

## **APPENDIX V**

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### Draft Individual Section 4(f) Evaluation

# INGLEWOOD TRANSIT CONNECTOR

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## Draft Section 4(f) Evaluation



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## ACRONYMS

ATS	Automated Transit System
AVE	Area of Visual Effect
CFR	Code of Federal Regulations
FHWA	Federal Highways Administration
FTA	Federal Transit Administration
ITC	Inglewood Transit Connector Project
LASED	Los Angeles Stadium and Entertainment District
LAX	Los Angeles International Airport
Metro	Los Angeles County Metropolitan Transportation Authority
MSF	Maintenance and Storage Facility
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
PDS	Power Distribution System
U.S.C.	United States Code
VIA	Visual Impact Assessment

# 1.0 INTRODUCTION

The City of Inglewood (City) proposes the Inglewood Transit Connector Project (ITC or proposed Project) to improve overall mobility and levels of service, address projected future congestion, provide access to transit to its priority populations, and advance its sustainability goals. This chapter describes the documentation necessary to support determinations required to comply with the provisions of Section 4(f) of the Department of Transportation Act of 1966, as amended (Code of Federal Regulations (CFR) Title 23 Part 774 (23 CFR 774) as codified in United States Code (U.S.C.) Title 49, Section 303 (49 U.S.C. Section 303) and generally referred to as “Section 4(f)”). This Draft Section 4(f) evaluation was prepared in accordance with the regulations of the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) for Section 4(f) compliance.

## 1.1 SECTION 4(F) REQUIREMENTS

The essence of 4(f) requirements is that special efforts are to be made to protect public park and recreation lands, wildlife and waterfowl refuges, and historic sites. Section 4(f) of the Department of Transportation Act of 1966 specifies that:

*“[t]he Secretary [of Transportation] may approve a transportation program or project requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, state, or local significance, or land of a historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge or site) only if:*

- (1) there is no prudent and feasible alternative to using that land; and*
- (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.”*

Section 4(f) further requires consultation with the Department of Interior and, as appropriate, the involved offices of the Department of Agriculture and the Department of Housing and Urban Development, and relevant state and local officials, in developing transportation projects and programs that use lands protected by Section 4(f).

The proposed project described in the following chapter will receive federal funding through the FTA and would have a “use” of property protected by Section 4(f) as defined in 23 CFR 774.17 (Section 2.0 of this evaluation provides more detail). Therefore, documentation of compliance with Section 4(f) is required. Section 4(f) protects the following properties of national, state, and local significance:

- Publicly owned, publicly accessible parklands and recreational lands
- Public wildlife/waterfowl refuges, regardless of public access
- Historic sites, regardless of public or private ownership

If parks, recreational areas, or refuges are determined not to be properties of national, state, or local significance by the official(s) with jurisdiction, and after review by FTA for reasonableness, then Section 4(f) protection generally does not apply. Absent a determination from the official with jurisdiction regarding the significance of these properties, FTA assumes that they are significant properties and applies the requirements of Section 4(f). Historic sites listed on, or eligible for listing on, the National Register of Historic Places (NRHP) are significant properties for Section 4(f) purposes.

### 1.1.1 SECTION 4(F) USE DEFINITIONS

As defined in 23 CFR 774.17, use can occur under three circumstances: (1) when protected land is permanently acquired for a transportation facility, (2) when a temporary use is considered adverse, or (3) when there is "constructive use" of the resource. These circumstances are further defined below:

#### **Direct Use**

A direct use of a Section 4(f) resource takes place when property is permanently incorporated into a proposed transportation project. This may occur as a result of partial or full acquisition of a fee simple interest, permanent easements, or temporary easements that exceed regulatory limits.

#### **Temporary Use**

A temporary use of a Section 4(f) resource occurs when there is a temporary occupancy of property that is considered adverse in terms of the preservationist purposes of the Section 4(f) statute. Under the FTA/FHWA regulations, a temporary occupancy of property does not constitute a use of a Section 4(f) resource when the following conditions are satisfied:

- (1) the occupancy must be of temporary duration (i.e., shorter than the period of construction) and not involve a change in ownership of the property;
- (2) the scope of work must be minor, with only minimal changes to the protected resource;
- (3) there are no permanent adverse physical effects on the protected resource, nor will there be temporary or permanent interference with activities or purpose of the resource;
- (4) the property being used must be fully restored to a condition which is at least as good as that which existed prior to the proposed project; and
- (5) there must be documented agreement of the appropriate officials having jurisdiction over the resource regarding the foregoing requirements (23 CFR 774.13(d)(1)–(5)).

#### **Constructive Use**

A constructive use of a Section 4(f) property occurs when a transportation project does not incorporate land from the resource, but the proximity of the Project results in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired (23 CFR 774.15).

### 1.1.2 SECTION 4(F) APPROVALS

#### ***De Minimis* Impact**

The requirements of Section 4(f) are satisfied with respect to a Section 4(f) resource if it is determined by the FTA that a transportation project would have only a "*de minimis* impact" on the Section 4(f) resource. The provision allows avoidance, minimization, mitigation, and enhancement measures to be considered in making the *de minimis* determination. The official(s) with jurisdiction over the resource must be notified of FTA's determination. 23 CFR 774.17 defines a *de minimis* impact as follows:

- For parks, recreation areas, and wildlife/waterfowl refuges, a *de minimis* impact is one that would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f), and the official with jurisdiction has concurred with this determination after there has been a chance for public review and comment (Note: For parks, recreation areas, and wildlife/waterfowl refuges, public notice and an opportunity for public review and comment

concerning the effects on the protected features, attributes, or activities of the property must be required from the official with jurisdiction).

- For historic sites, *de minimis* impact means that the FTA has determined, in accordance with Section 106 of the of the National Historic Preservation Act (NHPA) (36 CFR part 800), that either no historic property is affected by the Project, or the Project would have “no adverse effect” on the property in question. The official with jurisdiction must be notified that the FTA intends to make a *de minimis* finding based on their concurrence with the “no adverse effect” determination under 36 CFR 800. This is usually done in the effect determination letter send to the official with jurisdiction for their concurrence.

### Individual Section 4(f) Evaluations

An individual Section 4(f) Evaluation must be completed when approving a project that requires the use of Section 4(f) property if the use results in a greater than *de minimis* impact and a Programmatic Section 4(f) Evaluation cannot be applied to the situation (23 CFR 774.3)<sup>1</sup>. The Individual Section 4(f) Evaluation documents the evaluation of the proposed use of Section 4(f) properties in the project area of all alternatives. The individual Section 4(f) Evaluation requires two findings as follows:

1. That there is no feasible and prudent alternative that completely avoids the use of Section 4(f) property.
2. That the project includes all possible planning to minimize harm to the Section 4(f) property resulting from the transportation use (23 CFR 774.3(a)(1) and (2)).

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<sup>1</sup> FTA currently does not have any approved Programmatic Section 4(f) Evaluation processes in place but will be developing these in the near future; FHWA Section 4(f) Programmatic Evaluations do not apply to FTA.



## 2.0 DESCRIPTION OF ALTERNATIVES

This Section 4(f) Evaluation assesses the Build Alternative (proposed Project). The No Build Alternative is also under consideration by the FTA which provides a basis for comparing the Build Alternative and is used as the baseline for comparing environmental effects.

### 2.1 NO BUILD ALTERNATIVE

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The No Build Alternative provides the background transportation network, against which the Build Alternatives' impacts are identified and evaluated under National Environmental Policy Act (NEPA). The No Build Alternative does not include the proposed Project. Specifically, the No Build Alternative reflects the reasonably foreseeable transportation network in 2027 and 2045 and includes the existing transportation network and planned transportation improvements that have been committed to and identified in the constrained Los Angeles County Metropolitan Transportation Authority (Metro) Long Range Transportation Plan and the Southern California Association of Governments 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, as well as additional projects funded by Measure M, a sales tax initiative in Los Angeles County approved by voters in November 2016.

The No Build Alternative includes Transportation Management and Operations Plan developed by the City in 2020 to address future traffic demands that may result from events at SoFi Stadium. The Inglewood Stadium Events Transportation Management and Operations Plan establishes a plan that provides public information, reduces unwarranted traffic through adjacent neighborhoods, and promotes the use of alternative modes of transportation. To address the limited pre-sold on-site parking available at SoFi Stadium, the City has established a remote parking and shuttle program that considers comprehensive access, circulation and traffic management for residents, visitors, and businesses on National Football League game days and during large special events. Given the growing event-day demand of the program, the City would still have a need for additional real property to supplement continuation of its current transportation demand management programs. For example, the City has established a remote parking and shuttle program known as IPark&Go that promotes the easy, efficient use of high occupancy shuttles by event attendees traveling to SoFi Stadium. Also, the City has established transit partnerships and received support from Metro, Big Blue Bus (Santa Monica), GTrans (Gardena), and Torrance Transit to expand transit service to its major entertainment, employment, and residential centers in the Hollywood Park area. Under the No Build alternative, the City would work to promote and expand use of IPark&Go and would continue to work cooperatively with Metro and other municipal bus operators to increase and enhance transit service to City of Inglewood destinations through more frequent headways, additional route options, and other improvements. With respect to special events occurring at SoFi Stadium, Hollywood Park, The Forum, all of these high occupancy transportation modes currently conduct drop-off and pick-up at the City's Intermodal Transit Facility lot, located within the Hollywood Park redevelopment area. Because the Intermodal Transit Facility is already at or near full capacity on event days with the current shuttle and bus volume, the City would look to devote any additional, nearby City-owned real estate to the same transit purposes (including the vacant lot at the southwest corner of Prairie Avenue and Manchester Boulevard, should it be acquired). This additional space would facilitate the City's enhancement of existing traffic demand management programs under the No Build Alternative.

## 2.2 BUILD ALTERNATIVE

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The proposed Project would include an approximately 1.6-mile long elevated, guideway primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue (**Figure 2-1**). The alignment runs south for approximately 0.35 miles on Market Street, turning east at Manchester Boulevard for another 0.50 miles until turning south on Prairie Avenue. The alignment continues south on Prairie Avenue for approximately 0.75 miles ending north of Century Boulevard at Hardy Street. Three stations are proposed adjacent to the public right of way on privately-owned land that would be acquired as part of the proposed Project. Components of the proposed Project are summarized in **Table 2-1**.

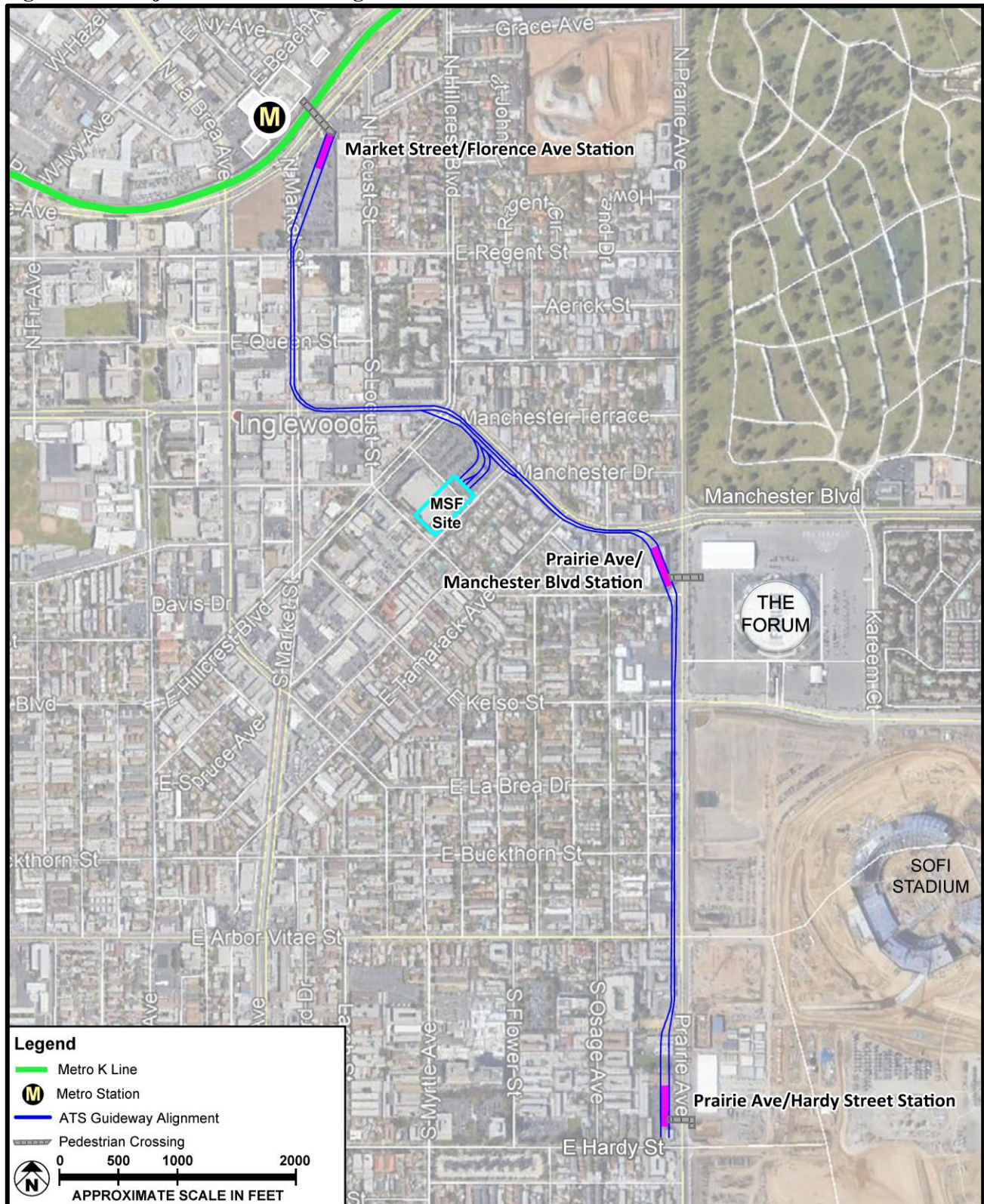
The Project Description and Visual Impact Assessment (VIA) are based on Conceptual Plans. The Conceptual Plans identify the proposed alignment for the Automated Transit System (ATS), which will be in the public right-of-way, with some supporting facilities and stations on private property located adjacent to the public right-of-way as described further in this section. These Conceptual Plans will likely be refined as design of the proposed Project progresses; however, for VIA purposes, the Conceptual Plans, including, among other things, the ATS guideway, columns, and other components as defined in the Conceptual Plans are analyzed to identify the likely maximum potential impact of the proposed Project. The location, layout, and size of the proposed stations, traction power substations, and maintenance and storage facility as illustrated in the Conceptual Plans also represent the likely maximum potential size of these facilities for the purpose of analyzing the potential impacts. Engineering and design-level details of the proposed Project will be refined as it moves through the environmental review, approval, procurement, and design phases.

**Operating Characteristics.** The transit technology would be fully automated (i.e., driverless), which is necessary to operate at the tight headways to meet the projected ridership needs. Automated vehicles are smaller than traditional heavy rail technology so as to successfully maneuver the tight radius curves driven by the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated people movers or simply monorails; regardless of the terminology used, it is a form of a light rail technology. The City is considering four transit technologies for the proposed Project. They include:

- **Self-Propelled Rubber-Tire ATS:** These systems are in widespread use at airports around the world, as well as in urban areas. They feature one-car to nine-car trains operating in a shuttle or pinched loop configuration.
- **Monorail:** Monorails are in widespread use in urban environments around the world, as well as some systems at airports. The unique feature of monorails is that they are either supported by or suspended from a single beam, which generally provides a minimized visual impact. Monorails feature connected vehicles operating in a shuttle or pinched loop configuration.
- **Automated Light Rail Transit:** Large steel-wheel ATS systems operate in numerous urban settings and airport applications. These systems feature two-car to six-car trains operating in a shuttle or pinched loop configuration. These would only be considered for the proposed Project if they can comply with the proposed Project's requirements, including maximum noise limits, and they are able to fit within the defined physical space available for the Project.
- **Cable-Propelled ATS:** Cable-propelled ATS systems operate in numerous urban settings and airport applications. The unique feature of a cable-propelled system is that the vehicles do not have onboard propulsion motors. Instead, they are propelled by a cable. These systems feature two-car to eight-car trains operating in a shuttle or pinched loop configuration. Like the automated light rail transit, a cable-propelled ATS system would only be considered for the proposed Project if it can comply with the proposed Project's requirements, including maximum noise limits, and if it is able to fit within the defined physical space available for the Project.



**Figure 2-1: Project Location and Alignment**



The operating system for the proposed Project consists of various integrated subsystems including the ATS train vehicles, automated train control, power distribution, guidance, propulsion, communications systems, and other equipment to create a fully functional, automated, and driverless system. In addition, the proposed Project would include equipment to guide the movement of trains between stations, emergency lighting, communications and wayfinding systems, a command and control system, a public information system, and security systems to monitor activity at station platforms, along the guideway, and at the maintenance and storage facility (MSF).

**Transit Stations.** The proposed Project includes three center-platform stations located at Market Street/Florence Avenue, Prairie Avenue/Manchester Boulevard, and Prairie Avenue/Hardy Street. The Market Street/Florence Avenue Station would provide connections to the Metro K Line and Downtown Inglewood. The Prairie Avenue/Manchester Boulevard Station would provide a connection to the Forum, local businesses and residents, and the Los Angeles Stadium and Entertainment District (LASED), including SoFi Stadium. The Prairie Avenue/Hardy Street Station would provide connections to the LASED including the SoFi Stadium, the commercial uses at Hollywood Park, well as existing and future local businesses and residences, and the Inglewood Basketball and Entertainment Center, including the Intuit Dome. Regardless of the transit technology, each station would have three levels including the ground, mezzanine, and platform levels. The mezzanine level would provide connections for passengers received from connecting pedestrian bridges to avoid at-grade passenger roadway crossings. The Market Street/Florence Avenue Station would include an elevated pedestrian bridge connecting to the Metro K Line Downtown Inglewood Station. The Prairie Avenue/Manchester Boulevard Station would include an elevated pedestrian bridge connecting to the Forum property, and the Prairie Avenue/Hardy Street Station would include an elevated pedestrian bridge connecting to the LASED properties on the east side of Prairie Avenue. Each station will include vertical transportation elements (stairs, escalators, and elevators) between levels to accommodate circulation needs and code compliance for safe egress. Design of the vertical circulation components would also accommodate mobility requirements of passengers (e.g., strollers, walkers, wheelchairs) and mobility concerns, and all requirements of the Americans with Disabilities Act.

**Power Distribution System (PDS).** Propulsion power which includes the power to run the train on the guideway and power for auxiliary and housekeeping needs would be provided by two PDS substations located along the alignment. Regardless of the transit technology, the two PDS substations would be located at the MSF site and at either the Prairie Avenue/Hardy Street Station site or the Prairie Avenue/Manchester Boulevard Station site. Each PDS substation would be approximately 3,000 square feet (approximately 30 feet by 100 feet) with 20 feet of clearance above the finished floor.

**Maintenance and Storage Facility (MSF).** The MSF would be used for regular, and corrective maintenance of the ATS trains and operating equipment, and for storage of the vehicle fleet. It is anticipated that the MSF would be similar regardless of the transit technology. The MSF is proposed on the western portion of the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue. The MSF would be elevated from ground level, with double-height clearance over the maintenance tracks, and a largely unenclosed ground floor. The maintenance level for ATS train cars would be located on the second floor to match the guideway track elevation. Employee and visitor employee access to the MSF would be provided via controlled gates. Security measures would include secured perimeter fencing, automated gates, electronic security card systems, intercoms, security cameras, and exterior lighting. This site is currently developed with commercial buildings containing a Vons grocery store, a private fitness gym, and gas station. The existing commercial building and gas station would be demolished and the Vons would be rebuilt. A PDS substation is proposed within this site, likely below the MSF or spur tracks.



**TABLE 2-1: ITC PROJECT COMPONENT LOCATIONS AND SIZES (CONCEPTUAL)**

Project Component	General Location	Approximate Size
Guideway	<ul style="list-style-type: none"> <li>Located predominantly within the existing public right-of-way of Market St., Manchester Blvd., and Prairie Ave.</li> </ul>	<ul style="list-style-type: none"> <li>Approximately 1.6 miles dual lane</li> <li>The guideway will vary in height from a minimum of ~35 feet to a maximum of ~60 feet measured from existing grade to top of guideway deck</li> <li>The dual-lane guideway width will vary from a minimum of ~30 feet to a maximum of ~75 feet. Maximum widths are at stations and approaches to stations.</li> </ul>
Market Street/Florence Avenue Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southeast corner of Market St./Florence Ave.</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> </ul>
Prairie Avenue/Manchester Boulevard Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the southwest corner of Prairie Ave./Manchester Blvd.</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75 feet wide (station structure and guideway only; not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> </ul>
Prairie Avenue/Hardy Street Station	<ul style="list-style-type: none"> <li>Located on private property (to be acquired by the City) at the northwest corner of Prairie Ave./Hardy St.</li> </ul>	<ul style="list-style-type: none"> <li>Up to ~80 feet in height measured from existing grade to top of station canopy</li> <li>~75-foot wide (station structure and guideway only, not including vertical circulation)</li> <li>~200-foot long platform for train berthing</li> </ul>
Vertical Circulation Elements	<ul style="list-style-type: none"> <li>Located at each station within the public right-of-way, easements, or private property to be acquired</li> <li>Locations will depend on station specific requirements to connect to existing sidewalk/passenger walkways.</li> </ul>	<ul style="list-style-type: none"> <li>Vertical circulation elements will exist at each station to provide access from the platform level to the mezzanine level and ground level</li> </ul>
Pedestrian Bridges	<ul style="list-style-type: none"> <li>Location 1: above Florence Ave. connecting the Market St./Florence Ave. Station to the Metro K Line Downtown Inglewood Station. The landing on the Metro property will require an easement.</li> <li>Location 2: above Prairie Ave. from Prairie/Manchester Station to the Forum site. The landing on The Forum property will require an easement.</li> <li>Location 3: above Prairie Ave. from Prairie/Hardy Station to the Hollywood Park site. The landing on the Hollywood Park property will require an easement.</li> </ul>	<ul style="list-style-type: none"> <li>Height will be up to ~65 feet measured from existing grade to top of structure</li> <li>~30 feet wide maximum for passenger walkway</li> <li>~280 feet long for location 1 and ~160 feet long for locations 2 and 3</li> <li>Minimum vertical clearance of 10 feet within the walkway interior</li> </ul>

**TABLE 2-1: ITC PROJECT COMPONENT LOCATIONS AND SIZES (CONCEPTUAL)**

Project Component	General Location	Approximate Size
Maintenance and Storage Facility (MSF)	<ul style="list-style-type: none"> <li>Primarily located on private property to be acquired by the City as part of the proposed Project with potential for portions of the MSF to be located within an easement at 500 E. Manchester Blvd. The MSF would share the property with a rebuilt Vons grocery store.</li> </ul>	<ul style="list-style-type: none"> <li>~75,000 sf building area</li> <li>Up to ~75 feet in height measured from existing grade to top of roof</li> <li>Surface parking area under building containing approximately 50 spaces for employees and visitors</li> </ul>
Power Distribution System Substation (PDS)	<ul style="list-style-type: none"> <li>Two PDS substations; one located at the MSF site and the second at the Prairie/Hardy Station site or the Prairie Avenue/Manchester Boulevard Station site.</li> <li>Specific locations within each site will be determined during the design phase</li> </ul>	<ul style="list-style-type: none"> <li>~30 feet wide x ~100 feet long</li> <li>Up to ~20 feet clearance height measured from floor to ceiling</li> <li>If located below grade, an additional space of ~30 feet wide x ~30 feet long for vertical circulation</li> <li>~20 feet wide x ~40 feet long additional space for auxiliary equipment such as a backup generator, if necessary</li> </ul>
Roadway Improvements	<ul style="list-style-type: none"> <li>Market St., Manchester Blvd. and Prairie Ave will be reconstructed to accommodate the ITC guideway, the existing number of traffic lanes will be maintained. Prairie Ave. will be shifted eastward up to ~28 feet</li> </ul>	<ul style="list-style-type: none"> <li>New roadway striping, lane reconfigurations, partial relocation, on-street parking adjustments, new sidewalks, lighting improvements, traffic signal adjustments, landscaping, and streetscape</li> </ul>
Pick-Up/Drop-Off Areas, Surface Parking Lots and Staging Areas During Construction	<ul style="list-style-type: none"> <li>Market St./Florence Ave. Station site</li> <li>150 S. Market St.</li> <li>Prairie/Hardy Station site</li> </ul>	<ul style="list-style-type: none"> <li>Surface level parking at each site: ~650 spaces at Market St./Florence Ave. Station ~50 spaces at 150 S. Market St. ~50 spaces at Prairie/Hardy Station Pick-Up/Drop-Off Area</li> <li>Market St./Florence Ave. Station site on Locust St. south of Florence Ave., and Regent St. between Locust St. and Market St.</li> <li>Prairie/Hardy St. Station within the station site</li> </ul>

**Source:** City of Inglewood, *Inglewood Transit Connector Project Environmental Impact Report*, February 2022.

## 3.0 SECTION 4(F) RESOURCES

The study area for identifying public park, recreation, and wildlife and waterfowl refuges consists of the Project alignment and a 1,000-foot buffer which was used to account for any potential property effects on Section 4(f) resources as well as any potential proximity impacts that could affect the regular use of a Section 4(f) resources. The study area for historic sites consists of the Area of Potential Effect (APE) established for the Section 106 process and provided as Appendix A to this report. A historic site protected under Section 4(f) is a property that is on or eligible for listing on the NRHP. This section describes the Section 4(f) resources identified for this analysis. Figure 3-1 presents the location of identified Section 4(f) protected resources relative to the Project.

### 3.1 PARK RESOURCES

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There is one publicly owned park identified in the 1,000-foot study area. Queen Park is located at 625 East Queen Street, approximately 700 feet north of the intersection of Manchester Boulevard and Prairie Avenue. Queen Park is a 1.2-acre neighborhood park with a playground, picnic area, and educational garden. The park is situated approximately 700 feet north of the nearest proposed project facilities along Manchester Boulevard. In addition, the park is separated from Manchester Boulevard by two blocks of residential development (See Figure 3-1).

### 3.2 HISTORIC SITES

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An Identification of Historic Properties Report (IHPR) and an Archaeological Survey Report (ASR) were prepared (March 2022) in compliance with Section 106 of the National Historic Preservation Act (NHPA) (36 CFR Part 800) (HNTB 2021). The IHPR evaluated historic built environment properties within the architectural APE and the ASR evaluated prehistoric and historic archaeological resources within the archaeological APE.

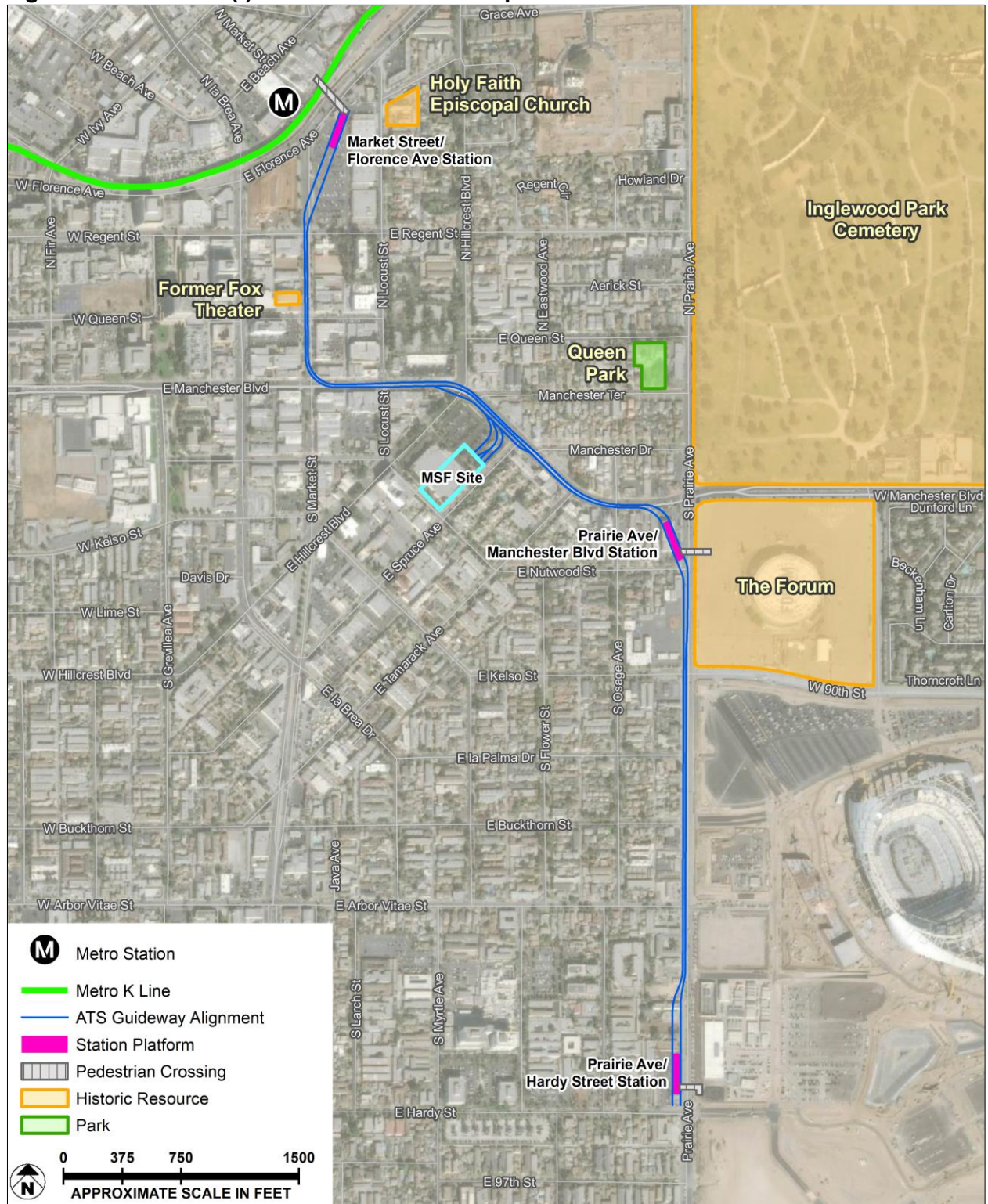
Within the APE there are four historic sites that qualify for protection under Section 4(f). These include Holy Faith Episcopal Church (260 North Locust Street), the Former Fox Theater (115 North Market Street), Inglewood Park Cemetery (720 East Florence Avenue), and The Forum (3900 West Manchester Boulevard). Both The Forum and the Former Fox Theater are already listed in the NRHP while the Holy Faith Episcopal Church and Inglewood Park Cemetery have been evaluated and appear eligible for listing in the NRHP. Figure 3-1 presents the locations of these resources relative to the Project. Descriptions of each resource are provided below.

#### **Former Fox Theater (115 North Market Street)**

The Former Fox Theater is located along Market Street and would face the ATS guideway proposed within the right-of-way of Market Street. This property, located on the west side of Market Street between Regent and Queen streets, contains a 1,008-seat neighborhood movie theater building. Originally constructed in 1949 for Fox West Coast Theaters, it was designed by prolific theater architect S. Charles Lee in the Late Moderne style. The theater closed in 1988. The building is currently unoccupied and its storefront is boarded up. On January 14th, 2013, the Fox Theater was listed in the National Register and is therefore a historic site protected under Section 4(f).



**Figure 3-1: Section 4(f) Resource Location Map**



### **The Forum (3900 West Manchester Boulevard)**

This property, located at the southeast corner of Manchester Boulevard and Prairie Avenue, contains the Forum, a multi-purpose indoor arena, surrounded by an expansive surface parking lot. It was built by nationally prominent businessman Jack Kent Cooke as a venue for his three professional sports franchises: the Los Angeles Lakers basketball team, the Los Angeles Kings hockey team, and the short-lived Los Angeles Wolves professional soccer team. Completed in 1967, it was designed by prominent Los Angeles architectural firm Charles Luckman & Associates in the New Formalist style. From 2012 to 2014, it underwent an extensive rehabilitation. The Forum was listed in the NRHP on September 24, 2014 under Criterion C as an excellent example of a 1960s New Formalist-style arena building. Accordingly, The Forum is an historic site protected under Section 4(f).

### **Holy Faith Episcopal Church (260 North Locust Street)**

The Holy Faith Episcopal Church is located just east of the proposed Market Street/Florence Avenue Station site, across Locust Street. The church building was officially consecrated in 1914 and has undergone various improvements and expansions through the late 1950s. The complex consists of the main church building, the rectory, and a school. Character-defining features of the church building include its double-cruciform plan; gabled roofs with capped parapets and decorative crosses; copper steeple; stucco exterior walls with cast-stone stepped buttresses; base with caststone molding; pointed-arch openings with decorative cast-stone surrounds; leaded stained-glass windows; cast-stone Gothic tracery and quoining; wood plank doors with exposed iron hardware; metal scuppers and downspouts; and decorative wrought-iron wall sconces. The church expansion was designed by the original architect to respect and complement the original church—with features such as wood entry doors and stained-glass windows retained and incorporated into the expanded design—and thus is considered to have acquired significance in its own right. Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident.

The Holy Faith Episcopal Church has been evaluated for eligibility for listing in the NRHP in the IHPR. According to the IHPR, the church appears eligible for listing in the NRHP under Criteria A and C. Therefore, the Holy Faith Episcopal Church is protected under Section 4(f).

### **Inglewood Park Cemetery (720 East Florence Avenue)**

The Inglewood Park Cemetery site is located at the northeast corner of Manchester Boulevard and Prairie Avenue, contains an approximately 200-acre cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery. Structures on the site include a Romanesque-style Grace Chapel, the Neoclassical-style Inglewood Mausoleum, and the Mausoleum of the Golden West (completed in the 1960s). Inglewood Park Cemetery was originally established in 1905, three years prior to the City of Inglewood's incorporation in 1908. Grace Chapel, built in 1907, is one of the oldest—if not the oldest—remaining religious buildings in Inglewood. The Inglewood Mausoleum was the first community mausoleum in the State of California when it was erected in 1915. Various notable persons have been laid to rest at Inglewood Park Cemetery, including some of the South Bay region's earliest settlers, a number of Civil War veterans, and famous figures such as former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams.

The IHPR evaluated the Inglewood Park Cemetery under NRHP Criteria A, C, and D and determined that the cemetery appears eligible for listing in the NRHP as an example of early institutional development in Inglewood, due to the quality of its architecture and design, and as the burial place of persons of transcendent importance. Therefore, the Inglewood Park Cemetery is protected under Section 4(f).

## 4.0 SECTION 4(F) USE DETERMINATIONS

This chapter presents the potential direct use, temporary occupancy, and constructive use of the Build Alternative and Section 4(f) protected resources as described in Section 3.0 of this document. Section 4(f) applies only to programs and projects undertaken by the Department of Transportation and only to publicly owned parks, recreation areas, and wildlife refuges, and to historic sites, whether publicly or privately owned. Historic sites are generally those listed on or eligible for the listing on the NRHP. For protected historic sites, Section 4(f) is triggered when:

- Land from a Section 4(f) protected resource is permanently incorporated into a transportation facility.
- The Project temporarily occupies land from the Section 4(f) protected resource in a manner that property that is considered adverse in terms of the preservationist purposes of the Section 4(f) statute.
- No land from a Section 4(f) protected resources is permanently incorporated into the Project, but “proximity impacts” to resource are so severe that the qualities that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired.

### *Definition of Effect and Criteria of Adverse Effect*

Regarding historic sites and determining adverse effects through the Section 106 process, the definition of effect is contained within 36 CFR Part 800 as follows: “Effect means alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register.”

An adverse effect 36 CFR Part 800.16(i) occurs “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 per 36 CFR 800.5(a)(1).” 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.

## 4.1 USE DETERMINATIONS

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The following discussion describes the potential for use of Section 4(f) properties posed by the proposed Project.

### **QUEEN PARK**

Queen Park is located approximately 700 feet north of the proposed Project facilities along Manchester Boulevard which at this location would consist of the ATS guideway, associated support columns, and the Prairie Avenue/Manchester Boulevard Station. No property associated with the park would be permanently or temporarily used for the Project. Given the distance of the park from the Project alignment, limited proximity impacts, if any would be experienced by park users. Noise analysis completed for the Project did not identify any adverse effects related to operational noise or vibration or to construction noise at any adjacent land uses let alone Queen Park. With implementation of the proposed Project’s Construction Commitment Program (CCP) and Avoidance Measure NV-4, temporary construction-related vibration impacts to buildings adjacent to the Project alignment would not be adverse; likewise, these measures would ensure construction-related vibration impacts to Queen Park would not be adverse. Air quality analysis completed for the proposed Project did not identify any adverse operational or construction-related air quality impacts. Portions of the aerial ATS guideway may be visible from the park; however, the park features and attributes are not reliant upon any views beyond the park property to continue to function. Therefore, no constructive use would occur.

***Use Determination:*** No Use.

## **HOLY FAITH EPISCOPAL CHURCH**

The Build Alternative would not result in physical alterations to the Holy Faith Episcopal Church building or property as all project components would be constructed more than 200 feet from the church. No construction activities or construction equipment would inhabit the church property at any time and therefore there would be no potential temporary use of the property. No operational or construction-related proximity impacts to the church are anticipated such that any aspect of its historic integrity – including location, design, materials, workmanship, feeling or association – would be adversely affected. Therefore, no constructive use would occur. Since no portion of the proposed Project would inhabit any of the church’s historic property, no direct use would occur and it has been determined that no use of the Holy Faith Episcopal Church would result from the Build Alternative.

**Use Determination:** No Use.

## **FORMER FOX THEATER**

**No Use.** The Build Alternative would not result in physical alterations to the Former Fox Theater building or property as all project components would be constructed within the public right-of-way where the theater is located along Market Street. Accordingly, no direct use would occur. The former Fox Theater building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway would be located. Construction of the ATS guideway and associated support columns is anticipated to occur entirely within the public right-of-way; therefore, no temporary use would occur.

The building would remain in its original location and retain all of its significant character-defining features. Further, with implementation of the CPP and Avoidance Measure NV-4, vibration damage of buildings due to groundborne vibration from construction would be avoided or repaired. However, the proposed Project would erect a substantial new physical structure in front of and within close proximity of the Fox Theater, altering its setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the Fox Theater building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building’s west and south façades. The ATS guideway would be elevated above the roadway and sidewalks, passing directly in front of the Fox Theater building. The main volume of the Fox Theater building measures approximately 38 feet tall, with its vertical sign pylon—an important component of the building’s design—rising to a height of approximately 70 feet. The horizontal distance from the edge of the guideway to the marquee would be approximately 17 feet; the horizontal distance from the edge of the guideway to the building façade would be approximately 28 feet (assuming a maximum guideway width of 42 feet). Additionally, the guideway would be carried by single columns positioned in the center of Market Street, although no column would be located directly in front of or immediately adjacent to the Fox Theater. This would allow for a greater distance between the ATS guideway and the Fox Theater building, maintaining much of the existing open sidewalk and street that define the building’s setting. The height of the guideway in front of the Fox Theater building, the stipulation that no support columns would be located in front of or adjacent to the Fox Theater, and the horizontal separation between the Fox Theater and the guideway, would ensure that the proposed Project would not obscure important physical features of the primary façade — including the sign pylon — when viewed from the east side of Market Street. For architecturally significant historical resources like the Fox Theater building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting would be altered along Market Street, all of the other aspects of integrity — including location, design, materials, workmanship, feeling and association—would remain, and therefore the historical resource would retain integrity overall and it is anticipated that no adverse effect to the Former Fox Theater would occur. Therefore, no constructive use of the Former Fox Theater would occur.

**Use Determination:** No Use.

## INGLEWOOD PARK CEMETERY

**No Use.** The Build Alternative would not result in physical alterations to the Inglewood Park Cemetery property as all project components would be constructed within the public right-of-way. The cemetery would remain in its original location and retain all of its significant character-defining features. No construction activities or construction equipment would inhabit the cemetery property at any time and therefore there would be no potential temporary use of the property. The Build Alternative would erect a new physical structure immediately adjacent to the cemetery property, thereby changing its physical surroundings to the southwest. The ATS would run along Manchester Boulevard west of the cemetery, and along Prairie Avenue south of the cemetery. Thus, the ATS would not run along the perimeter of the cemetery property at any point. At the intersection of Manchester Boulevard/Prairie Avenue, the ATS would make a turn, touching the parcel at the southwest corner; the cemetery property is situated at the northeast corner. At this location, where the ATS guideway would be closest to the cemetery property, the edge of the ATS guideway would be approximately 190 feet from the cemetery wall. Thus, there would be substantial physical separation between the cemetery property and the new construction. At the intersection, support columns for the guideway would be placed on the sidewalk at the northwest, southwest, and southeast corners; no support columns would be placed at the northeast corner. The addition of the ATS would not interfere with existing visual and/or spatial relationships between the property and its surroundings in any meaningful way. Furthermore, the most significant features of the Inglewood Park Cemetery—including the Grace Chapel (1907), Inglewood Mausoleum (1915), Mausoleum of the Golden West (1930s), and main entrance walls and gates—are clustered in the northernmost portion of the cemetery grounds or situated along Florence Avenue, whereas the new construction would be southwest of the cemetery property. Setting features important to the cemetery are within the boundaries of the property which is surrounded by a high wall, and these would not be altered or effected by the proposed Project. Therefore, the addition of new construction a substantial distance from the cemetery property would not substantially alter its setting and all aspects of integrity including location, design, materials, setting, workmanship, feeling, and association would remain unchanged such that operational or construction-related proximity impacts associated with the Build Alternative would not result in an adverse effect to the cemetery. Therefore, no constructive use would occur.

**Use Determination:** No Use.

## THE FORUM

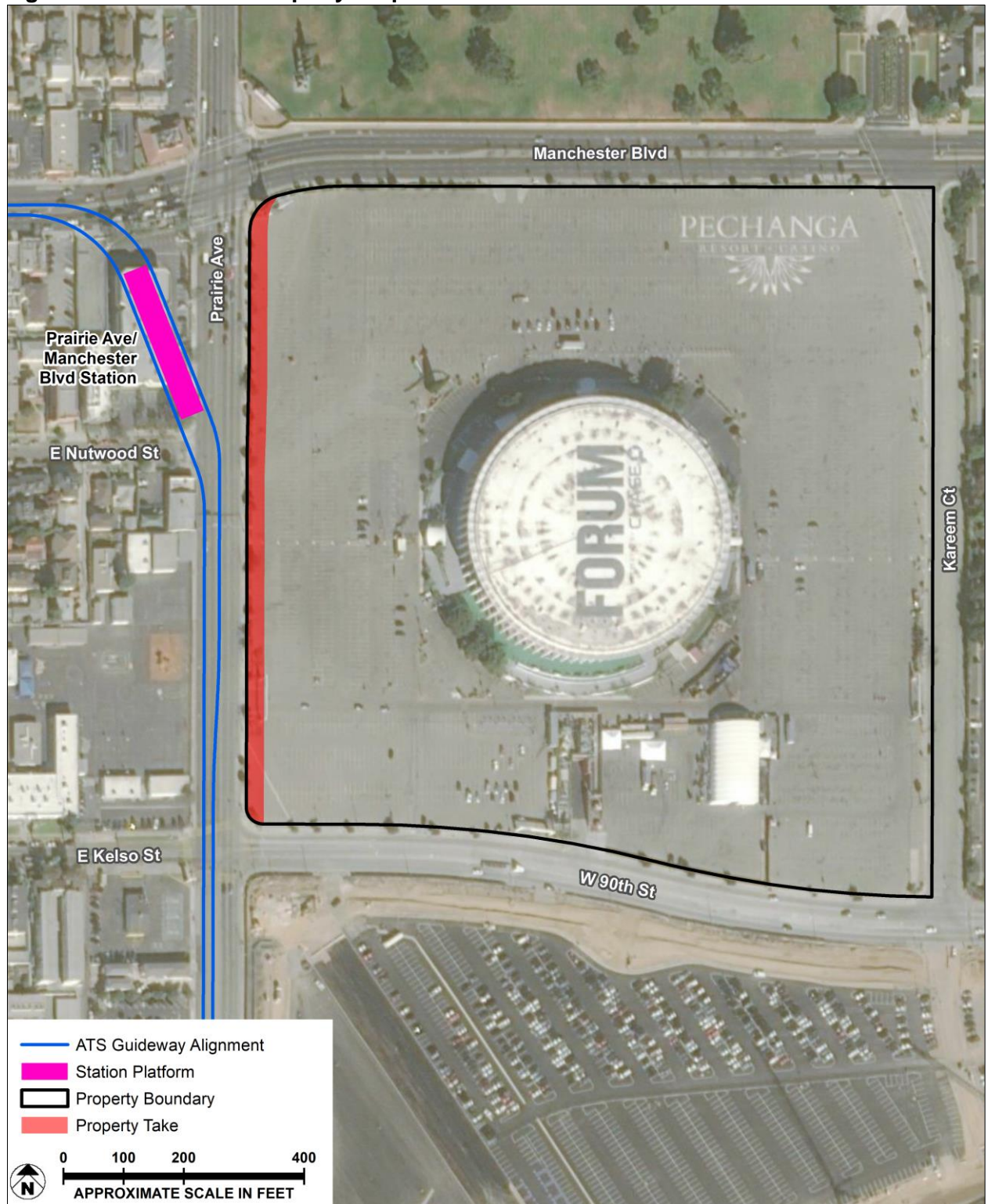
**De Minimis Impact.** A portion of the parking lot on The Forum property would be used and reconfigured to accommodate proposed relocation of traffic lanes along Prairie Avenue, straddle bent support columns, and the proposed pedestrian bridge from the Manchester Boulevard/Prairie Avenue Station. Proposed encroachment into the parking lot associated with the relocated traffic lanes, straddle bent support columns, and pedestrian bridge is anticipated to use no more than a 30-foot-wide strip of the existing property for the length of the property's western boundary, or approximately 0.7 acres of the approximately 29-acre property. Figure 4-1 depicts the anticipated area to be used by the Project.

No alterations or other effects to The Forum building would occur. Any potential groundborne vibration impacts from construction would be avoided or repaired with implementation of the CCP and Avoidance Measure NV-4. While the parking lot is defined in the National Register nomination as one of The Forum's character-defining features, alterations posed by the Build Alternative would not affect the parking lot's overall character—namely, an expansive, on-grade, asphalt-paved parking area surrounding The Forum building on all sides. Additionally, an elevated pedestrian bridge would provide a connection between The Forum and the Manchester Boulevard / Prairie Station. The footing of the proposed pedestrian bridge would be constructed within the 30-foot-wide acquisition area along the property's western edge. The new pedestrian bridge would be situated along the property's western edge, and thus there would remain a substantial physical distance between the proposed Project components and The Forum building itself (more than 300 feet). Thus, the proposed Project would not alter the relationship between The Forum building and its immediate surroundings in any meaningful way. Views of The Forum from Prairie Avenue (both the sidewalk and the roadway) would remain largely unobstructed with minimal impairment.





**Figure 4-1: The Forum Property Acquisition**



Despite the direct use of approximately 0.7 acre of The Forum property and alterations to the parking lot, The Forum property would retain its essential character as a large circular building set at the center of a sprawling, generally open site with largely unobstructed views from all sides. Important features of The Forum's setting are limited mainly to the property itself, including the expansive surface parking area surrounding the building on all sides. Because the proposed Project would not physically alter The Forum building; would not block or obscure important views of The Forum building; and would only alter a small portion of The Forum parking lot; the proposed Project would not result in a substantial adverse change in the significance of the historical resource and effects on The Forum would not be adverse. On-going design of the Build Alternative would be governed, in part, by Design Standards and Guidelines which among other requirements includes contextual design considerations for the placement of proposed straddle bent support columns near historic resources such as The Forum, massing considerations for proposed elevated walkways, and sidewalk/streetscape design requirements. Given that no adverse effect to The Forum property is anticipated, the relatively minor use of The Forum parking lot, and application of proposed Design Standards and Guidelines, the Build Alternative would involve a *de minimis* impact to The Forum.

**Use Determination:** *De minimis* Impact.

## 4.2 COORDINATION ACTIVITIES

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The *de minimis* impact description for The Forum contained in this report is included in the Inglewood Transit Connector Project Environmental Assessment prepared pursuant to the National Environmental Policy Act. The Environmental Assessment will be made available for agency and public comment. FTA will solicit public feedback on the *de minimis* determination for The Forum. In addition, FTA is coordinating with the SHPO throughout the Section 106 process and has consulted with the following interested parties to solicit feedback and address concerns, where feasible:

- California African American Museum
- California Preservation Foundation
- Centinela Historical Complex
- City of Inglewood Parks, Recreation and Community Services Department
- Inglewood Historic Preservation Alliance
- Los Angeles Conservancy
- Los Angeles Historic Theatre Foundation
- National Trust for Historic Preservation

FTA has notified the SHPO of its intent to make a *de minimis* impact determination based on SHPO's concurrence with the Section 106 No Adverse Effect determination. More detail on the coordination performed as part of the Section 106 process can be found in the Identification of Historic Properties Report.