



# WESTSIDE SUBWAY EXTENSION PROJECT

## Archaeological Resources Supplemental Survey Technical Report



**Metro**



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

**March 2012**

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## NATIONAL ARCHAEOLOGICAL DATABASE (NADB) INFORMATION

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Cogstone Project No.	2068
USGS 7.5' Quadrangle	Beverly Hills 1995, Hollywood 1966 (PR 1981), Los Angeles 1996 (PR 1981, MR 1994)
Acreage	Supplemental survey of 102 acres (Total of 755 acres within entire APE)
Keywords	Archaeological Survey, P-19-002563 (CA-LAN-2563), P-19-002610 (CA-LAN-2610), P-19-004192 (CA-LAN-4192), P-19-004193 (CA-LAN-4193), P-19-100887, historic-era sites, Los Angeles County, City of Beverly Hills, City of Los Angeles

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## Abstract

Cogstone Resource Management Inc. conducted a supplemental record search and survey, and an assessment to determine the effects on cultural resources of construction activities by the Los Angeles County Metropolitan Transportation Authority (Metro) for the Westside Subway Extension Locally Preferred Alternative (LPA) and associated components. Located in western Los Angeles County, including portions of the Cities of Los Angeles and Beverly Hills, as well as portions of unincorporated Los Angeles County, the study was completed in compliance with Section 106 of the National Historic Preservation Act (NHPA) and the California Environmental Quality Act (CEQA), with the Federal Transit Administration (FTA) acting as the lead federal agency. The study was also completed in support of the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the undertaking.

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

The supplemental record search conducted for this study on April 21 and 28, 2011, determined that 128 prior studies had been completed and 17 archaeological resources (15 sites and 2 isolates) had been previously recorded within a 0.25-mile radius of the APE. Forty-nine of the studies are within or immediately adjacent to the APE. An additional 5 archeological resources (4 sites and 1 isolate), all dated to the historic-era, have been previously recorded within the APE for an LPA component (Division 20 Maintenance and Storage Facility). By letter dated September 8, 2010, the Native American Heritage Commission (NAHC) informed Metro that Native American cultural resources were not identified within a 0.5-mile radius of the APE.

The supplemental pedestrian survey of approximately 102 acres, including vacant lots, was conducted on June 5, 2011. Approximately 80 percent of the APE in this urban setting is developed hardscape. Ground visibility outside of hardscape was poor to fair due to landscaping and dense vegetation. Dated sidewalk stamp locations noted by the prior survey were revisited and related information was updated. Additional such stamps within the refined APE were informally recorded for this report. No prehistoric, ethnohistoric, or historic-era archaeological sites were identified during the supplemental survey.

Of the four previously recorded historic-era archaeological sites within the APE, CA-LAN-2610 is eligible for National and California Register inclusion, and thus qualifies as a historic property and historical resource. FTA determined the project will have No Adverse Effect on this site because it will be avoided by the planned improvements for the Division 20 maintenance facility. The three other historic-era archaeological sites within the APE (CA-LAN-2563, CA-LAN-4192, and CA-LAN-4193) are not eligible for National or California Register inclusion, and do not qualify as historic properties or historical resources. By definition, the isolated find (P-19-100887) is ineligible for listing on either register. Thus, as currently designed, FTA determined the project will not adversely affect or cause a substantial adverse change on any documented resource that currently

qualifies as a historic property or historical resource. The State Historic Preservation Officer has concurred with the historic property determination and determination of effect made by the FTA.

Construction of the LPA and associated components may affect undocumented cultural resources, including intact archaeological deposits. Given that the LPA right-of-way is generally within the street right-of-way, which often did not disturb more than a few feet of topsoil during its construction, construction activities may encounter subsurface prehistoric and/or historic archaeological deposits. The study uses a variety of methods to estimate the potential for buried archaeological deposits within the APE. Implementation of the unanticipated discovery mitigation measures provided at the end of the report will ensure that construction impacts to undocumented archaeological resources, including human remains, are reduced to a level that is less than significant. These measures are provided in a Memorandum of Agreement executed between the FTA and the State Historic Preservation Officer.

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





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## Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
APN	Assessor Parcel Number
AT&SF	Atchison Topeka & Santa Fe
CCR	California Code of Regulations
CEQA	<i>California Environmental Quality Act</i> (PRC 21000-21177)
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CRHR	California Register of Historical Resources
CSUF	California State University, Fullerton
DPR	California Department of Parks and Recreation
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
FTA	Federal Transit Administration
GIS	Geographic information system
HOV	high-occupancy vehicle
HPOZ	historic preservation overlay zones
HRT	heavy rail transit
LPA	Locally Preferred Alternative
L RTP	Long Range Transportation Plan
Metro	Los Angeles County Metropolitan Transportation Authority
MOA	Memorandum of Agreement
MPO	Metropolitan Planning Organization
NADB	National Archaeological Database
NAHC	Native American Heritage Commission
NEPA	<i>National Environmental Policy Act</i> (42 USC 4321-4347)
NHPA	<i>National Historic Preservation Act of 1966</i> (16 USC 470)
NRHP	National Register of Historic Places
OHP	Office of Historic Preservation
OHR	Department of City Planning's Office of Historic Resources, City of Los Angeles
PRC	State of California Public Resources Code

RCPG	<i>Regional Comprehensive Plan and Guide</i>
RPA	Registered Professional Archaeologist
RTP	<i>Regional Transportation Plan</i>
SCAG	Southern California Association of Governments
SCCIC	South Central Coastal Information Center
SHPO	State Historic Preservation Officer
SHRC	State Historical Resources Commission
TBM	Tunnel boring machine
TPSS	traction power substation
UPRR	Union Pacific Railroad
USGS	United States Geological Survey
VA	Veterans Administration



## **1.0 INTRODUCTION**

This archaeological resources study was completed in support of the Final Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension project proposed by the Los Angeles County Metropolitan Transportation Authority (Metro). The project is located in western Los Angeles County and includes portions of the Cities of Los Angeles and Beverly Hills, as well as portions of unincorporated Los Angeles County.

The Metro Board selected the Westwood/VA Hospital Extension (Alternative 2 in the Draft EIS/EIR) as the Locally Preferred Alternative (LPA) on October 28, 2010. A supplemental study was required because the project-specific Archaeological Area of Potential Effects (APE) was revised to encompass the refined LPA alignment, including station options and associated staging and laydown areas. This study included a literature search, communication with Native American tribal representatives, pedestrian survey of portions of the APE not encompassed by the archaeological resource surveys conducted in 2009 and 2010 (URS 2010) in support of the Draft EIS/EIR (Metro 2010), and a significance assessment of known archaeological resources within the APE.

This report also examines the effects of construction associated with the LPA alignment and associated maintenance facility on documented archaeological resources located within the APE. In addition, construction activities required to implement the LPA may result in disturbance or potential destruction of undocumented archaeological resources, including human remains, and appropriate mitigation measures are presented.

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

Built environment resources are not covered by this study. Built resources within the Architectural APE for the LPA are discussed in a companion Historic Properties Supplemental Survey Report (Cogstone 2012), which was also prepared in support of the Final EIS/EIR.

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## 2.0 PROJECT DESCRIPTION

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

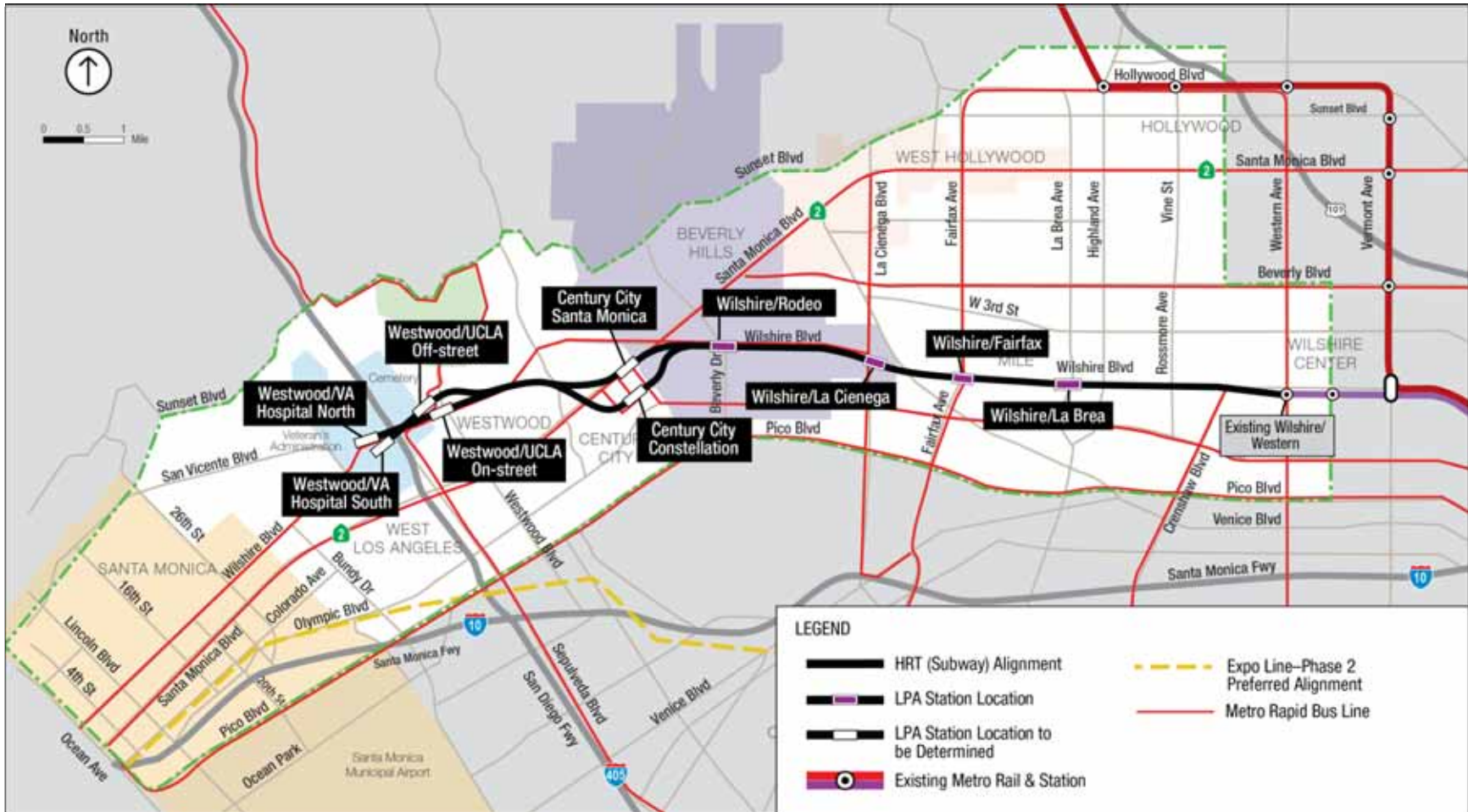
The LPA would best meet the Purpose and Need to improve mobility and provide fast, reliable, high-capacity, and environmentally sound transportation solutions in the study area. The separated right-of-way is all in a tunnel, with the top of the tunnel at least 30 to 70 feet below the ground surface.

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

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

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

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



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Figure 2-1: Locally Preferred Alternative: Westwood/VA Hospital Extension



**Wilshire/Rodeo Station** would serve the Beverly Hills “Golden Triangle,” a local and regional shopping destination as well as a hub for tourists visiting the famous Rodeo Drive and shops along Wilshire Boulevard, Beverly Drive, and other streets. The entrance would either be located on the southwest corner of Wilshire Boulevard and Reeves Drive at the current site of the Ace Gallery, on the northwest corner of Wilshire Boulevard and Beverly Drive (adjacent to the Bank of America Building), or on the southeast corner of the Wilshire Boulevard and El Camino Drive intersection at the current site of the Union Bank Building.

**Century City Station** would serve a high-density commercial, employment, and residential center. As part of the LPA selection, the Metro Board decided to continue to evaluate two station locations in Century City (Santa Monica Boulevard and Constellation Boulevard). The location of the Century City Station would affect the tunnel alignment to the east and west of the station.

- **Century City Santa Monica** would be a modified version of the Century City Santa Monica Station that was in the Draft EIS/EIR. Based on the results of the further studies of the Santa Monica Fault, the Century City Santa Monica Station was shifted to the east to the Century Park East intersection to avoid locating the station box on the Santa Monica Fault. The entrance would be located on the southwest corner of Santa Monica Boulevard and Century Park East.
- **Century City Constellation** would be located underneath Constellation Boulevard from west of Avenue of the Stars to just west of Century Park East. The entrance would be located either at the northeast corner of Constellation Boulevard and Avenue of the Stars or at the southwest corner of Constellation Boulevard and Avenue of the Stars near the Century Plaza Hotel.

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

- **Westwood/UCLA Off-Street** would be located underneath UCLA Lot 36, north of Wilshire Boulevard between Gayley Avenue and Veteran Avenue. The entrances would be on the northwest corner of the Wilshire Boulevard and Gayley Avenue intersection and the northeast corner of the Wilshire Boulevard and Veteran Avenue intersection.
- **Westwood/UCLA On-Street** would be located under Wilshire Boulevard, extending just west of Westwood Boulevard to west of Gayley Avenue, almost to Veteran Avenue. Either both station portals would be located on the north side of Wilshire Boulevard (the northwest corner of Wilshire Boulevard and Gayley Avenue and the northwest corner of Wilshire Boulevard and Westwood Boulevard) or the entrance at the Wilshire Boulevard and Westwood Boulevard intersection would be split between the north and south sides of Wilshire Boulevard.

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

- **Westwood/VA Hospital South** would be located at the northern edge of the VA Hospital parking lot, adjacent to Wilshire Boulevard. The entrance would be located on the Bonsall

level, beneath the bus drop-off area to the north of the VA Hospital parking lot. To accommodate the grade separation at this site, additional stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard. A parking structure providing both permanent and temporary replacement parking would be located in the existing physician's parking lot, east of the VA Hospital.

- **Westwood/VA Hospital North** would locate the Westwood/VA Hospital Station on the north side of Wilshire Boulevard. The entrance would be located along the north side of Wilshire Boulevard, just west of Bonsall Avenue and south of the station box on the Bonsall level. As with the South station, to accommodate the grade separation at this site, stairs, escalators, and elevators connecting the Wilshire level and the Bonsall level would be located on both the north and south sides of Wilshire Boulevard.

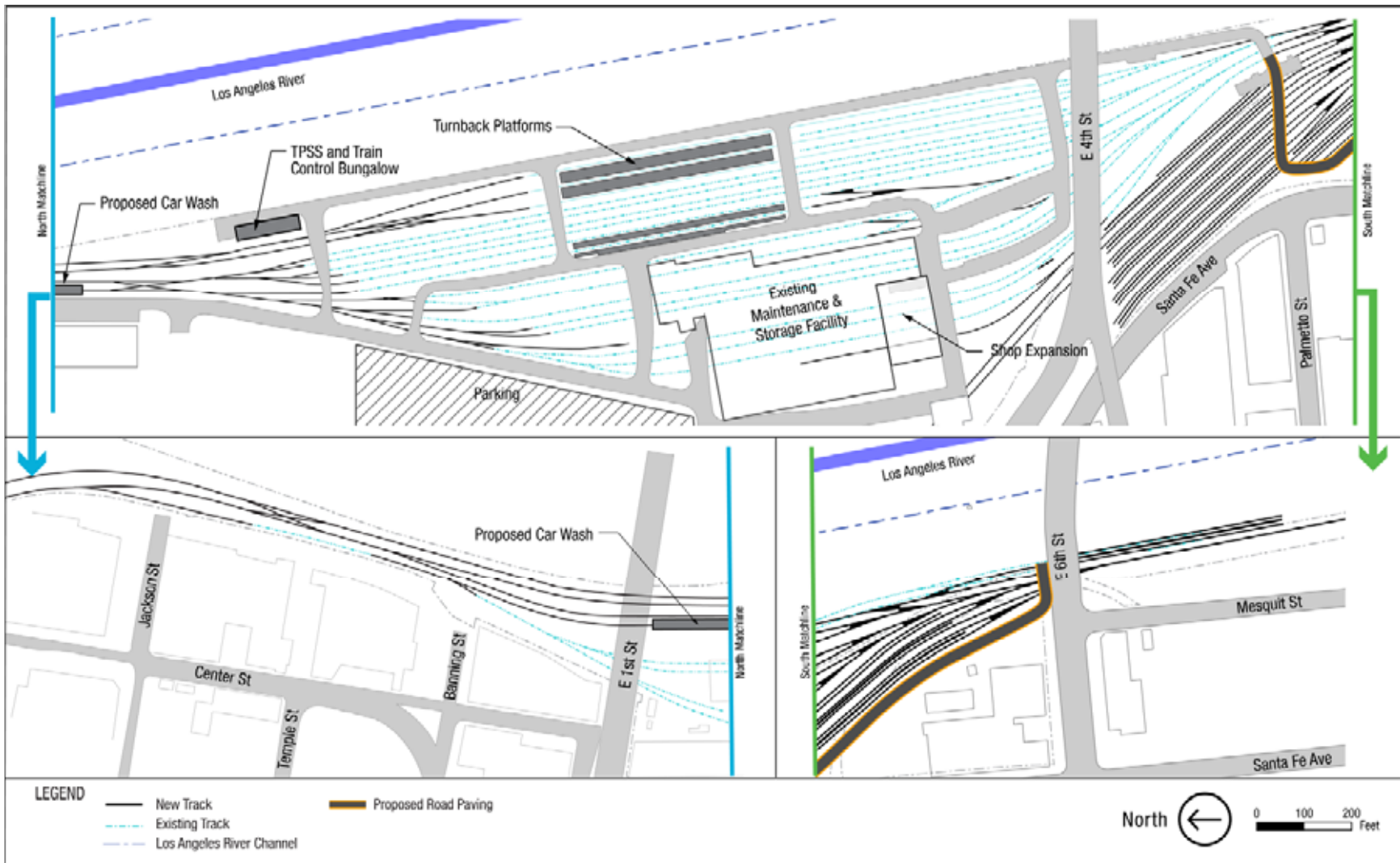
The estimated one-way running time would range from approximately 14 minutes, 26 seconds to 15 minutes, 21 seconds from the Wilshire/Western Station to the Westwood/VA Hospital Station depending on the alignment between the Wilshire/Rodeo and Westwood/VA Hospital Stations. The LPA is expected to operate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

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

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

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

A detailed description of the LPA is provided in Chapter 2 of the Final EIS/EIR.



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Figure 2-2: Division 20 Maintenance and Storage Facility Expansion

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### 3.0 AREA OF POTENTIAL EFFECTS

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

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

The Archaeological APE was established in compliance with 36 CFR Parts 800.4(a) and 800.16(d), and includes:

- A 200-foot wide corridor (extending 100 feet outward from both sides of the centerline) along the refined LPA alignment, including staging and laydown areas
- A 500-foot radius around all station locations
- Division 20 maintenance facility and a 100-foot radius around the facility boundaries

The parameters of the Archaeological APE, as well as the companion Architectural APE, were established during project planning in support of the Draft EIS/EIR, included guidance from Office of Historic Preservation (OHP) personnel, followed methodologies consistent with previous Metro projects, and were designed to avoid impacts to resources that qualify as historic properties or historical resources and are eligible for listing in the National Register of Historic Places (NRHP) or California Register of Historical Places (CRHR).

With selection of the LPA, the Archaeological APE boundaries were refined to reflect its current appearance as depicted on the project location map showing the LPA alignment and the Division 20 maintenance facility to the east (Figure 3-1 at 1:120,000 scale).

The refined Archaeological and Architectural APEs defined by the FTA, in consultation with the OHP and Metro, were subsequently approved by the SHPO as sufficient pursuant to 36 CFR Part 800.4(1)(a).

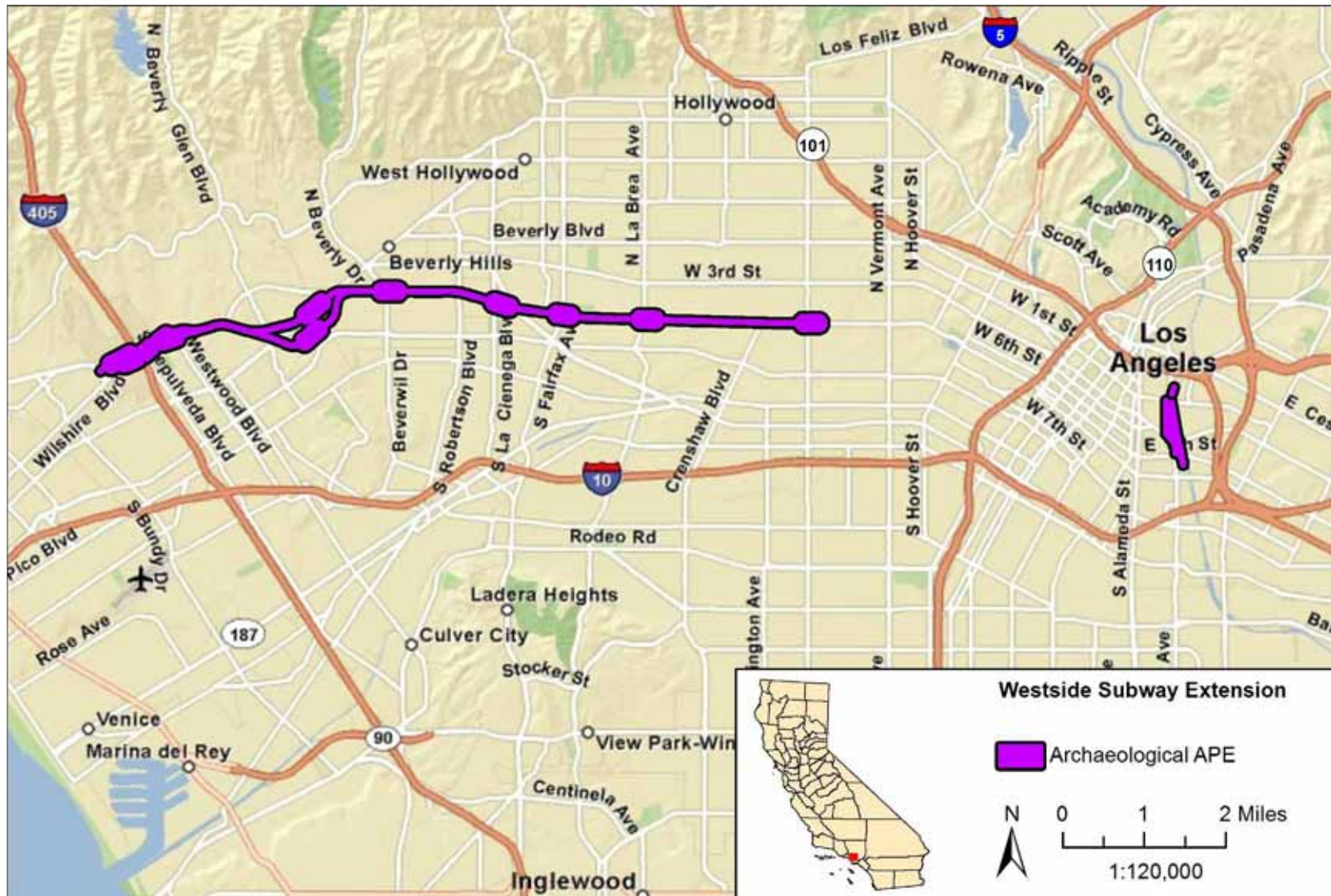
A series of eight aerial-based maps show the APE alignment and the Division 20 facility, at a scale of one inch equals 500 feet (1:7000) (Figure 3-2 through Figure 3-9).

The 755-acre APE, including 69 acres within the Division 20 facility, is located within the sections and USGS 7.5-minute quadrangles (San Bernardino Base and Meridian) listed below in Table 3-1. As discussed below under Survey Methods, 102 acres were covered by the supplemental archaeological survey for this study.

**Table 3-1: Project Location (Quadrangle, Township, Range, Section)**

<b>LPA Component</b>	<b>USGS 7.5' Quadrangle</b>	<b>Township</b>	<b>Range</b>	<b>Sections</b>
LPA Alignment	Beverly Hills, 1995	1S	15W	28, 27, 26, 25, 24, 23
LPA Alignment	Beverly Hills, 1995	1S	14W	19, 20
LPA Alignment	Hollywood, 1966, Photorevised 1981	1S	14W	20, 21, 22, 23, 24, 25, 26, 27, 28
Division 20 Maintenance Yard	Los Angeles 1996, Photorevised 1981, Minor Revision 1994	1S	13W	27, 34





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Figure 3-1: Project Location Map

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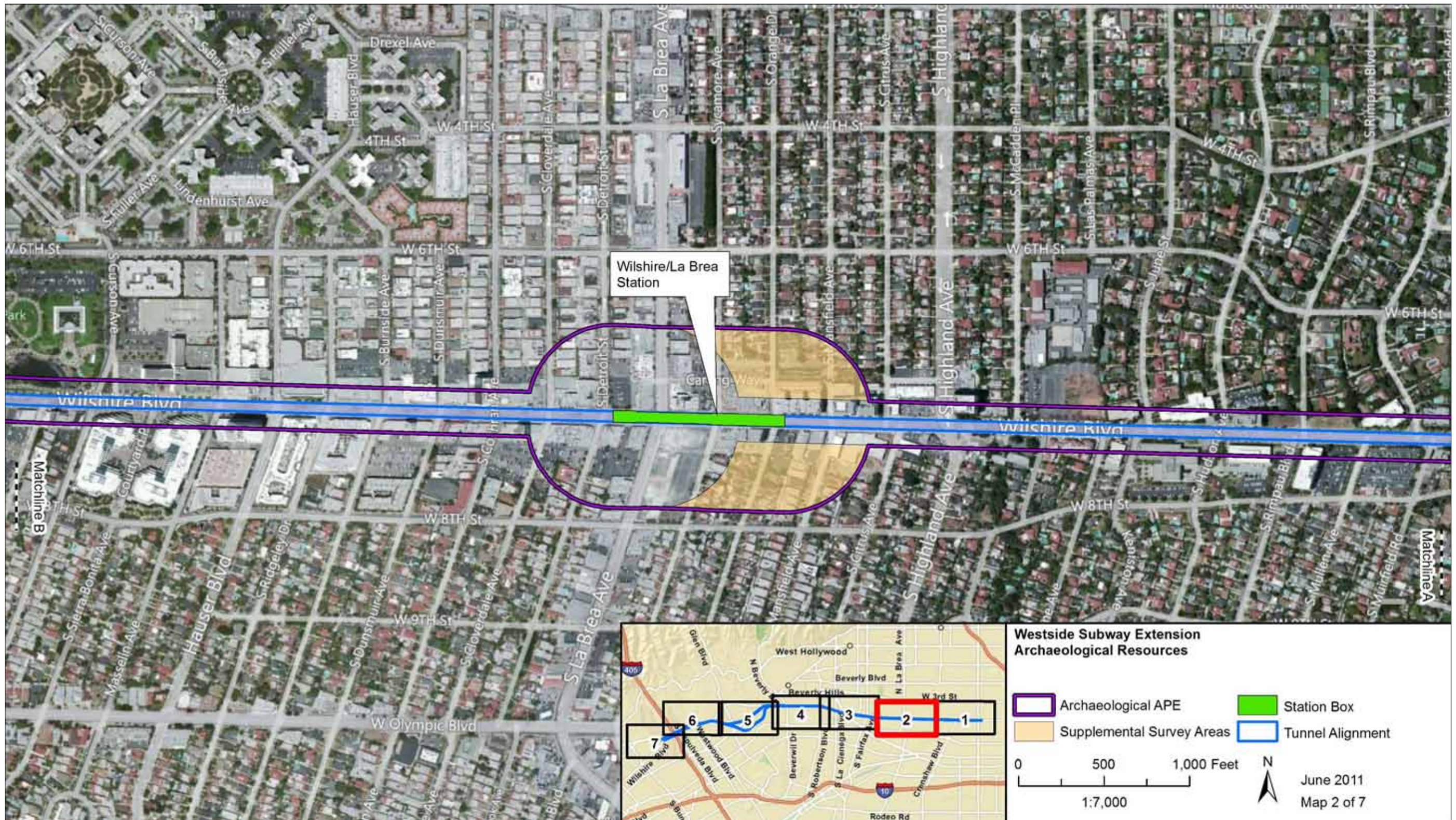






Figure 3-2: Archaeological APE for LPA Alignment (Map 1 of 7)





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Figure 3-3: Archaeological APE for LPA Alignment (Map 2 of 7)





Figure 3-4: Archaeological APE for LPA Alignment (Map 3 of 7)





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Figure 3-5: Archaeological APE for LPA Alignment (Map 4 of 7)



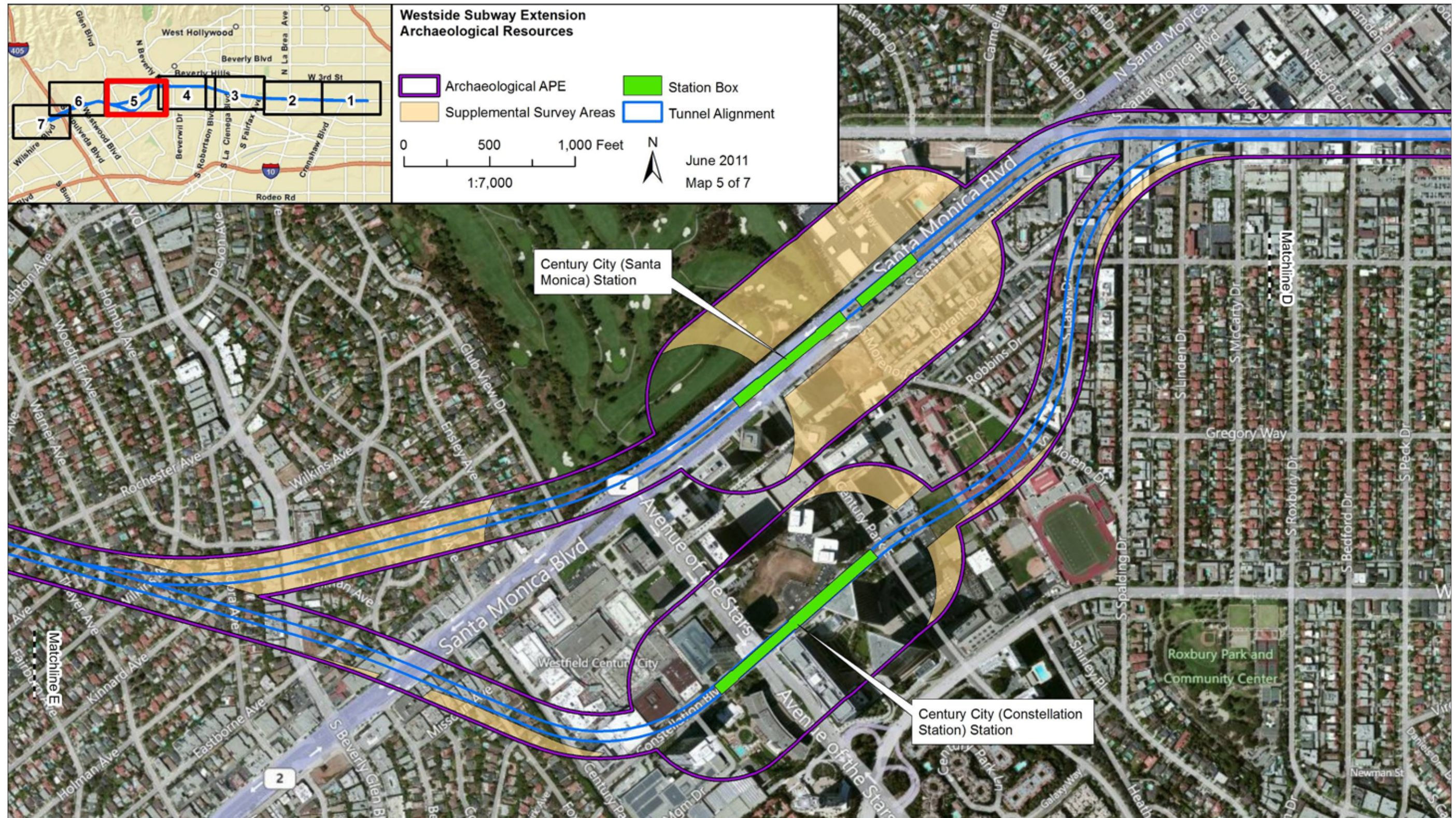


Figure 3-6: Archaeological APE for LPA Alignment (Map 5 of 7)



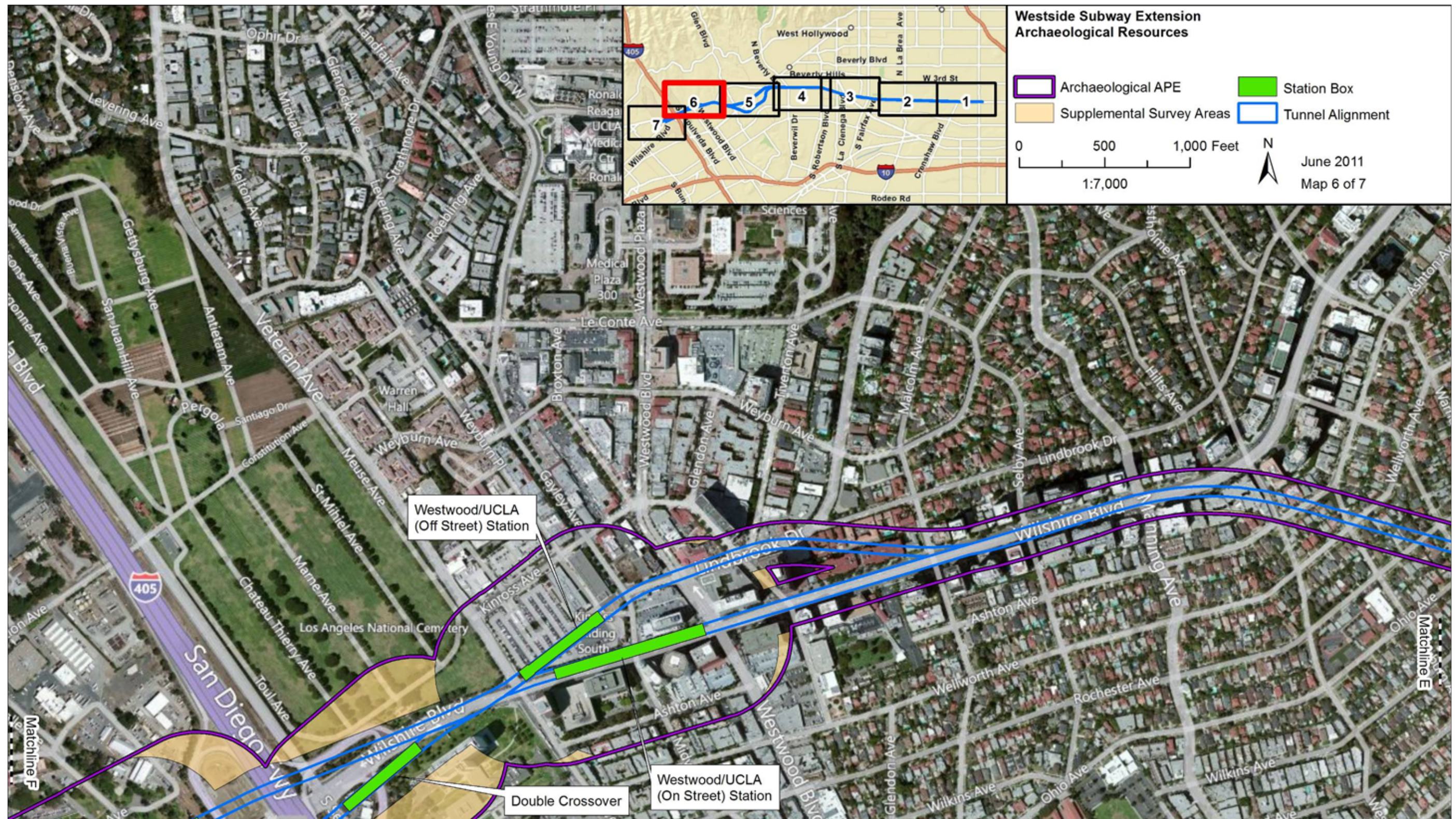
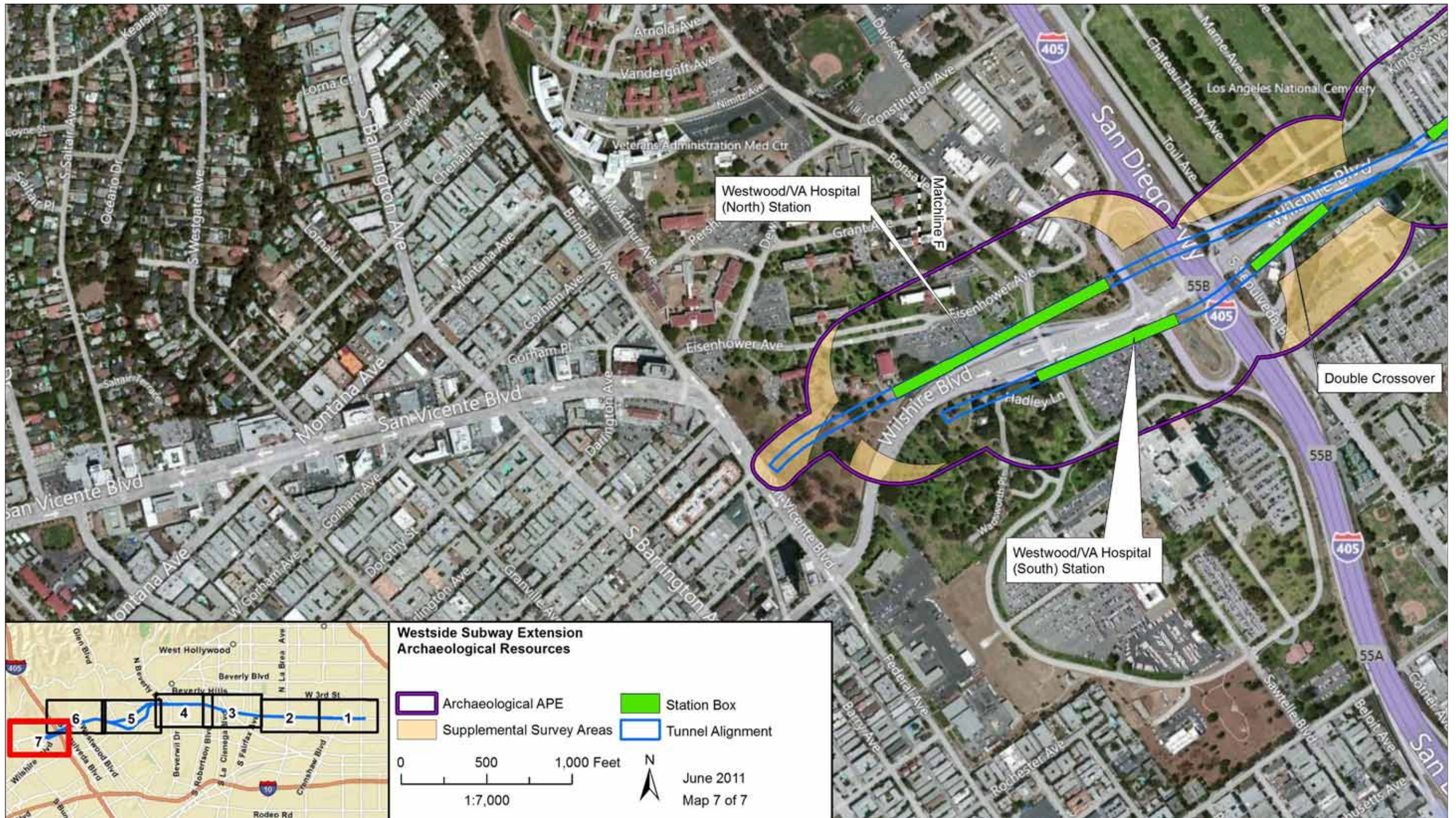


Figure 3-7: Archaeological APE for LPA Alignment (Map 6 of 7)

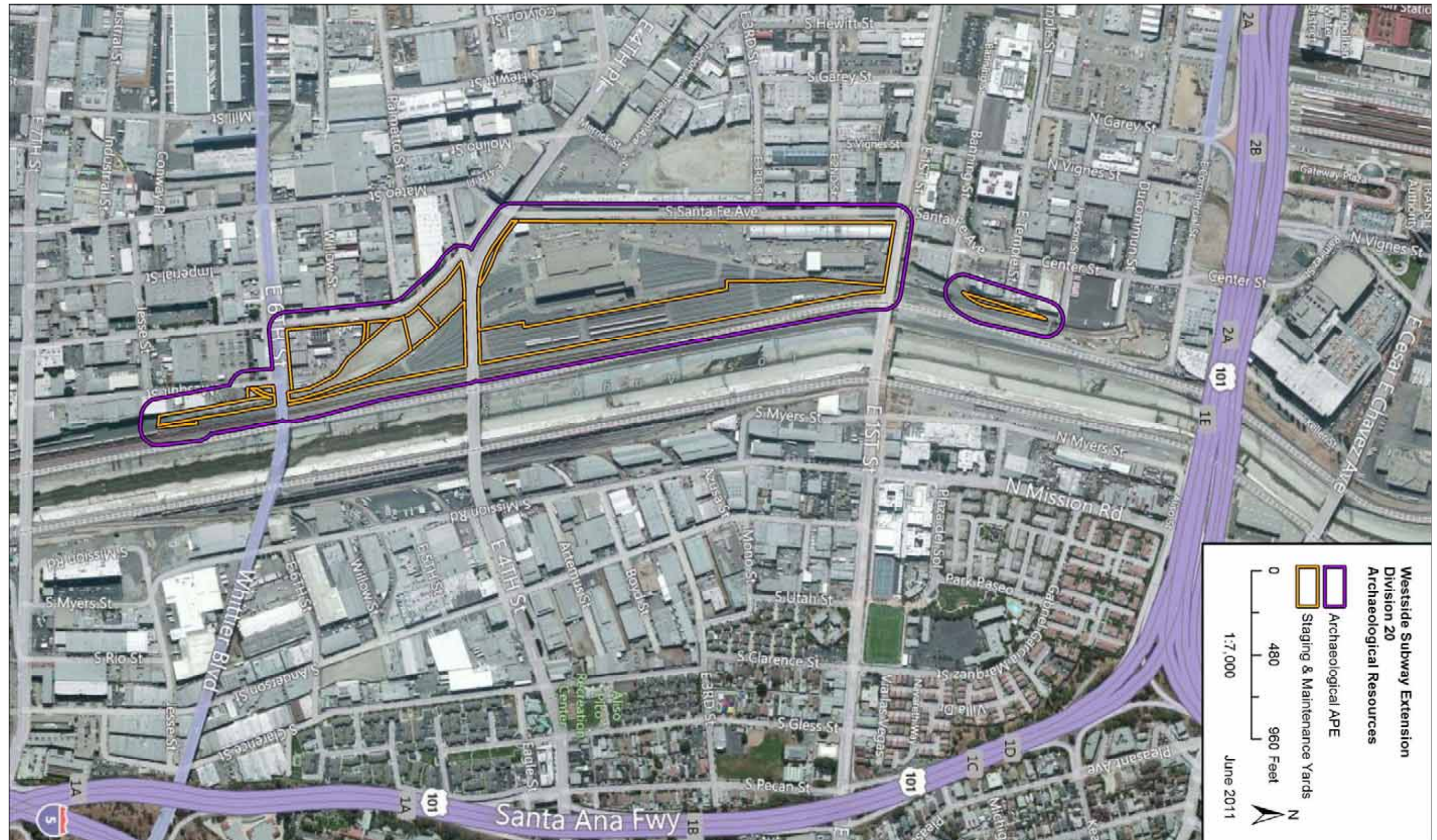




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Figure 3-8: Archaeological APE for LPA Alignment (Map 7 of 7)





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Figure 3-9: Archaeological APE for Division 20 Facility





## 4.0 REGULATORY FRAMEWORK

Several federal, state, and local laws apply to the identification, treatment, and protection of archaeological resources. Because Metro is seeking Federal funds from the FTA, the FTA is the lead federal agency for the Project and the following laws and regulations are applicable.

### 4.1 Federal

#### 4.1.1 National Environmental Policy Act (NEPA)

NEPA addresses Federal government actions in relation to all aspects of the human environment, which is defined as the “natural and physical environment and the relationship of people with that environment” (40 CFR 1508.14). NEPA requires consideration of any potentially adverse environmental effects that could result from proposed federal action.

#### 4.1.2 National Historic Preservation Act (NHPA)

The NHPA establishes a general policy for supporting and encouraging the preservation of prehistoric and historic resources for present and future generations. Under NHPA, Section 106 requires that Federal agencies take into account the effects of their actions on historic properties, including traditional cultural properties, which refers to the beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice. Given this perspective, a historic property’s traditional cultural significance is derived from the role it plays in a community’s historically rooted beliefs, customs, and practices (Parker and King 1998:1).

Section 106 declared a national policy of historic preservation and encourages such preservation. It established an Advisory Council on Historic Preservation (ACHP) and provided procedures for the federal agency to follow if a federal undertaking could affect a property included or eligible for inclusion in the NRHP. The ACHP’s development of 36 Code of Federal Regulations (CFR) Part 800 helps define how federal agencies could meet their statutory responsibilities under the NHPA (ACHP 2006).

For this project, the FTA is the federal agency responsible for conducting consultation under the Section 106 process with the State Historic Preservation Officer (SHPO). In consultation with the SHPO, the FTA is responsible for determining the APE, identifying other consulting parties, gathering information, determining whether a property/resource is eligible for the NRHP for Section 106 purposes, and determining the effect of the undertaking on historic properties. In accordance with 36 CFR Part 800.3, FTA and Metro initiated the Section 106 process with the SHPO and personnel from the OHP on June 22, 2009, via a notification letter.

#### 4.1.3 National Register of Historic Places (NRHP)

The NRHP is the official list of historic properties recognized for their significance and deemed worthy of preservation. The NRHP Criteria for Evaluation offers guidance for federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment. As established in the NHPA, to be listed in the NRHP, or to be determined eligible for listing, properties must meet certain criteria for historic or cultural significance. Qualities of significance may be found in aspects

of American history, architecture (interpreted in the broadest sense to include landscape architecture and planning), archaeology, engineering, and culture.

For cultural resources, a property is eligible for the NRHP if it is significant under one or more of the following criteria defined in 36 CFR Part 60.4 as follows: *The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, association, and*

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

## 4.2 State

### 4.2.1 California Environmental Quality Act (CEQA)

Section 15064.5(c) of CEQA, “Determining the Significance of Impacts on Historical and Unique Archaeological Resources” applies to project-related impacts on archaeological resources:

- When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource,
- If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the California Public Resources Code (PRC), and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the California PRC do not apply.
- If an archaeological site does not meet the criteria defined in subdivision (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the California PRC, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.
- If an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. It shall be sufficient that both the resource and the effect on it are noted in the EIR, but they need not be considered further in the CEQA process.

In addition, Section 15064.5(d) addresses the process of treatment of Native American human remains and the general prohibition of disinterring, disturbing, or removing human remains from any location other than the dedicated cemetery.

**4.2.2 California Penal Code, Section 622.5**

Section 622.5 of the California Penal Code establishes a misdemeanor penalty for injuring or destroying objects of historical or archaeological interest located on public or private lands, but specifically excludes the landowner.

**4.2.3 California Public Resources Code, Section 5097.5**

Section 5097.5 of the California PRC establishes a misdemeanor penalty for the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands.

**4.2.4 California Register of Historic Resources (CRHR)**

The CRHR is used as a guide by state and local agencies, private groups, and citizens to identify the state's cultural and historical resources, including archaeological resources, and to indicate which properties are to be protected, to the extent prudent and feasible, from substantial adverse change. The CRHR, as instituted by the California PRC, automatically includes all California properties already listed in the NRHP and those formally determined to be eligible for the NRHP. The CRHR also may include various other types of resources that meet the criteria for eligibility, including one or more of the following:

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

**4.2.5 State Historic Resources Commission and the Office of Historic Preservation**

In accordance with state law (California PRC Section 5020.4), the primary responsibility of the State Historical Resources Commission (SHRC) is to review applications for listing historic and archaeological resources on the NRHP, the CRHR, and the California Historical Landmarks and California Points of Historical Interest registration programs.

The SHRC is also charged with the responsibilities of conducting a statewide inventory of historical, including archaeological, resources and maintaining comprehensive records of these resources; and establish policies and guidelines for a comprehensive statewide historical, including archaeological, resources plan, among others.

The OHP is the governmental agency primarily responsible for the statewide administration of the historic preservation program in California. The chief administrative officer for the OHP is the SHPO. The SHPO is also the executive secretary of the SHRC. The mission of the OHP and the SHRC, in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital

legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations (OHP 2011).

The OHP is responsible for carrying out its mission by meeting the following goals:

- Identifying, evaluating, and registering historic properties, including archeological sites
- Ensuring compliance with federal and state regulatory obligations
- Cooperating with traditional preservation partners while building new alliances with other community organizations and public agencies
- Encouraging the adoption of economic incentives programs designed to benefit property owners
- Encouraging economic revitalization by promoting a historic preservation ethic through preservation education and public awareness, and, most significantly, by demonstrating leadership and stewardship for historic preservation in California

### 4.3 Regional

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

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

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

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

### 4.4 Local

#### 4.4.1 City of Los Angeles

The Historic Preservation Element of the General Plan for the City of Los Angeles (2001) contains ordinances for the preservation of archaeological, built, and paleontological resources. The City of



Los Angeles is strongly committed to historic preservation and has established a Cultural Heritage Commission to identify and protect the city’s history and cultural heritage.

Section 12.20.3 of the City’s Municipal Code contains procedures for the designation and protection of Historic Period Overlay Zones (HPOZ), areas that have structures, natural features, or sites of historic, architectural, cultural, or aesthetic significance and are otherwise known as historic districts. Twenty-nine areas of the city are presently classified as HPOZs, and eleven other areas are under active consideration or study (OHR 2011).

#### **4.4.2 City of Beverly Hills**

The recently amended City of Beverly Hills General Plan (2010) outlines the policies for identifying and protecting cultural resources within the city.

As defined by the Beverly Hills Municipal Code (Section 10-3-3202-Definition of Landmark), a “historical or cultural landmark” is any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City, such as historic structures or sites in which the broad cultural, political, economic, or social history of the nation, state, or community is reflected or exemplified, or which are identified with historic personages or with important events in the main currents of national, state, or local history, or which embody the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period style or method of construction, or a notable work of a master builder, designer, or architect whose individual genius reflects his age.

#### **4.4.3 County of Los Angeles**

Cultural resources within Los Angeles County include historic buildings, structures, artifacts and archaeological sites. They also include districts of historic, architectural, archaeological, or paleontological significance. Recognized resources are important parts of the built and natural environments within Los Angeles County (Los Angeles County 2007:138).

Within the Goal C/OS 12 of the County of Los Angeles is the protection of cultural heritage resources goal. There are four key policies. Policy C/OS 12.1 supports an inter-jurisdictional collaborative system that protects and enhances the County’s cultural heritage resources. Policy C/OS 12.2 supports initiatives that improve the effectiveness of the Los Angeles County Landmarks Commission and the preservation of historic buildings. Policy C/OS 12.3 ensures proper notification procedures to Native American tribes in accordance with Senate Bill 18 (2004). Policy C/OS 12.4 promotes public awareness of the County’s cultural heritage resources (Los Angeles County 2007:140).

#### **4.4.4 Specific Plans**

There are no Specific Plans within the study area that address cultural or historic resources.

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## **5.0 METHODOLOGY**

The following sections discuss in detail the personnel, agency consultation, research methodology, field methodology, identification methodology, and sensitivity assessment methodology employed for this supplemental archaeological report.

### **5.1 Personnel**

All cultural resources work for this supplemental survey has been conducted by personnel who meet the Secretary of the Interior’s professional qualifications for archaeologists (National Park Service 1983).

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

Molly Valasik and Amy Glover performed the records search and field survey. Valasik prepared all maps and contributed to portions of the report, including the records search, field methods, field findings, and consultation with Native American representatives. Glover contributed the records search portion of the report. Valasik is a RPA with a master’s degree in Anthropology from Kent State and more than eight years of experience in archaeology, including over three in California. Glover has a bachelor’s degree in Anthropology from the University of California at Riverside and over five years of experience in southern California archaeology.

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

### **5.2 California Office of Historic Preservation**

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

Coordination with the OHP was undertaken throughout the cultural resources analysis. A letter was submitted to OHP in June 2009 on behalf of FTA/Metro to initiate identification of historic properties for the Alternatives analysis. Additional efforts followed in 2009, 2010, and 2011. Coordination included guidance on establishment of the Archaeological APE, cultural resource identification methods, the effect the project may have on cultural resources, and mitigation measures to avoid or reduce project effects to cultural resources. A letter concurring with the APE was received from the SHPO on September 27, 2010.

In compliance with the Section 106 process (36 CFR Part 800), the FTA provided the SHPO with the APE for the refined LPA alignment, determination of eligibility, determination of effects and related

information by letter dated September 16, 2011. The FTA also recommended a Memorandum of Agreement (MOA) be prepared to resolve the adverse effects by the LPA on one built historic property.

**5.3 By letters dated November 1, 2011, and December 8, 2011, the SHPO concurred with the historic property determinations and determination of effect made by the FTA. A MOA between the FTA and the SHPO specific to the refined LPA alignment was executed in 2012, with Metro as an invited signatory.**

### **5.3 Records Search**

A records search for this supplemental archaeological resources survey was conducted on April 21 and 28, 2011, in support of the Final EIS/EIR for the LPA. This additional records search supplemented the previous cultural resources record searches accomplished on May 14, 2008, and August, 20, 2009, in support of the Draft EIS/EIR and presented in the Final Cultural Resources Technical Report of August 2010 (URS 2010).

This supplemental archaeological resources records search covered the areas within the Archaeological APE for the LPA that were not contained within the quarter-mile radii of the searches conducted in 2008 and 2009. Archaeologists Amy Glover and Molly Valasik accomplished the supplemental records search.

The record searches were conducted at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) located at California State University, Fullerton (CSUF), and included a review of available documents, historic maps, prior reports, and cultural resource records within the APE and within a quarter-mile radius of the APE centerline (creating a half-mile corridor). The searches at the SCCIC included a review of the following sources of information:

- California Inventory of Historical Resources
- Historic Property Data File
- California Register of Historical Resources
- National Register of Historic Places
- California State Historical Landmarks
- California Points of Historical Interest
- Caltrans State and Local Bridge Inventory

A search of additional archival sources by Molly Valasik included a review of historic aerials. The aerial images were reviewed to ascertain the approximate year of former development of a series of now-vacant lots within the Archaeological APE for the LPA. Relevant archival research (e.g., Sanborn Fire Insurance maps, assessor parcel numbers) completed for the companion study for the Architectural APE (Cogstone 2012; URS 2010) were also consulted, as relevant to this study.



## 5.4 Native American Heritage Commission

A Sacred Lands File search with the California Native American Heritage Commission (NAHC) was undertaken for knowledge of sacred sites or cultural resources that may be affected by the LPA. An initial request in support of the alternatives in the Draft EIS/EIR was made on May 28, 2009, and the NAHC responded on June 3, 2009. That response did indicate the presence of Native American cultural resources within one-half mile of the APE for the proposed alignments (see URS 2010: Appendix A).

By subsequent letter dated September 8, 2010, in response to the Draft EIS/EIR for the Westside Subway Extension Project, however, the NAHC informed Metro that “**Native American Cultural Resources were not identified** within one-half mile radius of the ‘area of potential effect (APE).’” Accordingly, this corrected information was incorporated in Section 4.14 of the Final EIS/EIR (Metro 2011), acknowledged in the Response to Comments on the Draft EIS/EIR, and is the foundation for identification of effects to known Native American traditional cultural resources within the APE for the LPA.

With each response letter in 2009 and 2010, the NAHC provided a list of tribes, groups or individuals who may have knowledge of traditional cultural resources within or near the APE. Letters requesting information regarding the presence of sacred sites or cultural resources within the project vicinity were sent to each individual on the NAHC contact lists. If no response to the letters was received, follow-up telephone calls were made to each individual on the contact lists.

The California Native American tribes contacted included the Ti’At Society, Gabrielino Tongva Indians of California Tribal Council, Gabrielino Tongva Nation, Gabrielino/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe, Shoshoneon Gabrieleno Band of Mission Indians, and Tongva Ancestral Territorial Tribal Nation. None of these groups meet the definition of Indian tribe pursuant to 36 CFR Part 800.16(m).

By letter dated February 22, 2011, Molly Valasik contacted each of the Native American individuals provided with the NAHC letter dated September 8, 2010, who were not on the list accompanying the NAHC letter dated June 3, 2009, and who had not been previously contacted for the Westside Subway Extension project. The individuals contacted in 2011 include Linda Candelaria, Chairwoman of the Gabrieleno-Tongva Tribe, and Andy Salas, Chairperson of the Shoshonean Gabrieleno Band of Mission Indians. Follow-up emails to both individuals were sent on March 17, 2011, and again on March 25, 2011. No responses have been received from these two Native American contacts.

The NAHC letter addressed to Metro and dated September 8, 2010, and all correspondence with tribal contacts made in 2011 is provided, along with a tracking log, as Appendix A to this report.

As documented by the prior Cultural Resources Technical Report in the support of the Draft EIS/EIR (URS 2010: Appendix A), eight tribal or individual contacts provided with the NAHC’s June 3, 2009, letter had been previously consulted. These included Ron Andrade, Los Angeles City/County Native American Indian Commission; Cindi Alvitre, Ti’At Society; John Tommy Rosas, Tongva Ancestral Territorial Tribal Nation; Anthony Morales, Gabrielino/Tongva San Gabriel Band of Mission Indians; Sam Dunlap, Gabrielino Tongva Nation; Robert Dorame, Gabrielino Tongva Indians of California Tribal Council; and Felicia Sheerman and Bernie Acuna of the Gabrielino-Tongva Tribe.

Responses by three of the eight Native American contacts were discussed in the body of the prior Cultural Resources Technical Report (URS 2010:4-9), and are provided below for reference.

Between July 27, 2009 and August 4, 2009, John Tommy Rosas wrote several emails asking procedural questions, objecting to the project and what was termed as its defective process, objecting to alleged violations to their indigenous rights, and objecting to the growth inducing negative impacts under CEQA. He objected to the claimed land titles by project (owners) because it is native land and thus the land claims are illegal. He wanted to see construction drawings of excavations when they become available.

Anthony Morales telephoned on July 30, 2009, to discuss preserving archaeological resources as part of the project, the importance of having a Native monitor onsite during excavations, and that areas near the La Brea Tar Pits and Century City are culturally sensitive because of previously identified village sites in those areas. Mr. Morales was also interested in how he could stay involved, and that he had previous negative experiences with Metro.

Ron Andrade telephoned on July 31, 2009, to relay that he had no concerns regarding cultural resources or Native American sacred sites within the project area. Mr. Andrade also said that he usually defers to the Gabrielino Tribe and that he would coordinate with Mr. Morales to see if there were any concerns.

## 5.5 Survey Methods

Molly Valasik and Amy Glover conducted an intensive-level pedestrian survey of portions of the Archaeological APE for the LPA on June 5, 2011 (Figure 5-1 through Figure 5-3 at 1:24,000 scale). The supplemental survey covered those portions of the refined APE that were not previously surveyed for archaeological resources in 2009 and 2010 in support of the Draft EIS/EIR, including vacant lots that were previously inaccessible (URS 2010). The archaeologists also examined the sidewalks within the supplemental survey area for stamp dates older than 45 years, and relocated a series of sidewalk stamps within the current refined APE that had been previously noted during the prior survey and provided on a series of figures in the prior report (URS 2010: Figures 4-4 through 4-14). The records search at the SCCIC indicated no archaeological sites or isolates had been previously recorded within the areas covered by the supplemental survey.

Located in an urban setting, the majority of the APE is developed, precluding observation of the ground surface. Within the undeveloped areas comprising approximately 20 percent of the APE, the archaeologists walked in parallel transects, spaced at approximately 15-meter intervals, while closely inspecting the ground surface. All undeveloped ground surface and exposed surface soils were examined for artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools, or fire-affected rock), soil discoloration that might indicate the presence of a cultural midden, soil depressions and features indicative of the former presence of structures or buildings (e.g., postholes, foundations), or historic-era debris (e.g., metal, glass, ceramics). Ground disturbances (e.g., rodent burrows, road cuts, etc.) were visually inspected.

The vacant lots within the current refined APE for the LPA were initially identified by a windshield survey of the LPA alignment, including stations, staging and laydown areas. Molly Valasik also examined current aerial photographs dating to 2011 for evidence of vacant parcels. In addition, the notations on the figures in the prior technical report were taken into consideration (URS 2010: Figures 4-4 through 4-14). With the exception of one of the five vacant lots identified by these



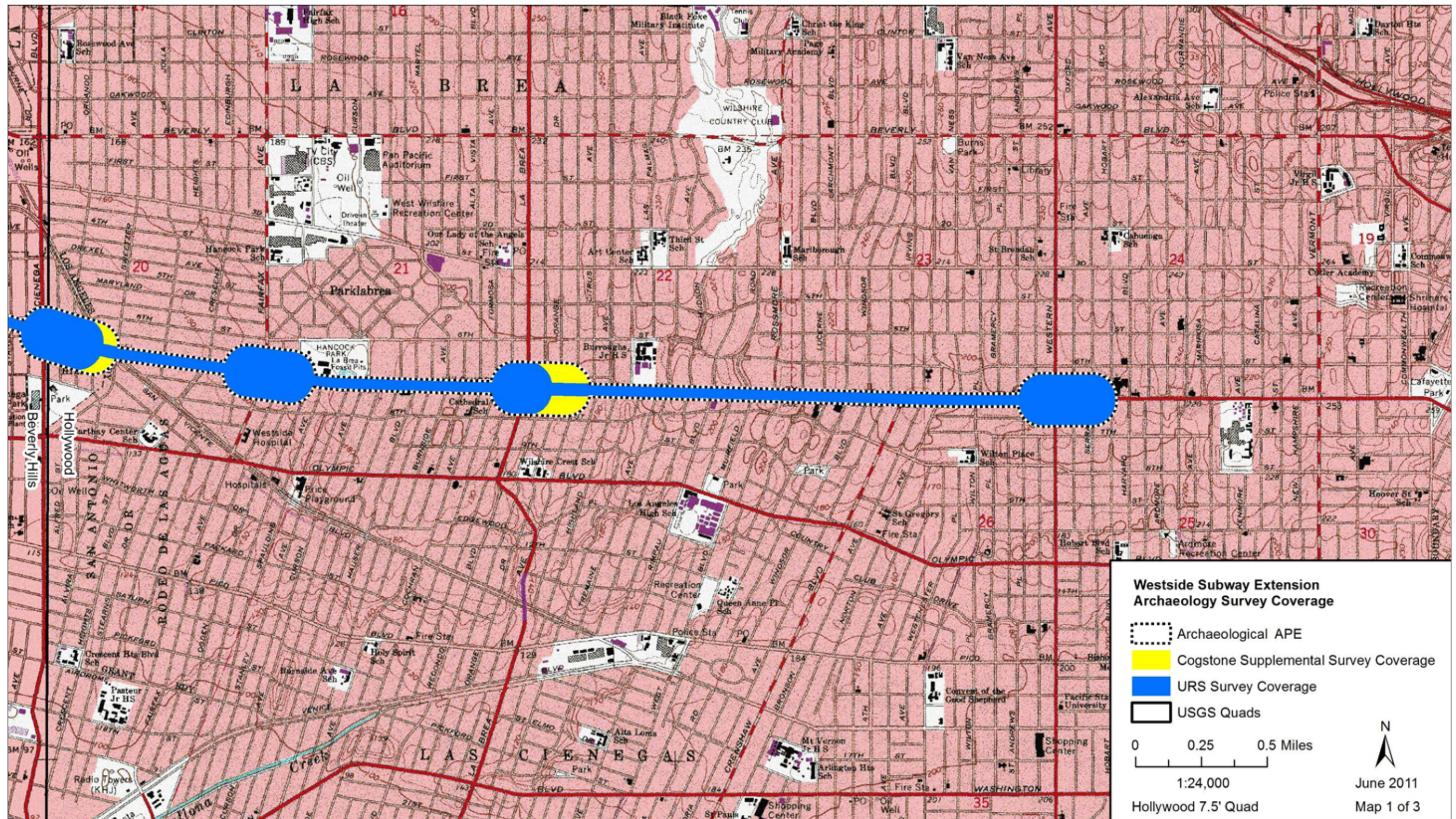
methods, each of the vacant lots was then intensively surveyed on foot. The fifth vacant lot was not surveyed because it is completely covered with asphalt paving

Following the methods employed for the prior inventory (URS 2010:4-53), the structural built dates on sidewalk stamps were noted and used to estimate the level of subsurface disturbance and the potential for buried archaeological deposits within the refined APE for the LPA. Sidewalk stamps noted previously were relocated within the current refined APE using the text for Alternative 2 and the figures in the technical report (URS 2010:4-64, Figures 4-4 through 4-14). The archaeologists also examined the sidewalks located within the supplemental survey area for evidence of additional stamp dates older than 45 years.

Photographs of the study area, including ground surface visibility, were taken with a digital camera. Location data was recorded with a handheld Trimble GeoXH GPS unit.



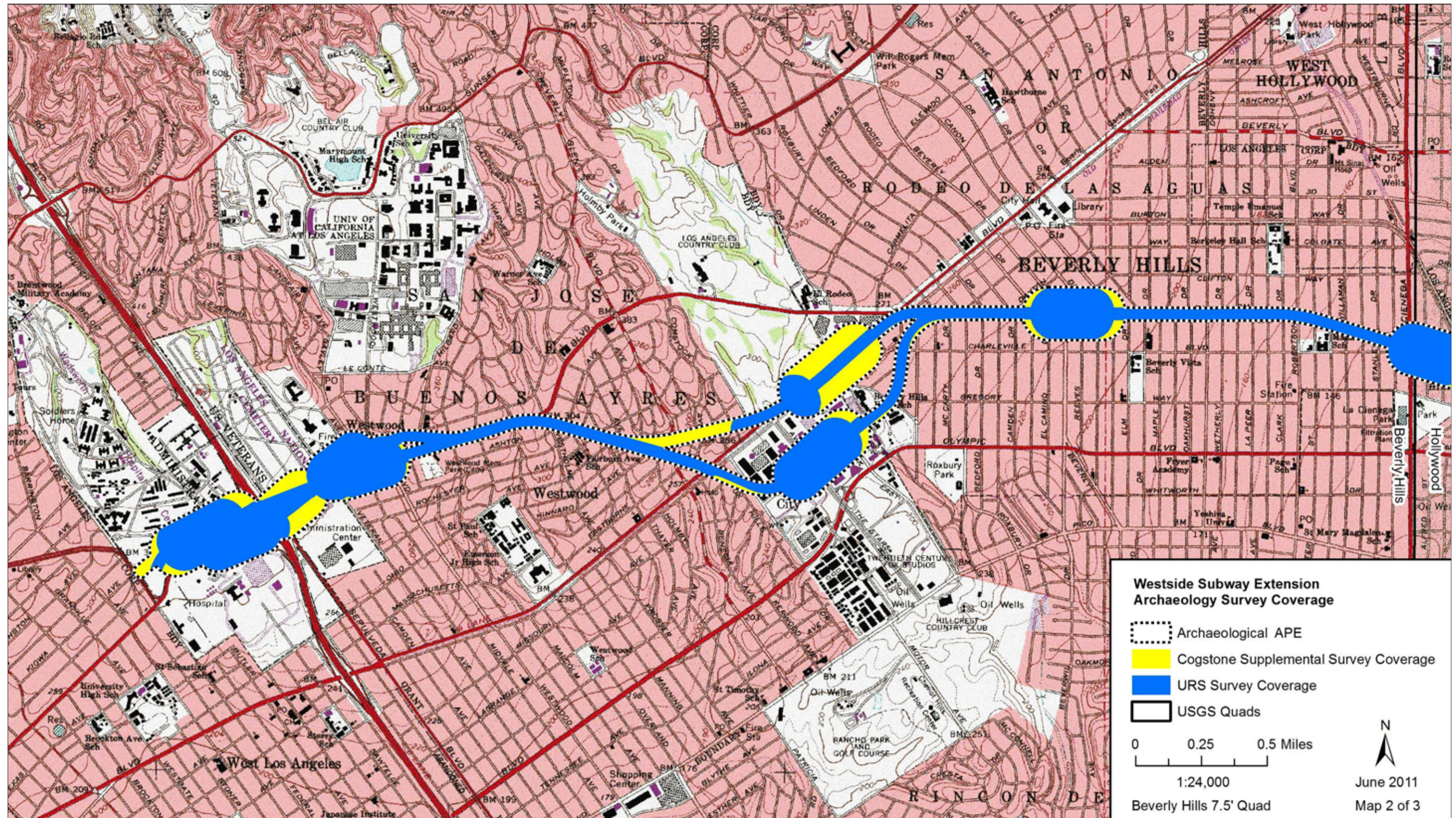




March 2012

Figure 5-1: Survey Coverage Map—East (Map 1 of 3)

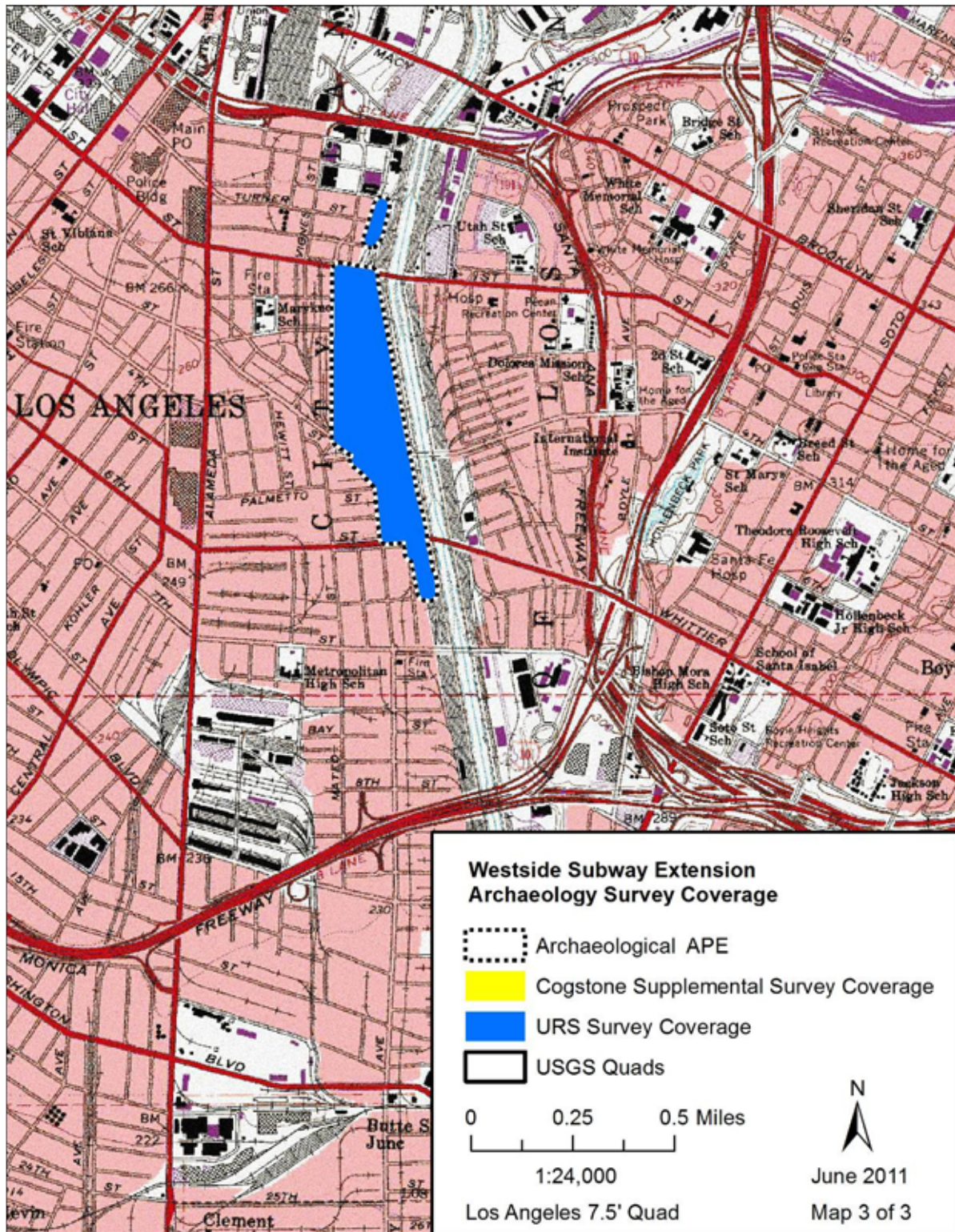




March 2012

Figure 5-2: Survey Coverage Map–West (Map 2 of 3)





March 2012

Figure 5-3: Survey Coverage Map—Division 20 Facility (Map 3 of 3)

## 5.6 Archaeological Sensitivity and Potential for Buried Resources

### 5.6.1 Locally Preferred Alternative (LPA)

A predictive model feasibility study of the potential for the presence of undocumented prehistoric and historic-era resources was developed in 2009 for the Alternatives analysis and presented in the prior report (URS 2010:4-19–4-21, Appendix C). For predicting the potential for historic-era resources, the build date of the buildings located on each parcel along the Alternatives alignments was entered into a geographical information system (GIS) database and then organized the density data into five classes of relative potential ranging from low to high. A similar predictive model for prehistoric resources was not generated in 2009 because of insufficient data, mainly due to a lack of documented prehistoric archaeological sites and early urbanization of the study area prohibiting reconstruction of former ecotone boundaries and the local stream network.

Although the strength of the resultant predictive model cannot be statistically quantified, it is considered a useful tool and is used below to assess the sensitivity along the refined LPA alignment of the potential for discovery of subsurface historic-era archaeological materials, features or deposits.

In addition to the GIS-based model, the development during the American period of the cities, commercial corridors, and medical and educational campuses along the LPA, plus the structural built dates on sidewalk stamps are used to estimate the level of subsurface disturbance and the potential for buried archaeological deposits within the LPA APE. This latter method was also employed in the prior report for the Alternatives analysis (URS 2010:4.4.1.2, Figures 4-4 through 4-12).

### 5.6.2 Other Components of the LPA

Since it was based on the build date of buildings, the GIS-based predictive model developed in 2009 for the Alternatives analysis does not encompass the Division 20 maintenance yard (URS 2010:Appendix C). This large industrial facility has railroad tracks and railroad-use and maintenance related structures, but few buildings, some of which are modern.

Methods used here for an assessment of the sensitivity for the discovery of historic-era archaeological sites during ground disturbance for planned improvements in the yard include the presence of known archaeological resources and the local history during the American period. The yard is adjacent to the Los Angeles River at the former eastern extent of the Little Tokyo Historic District, it is the location of a railroad station in operation before its replacement in 1893 by the La Grande Railroad Station, and it is crossed by three bridge viaducts built between 1929 and 1932.



## **6.0 AFFECTED ENVIRONMENT**

### **6.1 Natural and Cultural Setting**

The natural and cultural setting is briefly summarized below for this supplemental report. The context is presented in full in the prior Cultural Resources Technical Report (URS 2010:4-10-4-18) prepared in support of the Draft EIS/EIR.

The project area is situated on a broad, flat plain within the Los Angeles Basin between the Peninsular and Transverse ranges. Prehistoric occupation in Los Angeles County is generally divided into four temporal periods subsequent to approximately 12,000 years ago: Paleoindian, Milling Stone, Intermediate, and Late Prehistoric. At the time of historic contact, the study area was occupied by the Tongva/Gabrieleno, one of the most distinctive tribes in all of California (Bean and Smith 1978).

The earliest explorations in this region by non-natives occurred in the mid-16<sup>th</sup> century during the Spanish Colonial period. The San Gabriel de Arcángel mission was established by the Spaniards and two Franciscan friars in 1771; the Los Angeles pueblo was founded ten years later. Mexico controlled California between 1821 and 1848, awarding lands grants in the state's interior and opening up the region to American trappers. In 1850, two years after Mexico relinquished California to the United States, California became a state, Los Angeles was created as a county, and Los Angeles was incorporated as a city.

### **6.2 Summary of Archaeological Resources**

This section includes information on archaeological resources based on the records searches, field survey results, and other information.

The companion Historic Properties Supplemental Survey Report (Cogstone 2012), also prepared in support of the Final EIS/EIR, discusses the built environment resources within the Architectural APE for the LPA.

#### **6.2.1 Previously Conducted Cultural Resources Investigations**

The SCCIC records search identified 128 previously conducted cultural resources investigations within a quarter-mile search radius of the APE (Table 6-1). Forty-nine (49) of these investigations are within or immediately adjacent to the APE.



**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Ultra Systems. Report Missing. A one acre survey with no sites recorded.	1979	LAN-0563	Beverly Hills	APE
Padon, Beth. An Archaeological Assessment of Lots 1 and 32 on the UCLA Campus, Los Angeles County, CA. On file at SCCIC.	1982	LAN-1139	Beverly Hills	APE
Padon, Beth. An Archaeological Assessment of a Portion of the Long Range Development Plan 1982-83 of the UCLA Campus, Los Angeles County, CA. On file at SCCIC.	1982	LAN-1161	Beverly Hills	¼-mile
Wessel Richard. Letter Report: Survey of Tract 34961, 2.239 acres at 602 Masselin Avenue, Wilshire. On file at SCCIC.	1984	LAN-1330	Hollywood	¼-mile
Westec Services, Inc. Technical Report Archaeological Resources Los Angeles Rail Rapid Transit Project “Metro Rail”. On file at SCCIC.	1983	LAN-1578	Hollywood	APE
Michael Brandman Associates. Park La Brea EIR No. 88-347-2C (GPA) State Clearinghouse No. 88080307. On file at SCCIC.	1989	LAN-1932	Hollywood	¼-mile
Bissell, Ronald. Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los Angeles, Los Angeles County, CA. On file at SCCIC.	1989	LAN-1968	Beverly Hills	¼-mile
Greenwood, Roberta. Technical Report—Archaeology for the Fox Studios Environmental Impact Report. On file at SCCIC.	1990	LAN-2200	Beverly Hills	¼-mile
Salls, Roy. The La Brea Cogged Stone. On file at SCCIC.	1978	LAN-2331	Hollywood	¼-mile
Salls, Roy. The La Brea Atlatl Foreshafts: Inferences for the Millingstone Horizon. On file at SCCIC.	1986	LAN-2360	Hollywood	¼-mile
Wlodarski, Robert J. Results of a Record Search Phase Conducted for the Proposed Alameda Corridor Project, Los Angeles County, California. On file at SCCIC.	1992	LAN-2577	Los Angeles	¼-mile
Wlodarski, Robert J. The Results of a Phase I Archaeological Study for the Proposed Alameda Transportation Corridor Project, Los Angeles County, California. On file at SCCIC.	1992	LAN-2644	Los Angeles	¼-mile
Farnsworth, Laurie, et. al. The Shinen’Kan Site: Excavations at the Historic Hancock Ranch House. On file at SCCIC.	1992	LAN-2737	Hollywood	¼-mile
Michael Brandman Associates. Park La Brea Supplemental Draft EIR No. 88-347-ZC (GPA) (SUB) (CUB) State Clearinghouse No. 88080307. On file at SCCIC.	1991	LAN-2881	Hollywood	APE
Anonymous. Draft Stage I Environmental Site Assessment Eastside Extension (from Whittier Boulevard and Atlantic Boulevard Intersection to Union Station Area) Metro Red Line Los Angeles, California. On file at SCCIC.	1993	LAN-2966	Los Angeles	APE
Greenwood, Roberta S. Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1. On file at SCCIC.	1993	LAN-3103	Los Angeles	APE
Wlodarski, Robert J. Addendum Report: Results of a Phase I Archaeological Study of the Proposed Construction of the Whittier Boulevard Shaft Site East Central Interceptor Sewer Project, East-West Alignment, Los Angeles County. On file at SCCIC.	1995	LA-3115	Los Angeles	¼-mile
Demcak, Carol. Report of Archaeological Survey for L.S. Cellular Site #775, 4401 Wilshire Boulevard, Los Angeles, Los Angeles County, CA. On file at SCCIC.	1996	LAN-3438	Hollywood	¼-mile

**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Gipsman, Jacob. Special Study/Analysis: Epic Discoveries I made at La Brea. On file at SCCIC.	1973	LAN-3465	Hollywood	¼-mile
Frost, David. Special Study/Analysis: A Delineation of My Experiences at Rancho La Brea. On file at SCCIC.	1973	LAN-3466	Hollywood	¼-mile
Gordon, Marlene. Special Study/Analysis: Epic Discoveries I made at La Brea. On file at SCCIC.	1973	LAN-3467	Hollywood	¼-mile
Gilden, Eugene. Special Study/Analysis: The Rancho La Brea Project. On file at SCCIC.	1973	LAN-3468	Hollywood	¼-mile
Turner, Robin and Mark Selverston. Monitoring of Median Improvements, Wilshire Boulevard from Fairfax Avenue to La Brea Avenue. On file at SCCIC.	1996	LAN-3471	Hollywood	APE
Anonymous. Draft Environmental Impact Report: Metro Rail Transit Corridor Specific Plan, Park Mile Specific Plan Amendments. On file at SCCIC.	1985	LAN-3496	Hollywood	APE
Dillon, Brian. Archaeological Record Search and Impact Evaluation for the Los Angeles Wastewater Program Management (NOS-NCOS) Project, Los Angeles, CA. On file at SCCIC.	1990	LAN-3501	Hollywood	APE
Westec Services, Inc. Technical Report: Archaeological Resources Los Angeles Rail Rapid Transit Project “Metro Rail”. On file at SCCIC.	1983	LAN-3510	Hollywood	APE
Buckman, Bonnie. The Los Angeles Basin and Vicinity: A Gazetteer and Compilation of Archaeological Site Information. On file at SCCIC.	1974	LAN-3583	Hollywood	¼-mile
ENSR. Negative Phase I Archaeological Survey of 1.2 Acre at 1401 Sepulveda Boulevard, Westwood, Los Angeles County, California. On file at SCCIC.	1997	LAN-3599	Beverly Hills	¼-mile
Anonymous. Request for Determination of Eligibility for Inclusion in the National Register of Historic Places for Beverly Gardens. On file at SCCIC.	N/A	LAN-3678	Beverly Hills	¼-mile
Anonymous. Request for Determination of Eligibility for Inclusion in the National Register of Historic Places for Beverly Gardens. On file at SCCIC.	N/A	LAN-3679	Beverly Hills	¼-mile
Anonymous. Request for Determination of Eligibility for Inclusion in the National Register of Historic Places for Beverly Gardens. On file at SCCIC.	N/A	LAN-3680	Beverly Hills	¼-mile
City of Los Angeles. Historic Property Survey: 6th Street Between Gramercy Place and Bronson Avenue. On file at SCCIC.	1977	LAN-3730	Hollywood	¼-mile
City of Los Angeles. Historic Property Survey: Carrillo Drive and Crescent Heights Boulevard—Commodore Slat Drive to First Alley South of Olympic Boulevard. On file at SCCIC.	1977	LAN-3760	Hollywood	¼-mile
Webb, Lois, et. al. Historic Property Survey: 07 LA 02 P.M. 3.65/9.57 Route 405 to Fairfax Avenue, Los Angeles County, CA. On file at SCCIC.	1983	LAN-3765	Hollywood	APE
Anonymous. An Archival Study of a Segment of the Proposed Pacific Pipeline, City of Los Angeles, California. On file at SCCIC.	1992	LAN-3813	Los Angeles	APE
Foster, John M. and Roberta S. Greenwood. Archaeological Investigations at Maintenance of Way Facility, South Santa Fe Avenue (CA-LAN-2563H). On file at SCCIC.	1998	LAN-3923	Los Angeles	APE
Greenwood, Roberta S. and Portia Lee. Transportation-Related Resources on South Santa Fe Avenue, Los Angeles. On file at SCCIC.	1998	LAN-4047	Los Angeles	APE



**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
McKenna, Jeanette and Richard Shepard. Historic Documentation: The University of California, Los Angeles, Academic Health Center Westwood Campus Facility Reconstruction Project, Los Angeles County, CA. On file at SCCIC.	1997	LAN-4095	Beverly Hills	¼-mile
Lee, Portia. Seismic Retrofit of First Street Bridge Over the Los Angeles River. On file at SCCIC.	ND	LAN-4217	Los Angeles	¼-mile
ENVICOM CORPORATION. Historical Property Survey Report West Los Angeles Veloway Project. On file at SCCIC.	1989	LAN-4239	Beverly Hills	APE
Rockey, David. The Miracle Mile of Wilshire Boulevard. On file at SCCIC.	1999	LAN-4518	Hollywood	APE
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 652-04, in the County of Los Angeles, California. On file at SCCIC.	1999	LAN-4557	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 572-09, in the County of Los Angeles, CA. On file at SCCIC.	1999	LAN-4571	Beverly Hills	APE
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 577-02, County of Los Angeles, California. On file at SCCIC.	1999	LAN-4603	Hollywood	¼-mile
Starzak, Richard. Historic Property Survey Report for the Proposed Alameda Corridor from the Ports of Long Beach and Los Angeles to Downtown Los Angeles in Los Angeles County, California. On file at SCCIC.	1994	LAN-4625	Los Angeles	¼-mile
Ashkar, Shahira. Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties. On file at SCCIC.	1999	LAN-4834	Hollywood, Los Angeles	¼-mile
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 576-04, County of Los Angeles, CA. On file at SCCIC.	1999	LAN-5011	Beverly Hills	¼-mile
Gray, Deborah. Cultural Resource Assessment for ATT&T Wireless Services Facility Number C310.2, County of Los Angeles, CA. On file at SCCIC.	1999	LAN-5013	Beverly Hills	APE
Iverson, Gary. Negative Archaeological Survey Report: High Occupancy Vehicle Lane in the southbound center median area of Route 405 from Route 10/405 Interchange to Waterford Avenue. On file at SCCIC.	1999	LAN-5016	Beverly Hills	APE
Duke, Curt. Cultural Resource Assessment for AT&T Wireless Services Facility Number R329.2, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5032	Beverly Hills	¼-mile
Duke, Curt. Cultural Resource Assessment for ATT&T Wireless Services Facility Number R352.1, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5034	Beverly Hills	¼-mile
Lapin, Philippe. Cultural Resource Assessment for ATT&T Wireless Services Facility Number R351, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5039	Beverly Hills	APE
Duke, Curt. Cultural Resource Assessment for AT&T Wireless Services Facility Number R307.1, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5072	Hollywood	APE
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 241-01, County of Los Angeles, CA. On file at SCCIC.	1999	LAN-5087	Hollywood	¼-mile

**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Holson, John. Archaeological Survey and Record Search for WorldCom 1901 Avenue of the Stars, Century City Loop Project. On file at SCCIC.	2001	LAN-5189	Beverly Hills	APE
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 010-02, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5326	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for the ATT&T Wireless Services Facility Number R137.1, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5333	Hollywood	APE
Lapin, Philippe. Cultural Resource Assessment for Pacific Bell Wireless Facility SM 919-01, County of Los Angeles, CA. On file at SCCIC.	2000	LAN-5336	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for Cingular Wireless Facility No. SM 235-02, Los Angeles County, CA. On file at SCCIC.	2002	LAN-6124	Beverly Hills	¼-mile
Duke, Curt. Revised Cultural Resource Assessment, Cingular Wireless Facility No. SM 152-01, Los Angeles County, California. On file at SCCIC.	2002	LA-6133	Beverly Hills	APE
Earthtouch. Nextel Communication Kingsley (CA-7841), 3727 West Sixth Street, Los Angeles, CA. On file at SCCIC.	N/A	LAN-6431	Hollywood	¼-mile
McKenna, Jeanette. Los Angeles New Primary Center No. 1—Archaeological Records Check Summary. On file at SCCIC.	2002	LAN-6441	Hollywood	APE
Greenwood, Roberta and Peter Messick. Archaeological Monitor Report: Three Parcels at Park La Brea, Los Angeles, CA. On file at SCCIC.	2002	LAN-6444	Hollywood	¼-mile
Mason, Roger. Proposed Verizon Wireless Facility Mid-Wilshire (99900155) in the City and County of Los Angeles, CA. On file at SCCIC.	2001	LAN-6445	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for Cingular Wireless Facility No. SM 130-01, Los Angeles County, CA. On file at SCCIC.	2002	LAN-6452	Hollywood	APE
Duke, Curt and Judith Marvin. Cultural Resource Assessment for Cingular Wireless Facility No. SM 200-02, Los Angeles County, CA. On file at SCCIC.	2002	LAN-6455	Hollywood	¼-mile
Duke, Curt and Judith Marvin. Cultural Resource Assessment, Cingular Wireless Facility No. SM 196-03, Los Angeles County, California. On file at SCCIC.	200	LAN-6456	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for Pacific Bell Mobile Services Facility LA 578-11, County of Los Angeles, CA. On file at SCCIC.	1999	LAN-6462	Hollywood	¼-mile
Duke, Curt. Cultural Resource Assessment for Cingular Wireless Facility No. SM 053-01, Los Angeles County, CA. On file at SCCIC.	2001	LAN-6485	Beverly Hills	¼-mile
Wallock, Nicole. Cultural Resource Assessment, Cingular Wireless Facility No. SM 053-02, Los Angeles County, California. On file at SCCIC.	2001	LAN-6487	Beverly Hills	¼-mile
Sriro, Adam. Negative Archaeological Survey Report for Addition of a High Occupancy Vehicle (HOV) lane to the northbound Route 405 from 0.5 km south of I-10 to Ventura Boulevard, Los Angeles County, CA. On file at EIC.	2001	LAN-6491	Beverly Hills	APE
Duke, Curt. Cultural Resource Assessment for Cingular Wireless Facility No. SM 039-01, Los Angeles County, CA. On file at SCCIC.	2001	LAN-6501	Beverly Hills	APE



Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Bolin, David. Records Search for Site ID Number: R294—Doheny/Wilshire, Geo Trans Project Number L260-000, 911 Wilshire Blvd., Beverly Hills, Los Angeles County, CA. On file at SCCIC.	2001	LAN-6518	Beverly Hills	¼-mile
Billat, Lorna. Nextel Communication Proposed Wireless Telecommunications Service Facilities—Southern California. On file at SCCIC.	2001	LAN-6520	Beverly Hills	APE
Cox, Brian. Nextel Communications CA-6590A / Westholme, 10850 Wilshire Blvd., Los Angeles, CA. On file at SCCIC.	2001	LAN-6525	Beverly Hills	¼-mile
Greenwood, Roberta S. Cultural Resources Monitoring: Northeast Interceptor Sewer Project. On file at SCCIC.	2003	LAN-6837	Los Angeles	¼-mile
Budinger, Fred E., Jr. Phase I Archaeological Survey, Former Aliso Street MGP Site, Los Angeles, California. On file at SCCIC.	2003	LAN-6840	Los Angeles	¼-mile
Harper, Caprice. Cultural Resource Assessment for Cingular Wireless Facility No. SM 123-04, Los Angeles County, CA. On file at SCCIC.	2003	LAN-6883	Beverly Hills	¼-mile
Michalsky, Jay and Caprice Harper. Cultural Resource Assessment for Cingular Wireless Facility No. LA 396-91, Los Angeles County, CA. On file at SCCIC.	2004	LAN-7122	Beverly Hills	APE
WSA. Report on Cultural Resources Mitigation and Monitoring Activities; Fluor/ Level (3) Los Angeles Local Loops. On file at SCCIC.	2001	LAN-7178	Hollywood	APE
Bonner, Wayne. Records Search Results and Site Visit for Sprint Telecommunications Facility Candidate LA60X429C (Wilshire) 3921 Wilshire Boulevard, Los Angeles, Los Angeles County, CA. On file at SCCIC.	2004	LAN-7339	Hollywood	¼-mile
McKenna, Jeanette A. Historic Cultural Resources Study: The Los Angeles Unified School District Central Region Elementary School No. 14, Located in the Echo Park Area of the City of Los Angeles, Los Angeles County, California. On file at SCCIC.	2005	LAN-7387	Hollywood	APE
Hale, Alice E. Inspection of Auger Bore Samples for the Coyote Pass Geotechnical Project. On file at SCCIC.	2004	LAN-7555	Los Angeles	¼-mile
Bonner, Wayne H. Cultural Resources Records Search Results and Site Visit for Cingular Wireless Candidate EI-0092-02 (SBC Switch La Brea), 654 South La Brea Boulevard, Los Angeles, Los Angeles County, California. On file at SCCIC.	2006	LAN-7736	Hollywood	APE
Bonner, Wayne. Cultural Records Search Results and Site Visit for T-Mobile Facility Candidate LA03295B (Jamison Properties, Inc.), 4201 Wilshire Boulevard, Los Angeles, Los Angeles County, CA. On file at SCCIC.	2006	LAN-7753	Hollywood	APE
Bonner, Wayne. Direct and Indirect APE Historic Architectural Assessments for Sprint Telecommunications Facility Candidate LA60XC429C (Wilshire) 3921 Wilshire Boulevard, Los Angeles, Los Angeles County, CA. On file at SCCIC.	2004	LAN-7775	Hollywood	¼-mile
Strauss, Monica. Archaeological Resources Assessment for the Proposed Public Safety Facilities Master Plan Project, City of Los Angeles, California. On file at SCCIC.	2004	LAN-7888	Los Angeles	¼-mile

**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Wlodarski, Robert J. Records Search and Field Reconnaissance Phase for the Proposed Royal Street Communications Wireless Telecommunications Site LA 0150a (East LA/American Storage), Located at 300 South Avery Street, Los Angeles, California 90013. On file at SCCIC.	2006	LAN-7900	Los Angeles	¼-mile
Southern California Rapid Transit District. Technical Report: Cultural Resources Los Angeles rail Rapid Transit Project “Metro Rail”. On file at SCCIC.	1987	LAN-8020	Hollywood	APE
Sleepy, Robert. National Historic Preservation Act (NHPA) Section 106 Compliance for the California Department of Veterans Affairs, Proposed Veterans Homes of California—Greater Los Angeles / Ventura Counties. On file at SCCIC.	2005	LAN-8088	Beverly Hills	¼-mile
McKenna, Jeanette. Historic American Building Survey: Glendon Manor 1070 Glendon Avenue, Westwood Los Angeles, Los Angeles County, CA. On file at SCCIC.	2001	LAN-8089	Beverly Hills	¼-mile
Gust, Sherri and Heather Puckett. Los Angeles Metro Red Line Project, Segments 2 and 3 Archaeological Resources Impact Mitigation Program, Final Report of Findings. On file at SCCIC.	2004	LAN-8251	Hollywood	APE
Snyder, John W., et al. Request for Determination of Eligibility for Inclusion in the National Register of Historic Places/Historic Bridges in California: Concrete Arch, Suspension, Steel Girder and Steel Arch. On file at SCCIC.	1986	LAN-8252	Hollywood, Los Angeles	APE
Wood, Catherine. Archaeological Survey Report for the KRC Apartments Project Located at 900-906 South Crenshaw Boulevard, Los Angeles, California. On file at SCCIC.	2007	LAN-8509	Hollywood	¼-mile
Foster, John M. Archaeological Inventory: Emergency Operations Center, Fire Station, and Parking Garage. On file at SCCIC.	2005	LAN-8513	Los Angeles	¼-mile
Gregory, Carrie and Margarita Wuellner. Historical assessment and Technical Report for the Proposed Public Safety Facilities Master Plan, Los Angeles, California. On file at SCCIC.	2004	LAN-8514	Los Angeles	¼-mile
Taniguchi, Christeen. Historic Architectural Survey and Section 106 Compliance for a Proposed Wireless Telecommunications Service Facility Located on a Warehouse Building in the City of Los Angeles (Los Angeles County), California. On file at SCCIC.	2004	LAN-8518	Los Angeles	¼-mile
Chasteen, Carrie and Catherine Wood. Historic Property Survey Report: 7-LA-Sepulveda Boulevard Between Wilshire Boulevard and Mulholland Drive (6 miles) EA 07-4U2944L. On file at SCCIC.	2007	LAN-8710	Beverly Hills	APE
Bonner, Wayne H. and Sarah A. Williams. Cultural Resources Records Search Results and Site Visit for Sprint Nextel Telecommunications Facility Candidate CA8283E (Van Wyck), 601 South Santa Fe Avenue, Los Angeles, Los Angeles County, California. On file at SCCIC.	2006	LAN-8733	Los Angeles	¼-mile
Baker, Cindy and Mary Maniery. Cultural Resource Inventory and Evaluation of United States Army Reserve 63D Regional Readiness Command Facilities. On file at SCCIC.	2007	LAN-8898	Beverly Hills	¼-mile
Messick, Peter and Alice E. Hale. Archaeological Monitoring Report, Mangrove Parking Lot Project, Los Angeles, California. On file at SCCIC.	2007	LAN-8910	Los Angeles	¼-mile



Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Crawford, Kathleen. Direct APE Historic Architectural Assessment for T-Mobile Facility Candidate LA03295B (Jamison Properties, Inc.), 4201 Wilshire Boulevard, Los Angeles, Los Angeles County, CA. On file at SCCIC.	2006	LAN-9087	Hollywood	APE
Bonner, Wayne H. Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11559A (ATC Rooftop), 1100 Glendon Avenue, Los Angeles, Los Angeles County, California. On file at SCCIC.	2007	LAN-9133	Beverly Hills	¼-mile
Bonner, Wayne H. Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11560A (Wilshire Medical RT), 6221 Wilshire Boulevard, Los Angeles, Los Angeles County, California. On file at SCCIC.	2007	LAN-9226	Hollywood	¼-mile
Bonner, Wayne H. Cultural Resources Records Search and Site Visit Results for AT&T Candidate LAR022-51 (Avenue of the Stars & Olympic Boulevard), Los Angeles, Los Angeles County, California. On file at SCCIC.	2007	LAN-9253	Beverly Hills	¼-mile
Bonner, Wayne. Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11559A (ATC Rooftop) 110 Glendon Avenue, Los Angeles, Los Angeles County, CA. On file at SCCIC.	2007	LAN-9255	Beverly Hills	¼-mile
Billat, Lorna. Meyers/CA-6357A, 300 Avery Street, Los Angeles, CA. On file at SCCIC.	2004	LAN-9395	Los Angeles	¼-mile
Bonner, Wayne H. and Kathleen Crawford. Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate SV11718A (Palmer Building), 535 South Gramercy Place, Los Angeles, Los Angeles County, California. On file at SCCIC.	2008	LAN-9496	Hollywood	¼-mile
Bonner, Wayne H. and Kathleen Crawford. Direct APE Historic Architectural Assessment for T-Mobile USA Candidate SV11718A (Palmer Building), 535 South Gramercy Place, Los Angeles, Los Angeles County, California. On file at SCCIC.	2008	LAN-9533	Hollywood	¼-mile
Bonner, Wayne H. and Kathleen Crawford. Cultural Resources Records Search and Site Visit Results for AT&T Candidate EL0092-02@ (SBC Switch La Brea), 654 South La Brea Avenue, Los Angeles, Los Angeles County, California. On file at SCCIC.	2008	LAN-9537	Hollywood	APE
Anonymous. Final Supplemental Environmental Impact Statement/Final Subsequent Environmental Impact Report: Los Angeles Eastside Corridor. On file at SCCIC.	2001	LAN-9843	Los Angeles	¼-mile
Anonymous. Draft: Los Angeles Eastside Corridor, Revised Cultural Resources Technical Report, Final Supplemental Environmental Impact Statement/Final Subsequent Impact Report. On file at SCCIC.	2001	LAN-9844	Los Angeles	APE
Bonner, Wayne H. and Kathleen A. Crawford. Cultural Resources Records Search and Site Visit Results for Clearwire Candidate CA-LOS6718/CA6281, 4201 Wilshire Blvd., Los Angeles, Los Angeles County, CA. On file at SCCIC.	2009	LAN-10086	Hollywood	APE
Chasteen, Carrie. Finding of Effect—6 <sup>th</sup> Street Viaduct Seismic Improvement Project. On file at SCCIC.	2008	LAN-10451	Los Angeles	APE
Smith, Francesca. Historical Resources Evaluation Report—6 <sup>th</sup> Street Viaduct Seismic Improvement Project. On file at SCCIC.	2007	LAN-10452	Los Angeles	APE

**Table 6-1: Prior Cultural Resources Studies within 0.25-Mile of APE (continued)**

Citation	Survey Year	Survey Number	Quadrangle(s) (7.5 Minute)	Survey Within APE or ¼-mile radius?
Greenwood, Roberta S. Scott Savastio, and Peter Messick. Cultural Resources Monitoring: North Outfall Sewer—East Central Interceptor Sewer Project. On file at SCCIC.	2004	LAN-10506	Beverly Hills, Hollywood, Los Angeles	¼-mile
Anonymous. Technical Report—Historical/Architectural Resources—Los Angeles Rail Rapid Transit Project “Metro Rail”, Draft Environmental Impact Statement and Environmental Impact Report. On file at SCCIC.	1983	LAN-10507	Hollywood, Los Angeles	APE
Hatoff, Brian. Verizon Cellular Communications Tower Site—LTE Beverly Vista, 9033 Wilshire Boulevard, Beverly Hills, CA 90211. On file at SCCIC.	2010	LAN-10580	Beverly Hills	¼-mile
Hatoff, Brian. Verizon Cellular Communications Tower Site—Federal LTE, 11600 Wilshire Boulevard, Los Angeles, CA 90025. On file at SCCIC.	2010	LAN-10581	Beverly Hills	¼-mile
Dietler, Sara, Adela Amarai, and Linda Kry. Final Archaeological Assessment for the Temple Street Widening Project, City of Los Angeles, California. On file at SCCIC.	2010	LAN-10606	Los Angeles	¼-mile
Tang, Bai “Tom”. Preliminary Historical/Archaeological Resources Study, Southern California Regional Rail Authority (SCRRA) River Subdivision Positive Train Control Project, City of Los Angeles, Los Angeles County, California. On file at SCCIC.	2010	LAN-10638	Los Angeles	APE
Bonner, Wayne. Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate ELO352-01 (Wilshire Medical Center), 9033 Wilshire Boulevard, Beverly Hills, Los Angeles County, California. On file at SCCIC.	2010	LAN-10661	Beverly Hills	¼-mile
Bonner, Wayne H. Cultural Resources Records Search and Site Visit Results for Clearwire Candidate CA-LOS5987B (SBC Switch LA Brea), 666 South La Brea Avenue, Los Angeles, California. On file at SCCIC.	2010	LAN-10673	Hollywood	¼-mile
Gust, Sherri and Amy Glover. Cultural Resources Mitigation Compliance Report for the Metro Gold Line Eastside Extension, City of Los Angeles, California, for the Period 2004 to 2006. On file at SCCIC.	2009	LAN-10805	Los Angeles	¼-mile
Loftus, Shannon L. Addendum-Paleontological and Cultural Resource Compliance Monitoring Report, Los Angeles County, Metropolitan Transit Authority, Eastside Gold Line Transit Corridor Project. On file at SCCIC.	2010	LAN-10806	Los Angeles	¼-mile
Chasteen, Carrie. Sepulveda Boulevard Reversible Bike Lane and Intersection Improvement Project Between Wilshire Boulevard and Mulholland Drive (6 miles), City of Los Angeles, California. On file at SCCIC.	2007	LAN-10838	Beverly Hills	APE
Kane, Richard. Work Plan for Asbestos and Lead Paint Abatement VA B20 Chapel, Veteran’s Administration Facility, West Los Angeles, CA. On file at SCCIC.	2007	LAN-10839	Beverly Hills	APE
Chasteen, Carrie, Mark Robinson and Noelle Shaver. Historic Property Survey Report, 11000 Wilshire Blvd., Los Angeles, CA. On file at SCCIC.	2006	LAN-10841	Beverly Hills	APE



### 6.2.2 Previously Recorded Archaeological Resources

The SCCIC records search indicated that 17 archeological resources (15 sites and 2 isolates) have been previously recorded in West Los Angeles, Beverly Hills and Hollywood within the quarter-mile search radius but outside the Archaeological APE for the LPA (Table 6-2). Of these, the La Brea Tar Pits is the most prominent prehistoric and archaeological resource in the project vicinity. Within the quarter-mile search radius, the sites within the Los Angeles and Beverly Hills area are mainly historic refuse dumps that were discovered during trenching beneath paved streets, or circa 1900 remnants of the Los Angeles Zanja System, the city’s original water system. A filled-in open pit asphalt mine of the Civil War Period was identified in Los Angeles beneath today’s Hancock Park.

**Table 6-2: Archaeological Resources Recorded within 0.25-Mile of APE**

Primary No.	Trinomial	Site Description	USGS Quadrangle (7.5 Minute)	Year Recorded
P-19-000159	CA-LAN-0159	La Brea Tar Pits	Hollywood	1949
P-19-001261	CA-LAN-1261H	Historic Civil War Period filled-in open pit asphalt mine	Hollywood	1986
P-19-003169	CA-LAN-3169	Historic period abandoned railroad siding (2 segments of AT&SF RR)	Los Angeles	2003
P-19-003336	n/a	Historic trash scatter of glass, wood, brick and porcelain underneath Barrington Avenue	Beverly Hills	2000
P-19-003338	CA-LAN-3338	Late 19th/Early 20th Century historic trash dump	Los Angeles	2000
P-19-003339	CA-LAN-3339	Late 19th/Early 20th Century historic trash dump	Los Angeles	2000
P-19-003336	n/a	Historic trash scatter of glass, wood, brick and porcelain underneath Barrington Avenue	Beverly Hills	2000
P-19-003338	CA-LAN-3338	Late 19th/Early 20th Century historic trash dump	Los Angeles	2000
P-19-003339	CA-LAN-3339	Late 19th/Early 20th Century historic trash dump	Los Angeles	2000
P-19-003340	CA-LAN-3340	Late 19th/Early 20th Century historic trash dump	Los Angeles	2000
P-19-003352	CA-LAN-3352	Zanja No. 6-1 (1900) and associated historic artifacts	Los Angeles	2005
P-19-003353	CA-LAN-3353	Late 19th/Early 20th Century historic trash dump	Los Angeles	2005
P-19-003683	CA-LAN-3683	Late 19th/Early 20th Century historic trash dump	Los Angeles	2003
P-19-004112	CA-LAN-4112	Historic features associated with Zanja 6-1	Los Angeles	2008
P-19-004113	CA-LAN-4113	Historic extension of Zanja 6-1	Los Angeles	2008
P-19-004174	CA-LAN-4174	Late 19th/Early 20th Century historic trash dump	Los Angeles	2009
P-19-100882	n/a	Historic horseshoe isolate	Los Angeles	2009

The SCCIC records search indicated that five archeological resources (4 sites and 1 isolate) have been previously recorded in Los Angeles within the Archaeological APE (Table 6-3). Each of these is located within the APE at the Division 20 maintenance yard, and is associated with the American period during the late 19th/early 20th century. Included are two archaeological sites identified during field survey in 2010 (URS 2010: Appendix B).



Table 6-3: Archaeological Resources Previously Recorded within APE at Maintenance Yard

Primary No.	Trinomial	Brief Description	USGS Quadrangle	Year Recorded	Condition
P-19-002563	CA-LAN-2563	Historic refuse deposit; beneath modern facility	Los Angeles	1997	Good
P-19-002610	CA-LAN-2610	Remnant of historic cobblestone street and rail line in Little Tokyo Historic District; associated with 1893 La Grande Railroad Station; beneath modern street	Los Angeles	1997	Good
P-19-100887	n/a	Historic isolate: Japanese bowl and bottle base	Los Angeles	2009	n/a
P-19-004192	CA-LAN-4192	Historic brick and glass scatter	Los Angeles	2010	Poor
P-19-004193	CA-LAN-4193	Remnant of historic road; beneath modern street	Los Angeles	2010	Fair

The companion Historic Properties Supplemental Survey Report (Cogstone 2012) prepared in support of the LPA and the Final EIS/EIR discusses the specific portion of the Atchison Topeka & Santa Fe (AT&SF) railroad track (P-19-186804) (now UPRR) located within the Division 20 maintenance yard. That report also discusses the three bridges that cross the Division 20 yard: 1st Street Viaduct (53CO1166), 4th Street Bridge (53CO880), and 6th Street Viaduct (53CO44). Constructed in 1929, 1930 and 1932, these three local agency bridges are among the 12 significant bridges across the Los Angeles River and have been determined eligible for listing on the NRHP (Caltrans category 2).

### 6.2.3 Survey Findings

#### 6.2.3.1 Locally Preferred Alternative (LPA)

No prehistoric or historic-era archaeological resources were identified during pedestrian survey within the supplemental coverage area or within the series of vacant lots within the Archaeological APE for the LPA.

Approximately 80 percent of the area in this urban setting covered by the supplemental survey is developed hardscape (e.g., roads, sidewalks, buildings, structures), which generally resulted in little ground visibility (Photograph 6-1). Outside the hardscape, landscaping and dense vegetation (e.g., manicured lawns, shrubs, trees) (also referred to as softscape) reduced ground surface visibility from fair to poor (30-0%). In open areas covered with local grasses ground visibility was generally fair (Photograph 6-2).





**Photograph 6-1. VA Center hardscape north of Wilshire Boulevard and west of San Diego Freeway (view to east)**



**Photograph 6-2. VA Center landscape north of Wilshire Boulevard near San Vicente Boulevard (view to south)**

The most extensive softscape amenable to pedestrian survey within the supplemental coverage area is located within the Veterans Administration (VA) Medical Center (now called the Greater Los Angeles Healthcare System-West Los Angeles Medical Center). The center is located in a park-like setting, and an established landscape is a distinctive feature of the historic fabric of the VA Medical Center Historic District (P-19-173043). Extensive manicured lawns with mature trees are present west of Bonsall Avenue both north and south of Wilshire Boulevard. The areas around the mature trees were examined closely for the presence of archaeological resources. Between the landscaping and hardscape, there was little visible ground disturbance within the grounds of the VA Center. (For additional information on the NRHP-eligible district, see the companion study for the Architectural APE; Cogstone 2012).

Based on review of historic aerial images, two of the five vacant lots listed in Table 6-4 that were covered by the supplemental survey (Figure 6-1 through Figure 6-7) have been vacant since at least 1948 (Vacant Lots #1 and #2). The 1948 aerial shows a building and landscaping at the now vacant parcel on the northwest corner of Wilshire Boulevard and S. Rimpau Boulevard (Vacant Lot #3). Similarly, the 1972 aerial shows a building and landscaping at the now vacant parcel on the southwest corner of Wilshire Boulevard and S. Stanley Drive (Vacant Lot #4). As recently as 1980, the aerial imagery shows two buildings and two parking lots within the three adjoining parcels on the south side of Wilshire Blvd between S. Maple Drive and S. Palm Drive (Vacant Lot #5).

Ground visibility within the four vacant lots surveyed ranged from poor to fair, averaging 30 percent visibility (Table 6-4). A dense cover of dried grasses and invasive weeds along with modern trash contributed to the average 30% ground visibility within these undeveloped parcels (Photographs 6-3, 6-4, 6-5 and 6-6). The parcel on the southwest corner of Wilshire Boulevard and S. Stanley Drive had been recently mowed, with small pieces of asphalt, and gravel near the gated entry (Vacant Lot #4).

The survey coverage within four of the vacant lots ranged from 0.28 to 0.57 acres. As noted under the methods, one of the vacant lots was not surveyed since it is completely covered with asphalt paving (Vacant Lot #5; Photograph 6-7). This vacant lot, shown on Figure 6-4 on the south side of Wilshire Blvd between S. Maple Drive and S. Palm Drive and comprising 0.94 acres, was also identified in the prior report (URS 2010: Figure 4-6).



Table 6-4: Information on Vacant Lots Surveyed within APE

Vacant Lot No.	APN No.*	Location	Acreage	Ground Visibility	History of Development
1	550-400-90-17	North side of Wilshire Blvd between S. Irving Blvd. and S. Bronson Ave.	0.5 acres	Poor to fair (0-30%)	No evidence of development between 1948 to present based on historic aerials.
2	550-500-70-17	Northeast corner of Wilshire Blvd. and S. Rimpau Blvd.	0.57 acres	Poor to fair (0-30%)	No evidence of development between 1948 to present based on historic aerials.
3	550-500-60-02	Northwest corner of Wilshire Blvd. and S. Rimpau Blvd.	0.34 acres	Poor to fair (0-30%)	1948 aerial shows building and landscaping.
4	433-301-80-33	Southwest corner of Wilshire Blvd. and S. Stanley Dr.	0.28 acres	Poor to fair (0-30%)	1972 aerial shows building and landscaping.
5	433-101-80-23, 433-101-80-24, 433-101-80-25	Entire block on the south side of Wilshire Blvd. between S. Maple Dr. and S. Palm Dr.	0.94 acres	None (0%); completely covered with recent asphalt paving	1980 aerial shows 2 parking lots and 2 buildings.

\* Assessor parcel number.







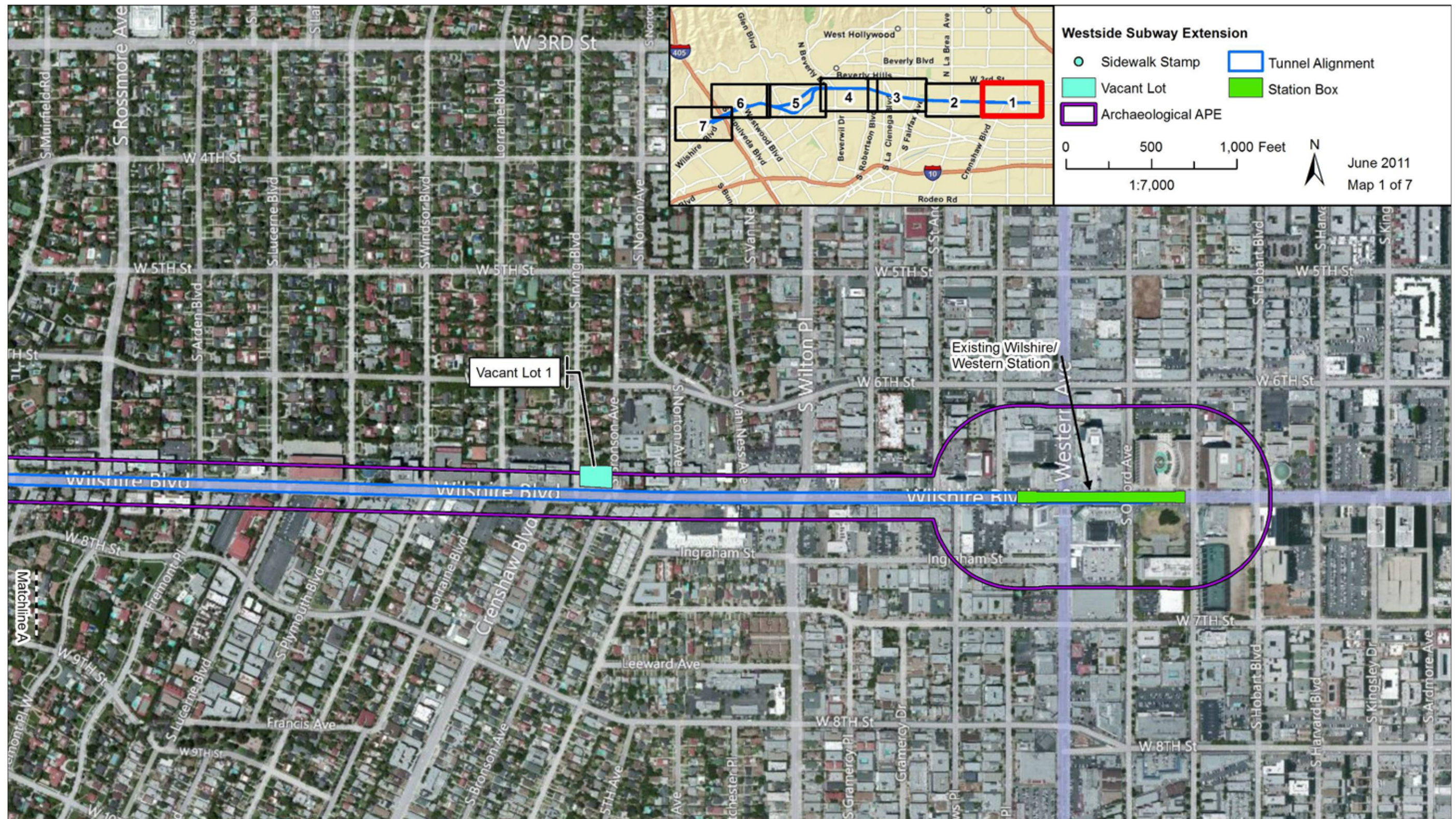


Figure 6-1: Survey Findings for LPA Alignment (Map 1 of 7)



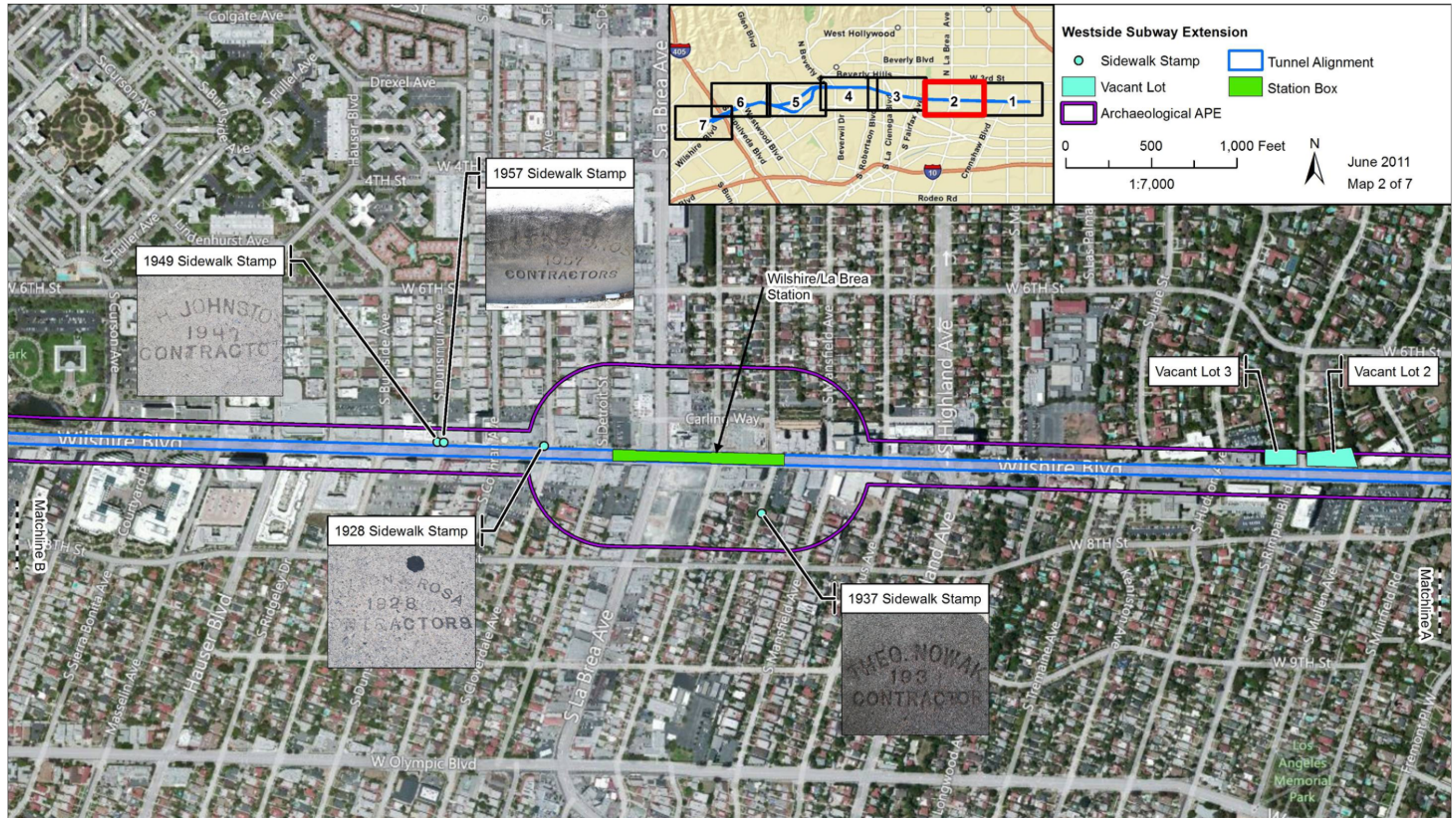


Figure 6-2: Survey Findings for LPA Alignment (Map 2 of 7)



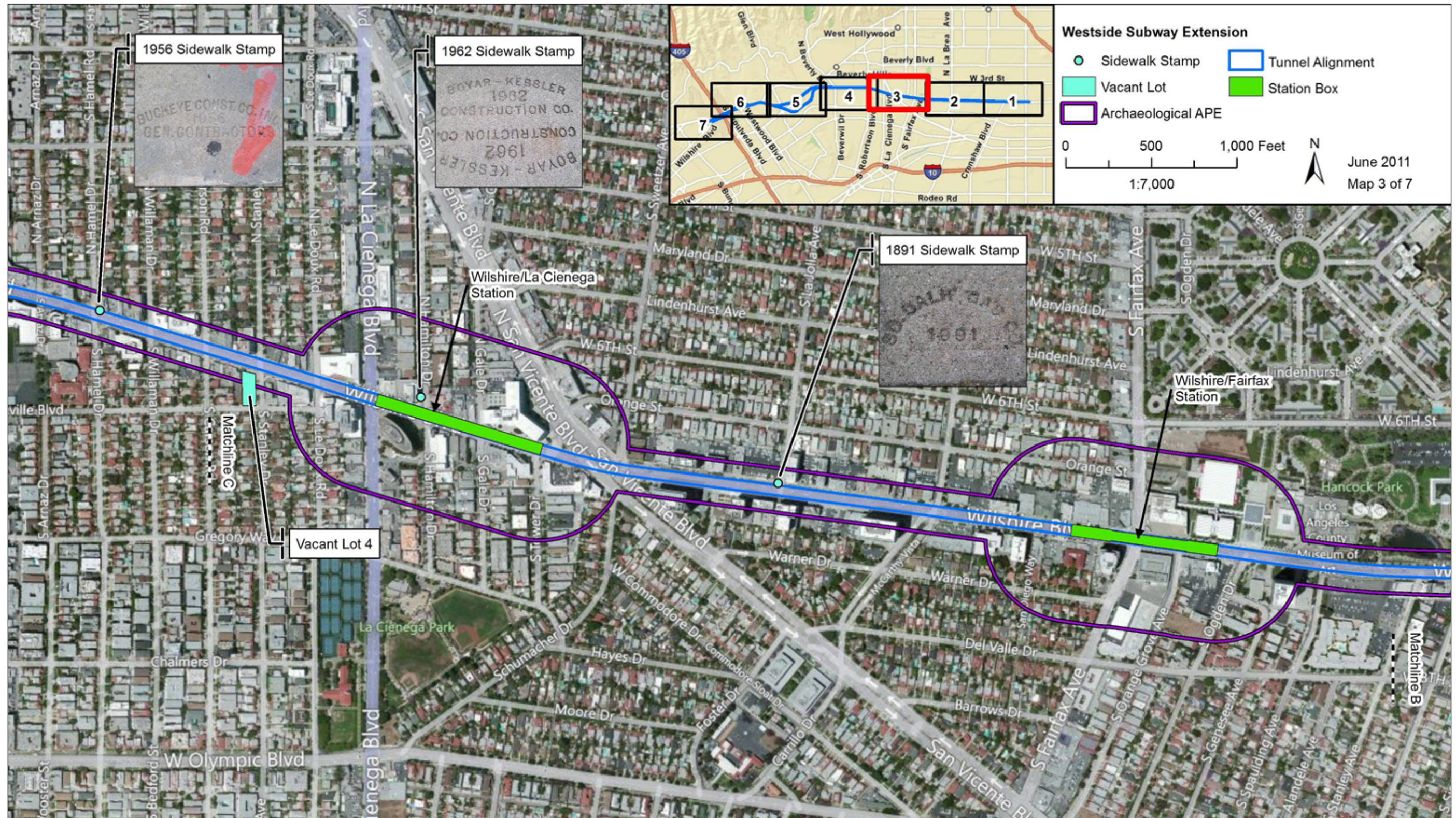
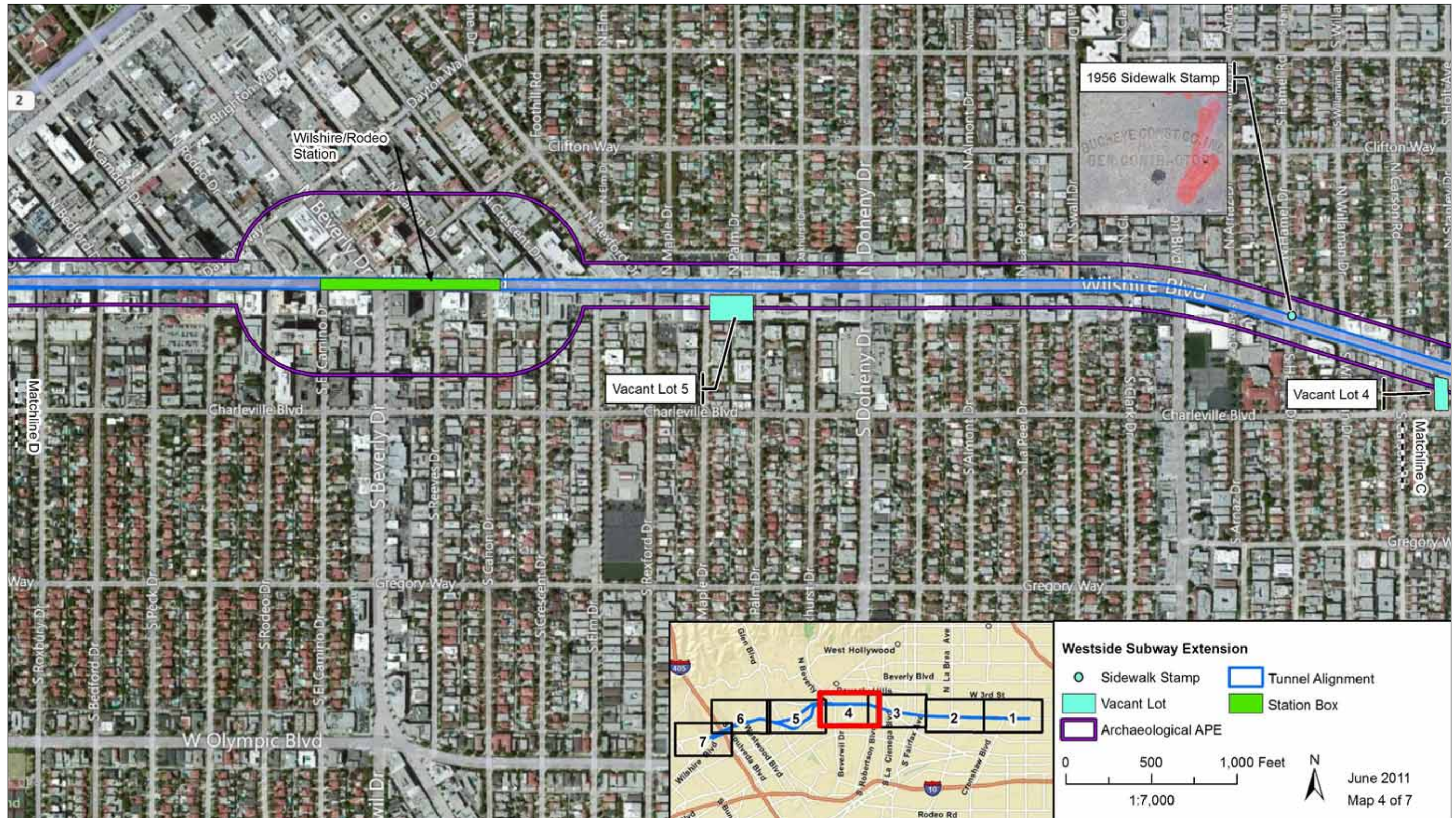


Figure 6-3: Survey Findings for LPA Alignment (Map 3 of 7)





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Figure 6-4: Survey Findings for LPA Alignment (Map 4 of 7)

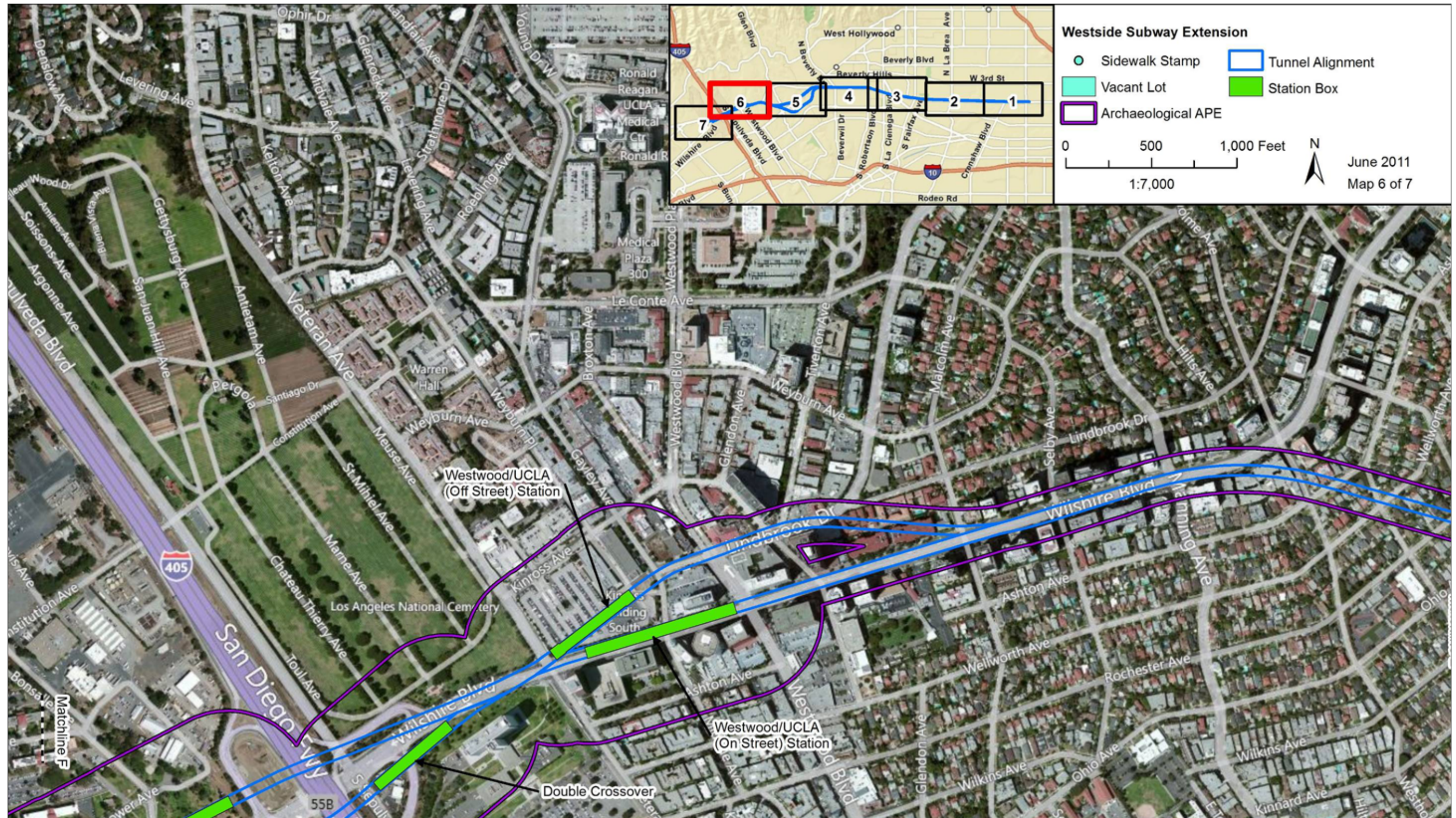




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Figure 6-5: Survey Findings for LPA Alignment (Map 5 of 7)

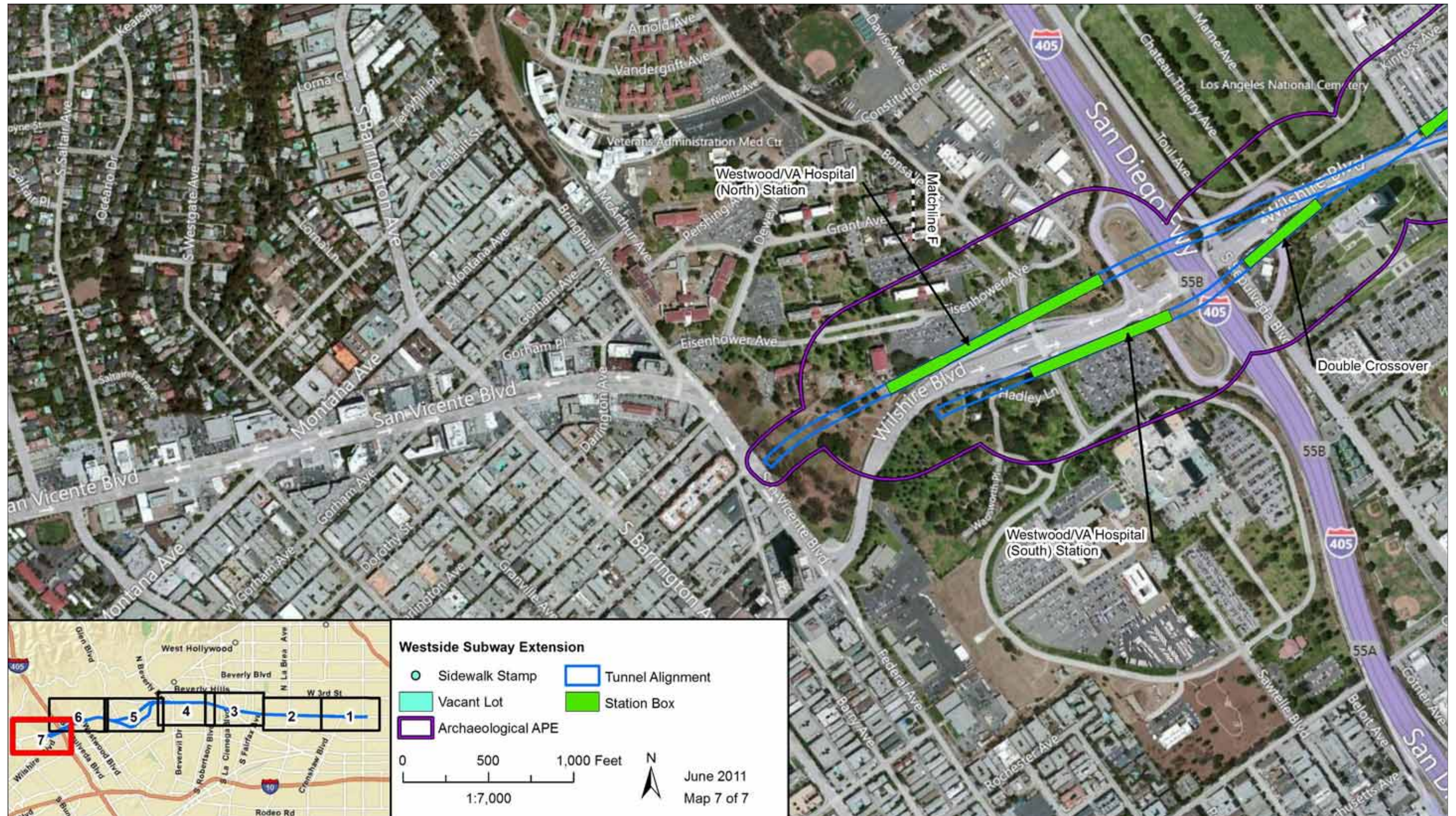




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Figure 6-6: Survey Findings for LPA Alignment (Map 6 of 7)





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Figure 6-7: Survey Findings for LPA Alignment (Map 7 of 7)



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**Photograph 6-3. Vacant Lot #1 (view to southeast)**



**Photograph 6-4. Vacant Lot #2 (view to southeast)**



**Photograph 6-5. Vacant Lot #3 (view to southwest)**



**Photograph 6-6. Vacant Lot #4 (view to north)**



**Photograph 6-7. Vacant Lot #5 (view to northwest)**



A total of eight sidewalk stamps with dates ranging from 1891 to 1962 were identified within the Archaeological APE for the LPA (Table 6-5; Figure 6-1 through Figure 6-4). These include two newly identified stamps within the supplemental survey area, a 1937 Theo Norwak Contractor stamp and a 1957 Garcias Bros stamp, and four of the stamps previously noted in the prior technical report (URS 2010:4-64, Figures 4-4 through 4-14).

As indicated in Table 6-5, two of the stamps identified by the archaeologists do not match those previously noted even though the locations are the same. An 1891 So. Dalm Gas Co. stamp was found at the northwest corner of Wilshire Boulevard and S. La Jolla Avenue where a 1965 Chotiner & Gombiner stamp had been previously noted. Similarly, a 1962 Boyar-Kessler Construction Co. stamp was present at the northwest corner of Wilshire Boulevard and N. Hamilton Drive where a 1926 Griffith Company stamp had been observed. A search of the vicinity near each of these intersections did not locate the two stamps, and we assume they were misplotted and may still exist outside the Archaeological APE for the LPA.

Another sidewalk stamp, which was molded in 1927 by the North Pacific Construction Company and located on the southwest corner of Wilshire Boulevard and S. Spaulding Drive (URS 2010: Figure 4-5), was not relocated despite widening the search in the vicinity of this intersection. Since the concrete sidewalks at this location appear to have been recently poured, it appears likely the 1927 stamp has been destroyed.

**Table 6-5: Information on Dated Sidewalk Stamps Located within APE**

Date of Sidewalk Stamp	Company	Location	Identification History
1937	Theo Nowak Contractor	East side of Orange St. between Wilshire Blvd. and W. 8th St.	Identified during this supplemental survey in 2011.
1928	Boxton & Rosa Contractors	Northeast corner of Wilshire Blvd. and Cloverdale Ave.	Identified in 2009 (URS 2010: Figure 4-11).
1957	Garcias Bros Contractors	Northwest corner of Wilshire Blvd. and S. Dunsmuir Ave. Stamp is located on the curb.	Identified during this supplemental survey in 2011.
1949	H. Johnston Contractor	Northwest corner of Wilshire Blvd. and S. Dunsmuir Ave.	Identified in 2009 (URS 2010: Figure 4-10).
1891	So. Dalm Gas Co.	Northwest corner of Wilshire Blvd. and S. La Jolla Ave.	Identified during this supplemental survey in 2011. Prior survey noted a 1965 Chotiner & Gombiner stamp at same location (URS 2010: Figure 4-9).
1962	Boyar-Kessler Construction Co.	Northwest corner of Wilshire Blvd. and N. Hamilton Dr.	Identified during this supplemental survey in 2011. Prior survey noted a 1926 Griffith Company stamp at same location (URS 2010: Figure 4-8).
1956	Buckeye Const. Co. Inc Gen. Contractors	Northeast corner of Wilshire Blvd. and N. Hamel Dr.	Relocated during this supplemental survey in 2011. Typo in prior report "1955" (URS 2010: Figure 4-8).
1927	North Pacific Construction Company	Southwest corner of Wilshire Blvd. and S. Spaulding Dr.	Identified in 2009 (URS 2010: Figure 4-5); new sidewalks in 2011; stamp destroyed.
1937	Gogo & Rados Contractor	Northeast corner of Santa Monica Blvd. and Warnall Ave.	Identified in 2009 (URS 2010: Figure 4-13).



### 6.2.3.2 Other Components of the LPA

The Division 20 maintenance yard is a large industrial property with railroad tracks, railroad-use and maintenance related structures, and a few buildings. This facility was surveyed in its entirety for the presence of archaeological resources for the prior Alternatives analysis (URS 2010). The yard was thus not included in the supplemental survey for this report (see Figure 5-3).

### 6.2.4 Significance of Known Archaeological Sites within APE

#### 6.2.4.1 Locally Preferred Alternative (LPA)

No prehistoric, ethnohistoric, or historic-era archaeological resources have been identified within the Archaeological APE for the LPA.

#### 6.2.4.2 Other Components of the LPA

A total of four historic-era archeological sites have been identified and recorded within the Archaeological APE at the Division 20 Maintenance and Storage Facility (Table 6-3). An assessment of the significance and eligibility of each site for listing in the NRHP and CRHR is presented below. No prehistoric or ethnohistoric archaeological resources have been identified within the APE at the maintenance yard.

**CA-LAN-2563 (P-19-002563):** This site was discovered one meter beneath the surface during archaeological monitoring of construction activities within the yard. Based on the temporally sensitive maker's marks on glass and ceramics, as well as the technological attributes of older unembossed bottles, the site record indicates the deposit dates to circa 1860 to 1892. Although the site includes some Chinese ceramics, the subsurface deposit was ascribed to Euro-American household discards. Considering the site's location, the artifacts may have been associated with the railroad station that was replaced in 1893 by the La Grande Railroad Station. The artifacts were cataloged and the site was fully recorded in 1997. The site thus has no further potential to yield additional information important to history (Criterion D/4) and is ineligible for NRHP and CRHR inclusion.

**CA-LAN-2610 (P-19-002610):** This site is a remnant of the circa 1893 cobblestone street and street car tracks associated with the La Grande Railroad Station that was adjacent to the Los Angeles River at the former eastern extent of the Little Tokyo Historic District. The site lies immediately beneath the current asphalt roadway and was discovered in 1997 during archaeological monitoring of east-west trenching activities across Santa Fe Avenue for relocation of a gas utility pipeline. The cobblestones are rectangular blocks of cut granite that vary in size. The street car track rails and ties ran north-south and traversed the approximate centerline of Santa Fe Avenue. At the time of discovery, the site was in good condition. The cobblestone street and street car tracks would have fronted the railroad station to the east.

Since site CA-LAN-2610 is situated beneath developed areas, direct examination of its condition, horizontal extent, and integrity is prohibited. The site has not been formally evaluated, but appears to be associated with events important to history (Criterion A/1), and may be likely to yield additional information important to history (Criterion D/4). The resource is thus considered eligible for listing in the NRHP and CRHR.

**CA-LAN-4192 (P-19-004192):** This site is a small surface scatter of approximately 15 brick and glass fragments, which was identified in 2010 underneath the 6<sup>th</sup> Street Viaduct. The artifacts indicate the age of the site as circa 1914 to 1945. The condition of the site is poor. In agreement with the statement in the prior report (URS 2010:4-68), site CA-LAN-4192 has no potential to yield additional



information (Criterion D/4), is not associated with events or persons important to history (Criteria A/1 and B/2), does not embody distinctive characteristics of a type, period or method of construction (Criterion C/3), and is not considered eligible for listing on the NRHP. The resource is also not considered eligible for CRHR inclusion.

**CA-LAN-4193 (P-19-004193):** This site is a subsurface remnant of the original roadway that was exposed near the foundation of the 6<sup>th</sup> Street Viaduct. The site was identified in 2010 and reported to be in fair condition. The age of the site was recorded as circa 1914 to 1945. In agreement with the statement in the prior report (URS 2010:4-68), site CA-LAN-4193 has no potential to yield additional information (Criterion D/4), is not associated with events or persons important to history (Criteria A/1 and B/2), does not embody distinctive characteristics of a type, period or method of construction (Criterion C/3), and is not considered eligible for listing on the NRHP. The resource is also not considered eligible for CRHR inclusion.



## 7.0 ENVIRONMENTAL IMPACTS/ENVIRONMENTAL CONSEQUENCES

For any identified resources that are listed in or appear eligible for inclusion in the NRHP or CRHR, the Criteria of Effect and Adverse Effect (36 CFR Part 800.9) is applied. A finding of adverse effect under these criteria will also be considered a significant impact under CEQA as a substantial adverse change in the significance of an archaeological resource.

### 7.1 Determination of Effects

Effects to documented archaeological resources within the APE for the LPA are assessed below by alternative. Effects to all identified eligible historic properties/historical resources were evaluated within the current context and setting of the archaeological resource, with regard to the identified historic significance and level of retention of historic integrity, and in relation to changes to the resource or within its vicinity that may result from the LPA.

Given the historic period nature of the built environment, which often did not disturb more than a few feet of topsoil, construction activities may encounter subsurface prehistoric or historic-era archaeological material, features, or deposits. Therefore, the following also includes an assessment of the potential for the discovery of buried archaeological resources based on the literature search, location of known resources, local history, identification of the original built date for streetscapes, buildings, structures, and other modifications to the built environment.

#### 7.1.1 Regulatory Requirements

As mandated by Section 106 of the NHPA, federal agencies must take into account the effects of their undertakings on historic properties, assess the effects, and seek ways to avoid, minimize, or mitigate any adverse effects on such properties (36 CFR 800.1[a]). For identified historic properties within the APE, the agency shall apply the criteria of adverse effect (36 CFR 800.5[a]). According to federal regulations, “*Effect* means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register” (36 CFR 800.16[i]). The criteria of adverse effect are:

*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. (36 CFR 800.5[a][1])*

When the effects of the proposed undertaking do not meet the criteria of adverse effect, then a finding of no adverse effect may be proposed (36 CFR 800.5[b]). If an adverse effect is found, the agency shall act pursuant to 36 CFR 800.6 (36 CFR 800.5[d][2]) to resolve the adverse effect by developing and evaluating alternatives or modifications to the undertaking that “could avoid, minimize or mitigate adverse effects on historic properties” (36 CFR 800.6[a]).



Under CEQA Guidelines Appendix G Criteria, adverse impacts to cultural resources would be considered significant if the proposed project would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CCR Section 15064.5. (Defined as: listed or determined eligible for a state or local register, or any building, structure, or object that is determined to be historically significant to California history.)
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CCR Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site.
- Disturb any human remains, including those interred outside of formal cemeteries.

Section 15064.5 of CEQA Guidelines provides that, in general, a resource not listed on state or local registers of historical resources shall be considered by the Lead agency to be historically significant if the resource meets the criteria for listing on the CRHR. This section also provides standards for determining what constitutes a “substantial adverse change” that must be considered a significant impact on archaeological or historical resources. For example, a “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines, 14 CCR §15064.5 [b][1]).

### **7.1.2 No Build Alternative**

The No Build Alternative would not affect archaeological resources. No excavation will be undertaken as a result of the No Build Alternative and therefore, no archaeological resources would be affected.

### **7.1.3 Locally Preferred Alternative (LPA)**

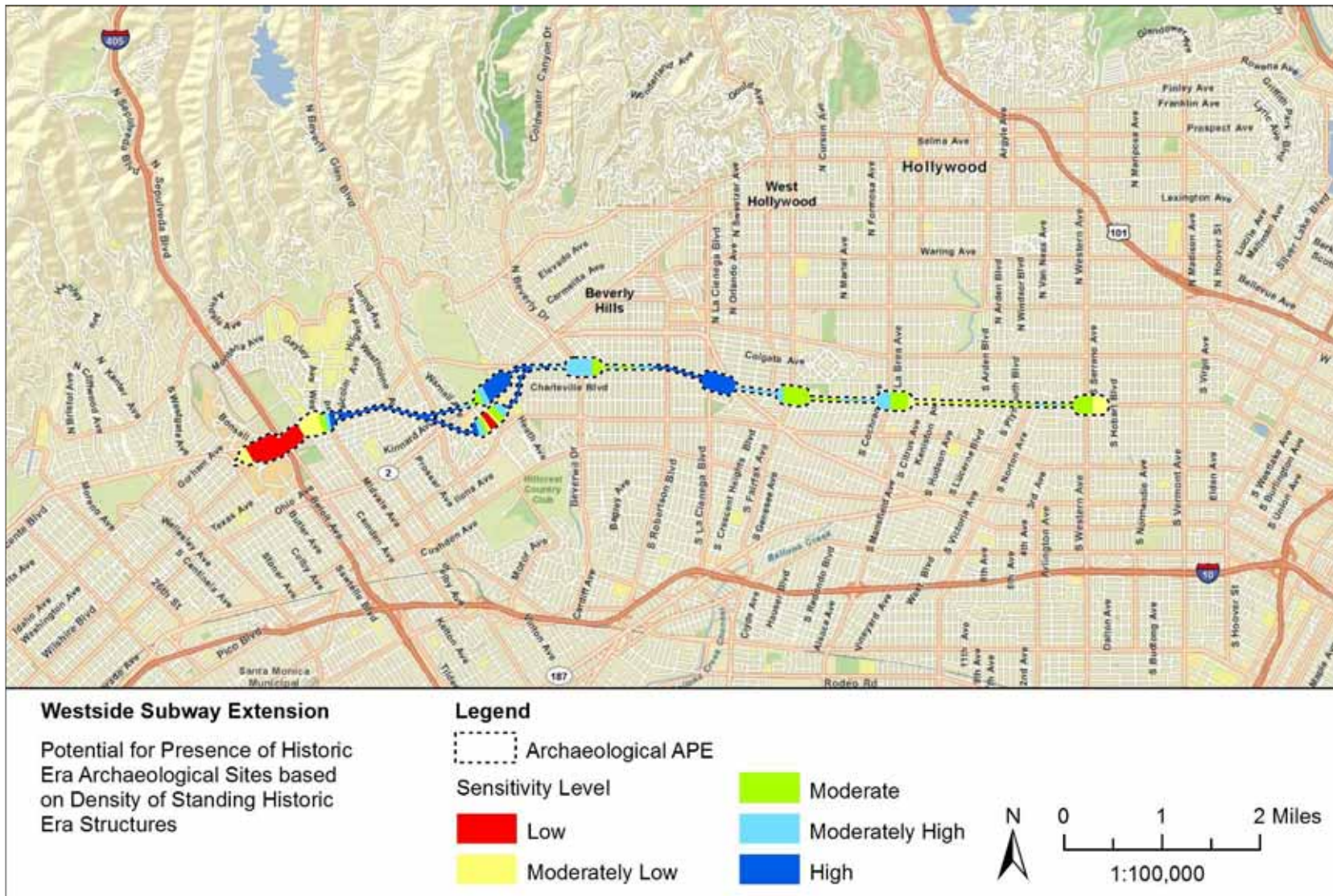
#### **7.1.3.1 Previously Recorded Archaeological Resources**

No archaeological resources have been identified within the APE for the LPA stations, alignment, or staging or laydown areas. Thus, based on the results of this study, the proposed LPA will not cause an adverse effect on known historic properties or historical resources of an archaeological nature that are eligible for listing in the NRHP or CRHR.

#### **7.1.3.2 Potential for Buried Deposits**

The LPA may affect undocumented cultural resources, including intact archaeological deposits. Given that the LPA right-of-way is generally within the street right-of-way, which often did not disturb more than a few feet of topsoil during its construction, construction activities may encounter subsurface prehistoric and/or historic archaeological deposits.

Figure 7-1 shows the low-to-high potential for the presence of historic-era archaeological resources within the Archaeological APE for the LPA. Variation in the potential for discovery is based on the density of standing historic-period buildings and structures, and was generated by the GIS-based predictive model developed for the Alternatives Analysis (URS 2010:4-19–4-21, Appendix C). As indicated in the figure, the sensitivity for the discovery of historic-era archaeological sites is higher near the Wilshire/La Cienega Station and between the Westwood/UCLA and Century City Stations.



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Figure 7-1: Potential for Historic-Era Archaeological Deposits

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The GIS-based model predicts a moderately high potential for historic-era resources near the Wilshire/La Brea and Wilshire/Rodeo stations, with the largest area of low to moderately low potential at the Westwood/VA Hospital and Westwood/UCLA stations. As discussed further below, although the density of historic-period buildings or structures within the VA Medical Center is low, the archaeological sensitivity of this area is considered high because the medical facility has been operational since 1888 and contains an established historic landscape with mature trees that are the remains of a larger stand of trees shown in historic aerials dating to 1952 (Christoph 2011).

In addition to incorporating the GIS-based predictive model, the following discussion of the potential for discovery of archaeological resources considers the presence of dated sidewalk stamps ranging in age from 1891 to 1962 (Table 6-5; Figure 6-1 through Figure 6-7), and the development during the American period of the cities, commercial corridors, and medical and educational campuses along the LPA. Due to the extent and time depth of urban development, the potential for discovery of prehistoric or ethnohistoric archaeological resources within the APE alignment is considered low. The discussion proceeds from east to west along the Archaeological APE.

In the area of Wilshire Boulevard in the approximately one-third mile stretch between S. Orange Drive and S. Dunsmuir Avenue near the Wilshire/La Brea Station, four sidewalk stamps have dates of 1928, 1937, 1949, and 1957 (Figure 6-2). The age of these stamps suggest there is a potential for the presence of subsurface historic-period resources. This area of Wilshire Boulevard is also known as the Miracle Mile, which spans roughly from La Brea to Fairfax Avenues and was developed in the late 1920s and 1930s. The GIS-based model similarly predicts a moderately high potential for historic-era resources near the Wilshire/La Brea station (Figure 7-1).

Along Wilshire Boulevard between the Fairfax and La Cienega Stations, a sidewalk stamp at S. La Jolla Avenue has a date of 1891. This is the earliest of the series of eight sidewalk stamps, each poured more than 48 years ago, identified within the Archaeological APE for the LPA. Retention of this 19<sup>th</sup> century stamp in this urban setting is remarkable, and is a relatively good indication that historic-era resources may remain beneath the surface (Figure 6-3). Based on the density of standing historic-period buildings and structures, the GIS-based model similarly predicts a moderately high potential for the discovery of buried historic-era resources near this sidewalk stamp (Figure 7-1).

Continuing west along Wilshire Boulevard to the area near La Cienega Boulevard between N. Hamilton Drive and Robertson Boulevard, two sidewalk stamps dating to 1956 and 1962 (Figure 6-3) suggest a sensitivity for historic-period buried deposits dating from as late as 1962 to as early as 1956, or perhaps earlier. There have also been a number of recent street improvements in this area. A high potential for the discovery of buried historic-era resources in the vicinity of these stamps west of the Wilshire/La Cienega Station is predicted by the GIS-based model (Figure 7-1).

In the area of Beverly Hills, near Wilshire Boulevard and Rodeo Drive and the Wilshire/Rodeo Station (Figure 6-4), there have been a number of recent street improvements. Considering the history of the development of Beverly Hills, beginning with creation of a new residential community at the turn of the 20<sup>th</sup> century, plus the city's preservation policies, the GIS-based model provides a moderately high potential for the presence of buried historic-era resources in the vicinity of the Wilshire/Rodeo Station (Figure 7-1).

Continuing west, a sidewalk stamp dating to 1927 appears to have been destroyed within the last two years by sidewalk and street improvements at the intersection of Wilshire Boulevard and S. Spaulding Drive. Despite this recent disturbance, the age of the stamp suggests sensitivity for historic-period subsurface deposits. A moderately high to high potential for the discovery of buried



historic-era resources in this area between the Wilshire/Rodeo and Century City Stations is predicted by the GIS-based model (Figure 7-1).

Near the intersection of Santa Monica Boulevard and Avenue of the Stars, there is a sidewalk stamp dating to 1937 (Figure 6-5). Given the stamp has not been disturbed by modern development, including post-1964 construction of the Century City section of the City Los Angeles, this is a relatively good indication that historic-era resources may remain beneath the surface in the vicinity of this stamp. The GIS-based model also predicts a high potential for the presence of buried historic-era resources in this area west of the Century City Stations (Figure 7-1).

Further west, Westwood Village was initially part of an 1843 Mexican-period land grant (Rancho San Jose de Buenos Ayres), and later chosen in the 1920s as the location for a new University of California campus. No sidewalk stamps were identified in the Westwood/UCLA Station vicinity where the GIS-based model mainly predicts a moderately low potential for the presence of buried historic-era resources (Figure 7-1).

The area in the vicinity of the westernmost Westwood/VA Hospital Stations is considered highly sensitive for the discovery of subsurface historic-era resources based on the presence of a medical facility at the VA Medical Center since 1888 (National Home for Disabled Volunteer Soldiers; National Park Service 2011) and the relatively open, undeveloped landscape. Because of the presence of an established historic landscape with a low density of historic-era buildings, the GIS-based model predicts a low potential for the presence of buried historic-era resources (Figure 7-1). Many of the mature trees to the north and south of Wilshire Boulevard, however, are the remains of a larger stand of trees shown in historic aerials dating to 1952 (Christoph 2011). By 1972 the on- and off-ramps for Wilshire Boulevard had been constructed and the aerial imagery shows many of the mature trees visible in the 1952 historic aerials had disappeared. The preservation of the remaining mature trees in the park-like setting of the VA Medical Center is a relatively good indication that historic-era resources may remain beneath the surface in the vicinity of the historic landscape.

#### **7.1.4 Other Components of the LPA**

##### **7.1.4.1 Previously Recorded Archaeological Resources**

As summarized in Table 7-1 and discussed in Section 6.2.4.2, of the five late 19th/early 20th century archeological resources recorded (four sites and one isolate) within the Archaeological APE at the Division 20 facility (Figure 7-2), only site CA-LAN-2610 is eligible for listing in the NRHP and CRHR.

Site CA-LAN-2610 will be avoided by construction for the LPA at the Division 20 facility. The site is located beneath Santa Fe Avenue immediately west of and bordering the maintenance yard (compare Figure 3-9 and Figure 7-2), and no improvements at the yard are proposed within approximately 215 meters (705 feet) of the site. Thus, under current construction plans, the FTA has determined the LPA and associated improvements at the Division 20 maintenance yard will have No Adverse Effect on this historic property/ historical resource.

In development of the MOA and pursuant to 36 CFR Part 800.5(a), the SHPO concurred with FTA's determination of No Adverse Effect by the undertaking on the one identified archaeological historic property, CA-LAN-2610. A copy of the MOA is provided in Appendix B.



Sites CA-LAN-2563, CA-LAN-4192, and CA-LAN-4193 do not qualify as historic properties or historical resources and are not eligible for listing in the NRHP or CRHR (see Section 6.2.4.2). The isolated find does not qualify for listing on either the NRHP or CRHR.

**Table 7-1: Summary of Eligibility and Effects on Archaeological Resources within APE at Maintenance Yard**

Primary No.	Trinomial	Brief Description	NRHP and CRHR Eligibility	Impact/ Determination
P-19-002563	CA-LAN-2563	Historic refuse deposit; beneath modern facility	Not Eligible (Criterion D/4)	Not historic property: No Effect
P-19-002610	CA-LAN-2610	Remnant of historic cobblestone street and rail line in Little Tokyo Historic District; associated with 1893 La Grande Railroad Station; beneath modern street	Eligible (Criteria A/1, D/4)	Project will avoid: No Adverse Effect
P-19-100887	n/a	Historic isolate: Japanese bowl and bottle base	Not Eligible (Criterion D/4)	Not historic property: No Effect
P-19-004192	CA-LAN-4192	Historic brick and glass scatter	Not Eligible (Criterion D/4)	Not historic property: No Effect
P-19-004193	CA-LAN-4193	Remnant of historic road; beneath modern street	Not Eligible (Criterion D/4)	Not historic property: No Effect

#### 7.1.4.2 Potential for Buried Deposits

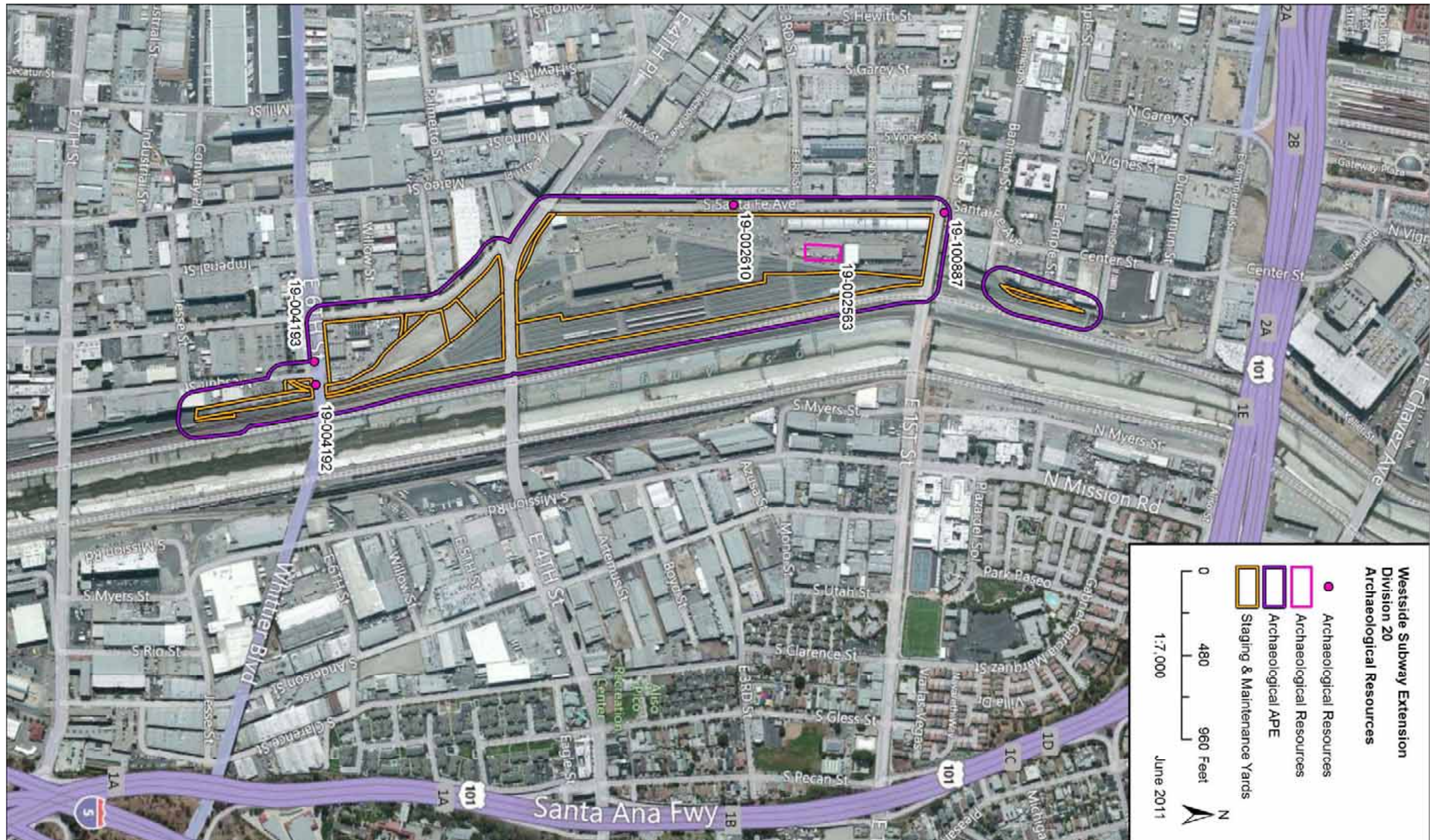
The construction of proposed improvements at the maintenance yard may affect undocumented cultural resources, including intact archaeological deposits. Given the historic-period nature of the built environment, which often did not disturb more than a few feet of topsoil, construction activities may encounter subsurface prehistoric and/or historic archaeological deposits.

Based on the location of the Division 20 facility adjacent to the Los Angeles River at the former La Grande Railroad Station built in 1893, its location at the former eastern extent of the Little Tokyo Historic District, and the prior discovery of archaeological resources beneath the modern surface within or immediately adjacent to the yard (Figure 7-2), the sensitivity for the discovery of historic-era archaeological sites during ground disturbance for yard improvements is considered high.

Considering its location as well as the time depth of development and the results of the literature search, the potential for discovery of prehistoric or ethnohistoric archaeological resources within the APE for the maintenance yard is considered moderate.

**CA-LAN-2563**, a circa 1860-1892 buried refuse deposit likely associated the railroad station that was replaced by the La Grande Railroad Station in 1893, is located beneath the surface immediately south of the planned impact area south of E. 1<sup>st</sup> Street. This suggests the potential is high for the discovery of historic-era resources, such as another refuse deposit, during replacement of the two maintenance-of-way buildings adjacent to this site.





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Figure 7-2: Previously Recorded Sites within APE for Division 20 Yard

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**CA-LAN-2610**, a remnant of the circa 1893 cobblestone street and street car tracks associated with the La Grande Railroad Station, is located beneath the Santa Fe Avenue asphalt paving immediately west of and bordering the yard. The potential is high for discovery of additional subsurface historic-era features associated with this site during future development not associated with the LPA of the adjacent portion of the yard.

**CA-LAN-4192 and CA-LAN-4193**, a surface scatter of brick and glass fragments and a subsurface roadway remnant, both dated circa 1914 to 1945, are located beneath the 6<sup>th</sup> Street Viaduct. It is feasible that these sites may be associated with the construction of the 6<sup>th</sup> Street Viaduct in 1932. The potential for additional discoveries in this portion of the Division 20 maintenance yard during replacement of the existing building in the impact area north of the Viaduct and construction of the new cart path extending northward beneath the bridge is considered relatively high.

In addition to the relatively high potential for archaeological discoveries in association with the 6<sup>th</sup> Street Viaduct, the sensitivity for discovery of buried historic-era sites is also relatively high near the 1<sup>st</sup> Street Viaduct and 4<sup>th</sup> Street Bridge, which were built in 1929 and 1930, respectively. Planned yard improvements include replacement of maintenance-of-way buildings located approximately 100 feet south of the 1<sup>st</sup> Street Viaduct and expansion of the heavy maintenance area approximately 50 feet north of the 4<sup>th</sup> Street Bridge.

## **7.2 CEQA Determination**

Pursuant to the statutes of CEQA, as noted above, an impact by the LPA would be considered significant if it has the potential to:

- Cause a substantial adverse change in the significance of an historical resource pursuant to Section 15064.5
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5
- Disturb any human remains, including those interred outside of formal cemeteries

Based on the results of this study, the proposed improvements at the Division 20 Maintenance and Storage Facility will avoid the one known archaeological resource (CA-LAN-2610) within the APE that is eligible for listing in the CRHR and thus qualifies as a historical resource (Table 7-1). The project will not demolish, destroy, relocate, or alter the resource such that it or its immediate surroundings impair the significance of the resource. The physical characteristics of the resource that convey its historical significance and that justify its inclusion, or eligibility for inclusion, in the CRHR will not be demolished or materially altered by the LPA and associated components.

While no resources considered eligible for CRHR listing were identified during the supplemental or initial pedestrian survey given the nature of the built environment, due to the possibility of the existence of undocumented buried subsurface resources, the LPA may cause a substantial adverse change to the significance of an archaeological resource and result in a significant direct impact to archaeological resources (PRC Section 5020.1[q] and CEQA Guidelines Section 15064.5[b]), including resources eligible for CRHR inclusion that qualify as historical resources.



Implementation of the unanticipated discovery mitigation measure (refer to MOA in Appendix B) will reduce construction impacts to undocumented archaeological resources to a less than significant impact.

Construction of the LPA and associated components is not expected to disturb any human remains, including those interred outside of formal cemeteries. Although the Los Angeles National Cemetery occurs in the vicinity of the refined LPA alignment, the subway extension will not impact the cemetery. In the event human remains are discovered during construction or earth-disturbing activities, their protection shall be ensured by implementation of the unanticipated discovery measures provided below.



## 8.0 MITIGATION MEASURES

### 8.1 Locally Preferred Alternative (LPA) and Other Components of the LPA

The MOA sets forth measures to be implemented to reduce potential construction impacts within the APE to known archaeological historic properties and to undocumented archaeological resources, including human remains. The FTA, in consultation with the SHPO, determined that the undertaking will have No Adverse Effect on the one identified archaeological historic property, CA-LAN-2610, or to undocumented archaeological resources within the APE provided the measures described in the MOA are implemented (see Appendix B).

The following measures are incorporated into the MOA and their implementation will reduce impacts to the known historic property that may be affected in an unanticipated manner and to unanticipated discoveries made during implementation of the MOA and the undertaking within the APE.

As additionally stated in the MOA, Metro will ensure that all archaeological work for or by Metro is performed under the direct supervision of a person or persons who meet(s) or exceed(s) the pertinent qualifications in the Secretary of Interior's *Professional Qualifications Standards* (48 CFR Parts 44738 and 44739) specific to the work performed. Further, all written documentation of activities will conform to the Secretary of the Interior's *Standards and Guidelines for Archaeology and Historic Preservation*, as amended and annotated (48 CFR Parts 44716 to 44740), as well as to applicable standards and guidelines established by the SHPO.

#### AR-1 Unanticipated Discoveries

If previous unidentified cultural resources, including human remains, are encountered during construction or earth-disturbing activities, all activities at that location shall be halted until a qualified archaeologist can examine the resources and assess their significance. If the resources are determined to be significant, Metro will notify FTA and SHPO within 48 hours of the discovery to determine the appropriate course of action.

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

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

Should Indian burials and related items be discovered during construction of the project, Metro will consult with the affected Native American individuals, tribes and organization regarding the treatment of cultural remains and artifacts. These will be treated in accordance with the requirements of the California Health and Safety Code. If the county coroner/medical examiner determines that the human remains are or may be of Native American origin, then the discovery



shall be treated in accordance with the provisions of §§ 5097.98 (a) - (d) of the California Public Resources Code which provides for the notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

With implementation of these mitigation measures, the construction of the LPA will not have adverse effects or significant impacts to archaeological resources under either scenario.

## **8.2 Impacts Remaining After Mitigation**

Implementation of the above measures (AR-1 and AR-2) will ensure that any undocumented cultural resources or unanticipated discoveries of cultural resources during construction or ground-disturbing activities would be properly recorded and the significance of the resources documented, and would thus reduce potentially significant impacts to a known historic property affected in an unanticipated manner or to undocumented archaeological resources, including human remains, to a level that is less than significant.



## 9.0 REFERENCES

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APPENDIX A—NATIVE AMERICAN HERITAGE COMMISSION (NAHC)  
COORDINATION

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

## NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95834  
(916) 653-6251  
Fax (916) 657-5300  
Web Site [www.nahc.ca.gov](http://www.nahc.ca.gov)  
e-mail: [ds\\_nahc@pacbel.net](mailto:ds_nahc@pacbel.net)

September 8, 2010

Mr. David Mieger

**Los Angeles County Metropolitan Transportation Authority**One Gateway Plaza, MS 99-22-3  
Los Angeles, CA 90012-2952

Re: SCH#2009031082 CEQA Notice of Completion; Draft Environmental Impact Report (DEIR) for the Westside Subway Expansion Project located in the City of Los Angeles, Los Angeles County, California.

Dear Mr. Mieger:

The Native American Heritage Commission (NAHC) is the state 'trustee agency' pursuant to Public Resources Code §21070 for the protection and preservation of California's Native American Cultural Resources. (Also see *Environmental Protection Information Center v. Johnson* (1985) 170 Cal App. 3<sup>rd</sup> 604). The California Environmental Quality Act (CEQA - CA Public Resources Code §21000-21177, amendment effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the California Code of Regulations §15064.5(b)(c)(f) CEQA guidelines. Section 15382 of the CEQA Guidelines defines a significant impact on the environment as "a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ... objects of historic or aesthetic significance. The lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. State law also addresses Native American Religious Expression in Public Resources Code §5097.9.

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The Native American Heritage Commission did perform a Sacred Lands File (SLF) search in the NAHC SLF Inventory, established by the Legislature pursuant to Public Resources Code §5097.94(a) and Native American Cultural Resources were not identified within one-half mile radius of the 'area of potential effect (APE).' Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed are the names of the culturally affiliated tribes and interested Native American individuals that the NAHC recommends as 'consulting parties,' for this purpose, that may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We recommend that you contact persons on the attached list of Native American contacts. A Native American Tribe or Tribal Elder may be the only source of information about a cultural resource.. Also, the NAHC recommends that a Native American Monitor or Native American culturally knowledgeable person be employed whenever a professional archaeologist is employed during the 'Initial Study' and in other phases of the environmental planning processes.

Furthermore the NAHC recommends that you contact the California Historic Resources Information System (CHRIS) of the Office of Historic Preservation (OHP), for archaeological data. (916) 653-7278.

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Consultation with tribes and interested Native American tribes and interested Native American individuals, as consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA (42 U.S.C. 4321-43351) and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 (f)) *et se*, 36 CFR Part 800.3, the President's Council on Environmental Quality (CSQ; 42 U.S.C. 4371 *et seq.*) and NAGPRA (25 U.S.C. 3001-3013), as appropriate. The 1992 *Secretary of the Interior's Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including *cultural landscapes*. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e).

Lead agencies should consider avoidance, as defined in Section 15370 of the California Environmental Quality Act (CEQA) when significant cultural resources could be affected by a project. Also, Public Resources Code Section 5097.98 and Health & Safety Code Section 7050.5 provide for provisions for accidentally discovered archeological resources during construction and mandate the processes to be followed in the event of an accidental discovery of any human remains in a project location other than a 'dedicated cemetery. Discussion of these should be included in your environmental documents, as appropriate.

The authority for the SLF record search of the NAHC Sacred Lands Inventory, established by the California Legislature, is California Public Resources Code §5097.94(a) and is exempt from the CA Public Records Act (c.f. California Government Code §6254.10). The results of the SLF search are confidential. However, Native Americans on the attached contact list are not prohibited from and may wish to reveal the nature of identified cultural resources/historic properties. Confidentiality of 'historic properties of religious and cultural significance' may also be protected under Section 304 of the NHPA or at the Secretary of the Interior's discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APE and possibly threatened by proposed project activity.

CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens. Although tribal consultation under the California Environmental Quality Act (CEQA; CA Public Resources Code Section 21000 – 21177) is 'advisory' rather than mandated, the NAHC does request 'lead agencies' to work with tribes and interested Native American individuals as 'consulting parties,' on the list provided by the NAHC in order that cultural resources will be protected. However, the 2006 SB 1059 the state enabling legislation to the Federal Energy Policy Act of 2005, does mandate tribal consultation for the 'electric transmission corridors. This is codified in the California Public Resources Code, Chapter 4.3, and §25330 to Division 15, requires consultation with California Native American tribes, and identifies both federally recognized and non-federally recognized on a list maintained by the NAHC

Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the California Code of Regulations (CEQA Guidelines) mandate procedures to be followed, including that construction or excavation be stopped in the event of an accidental discovery of

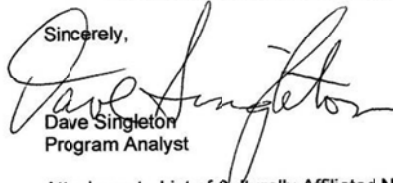
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any human remains in a location other than a dedicated cemetery until the county coroner or medical examiner can determine whether the remains are those of a Native American. Note that §7052 of the Health & Safety Code states that disturbance of Native American cemeteries is a felony.

Again, Lead agencies should consider avoidance, as defined in §15370 of the California Code of Regulations (CEQA Guidelines), when significant cultural resources are discovered during the course of project planning and implementation.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton  
Program Analyst

Attachment: List of Culturally Affiliated Native American Contacts

Cc: State Clearinghouse

# 5



Native American Contacts  
Los Angeles County  
September 8, 2010

LA City/County Native American Indian Comm  
Ron Andrade, Director  
3175 West 6th Street, Rm.  
Los Angeles, CA 90020  
randrade@css.lacounty.gov  
(213) 351-5324  
(213) 386-3995 FAX

Gabrielino Tongva Nation  
Sam Dunlap, Chairperson  
P.O. Box 86908  
Los Angeles, CA 90086  
samdunlap@earthlink.net  
Gabrielino Tongva  
(909) 262-9351 - cell

Ti'At Society  
Cindi Alvitre  
6515 E. Seaside Walk, #C  
Long Beach, CA 90803  
calvitre@yahoo.com  
(714) 504-2468 Cell  
Gabrielino

Gabrielino Tongva Indians of California Tribal Council  
Robert F. Doramae, Tribal Chair/Cultural  
P.O. Box 490  
Bellflower, CA 90707  
gtongva@verizon.net  
562-761-6417 - voice  
562-925-7989 - fax  
Gabrielino Tongva

Tongva Ancestral Territorial Tribal Nation  
John Tommy Rosas, Tribal Admin.  
tattnlaw@gmail.com  
310-570-6567  
Gabrielino Tongva

Gabrielino-Tongva Tribe  
Bernie Acuna  
1875 Century Pk East #1500  
Los Angeles, CA 90067  
(310) 428-7720 - cell  
(310) 587-2281

Gabrielino/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693  
San Gabriel, CA 91778  
GTTribalcouncil@aol.com  
(626) 286-1632  
(626) 286-1758 - Home  
(626) 286-1262 - FAX  
Gabrielino Tongva

Shoshoneon Gabrieleno Band of Mission Indians  
Andy Salas, Chairperson  
PO Box 393  
Covina, CA 91723  
gabrielenoindians@yahoo.  
626-926-4131  
213) 688-0181 - FAX  
Gabrieleno

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2009 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Westside Subway Expansion Project; located in the City of Los Angeles; Los Angeles County, California.

Native American Contacts  
Los Angeles County  
September 8, 2010

Gabrielino-Tongva Tribe  
Linda Candelaria, Chairwoman  
1875 Century Park East, Suite 1500  
Los Angeles, CA 90067 Gabrielino  
lcandelaria1@gabrielinoTribe.org  
310-428-5767- cell  
(310) 587-2281

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code. Also, federal National Environmental Policy Act (NEPA), National Historic Preservation Act, Section 106 and federal NAGPRA. And 36 CFR Part 800.

This list is only applicable for contacting local Native Americans for consultation purposes with regard to cultural resources impact by the proposed SCH#2009 CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for the Westside Subway Expansion Project; located in the City of Los Angeles; Los Angeles County, California.

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February 22, 2011

Linda Candelaria, Chairwoman  
Gabieleno-Tongva Tribe  
1875 Century Park East, Suite 1500  
Los Angeles, CA 90067

Re: Metro Westside Expansion

Dear Chairwoman,

The Metro Westside Expansion project proposes to construct a subway extending from Wilshire/Western along Wilshire Boulevard to the Westwood VA Hospital. The final phase of the environmental analysis is underway through preparation of a Final EIS/EIR. In October 2010, the Metro Board of Directors adopted the Locally Preferred Alternative (Alternative 2 of the Draft EIS/EIR). The project falls within the Beverly Hills and Hollywood USGS 7.5-minute quadrangles, as shown on the attached figures.

The Native American Heritage Commission (NAHC) responded to the Draft EIS/EIR on September 8, 2010. The NAHC has no record of Native American cultural resources in a half-mile radius of the projects area. The NAHC also provided a list of Native American tribes and individuals that may have knowledge of traditional or cultural resources within the project area and recommended that we contact you, among others.

I am requesting any information you may have regarding sacred lands or other heritage sites that might be impacted by the proposed project. All information provided regarding such resources or other areas of concern will be treated as confidential material. We would appreciate receipt of your response within two weeks. Please send your response via email ([mvalasik@cogstone.com](mailto:mvalasik@cogstone.com)) or fax (714-974-8303), or phone me at one of the numbers listed below.

Thank you for your assistance.

Sincerely,

Molly Valasik, M.A.  
Cultural Resources Field and Lab Technician



February 22, 2011

Andy Salas, Chairperson  
Shoshonean Gabrieleno Band of Mission Indians  
PO Box 393  
Covina, CA 91723

Re: Metro Westside Expansion

Dear Chairperson,

The Metro Westside Expansion project proposes to construct a subway extending from Wilshire/Western along Wilshire Boulevard to the Westwood VA Hospital. The final phase of the environmental analysis is underway through preparation of a Final EIS/EIR. In October 2010, the Metro Board of Directors adopted the Locally Preferred Alternative (Alternative 2 of the Draft EIS/EIR). The project falls within the Beverly Hills and Hollywood USGS 7.5-minute quadrangles, as shown on the attached figures.

The Native American Heritage Commission (NAHC) responded to the Draft EIS/EIR on September 8, 2010. The NAHC has no record of Native American cultural resources in a half-mile radius of the projects area. The NAHC also provided a list of Native American tribes and individuals that may have knowledge of traditional or cultural resources within the project area and recommended that we contact you, among others.

I am requesting any information you may have regarding sacred lands or other heritage sites that might be impacted by the proposed project. All information provided regarding such resources or other areas of concern will be treated as confidential material. We would appreciate receipt of your response within two weeks. Please send your response via email ([mvalasik@cogstone.com](mailto:mvalasik@cogstone.com)) or fax (714-974-8303), or phone me at one of the numbers listed below.

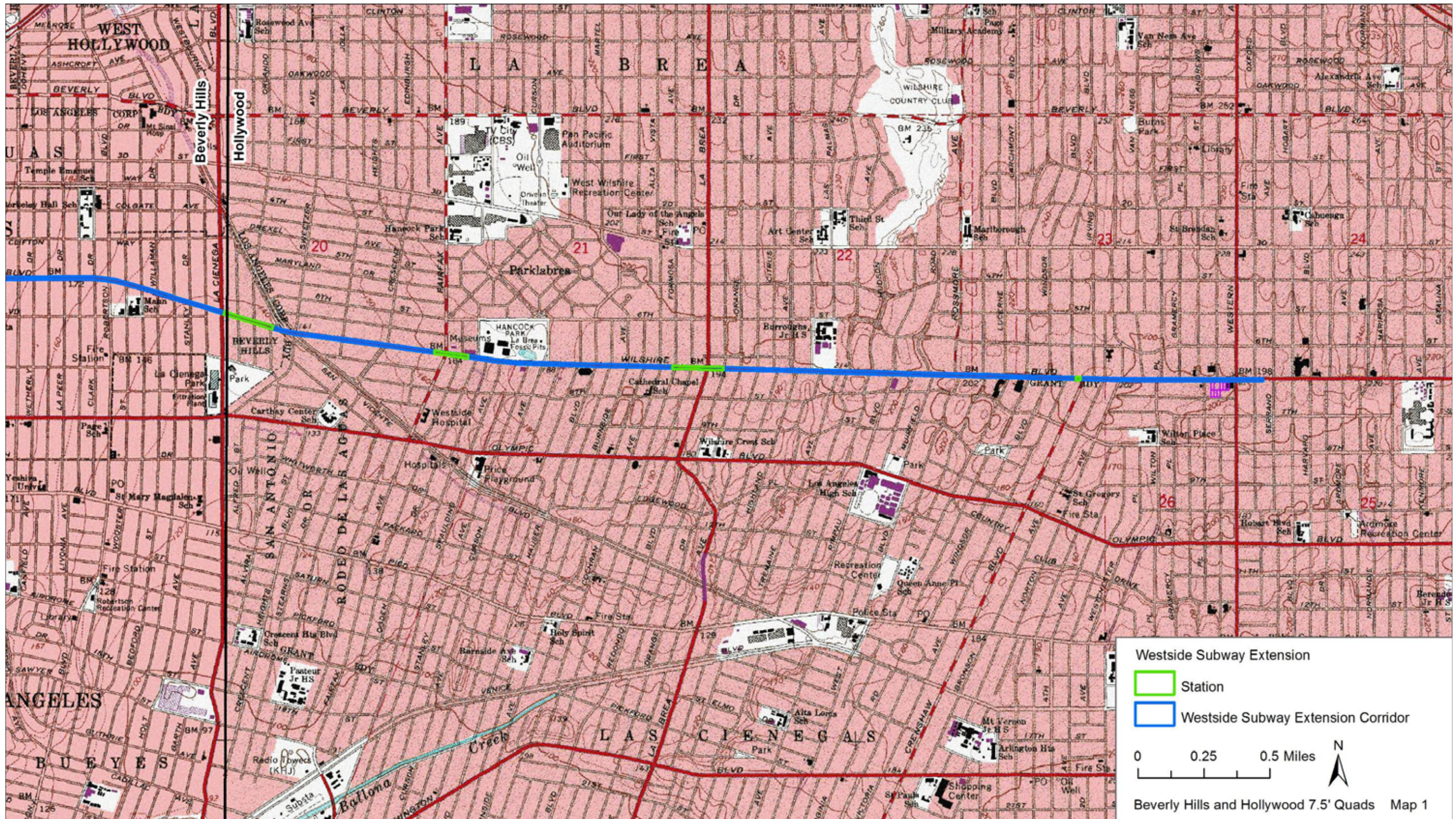
Thank you for your assistance.

Sincerely,

Molly Valasik, M.A.

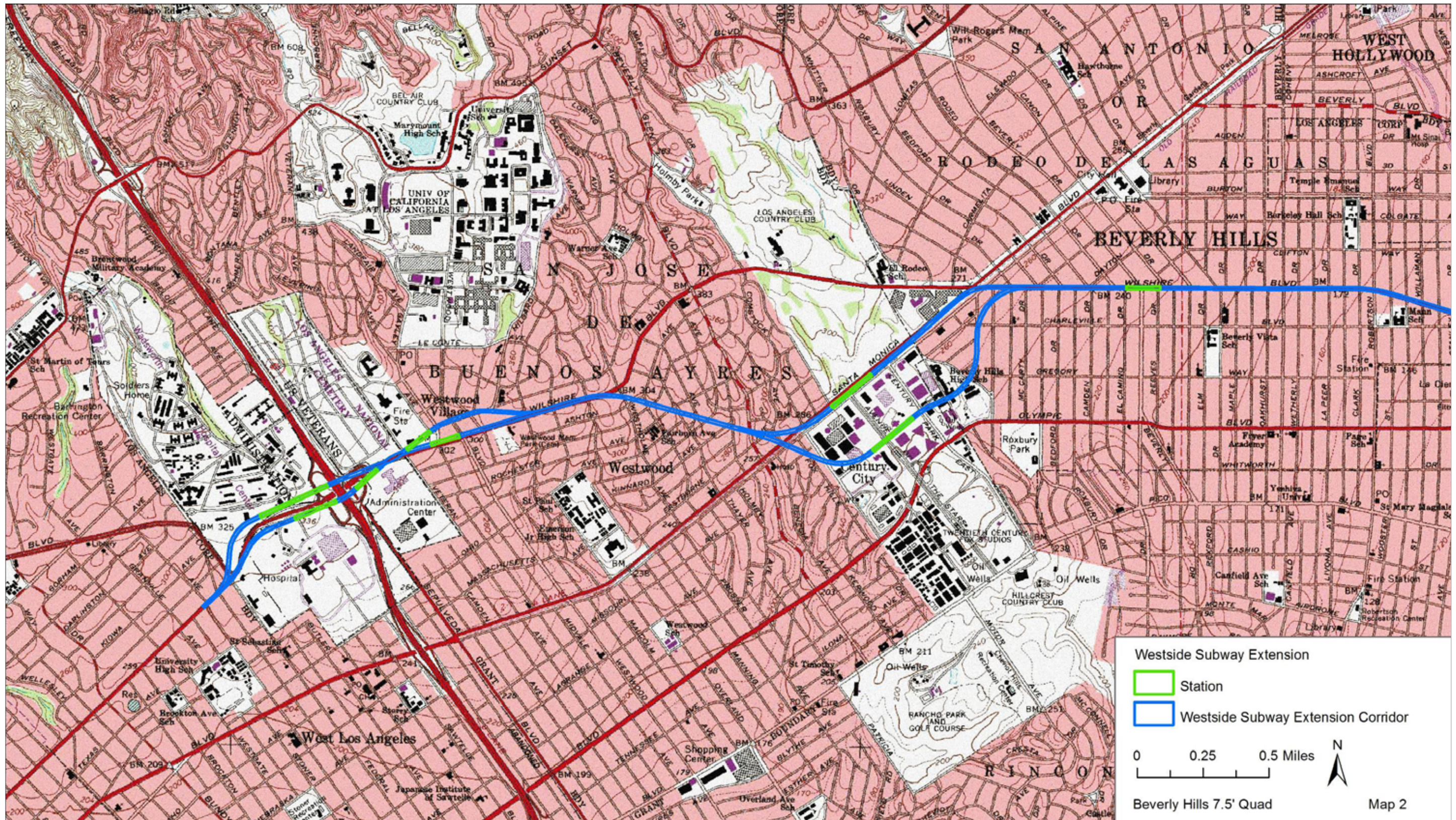
Cultural Resources Field and Lab Technician





WESTSIDE SUBWAY EXTENSION PROJECT





WESTSIDE SUBWAY EXTENSION PROJECT





Westside Subway Extension Project — Locally Preferred Alternative (LPA)

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

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

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

Native American Group/Individual	Date(s) of First Contact Attempt	Date(s) of Replies Rec'd	Date(s) of 2nd Contact Attempt	Date(s) of 3rd Contact Attempt	Comments
Shoshoneon Gabrieleno Band of Mission Indians, Andy Salas	2/22/2011	None	3/17/2011	3/25/2011	On February 22, 2011 a letter and map detailing the project location were emailed to Mr. Salas. When no response was received, one email was sent on March 17, 2011 and a second email was sent on March 25, 2011 to Mr. Salas. No response was received.
Gabrielino-Tongva Tribe, Linda Candelaria	2/22/2011	None	3/17/2011	3/25/2011	On February 22, 2011 a letter and map detailing the project location were emailed to Ms. Candelaria. When no response was received, one email was sent on March 17, 2011 and a second email was sent on March 25, 2011 to Ms. Candelaria. No response was received.



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**Metro**

## **APPENDIX B—MEMORANDUM OF AGREEMENT AND SECTION 106 CORRESPONDENCE**



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## MEMORANDUM OF AGREEMENT



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**MEMORANDUM OF AGREEMENT  
BETWEEN THE FEDERAL TRANSIT ADMINISTRATION  
AND THE  
CALIFORNIA STATE HISTORIC PRESERVATION OFFICER**

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

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

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

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

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

**WHEREAS**, FTA will be the lead Federal agency for the Undertaking, with the LACMTA, a grant applicant, as required by FTA, and as an invited signatory to this MOA; and,



**WHEREAS**, FTA has consulted with the California Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (16 USC § 470f) on eligibility and effects for properties within the APE; and, regarding the Undertaking's potential to affect historic properties, has decided to prepare a Memorandum of Agreement (MOA) pursuant to 36 CFR §§ 800.4(b)(2) and 800.6(c); and,

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

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

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

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

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

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

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

**WHEREAS**, the FTA and the SHPO are signatories pursuant to 36 CFR § 800.6(c)(1) and LACMTA is an invited signatory pursuant to 36 CFR § 800.6(c)(2); and,

**NOW, THEREFORE**, all signatories agree that, upon FTA's decision to proceed with the Undertaking, FTA shall ensure that the Undertaking is implemented in accordance with the following stipulations in order to take into account the effects of the Undertaking on historic properties; and further agree that these stipulations shall govern the Undertaking and all of its parts until this MOA expires or is terminated.

## **STIPULATIONS**

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

### **I. ARCHITECTURAL HISTORIC PROPERTIES**

#### **A. Treatment to Resolve Adverse Effect**

##### **1. HABS/HAER Documentation**

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

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

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

##### **2. Public Website Development**

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



## **B. Treatment to Avoid Adverse Effects**

### **1. Design Phase Planning**

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

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

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

### **2. Design Review and Monitoring**

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

## **C. Construction Phase**

### **1. Geotechnical Investigations**

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

## **D. Treatment to Avoid Adverse Effect to Historic District Contributing Historic Landscape Element**

### **1. Pre-Construction Survey**

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

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

### **2. Landscape Protection Measures**

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

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

### **3. Construction Monitoring**

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



## **E. Reporting Reviews**

### **1. SHPO Review and Comment**

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

### **2. Document Submittal**

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

### **3. Report Standards**

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

## **II. ARCHAEOLOGICAL RESOURCES**

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

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

1. The parties to this MOA agree that Indian burials and related items discovered during the implementation of the MOA and the Undertaking will be treated in accordance with the requirements of § 7050.5(b) of the California Health and Safety Code. If, pursuant to § 7050.5(c) of the California Health and Safety Code, the county coroner/medical examiner determines that the human remains are or may be of Native American origin, then the discovery shall be treated in accordance with the provisions of §§ 5097.98 (a) - (d) of the California Public Resources Code.
2. LACMTA will ensure that the expressed wishes of Native American individuals, tribes, and organizations are taken into consideration when decisions are made regarding the disposition of other Native American archaeological materials and records relating to Indian tribes.

## **B. Confidentiality**

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

## **C. Worker Training**

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

## **D. Unanticipated Discoveries**

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

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

## **III. ADMINISTRATIVE PROVISIONS**

### **A. Standards**

#### **1. Definitions**

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



## **2. Professional Qualifications**

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

## **3. Documentation Standards**

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

## **4. Curation and Curation Standards**

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

## **B. Dispute Resolution**

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

1. Forward all documentation relevant to the dispute, including the FTA's proposed resolution, to the ACHP. The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.
2. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.
3. FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

### **C. Amendments**

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

### **D. Termination**

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

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

### **E. Duration of the MOA**

1. Unless terminated pursuant to Section D of Stipulation III above, or unless superseded by an amended MOA, this MOA will be in effect following execution by the signatory parties until FTA, in consultation with the other MOA parties, determines that all of its stipulations have been satisfactorily fulfilled. This MOA will terminate and have no further force or effect on the day that FTA notifies the other MOA parties in writing of its determination that all stipulations of this MOA have been satisfactorily fulfilled.
2. The terms of this MOA shall be satisfactorily fulfilled within twenty (20) years following the date of execution by the signatory parties. If FTA determines that this requirement cannot be met, the MOA parties will consult to reconsider its terms. Reconsideration may include the continuation of the MOA as originally executed, amendment of the MOA, or termination. In the event of termination, FTA will comply with Section D of Stipulation III, above, if it determines that the Undertaking will proceed notwithstanding termination of this MOA.
3. If the Undertaking has not been implemented within ten (10) years following execution of this MOA by the signatory parties, this MOA shall automatically terminate and have no further force or effect. In such event, FTA shall notify the other MOA parties in writing and, if it chooses to continue with the Undertaking, shall reinstate review of the Undertaking in accordance with 36 CFR Part 800.



**F. Effective Date**


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

**G. Execution**

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


**SIGNATORY**

**Federal Transit Administration**

By   
Leslie T. Rogers  
Regional Administrator  
FTA Region IX

Date MAR 6 2012

**California State Office of Historic Preservation**

By  FOR MILFORD WAYNE DONALDSON Date 3/7/12  
Milford Wayne Donaldson  
State Historic Preservation Officer  
Office of Historic Preservation, Sacramento

**INVITED SIGNATORY PARTY:**

**Los Angeles County Metropolitan Transportation Authority**

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

Date 12-19-11



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**Metro**

Archaeological Resources Supplemental Survey Technical Report  
Appendix B—Memorandum of Agreement and Section 106 Correspondence

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## SECTION 106 CORRESPONDENCE



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U.S. Department  
of Transportation  
Federal Transit  
Administration

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

201 Mission Street  
Suite 1650  
San Francisco, CA 94105-1839  
415-744-3133  
415-744-2726 (fax)

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

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

Re: Metro Westside Extension Project

Dear Mr. Donaldson:

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

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

#### Project Description

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

The purpose of the project is to address the mobility needs of residents, workers, and visitors traveling to, from, and within the highly congested Westside Extension Study Area by providing faster and more reliable high-capacity public transportation than existing services which operate in mixed-flow traffic. This proposed subway



improvement will bring about a significant increase in east-west capacity and improvement in person-mobility by reducing transit travel time. On a county-wide level, the project will strengthen regional access by connecting Metro bus, Metro rail, and Metrolink networks to a high-capacity transit serving the Study Area. The overall goal of the project is to improve mobility in the Westside Extension Transit Corridor by extending the benefits of the existing Metro Red/ Metro Purple Line rail and bus services beyond their current termini near Highland Avenue and/or Western Avenue in Los Angeles as far as Ocean Avenue in Santa Monica.

### Alternatives

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

- *Wilshire Boulevard Alignment Heavy Rail Transit (HRT) Subway (Alternative I):* This alternative alignment extends underground from the Metro Purple Line Wilshire/Western station to 4th Street and Wilshire Boulevard in Santa Monica (approximately 12.5-miles in length). It has 10 stations and 1 optional station (Refer to enclosed maps for station locations and names). The alignment is generally under Wilshire Boulevard with various route alignments between Century City and Santa Monica.
- *Wilshire/Santa Monica Boulevard Combined HRT Subway (Alternative II):* This alignment alternative extends underground from the Metro Purple Line Wilshire/Western station and from the Metro Red Line at the Hollywood/Highland station to 4th Street and Wilshire Boulevard in Santa Monica (approximately 17-miles in length). It has 14 stations and 1 optional station (Refer to enclosed maps for station locations and names). This alternative has two alignment options in the Beverly Center area. One option follows San Vicente Boulevard from Santa Monica Boulevard to La Cienega Boulevard, where it curves south and then west to meet the Wilshire Boulevard alignment. The second option follows La Cienega Boulevard from Santa Monica Boulevard, past the Beverly Center, and curves west at Wilshire Boulevard.
- *No Build Alternative:* This EIS will also consider the No Build Alternative that includes all existing highway and transit services and facilities and the committed highway and transit projects in the current LACMTA Long Range Transportation Plan and the current 2008 Southern California Association of Governments' Regional Transportation Plan. No new infrastructure would be built within the Study Area, aside from projects currently under construction, or funded for construction and operation by 2030 by the recently approved Measure R and identified in the LACMTA Long Range Transportation Plan. Proposed major highway improvements affecting the Westside Extension Transit Corridor

between now and 2030 include completing missing segments of high occupancy vehicle (HOV) lanes on Interstate 405 (I-405) Freeway. From a rail transit perspective, the No Build Alternative includes the Metro Purple and Metro Red Lines along the eastern and northeastern edges of the study area. This alternative also includes a rich network of local, express, and Metro Rapid bus routes that will continue to be provided, with both bus route and additions and modifications proposed.

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

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

#### Area of Potential Effects

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

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

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

For historic and architectural resources, the proposed built environment APE includes all parcels adjacent to both sides of the proposed project alignment, including stations,



subway or open cut construction areas, and areas proposed for acquisition. In addition, the APE includes areas that may be subject to potential project-related effects, including visual or audible effects, and settlement effects that may result from construction or implementation the proposed project. Additionally, the built environment APE includes the boundaries of seven known identified historic structures, and one historic district that have been listed in or evaluated and considered eligible for the listing on the National Register. The built environment APE generally will not consider properties set far back from the edge/boundary of their parcel (*e.g.*, where there is a sliver impact); entire complexes or rows of structures on a parcel or multiple parcels (*e.g.*, shopping center) - only the front row of structures are included in the survey area; properties elevated high above the alignment due to topographic features; and, properties separated from the Project improvements by frontage roads or large retaining/sound barrier walls. Very large linear properties will not be identified or evaluated beyond the area reasonably subject to effect by the Project. Rather, the identification and evaluation of these complex linear properties within the APE considered whether the segment in the APE would be a contributor or non-contributor to a larger significant property as a whole (should that larger property ever be determined eligible for inclusion to the National and California.

For archaeological resources, the proposed APE includes the proposed at-grade and underground right-of-way and/or areas of direct ground disturbance. The APE also includes areas with permanent site improvements and areas for staging and temporary construction activities. Most Pleistocene Age sediments within the project area that have the potential to contain archaeological resources, in most areas, do not exceed a depth of 40 ft. However, due to geologic distortion, prehistoric sediment deposits, and early historic period disturbance (trenching, tunneling, or structural foundations), the potential for archaeological resources may be encountered at depths greater than 40 ft. Therefore, the proposed vertical APE for archaeological resources extends from the ground surface to approximately 100 feet below the existing ground surface. The proposed horizontal APE for archaeological resources extends from the edge of the existing ROW to 100 ft on either side of the ROW (100 ft radius), except in those areas where excavation, earth moving, or staging will occur beyond 100 feet; in which case, those areas will be included in the horizontal APE.

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

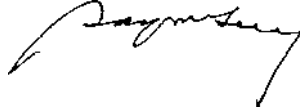
#### Consultation Coordination

To the extent that it facilitates the review and approval process, FTA has authorized certain experienced and knowledgeable agencies to consult directly with you in addressing Section 106 requirements. In permitting this arrangement, agencies have been instructed to keep FTA informed by forwarding copies of all transmittals to our attention, and immediately contacting FTA on matters deemed to be of significant importance. Until further notice, this authority is extended to the LACMTA for the Metro Westside Extension project.

Previous scoping efforts have taken place and are expected to continue over the next several months. On behalf of FTA, the LACMTA supported by its consultant Parsons Brinckerhoff and sub-consultant URS Corporation, is currently contacting local historic groups, Native American groups, and other stakeholders that may have an interest in the project. The LACMTA has met with the City of Los Angeles, Office of Historic Resources, and expects to meet with the other jurisdictional agencies and groups like the Los Angeles Conservancy to address their concerns.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Leslie T. Rogers". The signature is fluid and cursive, with a long, sweeping underline that extends to the left.

Leslie T.  
Rogers  
Regional  
Administrator

Enclosure: Draft Area of Potential Effects Map

cc: David Meiger, Project Manager, LACMTA



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

P.O. BOX 942896  
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calshpo@ohp.parks.ca.gov  
www.ohp.parks.ca.gov



27 September 2010

Reply To: FTA100816B

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

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

Dear Mr. Martin:

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

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

Thank your 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](mailto: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



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

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

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SEP 16 2011

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

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

Attention: Ms. Amanda Blosser, Project Review Unit

Dear Mr. Donaldson:

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

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

The archaeological resources survey concluded that there are no prehistoric or archaeological resources present within the archaeological APE for the LPA. At the Division 20 facility (see Figure 7-2 of *Archaeological Resources Technical Report*), only site CA-LAN-2610, one of four previously recorded sites, is eligible for listing in the National Register of Historic Places (NRHP) under Criteria D (see Table 7-1 of *Archaeological Resources Technical Report*). Site CA-LAN-2610 is located beneath Santa Fe Avenue and will be avoided by the project construction. As a result, FTA has determined that a “*no adverse effect*” is appropriate for this site.



Within the historic/architectural APE, 41 historic resources (39 individual properties and 2 historic districts) eligible for or listed on the NRHP were evaluated for project effect. Five of these properties are currently listed on the NRHP; 36 historic resources including two historic districts (VA Medical Center and Westwood/UCLA) have been determined eligible for inclusion on the NRHP. The following table provides a brief site description, eligibility status/recommendation, and effect determinations.

WSE No.	Common Name	Brief Description	NRHP Eligibility/ Listing	NRHP Criteria	Impact/ Determination
WSE 41	VA Medical Center Historic District	Old Soldiers Home and VA Medical Center buildings; includes WSE 41a Wadsworth Theater, and WSE 41b historic landscape	Eligible	A, C	Protection or temporary removal and return of historic landscape and trees to original site; no impact by tunneling noise or vibration/ No Adverse Effect
HD 1	Westwood/UCLA Historic District	Spanish Revival, Monterey Revival; includes WSE 46, WSE 47, WSE 49, and contributor HD1a/WSE 61	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 10	Linde Medical Building	Mid-Century Modern	Eligible	C	Removal for station entrance of a section of meeting wall between attached, integrated garage and rear of main structure/ No Adverse Effect
WSE 11	Century Plaza Hotel	Mid-Century Modern	Eligible	C	Avoid/ No Adverse Effect
WSE 12	Century Park Towers	Mid-Century Modern	Eligible	G, C	Avoid/ No Adverse Effect
WSE 13	Beverly Wilshire Hotel	Italian Renaissance	Listed	A, B, C	Avoid/ No Adverse Effect
WSE 14	Union Bank Building	Mid-Century Modern	Eligible	C	Alteration for station entrance of exterior wall on west end of first level/ No Adverse Effect
WSE 15	Ace Gallery Building	Mid-Century Modern - Brutalism	Eligible	C	Demolish/ Adverse Effect
WSE 16	Glendale Federal Savings Building	Mid-Century Modern	Eligible	C	Avoid/ No Adverse Effect
WSE 17	California Bank Building-Sterling Plaza	Art Deco Commercial	Eligible	C	Avoid/ No Adverse Effect
WSE 18	Fine Arts Theater	Art Deco	Eligible	C	Avoid/ No Adverse Effect
WSE 21	Fox Wilshire Theater	Art Deco	Eligible	C	Avoid/ No Adverse Effect
WSE 23	Johnie's Coffee Shop	Googie style design	Eligible	C	Avoid/ No Adverse Effect
WSE 24	May Company Wilshire (LACMA West)	Streamline Moderne	Eligible	C	Station portal entrance will be constructed in the interior of the first level; avoid alterations to the exterior of the building/ No Adverse Effect
WSE 25	Art Deco-style commercial building	Art Deco	Eligible	C	Avoid/ No Adverse Effect
WSE 26	Darkroom Photography Store façade	Streamline Moderne	Eligible	C	Avoid/ No Adverse Effect

WSE No.	Common Name	Brief Description	NRHP Eligibility/ Listing	NRHP Criteria	Impact/ Determination
WSE 27	Art Deco-style commercial building	Art Deco	Eligible	C	Avoid/ No Adverse Effect
WSE 28	Tidewater (Getty) Oil building	International style	Eligible	C	Avoid/ No Adverse Effect
WSE 29	Los Altos Hotel and Apartments	Spanish Revival	Listed	C	Avoid/ No Adverse Effect
WSE 30	Wilern Theater	Art Deco	Listed	C	Avoid/ No Adverse Effect
WSE 31	Pierce National Life	Mid-Century Modern	Eligible	C	Avoid/ No Adverse Effect
WSE 42	Catholic-Protestant Chapels/ Wadsworth Chapel	1890 Chapel	Listed	A, C	Avoid/ No Adverse Effect
WSE 43	Westwood Federal Building	Mid-Century Modern	Eligible	G, C	Avoid/ No Adverse Effect
WSE 44	Ralph's Grocery Store	Spanish Revival	Listed	C	Avoid: No Adverse Effect
WSE 45	Glendon Arcade Shops	Spanish Revival	Eligible	C	Avoid/ No Adverse Effect
WSE 46	Lindbrook Village	Spanish Revival	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 47	Courtyard Apartment Complex	Monterey Revival	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 49	University Bible Building	Gothic Revival	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 54	The Barn	Home and office of A.Q. Jones architect	Eligible	G, B	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 55	Beverly Hills High School	French Eclectic and Streamline Moderne	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 56	Perpetual Savings Bank Building	Mid-Century Modern	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 87	AAA Building	Mid-Century Modern	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 88	Wilshire Beverly Centre Building (Bank of America Building)	Mid-Century Modern	Eligible	C	Avoid/ No Adverse Effect
WSE 89	Beverly Hills Porsche Dealership	1920s Spanish Revival commercial	Eligible	C	Avoid/ No Adverse Effect
WSE 90	Security National Bank Building/Zephyr Club	Art Deco commercial	Eligible	C	Avoid/ No Adverse Effect
WSE 91	1 <sup>st</sup> Street Viaduct	1920s concrete bridge	Eligible	C	Avoid/ No Adverse Effect
WSE 92	4 <sup>th</sup> Street Bridge	1920s concrete bridge	Eligible	C	Avoid/ No Adverse Effect
WSE 93	6 <sup>th</sup> Street Viaduct	1920s concrete bridge	Eligible	C	Avoid/ No Adverse Effect
WSE 94	Clem Wilson /Mutual of Omaha Building	Art Deco and Gothic	Eligible	C	Avoid/ No Adverse Effect
WSE 96	[unoccupied]	Art Deco	Eligible	C	Avoid/ No Adverse Effect
WSE 97	Los Angeles Country Club (South Course)	Private club established in 1897	Eligible	C	No impact by tunneling noise or vibration/ No Adverse Effect



The VA Medical Historic District, WSE 41, includes the contributing landscape that would be in the "cut-and-cover" area associated with the construction of tunnels for the Westwood/VA Hospital Station. This would require the temporary removal of some ficus and palm trees near the Wadsworth Theater and the Palm Garden during construction. Following construction, the trees will be returned to their current location. A qualified Historic Landscape Architect will conduct on-site monitoring to ensure that the trees are properly removed and replaced. Additionally, measures will be taken to protect a large eucalyptus within the historic district (south side of Wilshire Boulevard). Therefore, FTA has determined a finding of "no adverse effect" for this resource.

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

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

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

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

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

We thank you for your attention to this critical project to the Los Angeles County metropolitan area. FTA will be contacting your office shortly after your receipt of this letter to address any concerns or answer any questions you may have regarding this project and schedule a meeting. If you have any questions or concerns, please contact Mr. Ray Tellis, Team Leader of our

Mr. Milford Wayne Donaldson, FAIA  
September 16, 2011  
Page 5 of 5

Los Angeles Metropolitan Office, 213-202-3956 or [ray.tellis@dot.gov](mailto:ray.tellis@dot.gov). The staff contact person is Mr. Anthony Lee, Environmental Protection Specialist, at 212-668-2173 or 202-695-0846 or [anthony.lee@dot.gov](mailto:anthony.lee@dot.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Leslie T. Rogers", written in a cursive style.

Leslie T. Rogers  
Regional Administrator

Copy to (by e-mail):

David Mieger, Los Angeles County Metropolitan Transportation Authority

Enclosures



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

1725 23<sup>rd</sup> Street, Suite 100  
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01 November 2011

Reply To: FTA100816B

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

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

Dear Mr. Rogers:

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

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

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

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

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

In addition, the stand of mature ficus and palm trees in the north-west quadrant of the Wadsworth Theater were determined to be a contributing feature to the VA Medical Center Historic District (11301 Wilshire Boulevard). The district was determined eligible for listing in


1981 by the Keeper of the National Register under Criteria A and C. Also, the segment of the AT&SF Railroad, previously recorded and determined eligible in 2000, no longer appears to retain sufficient integrity to convey its significance for inclusion in the NRHP. At this time, I am only able to concur with the determinations for the contributing landscape feature to the VA Medical Center Historic District and that the AT&SF segment is no longer eligible. Insufficient information was provided on the five other built environment resources precluding my ability to concur with the determination. For concurrence, I need the following information:

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

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

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

Sincerely,



Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

MWD:ab



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

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8 December 2011

Reply To: FTA100816B

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

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

Dear Mr. Rogers:

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

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

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

1. Linde Medical Building, 10291 Wilshire Boulevard, Criterion C, meets Criterion Consideration G, period of significance 1962-63.
2. Century Plaza Hotel, 2025 Avenue of the Stars, Criterion C, meets Criterion Consideration G, period of significance 1965.
3. Century Park Towers, 2029 Century Park East, Criterion C, meets Criterion Consideration G, period of significance 1973-1977.
4. Union Bank Building, 9460 Wilshire Boulevard, Criterion C, period of significance 1958-1960.
5. Ace Gallery Building, 9430 Wilshire Boulevard, Criterion C, period of significance 1948-1950.
6. Glendale Federal Savings Building, 9450 Wilshire Boulevard, Criterion C, period of significance 1968.
7. California Bank Building-Sterling Plaza, 9429 Wilshire Boulevard, Criterion C, period of significance 1929.
8. Fine Arts Theater, 9554 Wilshire Boulevard, Criterion C, period of significance 1938.
9. Fox Wilshire Theater, 8430 Wilshire Boulevard, Criterion C, period of significance 1930.
10. Johnie's Coffee Shop, 6101 Wilshire Boulevard, Criterion C, period of significance 1956.
11. May Company Wilshire, 6067 Wilshire Boulevard, Criterion C, period of significance 1939-1940.

12. Commercial Building, 5352 & 5354 Wilshire Boulevard, Criterion C, period of significance 1937.
13. Darkroom Photography Store, 5366-5354 Wilshire Boulevard, Criterion C, period of significance 1930s.
14. Commercial Building, 5410 Wilshire Boulevard, Criterion C, period of significance 1931.
15. Tidewater (Getty) Oil Building, 4201 Wilshire Boulevard, Criterion C, period of significance 1958.
16. Pierce National Life, 3807 Wilshire Boulevard, Criterion C, meets Criterion Consideration G, period of significance 1967-1969.
17. Westwood Federal Building, 11000 Wilshire Boulevard, Criterion C, meets Criterion Consideration G, period of significance 1966.
18. Glendon Arcade Shops, 1139 Glendon Avenue, Criterion C, period of significance 1933.
19. Westwood-UCLA Historic District, Criterion C, period of significance 1933-1940.  
The following contributors were identified in the APE for this project:
  - Lindbrook Village, 10830, 10836 Lindbrook Drive
  - Courtyard Apartment Complex, 10840 Lindbrook Drive
  - University Bible Building, 10801 Wilshire Boulevard
  - Dracker Apartments/Lindbrook Manor, 10824 Lindbrook Drive
20. The Barn, 10300 Santa Monica Boulevard, Criterion B, period of significance 1965-1979, meets Criterion Consideration G.
21. Beverly Hills High, 241 Moreno Drive, Criterion C, period of significance 1927 and 1939.
22. Perpetual Savings Bank Building, 9720 Wilshire Boulevard, period of significance 1962.
23. AAA Building, 1950 Century Park East, eligible under Criterion C
24. Wilshire Beverly Center Building (Bank of America Building), 9461 Wilshire Blvd, eligible under Criterion C, meets Criterion Consideration G, period of significance 1960-1965.
25. Beverly Hills Porsche, 8423 Wilshire Blvd, Salinas, eligible under Criterion C, 1920-1935.
26. 8400 Wilshire Blvd, eligible under Criterion C, period of significance 1930-1940.
27. Los Angeles Country Club (South Course), 10101 Wilshire Blvd, eligible under Criterion C, period of significance 1897-1960.

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

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

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

Sincerely,



*Susan H Stratton for*

Milford Wayne Donaldson, FAIA  
State Historic Preservation Officer

MWD:ab



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

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
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415-744-3133  
415-744-2726 (fax)

Mr. John M. Fowler  
Executive Director  
Advisory Council on Historic Preservation  
Old Post Office Building  
1100 Pennsylvania Avenue, NW, Suite 803  
Washington, DC 20004

DEC 15 2011

Attention: Louise D. Brodnitz, Program Analyst, ACHP

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

Dear Mr. Fowler:

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

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

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



California SHPO on both the adverse and no adverse effect findings based on conversations and emails to date.

Within the project's historic/architectural APE, 41 historic resources (39 individual properties and 2 historic districts) were identified eligible for or currently listed on the NRHP. Detailed identification and eligibility determination process for historic resources can be found in the *Historic Properties Survey Technical Report*. These properties were evaluated for project effect. As summarized in the following table, of the total of 41 historic properties, only one individual historic property, the Ace Gallery, has a determination of Adverse Effect.

WSE No.	Common Name	Brief Description	Impact/ Determination
WSE 41	VA Medical Center Historic District	Old Soldiers Home and VA Medical Center buildings; includes WSE 41a Wadsworth Theater, and WSE 41b historic landscape	Protection or temporary removal and return of historic landscape and trees to original site; no impact by tunneling noise or vibration/ <b>No Adverse Effect</b>
HD 1	Westwood/UCLA Historic District	Spanish Revival, Monterey Revival; includes WSE 46, WSE 47, WSE 49, and contributor HD1a/WSE 61	No impact by tunneling noise or vibration/ <b>No Adverse Effect</b>
WSE 10	Linde Medical Building	Mid-Century Modern	Removal for station entrance of a section of meeting wall between attached, integrated garage and rear of main structure/ <b>No Adverse Effect</b>
WSE 11	Century Plaza Hotel	Mid-Century Modern	Avoid/ <b>No Adverse Effect</b>
WSE 12	Century Park Towers	Mid-Century Modern	Avoid/ <b>No Adverse Effect</b>
WSE 13	Beverly Wilshire Hotel	Italian Renaissance	Avoid/ <b>No Adverse Effect</b>
WSE 14	Union Bank Building	Mid-Century Modern	Alteration for station entrance of exterior wall on west end of first level/ <b>No Adverse Effect</b>
WSE 15	Ace Gallery Building	Mid-Century Modern - Brutalism	Demolish/ <b>Adverse Effect</b>
WSE 16	Glendale Federal Savings Building	Mid-Century Modern	Avoid/ <b>No Adverse Effect</b>
WSE 17	California Bank Building-Sterling Plaza	Art Deco Commercial	Avoid/ <b>No Adverse Effect</b>
WSE 18	Fine Arts Theater	Art Deco	Avoid/ <b>No Adverse Effect</b>
WSE 21	Fox Wilshire Theater	Art Deco	Avoid/ <b>No Adverse Effect</b>
WSE 23	Johnie's Coffee Shop	Googie style design	Avoid/ <b>No Adverse Effect</b>
WSE 24	May Company Wilshire (LACMA West)	Streamline Moderne	Station portal entrance will be constructed in the interior of the first level; avoid alterations to the exterior of the building/ <b>No Adverse Effect</b>
WSE 25	Art Deco-style commercial building	Art Deco	Avoid/ <b>No Adverse Effect</b>

WSE No.	Common Name	Brief Description	Impact/ Determination
WSE 26	Darkroom Photography Store façade	Streamline Moderne	Avoid/ No Adverse Effect
WSE 27	Art Deco-style commercial building	Art Deco	Avoid/ No Adverse Effect
WSE 28	Tidewater (Getty) Oil building	International style	Avoid/ No Adverse Effect
WSE 29	Los Altos Hotel and Apartments	Spanish Revival	Avoid/ No Adverse Effect
WSE 30	Wiltren Theater	Art Deco	Avoid/ No Adverse Effect
WSE 31	Pierce National Life	Mid-Century Modern	Avoid/ No Adverse Effect
WSE 42	Catholic-Protestant Chapels/ Wadsworth Chapel	1890 Chapel	Avoid/ No Adverse Effect
WSE 43	Westwood Federal Building	Mid-Century Modern	Avoid/ No Adverse Effect
WSE 44	Ralph's Grocery Store	Spanish Revival	Avoid/ No Adverse Effect
WSE 45	Glendon Arcade Shops	Spanish Revival	Avoid/ No Adverse Effect
WSE 46	Lindbrook Village	Spanish Revival	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 47	Courtyard Apartment Complex	Monterey Revival	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 49	University Bible Building	Gothic Revival	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 54	The Barn	Home and office of A.Q. Jones architect	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 55	Beverly Hills High School	French Eclectic and Streamline Moderne	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 56	Perpetual Savings Bank Building	Mid-Century Modern	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 87	AAA Building	Mid-Century Modern	No impact by tunneling noise or vibration/ No Adverse Effect
WSE 88	Wilshire Beverly Centre Building (Bank of America Building)	Mid-Century Modern	Avoid/ No Adverse Effect
WSE 89	Beverly Hills Porsche Dealership	1920s Spanish Revival commercial	Avoid/ No Adverse Effect
WSE 90	Security National Bank Building/Zephyr Club	Art Deco commercial	Avoid/ No Adverse Effect
WSE 91	1 <sup>st</sup> Street Viaduct	1920s concrete bridge	Avoid/ No Adverse Effect
WSE 92	4 <sup>th</sup> Street Bridge	1920s concrete bridge	Avoid/ No Adverse Effect
WSE 93	6 <sup>th</sup> Street Viaduct	1920s concrete bridge	Avoid/ No Adverse Effect
WSE 94	Clem Wilson /Mutual of Omaha Building	Art Deco and Gothic	Avoid/ No Adverse Effect
WSE 96	[unoccupied]	Art Deco	Avoid/ No Adverse Effect



WSE No.	Common Name	Brief Description	Impact/ Determination
WSE 97	Los Angeles Country Club (South Course)	Private club established in 1897	No impact by tunneling noise or vibration/ No Adverse Effect

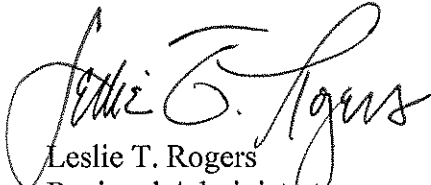
The Ace Gallery building has been determined eligible for listing in the NRHP because it embodies the distinctive characteristics of the Brutalism architectural style. Demolition of the Ace Gallery building will be required to accommodate Wilshire/Rodeo station entrance (portal) and a construction staging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

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

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

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

Sincerely,

  
Leslie T. Rogers  
Regional Administrator

Enclosures:

Mr. John M. Fowler  
December 15, 2011  
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Project Figures  
Archeological Resources Survey Report  
Historic Properties Survey Report





Preserving America's Heritage

January 3, 2012

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

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

Dear Mr. Rogers:

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

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

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

Sincerely,

Raymond V. Wallace  
Historic Preservation Technician  
Office of Federal Agency Programs