National Register), local planning documents, agency sources, maps, satellite imagery, and field surveys were conducted for this evaluation.

4.2 Section 4(f) Resources

4.2.1 Section 4(f) Use and Impact Determinations

Per 23 CFR 774, amended May 11, 2026, a Section 4(f) “use” of a protected property occurs when:

- Land is permanently incorporated into a transportation facility (e.g., permanent property acquisition)
- There is temporary occupancy of a property (e.g., staging area, construction easement), which adversely affects preservation
- There is a constructive use of a property (i.e., no land incorporated from the resource, but project proximity substantially impairs the resource)

A *de minimis* finding applies when a use does not adversely affect the activities, features, or attributes that make the property eligible for Section 4(f) protection. For historic sites, this means no historic property is affected, or the project would have “no adverse effect” (per Section 106). This is determined by FTA in consultation with SHPO (consultation is ongoing; see **Table 4.4** for preliminary Section 4(f) determinations). For parks, recreation areas, and wildlife and waterfowl refuges, it means the net impact does not harm the features, attributes, or activities qualifying the property for protection under Section 4(f).

FTA may not approve the use of Section 4(f) property for a proposed transportation project unless it determines there is no feasible and prudent avoidance alternative, and the action involves all possible planning to minimize harm or mitigate effects on the resource. If FTA concludes that there is no feasible and prudent avoidance alternative, then the Administration may approve, from among the remaining alternatives that use Section 4(f) property, only the alternative that causes the least overall harm in light of the preservation purpose.

4.2.2 Section 4(f) Resources in Area of Potential Effects

Table 4.1 identifies the historic resources listed or potentially eligible for listing on the National Register of Historic Places within the Area of Potential Effects, and **Table 4.2** identifies the public parks and recreation areas within the Study Area for parks, recreation areas, and refuges (**Section 4.1**). The Rio Hondo and San Gabriel River Spreading Grounds and Multi-Use Trails are located east of this Study Area and there are no other wildlife or waterfowl refuges within the Study Area for parks, recreation areas, and refuges. Section 4(f) resources are shown in **Figure 4.1**.

Table 4.1 Historic Properties Protected by Section 4(f)

Map ID	Property	Address	Date	Jurisdiction	NRHP Eligibility	Ownership
1	National Chicano Moratorium March (NRIS ID# 100002655)	3rd Street, Beverly Boulevard, Atlantic Avenue, Whittier Boulevard, and Salazar Park	1970	East Los Angeles (unincorporated Los Angeles County)	Listed in the NRHP	Public
2	Griffith STEAM Magnet Middle School (DOE-19-94-0475-0000)	4765 4th Street	1939	East Los Angeles (unincorporated Los Angeles County)	Eligible for listing in the NRHP	Public
3	Golden Gate Theater (NRIS IS# 82002192)	5176 Whittier Boulevard	1927	East Los Angeles (unincorporated Los Angeles County)	Listed in the NRHP	Private
4	Vail Field Industrial Addition –historic district	Vail Field Industrial Addition – Commerce	1951–1960	City of Commerce	Eligible for listing in the NRHP	Private
5	Pacific Metals Company building	2187 Garfield Avenue	1955 1952	City of Commerce	Eligible for listing in the NRHP	Private
6	Goodyear Tire and Rubber Company Warehouse	2353 Garfield Avenue	1952	City of Commerce	Eligible for listing in the NRHP	Private
7	E.F. Hauserman Company Building	6838 East Acco Street	1957	City of Commerce	Eligible for listing in the CRHR	Private

Map ID	Property	Address	Date	Jurisdiction	NRHP Eligibility	Ownership
8	Greenwood Elementary School (DOE-19-90-0060-0000)	900 Greenwood Avenue	1947	City of Montebello	Eligible for listing in the NRHP	Public
9	South Montebello Irrigation District	864 Washington Boulevard	1941	City of Montebello	Eligible for listing in the NRHP	Public
10	William and Florence Kelly House ("Kelly House") - Spanish Colonial Revival-style single-family residence	860 Washington Boulevard	1937	City of Montebello	Eligible for listing in the NRHP	Private

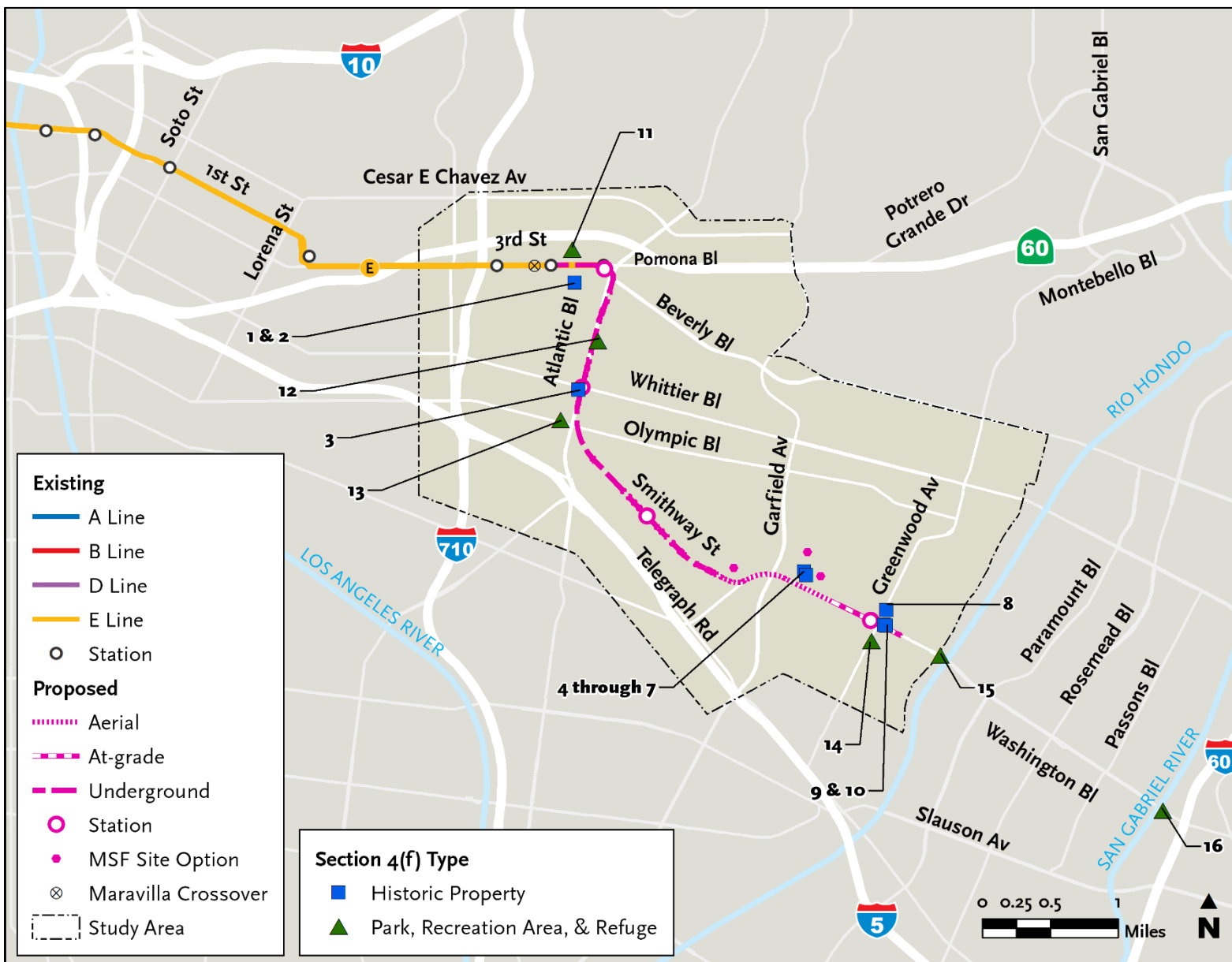
Source: South Central Coastal Information Center 2024; CDM Smith/AECOM JV 2026.

Key: NRIS ID# = National Register Information System Identification Number

Table 4.2 Parks and Recreation Areas Protected by Section 4(f)

Map ID	Property	Address	Jurisdiction	Distance from the Build Alternative
11	Belvedere Park Lake	3rd Street and La Verne Avenue	East Los Angeles (unincorporated Los Angeles County)	50 feet
12	Atlantic Avenue Park	570 Atlantic Boulevard	East Los Angeles (unincorporated Los Angeles County)	30 feet
13	Woods Avenue Park	Verona Street and Woods Avenue	East Los Angeles (unincorporated Los Angeles County)	375 feet
14	Chet Holifield Park and Community Center	1060 Greenwood Avenue	City of Montebello	425 feet
15	Rio Hondo Spreading Grounds and Multi-Use Trail	Not available	City of Pico Rivera	1,600 feet
16	San Gabriel River Spreading Grounds and Bike Multi-Use Trails	Not available	City of Pico Rivera	2.15 miles

Source: Los Angeles County Department of Parks and Recreation 2024, 2025.



Source: County of Los Angeles Department of Regional Planning 2025; Los Angeles County Department of Parks and Recreation 2024; Metro and CDM Smith/AECOM JV 2026.

Figure 4.1 Section 4(f) Resources

4.3 No Build Alternative

The No Build Alternative, as described in **Section 2.2** (No Build Alternative) of the EA, would include already planned and funded roadway and transit projects but would not provide a rail transit option for communities in eastern Los Angeles County. Overall, as shown in **Table 4.3**, the No Build Alternative would not impact Section 4(f) resources, and would result in no adverse effect on Section 4(f) resources.

Table 4.3 Section 4(f) Impact Summary – No Build Alternative

Topic	Impact	Rationale
Section 4(f) resources	No Adverse Effect	Construction of planned transit and roadway projects would adhere to applicable federal regulations regarding the treatment and protection of Section 4(f) resources.

Source: Metro; CDM Smith/AECOM JV 2026.

4.4 Build Alternative

The Build Alternative would either have no use of Section 4(f)-protected properties, or would be subject to a *de minimis* impact finding for all Section 4(f)-protected properties. Consequently, the Build Alternative does not require evaluation of avoidance alternatives, and a least overall harm analysis is not necessary. **Table 4.4** summarizes the impacts to the Section 4(f) properties within the Area of Potential Effects.

4.4.1 Use of Section 4(f) Properties through Permanent Incorporation and/or Temporary Occupancy

Demolition and construction activities would represent a use through temporary occupancy of the National Chicano Moratorium March Historic District (National Register Information System Identification Number [NRIS ID#] 100002655). Permanent property acquisition, demolition, and construction activities would represent a use through permanent incorporation and temporary occupancy of the Vail Field Industrial Addition historic district. Additionally, permanent property acquisition and construction of the aerial supports for MSF Site 2 within the Pacific Metals Company building parking lot would represent a use through permanent incorporation and temporary occupancy if MSF Site 2 is selected.

During the public review of the EA, FTA will consult with SHPO regarding the finding of effect and request concurrence on the finding of no adverse effect to historic resources.

4.4.1.1 National Chicano Moratorium March Historic District

Construction of the Build Alternative would remove and replace asphalt pavement along portions of the historic district's contributing march route at 3rd Street, Beverly Boulevard, Atlantic Boulevard, and Whittier Boulevard and install a trench within the existing right-of-way at 3rd Street and La Verne Avenue where the existing alignment would transition underground. Temporary occupancy from construction would represent a use.

There would be no use of the following Section 4(f) properties through permanent incorporation or temporary occupancy:

- Griffith STEAM Magnet Middle School
- Golden Gate Theater
- Goodyear Tire and Rubber Company Warehouse
- E.F. Hauserman Company
- Greenwood Elementary School
- South Montebello Irrigation District
- William and Florence Kelly House ("Kelly House") - Spanish Colonial Revival-style single-family residence
- Belvedere Park Lake
- Atlantic Avenue Park
- Woods Avenue Park
- Chet Holifield Park and Community Center
- Rio Hondo Spreading Grounds and Multi-Use Trail
- San Gabriel River Spreading Grounds and Bike Multi-Use Trail

Removing and replacing pavement along the march route would not impair the significance of any of the contributing elements to the historic district, such as the March Route, the El Barrio Free Clinic, Silver Dollar Café, or Ruben Salazar Park. Street and sidewalk improvements under the Build Alternative would maintain the march route, and improvements would be made using matching materials (asphalt). The Build Alternative would not result in the permanent reconfiguration of the streets and sidewalks that contribute to the historic district's significance. The district's use would not change, nor would the physical features within the property's setting that contribute to its historic significance. The historic district would still convey its historical significance and there would be no adverse effect on the march route. Therefore, the use from the Build Alternative would result in a *de minimis* impact.

4.4.1.2 Vail Field Industrial Addition Historic District

The Build Alternative would permanently acquire and demolish six properties that contribute to the Vail Field Industrial Addition historic district. Permanent incorporation from acquisition and demolition and temporary occupancy from construction activities would represent a use. Refer to **Appendix M** (Real Estate and Acquisition Impacts Report) for acquisition effects of the Build Alternative. Further, MSF Site 3 is within the historic district. If selected, MSF Site 3 would be at the site of three of the six properties demolished during construction that contribute to the historic district. Despite demolition of these six buildings, the district core would remain intact with enough contributors with characteristics to convey its historical significance, and the district would be eligible for listing in the National Register of Historic Places. Therefore, the Build Alternative would not have an adverse effect on the historic district and the use from the Build Alternative would result in a *de minimis* impact.

4.4.1.3 Pacific Metals Company Property

If MSF Site 2 is selected, the aerial supports for the guideway would be sited within the Pacific Metals Company property's existing parking lot. The new aerial structure would require partial permanent property acquisition and introduce a new visual element. Permanent incorporation from acquisition and temporary occupancy from guideway construction activities would represent a use (**Appendix M**). However, the guideway would be at a relatively similar height to the existing utility infrastructure and would not alter the façade of the Pacific Metals Company building, change the historic character of the building, nor diminish its significance. The construction activities and alteration of the setting with the new visual element of the aerial structure would not materially impair the building's integrity, and therefore, would result in no adverse effect. Therefore, the use from MSF Site 2 would result in a *de minimis* impact. Aerial supports for MSF Sites 1 and 3 would be located within the median of Washington Boulevard and would not result in a use of the Pacific Metals Company building.

Table 4.4 *De Minimis* Impacts to Section 4(f) Resources

Property Name	Use Type	Preliminary Section 4(f) Determination	Justification for Minimal Impact
National Chicano Moratorium March	Use through temporary occupancy	<i>De Minimis</i> Impact	- No impact on the March Route, the El Barrio Free Clinic, Silver Dollar Café, or Ruben Salazar Park. - Street and sidewalk improvements and installation of a trench would utilize matching materials to maintain historic integrity. - Avoids permanent reconfiguration of the march route and its setting. - No adverse effect on march route, resulting in a "<i>de minimis</i>" impact.

Property Name	Use Type	Preliminary Section 4(f) Determination	Justification for Minimal Impact
Vail Field Industrial Addition – historic district	Use through permanent incorporation and temporary occupancy	<i>De Minimis</i> Impact	- Despite demolition of six contributors, core of historic district would remain intact with enough contributors to convey historic significance. - No adverse effect on historic district, resulting in a “<i>de minimis</i>” impact.
Pacific Metals Company building	MSF Sites 1 and 3: No use MSF Site 2: Use through permanent incorporation and temporary occupancy	MSF Sites 1 and 3: No use MSF Site 2: <i>De Minimis</i> Impact	- Construction of aerial supports within property parking lot for MSF Site 2 would not affect building’s façade, change its character, or diminish its significance. - No adverse effect on the building, resulting in a “<i>de minimis</i>” impact.

Source: South Central Coastal Information Center 2024; CDM Smith/ AECOM JV 2025; Los Angeles County Department of Parks and Recreation 2024.

Key: no use = no permanent incorporation of a property or temporary occupancy of a property that adversely affects preservation

4.4.2 Constructive Use of Section 4(f) Properties

The Build Alternative would not substantially impair any Section 4(f) resources due to project proximity, and there would be no constructive use of any Section 4(f) resource. Construction activities could produce localized noise and air pollutant emissions or result in temporary lane and/or road closures that could affect any of the Section 4(f) resources, as discussed in **Appendix O** (Transportation Impacts Report) and **Appendix L** (Noise and Vibration Impacts Report). As discussed in **Appendix F** (Air Quality Impacts Report), there would be no adverse effect on air quality from construction activities. As set forth in NPM TRA-2 (Construction Best Management Practices for Transportation) and NPM NOI-2 (Construction Noise and Vibration Control), the Build Alternative would adhere to transportation best management practices and noise specifications during construction. Implementation of NMM NOI-1 (Construction Noise Plan and Noise Monitoring Plan) and NMM TRA-2 (Traffic Management Plan) would reduce adverse effects from noise and traffic circulation changes during construction, and thus, there would be no constructive use on Section 4(f) properties.

The new open trench along 3rd Street could adversely impact access to Belvedere Park Lake by eliminating vehicle and pedestrian crossings of 3rd Street at La Verne Avenue. Left turns would also be eliminated at Civic Center Way. U-turns would be allowed at Medick Avenue and Woods Avenue to facilitate traffic movement to and from La Verne Avenue. Vehicles could also access Belvedere Park Lake from the existing entrance on Mednick Avenue north of 3rd Street. Further, the existing pedestrian crosswalk at Civic Center Way would remain, and a new pedestrian crosswalk east of La Verne Avenue would be constructed to provide access to Belvedere Park Lake and other facilities. Therefore, access to Belvedere Park Lake would be maintained and there would be no constructive use of the park.

The underground guideway and Atlantic/Whittier station would be within 80 feet of the Golden Gate Theater. Vibration could affect the historic resource, however, NMM CUL-1 (Protection Measures – Differential Settlement/Vibration/Tunnel Boring Machine Specifications for CVS Pharmacy/Golden Gate Theater) would reduce the potential for vibration during construction activities to damage the Golden Gate Theater, as discussed in **Section 3.5** and **Appendix K**. Thus, there would be no constructive use of the Golden Gate theater.

4.4.3 Agency Coordination and Consultation

This section summarizes consultation and coordination with officials with jurisdiction over Section 4(f) properties and provides an overview of the public and agency review of the Section 4(f) evaluation.

For historic properties, FTA and Metro informed the officials with jurisdiction (State and Tribal Historic Preservation Offices and consulting parties) of the intent to make a *de minimis* finding contingent on their concurrence with the Section 106 finding. The notification included a request for input or acknowledgement. No additional public notice beyond the standard Section 106 requirements is required. Section 106 coordination is discussed in **Appendix K**.

The Project would not result in the use of any parks, recreational areas, or wildlife and waterfowl refuges; therefore, consultation with the officials with jurisdiction over those resources is not required under Section 4(f).

4.5 Avoidance, Minimization, and Mitigation Measures for the Build Alternative

The measures identified in **Table 4.5** would be implemented for operation of the Build Alternative.

Table 4.5 Avoidance, Minimization, and Mitigation Measures

Topic	Potential Effect	Proposed Measure	Measure Type	Effects After Implementation of Measure(s)
Section 4(f) use through permanent incorporation and/or temporary occupancy	The Build Alternative would have a <i>de minimis</i> impact on three Section 4(f) resources, as shown in Table 4.4	No avoidance, minimization, or mitigation measures are needed	None	<i>De Minimis</i> impact – see Table 4.4
Section 4(f) Constructive Use	Potential transportation effects on Section 4(f) properties during construction from temporary lane and/or road closures	NPM TRA-2 (Construction Best Management Practices for Transportation). Construction best management practices (BMP) for the Build Alternative shall include the following: - Cooperation with the corridor cities and the County shall occur throughout the construction process. Restrictions on haul routes may be incorporated into the construction specifications according to local permitting requirements. - Pedestrian access to adjacent properties along the Project shall be maintained during construction. - Construction-related traffic circulation changes shall generally be localized to the work area. - Construction activities shall comply with Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health Administration (Cal/OSHA), and Metro safety and security programs. - Safety for pedestrians, multi-use trail users (i.e., hikers, bicyclists, equestrians), and motorists shall be maintained during construction; methods may include signage, partial lane closures, and construction barriers. - Access to Los Angeles County Fire Department (LACFD) Station 50 on Saybrook Avenue shall be maintained during construction activities, including construction of MSF Site 3 (if selected), and the launch of the tunnel boring machine (TBM). - Metro shall coordinate with staff of the Los Angeles County Sheriff's Department and LACFD Station 50 in advance of any construction activities to preserve station access. - Lane and/or road closures shall be scheduled to minimize disruptions, including detour routes, in coordination with authorities having jurisdiction and local fire and police departments prior to construction. The nearest local first responders shall be notified, as appropriate, of traffic control measures in the Traffic Management Plan (see NMM TRA-2) during construction to coordinate emergency response routing.	Project Measure	No Constructive Use - Construction best management practices related to transportation would be implemented

Topic	Potential Effect	Proposed Measure	Measure Type	Effects After Implementation of Measure(s)
		The Project shall be designed and constructed per applicable state, Metro, and city design criteria and standards, including adherence to design codes and standards such as the OSHA, Cal/OSHA, California Public Utilities Commission (CPUC), California Manual of Uniform Traffic Control Devices (MUTCD), and Metro safety and security programs and standards (i.e., Metro Rail Design Criteria [MRDC] and Metro Systemwide Station Design Standards Policy).		
Section 4(f) Constructive Use	Potential noise effects on Section 4(f) properties during construction from use of construction equipment near Section 4(f) properties	NPM NOI-2 (Construction Noise and Vibration Control). Construction activities shall comply with Metro's baseline specifications Section 01 56 19, Construction Noise and Vibration Control. Although Metro, as a state-chartered transportation agency, is exempt from local noise ordinances, the agency is committed to consistency with local construction noise limits whenever feasible and reasonable in accordance with its own construction specifications. Metro/Metro's contractor shall utilize control measures from Metro's specifications that effectively minimize noise and vibration impacts in the community. Some mitigation measures for Noise and Vibration are based on the provisions set forth in Section 01 56 19 and are refined to have more specificity towards the Project-related impacts concerning noise and vibration. Under NPM NOI-2, the Project shall comply with the entirety of Metro's baseline specifications Section 01 56 19 and Metro/Metro's contractor shall utilize control measures from its own specifications that effectively minimize noise and vibration impacts in the community, such as: ▪ Conducting at-grade construction activities adjacent to residential neighborhoods during the daytime whenever practicable. ▪ Requiring special permits for construction within a specified distance and a specified time period for residential zones during the nighttime and weekends. ▪ Using construction equipment with effective noise-suppression devices whenever feasible. ▪ Using noise control measures, such as enclosures and noise barriers, as necessary to protect the public and achieve compliance with Metro's noise limits. Conducting all operations in a manner that will minimize, to the greatest extent practicable, disturbance to the public in areas adjacent to the construction activities and to occupants of nearby buildings.	Project Measure	No Constructive Use - Construction best management practices related to noise would be implemented
Section 4(f) Constructive Use	Potential transportation effects on Section 4(f) properties during construction from temporary lane and/or road closures	NMM TRA-2 (Traffic Management Plan). Metro shall prepare a Traffic Management Plan as needed to facilitate the flow of traffic in and around construction zones. The Traffic Management Plan shall include, at minimum, the following measures: ▪ Where feasible, a majority of schedule construction-related travel (i.e., deliveries) during off-peak hours and maintain two-way traffic circulation along affected roadways during peak hours. ▪ Designated routes for project haul trucks shall be located along the Project corridor right-of-way (ROW) and/or major streets connecting to construction staging areas and the nearest	Mitigation Measure	No Constructive Use - potential adverse effects on traffic circulation from road and lane closures during construction

Topic	Potential Effect	Proposed Measure	Measure Type	Effects After Implementation of Measure(s)
		freeways (e.g., State Routes (SR)-60 and Interstate (I)-5). Major streets may include Atlantic Boulevard, Saybrook Avenue, Telegraph Road, Washington Boulevard, and Whittier Boulevard. In cooperation with the jurisdictions along the alignment and implemented throughout the construction process, these routes shall be consistent with local land use and mobility plans and situated to minimize noise, vibration, and other possible impacts. ▪ Metro shall maintain safe and convenient pedestrian routes to school by ensuring project haul routes and construction traffic, to the greatest extent possible, avoid any published and unofficial school pedestrian routes. ▪ Develop detour routes to facilitate traffic movement through construction zones without significantly increasing cut-through-traffic in adjacent residential areas. ▪ Develop and implement an outreach program and public awareness campaign in coordination with transit agencies to inform the general public about the construction process and planned roadway closures, potential impacts, and mitigation measures, including temporary bus stop relocation. ▪ Develop and implement a program with business owners to minimize effects to businesses during construction activity, including but not limited to signage programs and identification of detours (particularly for truck access). ▪ Where feasible, temporarily restripe roadways to maximize the vehicular capacity at locations affected by construction closures. ▪ Where feasible, temporarily remove on-street parking to maximize the vehicular capacity at locations affected by construction closures. ▪ Traffic control officers at major intersections during peak hours shall be provided as required by the Traffic Management Plan and Worksite Traffic Control Plans if delays are related to construction activities. ▪ Provide wayfinding signage, lighting and access to specify pedestrian safety amenities (such as handrails, fences, and alternative walkways) during construction. ▪ Where construction encroaches on sidewalks, walkways, crosswalks, and multi-use trails, special pedestrian safety measures shall be used, such as detour routes and temporary pedestrian shelters. ▪ Provide detour routes and signage to address temporary effects to multi-use trails and bicycle circulation, and minimize inconvenience (e.g., lengthy detours) as to minimize users potentially choosing less safe routes if rerouted. Regular communication with school administrators shall be maintained to ensure sufficient notice of construction activities and/or detours, that could affect pedestrian routes to schools is provided.		would be reduced

Topic	Potential Effect	Proposed Measure	Measure Type	Effects After Implementation of Measure(s)
		- Construction flaggers shall be implemented any time a construction ingress or egress is located within 200 feet of a school's student entrance during school hours. - Metro's construction outreach efforts shall include reaching out to local school district administrators to provide advanced information regarding construction activities and/or detours if construction activities will affect bus routes and stops to schools. - Access to adjacent businesses and schools (including access to passenger loading areas for student drop-offs at schools) shall be provided via existing or temporary driveways or loading zones during business and school hours throughout the construction period.		
Section 4(f) Constructive Use	Potential noise effects on Section 4(f) properties during construction from use of construction equipment near Section 4(f) properties	NMM NOI-1 (Construction Noise Plan and Noise Monitoring Plan). Metro shall require the Contractor to develop a construction noise control plan and a construction noise monitoring plan to minimize noise impacts. The construction noise plan shall include construction noise performance criteria. At a minimum, the performance criteria shall prohibit construction noise from exceeding the Federal Transit Administration (FTA) general assessment construction noise criteria of 80 A-weighted decibels (dBA) for nighttime work and 90 dBA for daytime work at residential properties, or 100 dBA at commercial or industrial properties for daytime or nighttime work. These criteria shall be measured at the boundary of any occupied property where the noise is being received.	Mitigation Measure	No Constructive Use – potential adverse effects related to noise from construction equipment use during construction would be reduced

Topic	Potential Effect	Proposed Measure	Measure Type	Effects After Implementation of Measure(s)
Section 4(f) Constructive Use	Construction of the alignment and station has the potential to cause vibration and ground settlement that could affect the Golden Gate Theater	NMM CUL-1 (Protection Measures – Differential Settlement/Vibration/ Tunnel Boring Machine [TBM] Specifications for CVS Pharmacy [CVS]/Golden Gate Theater). ▪ Metro/Metro’s contractor shall conduct a pre-construction baseline survey and building protection report, implement building protection measures as specified in the building protection report, and conduct a post-construction survey of the CVS/Golden Gate Theater in relation to Guideway Alignment construction adjacent to the historic property. Building protection measures shall be implemented in conjunction with NMM NOI-1 through NMM NOI-14. ▪ Metro/Metro’s contractor shall conduct a pre-construction survey to establish baseline, pre-construction conditions and to assess the building category and the potential for ground-borne vibration to cause damage. Geotechnical investigations shall be undertaken to evaluate soil, groundwater, seismic, and environmental conditions along the alignment. This analysis shall inform the development of appropriate support mechanisms for cut and fill construction areas or areas that could experience differential settlement as a result of using a TBM in proximity to the historic property. An architectural historian or historical architect who meets the Secretary of the Interior’s Professional Qualification Standards (36 Code of Federal Regulation [CFR] Part 61) shall review final design documents prior to implementation of measures. ▪ Metro/Metro’s contractor shall implement building protection measures as identified in the building protection report to protect the structure from vibration damage. This may include methods such as underpinning, soil grouting, or other forms of ground improvement, as well as lower vibration equipment and/or construction techniques. If the building protection report determines the historic property has the potential to be impacted by differential settlement caused by TBM construction, appropriate building protection measures shall be identified and implemented such as the use of an earth pressure balance or slurry shield TBM. The implementation of the required measures and their effectiveness shall be documented in a post-construction survey. A post-construction survey shall also be undertaken to ensure that damage has not occurred to historic properties. An architectural historian or historical architect who meets the Secretary of the Interior’s Professional Qualification Standards (36 CFR Part 61) shall prepare an assessment of the implementation of the mitigation measures.	Mitigation Measure	No Constructive Use - potential construction effects on the CVS/Golden Gate Theater and other historic properties would be reduced to “no adverse effect” under Section 106 of the National Historic Preservation Act

Source: Metro; CDM Smith/AECOM JV 2026.