

**APPENDIX 6**

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EVALUATION DEMONSTRATING NO IMPACTS  
TO SOUTHWEST MUSEUM AND COLLECTION



## APPENDIX 6

### TECHNICAL MEMORANDUM REGARDING SOUTHWEST MUSEUM AND COLLECTIONS

Margarita Wuellner, Ph.D., of PCR Services Corporation (PCR) has reviewed the written public comments regarding potential impacts to the Southwest Museum and collections for the proposed Autry National Center's Griffith Park Campus Improvement Project. In order to more fully address the concerns expressed in the written public comments, PCR conducted a site visit, interviews with key museum personnel, and archival research on the history of the Southwest Museum and its collections. Specific research was conducted on the buildings, collections, original mission and evolution of the museum, exhibition history, integrity of the gallery and exhibition areas, and the current disposition of the collections including conservation, management and research/public access. The primary goal of the research was to determine whether or not the collections contribute to the significance of the Southwest Museum as a historical resource under CEQA. The potential significance of the collections themselves was also assessed, in order to determine whether potential impacts to the collections that may be posed by their proposed relocation must be considered to comply with CEQA. Analysis and resolution of both goals are provided below.

#### 1. Contribution of Collections to Significance of the Southwest Museum

To answer the question of whether the collections contribute to the significance of the Southwest Museum, it was necessary to investigate whether or not the original design of the Museum included specifications for the exhibition/display of specific collections or objects as part of the architectural program for the building, and in addition, to study how the objects in the collections were exhibited or displayed in the museum. These investigations assessed whether or not there is an important relationship between the museum building and the collections housed in the museum that may contribute to the significance of the Southwest Museum as a historical resource.

The Southwest Museum was listed on the National Register of Historic Places on March 11, 2004,<sup>1</sup> and was also listed in the California Register of Historical Resources.<sup>2</sup> The Southwest Museum was determined significant under National Register Criterion B, for its association with important local figure Charles Fletcher Lummis, and under Criterion C, as a prime representation of the Spanish Colonial Revival style as developed by prominent local architect Sumner Hunt.<sup>3</sup>

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<sup>1</sup> *National Register of Historic Places, National Park Service, registered properties, accessed via the world-wide web at [http://www.nr.nps.gov/iwisapi/explorer.dll?IWS\\_SCHEMA=NRIS1&IWS\\_LOGIN=1&IWS\\_REPORT=100000044](http://www.nr.nps.gov/iwisapi/explorer.dll?IWS_SCHEMA=NRIS1&IWS_LOGIN=1&IWS_REPORT=100000044).*

<sup>2</sup> *Letter, Milford Wayne Donaldson to Southwest Museum, August 7, 2007, on file, Southwest Museum. The Southwest Museum building is also a designated City of Los Angeles Cultural-Historic Monument, adopted August, 29, 1984.*

<sup>3</sup> *Charlie Fisher, Teresa Grimes, Barbara Hoff, Sandy Levis, and Jennifer Schroder, "Southwest Museum, Los Angeles, California," National Register of Historic Places Registration Form prepared by the Los Angeles Conservancy, May 23, 1992 (2<sup>nd</sup> Draft), certified by the California Office of Historic Preservation on August 19, 1992.*

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On January 19, 2007, prior to the designation, the Autry National Center submitted an amendment to the National Register nomination for the Southwest Museum, to expand the period of significance from 1912 to 1957, to include the Poole Wing addition by architect Gordon B. Kaufmann under Criterion C, and to include additional significant persons, James A. B. Scherer, Mark R. Harrington, and Frederick Webb Hodge as a part of the nomination under Criterion B.<sup>4</sup> The amendment concluded that the Southwest Museum, founded in 1907, is additionally significant under both Criterion A and B, for its importance in the history of education and archaeology. The amendment establishes the national significance of the Southwest Museum under Criterion A “as a contributor of consequence to the broad pattern and trend of acquisition of knowledge relating to Southwestern United States and Native American cultures and its conveyance through their research, exhibit and publication programs in the United States,” and under Criterion B “due to the property’s association with several persons important to the development of the Southwest Museum, the academic fields of archaeology and ethnology and study of American and Southwestern United States cultures, and museums in the United States with education programs related specifically to Southwestern and Native American material.” However, nowhere in the original nomination prepared by the Los Angeles Conservancy or in the amendment prepared by the Autry National Center are the museum collections or objects in the collections called out as contributing resources as a part of the historic property designation for the Southwest Museum.

It cannot be argued that the collections of the Southwest Museum are, themselves, historical resources under the National Register. To be eligible for the National Register, a resource must be significant and must have integrity (National Register Bulletin Nos. 15, 16). National Register Bulletin No. 15 defines the term “object” as follows:

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.<sup>5</sup>

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.<sup>6</sup>

<sup>4</sup> David Burton, “Southwest Museum (Amendment), Los Angeles, California,” *Draft National Register of Historic Places Registration Form, on file in the Southwest Museum. Letter, Milford Wayne Donaldson to David Burton, March 19, 2007, regarding “National Register of Historic Places Nomination for Southwest Museum (Amendment),” stating the State Historical Resources Commission (SHRC) intended to consider and take action on the nomination of the Southwest Museum to the National Register at the May 3, 2007 meeting of the SHRC. On file, Southwest Museum.*

<sup>5</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (Washington, D.C.: U.S. Department of the Interior, National Park Service, 1990; Revised 1991, 1995, 1997; revised for Internet 1995), p. 5.

<sup>6</sup> *Ibid.*

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Finally, the National Register specifically does not include objects relocated to a museum, including the Southwest:

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.<sup>7</sup>

No evidence was uncovered during these investigations that suggests the original architectural program for the Museum was designed for the display of specific permanent exhibits or objects that were incorporated as a part of the project by the architect Sumner Hunt or the museum's founder, Charles Fletcher Lummis, who worked closely with Hunt on the design concept.<sup>8</sup> In fact, documentary evidence shows there was originally no direct relationship between the design of the original Museum building and specific collections or objects. Rather, the evidence shows that the architectural program was primarily defined by use (library, galleries, storage, offices, curator's apartment), and it was expected the museum would grow over time. While galleries and display areas were certainly included as a part of the original building design, there was no specific defined relationship between certain distinctive collections or objects and the museum building. In other words, the museum building was not designed specifically for the display of certain distinctive collections, objects, or permanent exhibitions/displays. Rather, it appears to have been designed as a collections repository and research center that provided facilities for scholars and the community in the central pavilion and the Caracol and Torrance towers.<sup>9</sup> The collections were placed in display cabinets or on display tables, hung on the wall, or stored on shelves.<sup>10</sup> Their manner of organization and presentation was generally typical of early twentieth-century museums where objects were classified by type and presented with little interpretation.<sup>11</sup>

Furthermore, there is substantial documentary evidence that shows the use of the building has changed and evolved over the years. Early museum guides, annual reports and historic

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<sup>7</sup> *Ibid.* See also *National Register Bulletin 16A*, page 15-41, and page 48.

<sup>8</sup> Letter, Sumner Hunt to Charles F. Lummis, July 19, 1926, on file, Braun Research Library. See also "Superintendent's Report of Construction of the Southwest Museum up to February 10, 1914," on file, Braun Research Library.

<sup>9</sup> The Caracol Tower was a name bestowed upon the highest tower by Lummis, in reference to the winding (caracol) staircase at its center. The Torrance Tower was named for benefactor Jared S. Torrance, a Pasadena who was active in Southern California's development and one of the museum's most generous friends. W. W. Robinson, *The Story of the Southwest Museum* (Los Angeles: Ward Ritchie Press, 1960), 16.

<sup>10</sup> Typed manuscript description of the wall recesses and exhibit cases, on file, Braun Research Library. See also, "Report of the Superintendent of Construction and Secretary of the Southwest Museum," July 6, 1914, on file Braun Research Library; "Report of the Superintendent of Construction," April 30, 1914, on file, Braun Research Library.

<sup>11</sup> Charles F. Lummis, "The Southwest Museum," 3<sup>rd</sup> Bulletin, 1907. Norman Bridge, "Address at the Memorial-Stone Laying Southwest Museum, Los Angeles, California," December 6, 1913. Historic photographs of the Southwest Museum on file, Braun Research Library. W. W. Robinson, *The Story of the Southwest Museum* (Los Angeles: The Ward Ritchie Press, 1960). Daniela P. Moneta, *Charles F. Lummis-The Centennial Exhibition Commemorating His Tramp Across the Continent* (Los Angeles: Southwest Museum, 1985).

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photographs show that the exhibits were changed frequently, and the uses of the spaces in the building have also changed over time.<sup>12</sup> Therefore, the relationship between the original building (Caracol Tower, Torrance Tower and Main Pavilion) and the location and display of the collections has substantially changed over the years. For example, the original niches are still extant in the walls of the two main galleries (upper level east and west of the main staircase in the pavilion), where the free-standing wood display cabinets were located; however, only a few cabinets survive (not in situ) and the annual reports and historic photographs show that the contents/displays in the cabinets changed many times over the years. The original museum building itself, however, retains a high degree of architectural integrity.

In contrast, there are only a few specific areas in the larger museum complex that retain a high degree of integrity with regard to the relationship between the building and the location and display of the collections.<sup>13</sup> Presently, there are three areas within the larger museum complex where there exists a direct relationship between the distinctive collections and building use. A discussion of these areas and the collections within these areas is provided below.

1. The Caroline Boeing Poole Wing of Basketry was designed in 1938-41 by architect Gordon B. Kaufmann and was the first addition to the museum since 1920 (see below). The wing was created in great part to house the extensive basketry collection donated to the Southwest Museum by Mr. and Mrs. John Hudson Poole, who financed the wing's construction. Hence, there is a direct relationship between the Poole Wing building and the Poole basketry collection which it was intended to house.<sup>14</sup> The Poole Wing is located in approximately the same location as an "east wing" designed by Hunt and Burns in their Scheme II plans for the Museum that was never built, and evokes the original 1910-1912 architectural vision for the Museum by architecturally complimenting but not imitating the Main building. There have been some minor changes in the design and layout of the exhibits in the second-floor exhibit hall of the Poole Wing; however,

<sup>12</sup> "The Southwest Museum," museum guide, ca. 1918, on file Braun Research Library. *The Southwest Museum Bulletin, Annual Report for the Year 1926* (Los Angeles: Southwest Museum, 1927). *The Southwest Museum Bulletin: A Declaration of Policy* (Los Angeles: The Southwest Museum, 1926). Thomas H. Wilson, *F. W. Hodge and the Southwest Museum 1932-1955* (The Author, 1994). Donovan Lee Clark, "A History of the Southwest Museum 1905-1955," Master's Thesis (Claremont Graduate School, 1956).

<sup>13</sup> The early history of the Southwest Museum collections is described and documented in Shepard Krech III and Barbara A. Hail, *Collecting Native America 1870-1960*, (Washington and London: Smithsonian Institution Press, 1999), as well as in the numerous historic images depicting the collections over the years in the Braun Research Library archives. Other sources documenting the disposition and appearance of the collections include, Richard F. Bach, "The Southwest Museum, Los Angeles, California," *Architectural Record*, July 1925. As a part of the research conducted by Brenda Levin for the Southwest Rehabilitation Study, a chronology of the layout and location of the collections in the Southwest Museum building was developed by Brenda Levin, manuscript notes on file in the Braun Research Library. See also the *Southwest Museum Handbook*, ca. 1938.

<sup>14</sup> The conditions of the gift of the basketry collection to the Southwest Museum require that the collection remain on permanent display in the Poole Wing.

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the original display cases along the walls are still extant. The first floor of the Poole Wing was originally designed as a storage area with a staff bathroom and workroom, and is still used for this purpose. Overall, the Poole Wing retains a high degree of architectural integrity and the exterior of the building remains essentially unchanged. Due to its architecture, the Poole Wing was included in the Amendment to the National Register Nomination for the Southwest Museum, and is a historical resource under CEQA.<sup>15</sup> The basketry collection, however, was not included as a contributing resource in the nomination, and therefore is not a historical resource under CEQA.

Due to its semi-subterranean nature, the Poole Wing has become subject to rising dampness. As a result, the Poole Basketry Collection can no longer remain in the Poole Wing and will be relocated to Griffith Park for proper care and storage. The Poole Collection will be moved in a proper and legal fashion so as to not violate the original gift. Relocation of the Poole Collection will ensure the proper care of the Poole Collection and such relocation will not materially impair the Poole Wing.

2. In 1919-1920, a tunnel and elevator, known as “the subway,” were added to provide more convenient access to the museum. Prior to that time the only visitor approach was up a pathway from Museum Drive. The tunnel portal, designed by the architectural firm of Allison and Allison with Marguerite Tew, is an excellent example of Mayan Revival architecture and was included in the National Register Nomination for the Southwest Museum. The tunnel portal is, therefore, a historical resource under CEQA. The niches and glass cases for the dioramas formerly exhibited in the subway tunnel are still extant. The dioramas have been removed for conservation purposes because the subway tunnel is currently not a stable environment due to water leaks, fluctuations in humidity, and temperature. The dioramas will be returned once the tunnel is satisfactorily waterproofed. There are additional dioramas that are also in storage, all of which were either damaged or at risk of damage in the rainstorms of 2004. The dioramas are not accessioned artifacts in the Collection; they were regarded by the museum more as features of the building and Museum. It is the Autry’s current intention that they should return to the building when all structural work is complete. The dioramas themselves are not noted as significant in the original National Register nomination, wherein the tunnel portal is identified as a contributing significant feature for its architectural importance as an example of the exotic revival styles of the 1920s. The dioramas are not mentioned in the Amendment.

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<sup>15</sup> Gordon B. Kaufmann, “New Wing for the Display of the Caroline Boeing Poole Collection of American Indian Basketry. Col. John Hudson Poole, Donor,” architectural rendering on file, Braun Research Library. See also, “Poole Basketry Wing at Southwest Museum Open,” *Museum News*, Vol. 20, no. 10, November 15, 1942; and “The Caroline Boeing Poole Basketry Wing,” in *The Masterkey*, June 1943.

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3. The Braun Research Library currently houses the museum's extensive library collection. Designed by Glen E. Cook, it was built in 1979 for the purpose of housing a library. The library was originally housed in the Caracol tower, but eventually outgrew the space.<sup>16</sup> Neither the Braun Research Library nor its materials were included in the National Register Nomination for the Southwest Museum or the Amendment, and therefore are not considered a historical resource under CEQA.<sup>17</sup> Thus, relocation of materials from the Braun Library to the Institute Library in Griffith Park would not have the potential to materially impair a historic resource.

Based on the above, the proposed relocation of portions of the Southwest collections will not materially impair any historic resources within the Southwest Museum. In addition, none of the artifacts within the areas of the Southwest Museum above have been previously set forth as contributing resources within the Southwest Museum.

### **2. Collection as a Historical Resource**

PCR also investigated the question of whether or not the Southwest Museum's collections (Collection) could be considered individual or contributing historical resources under CEQA. The Southwest's Collection totals in excess of 250,000 archaeological and ethnographic items from all parts of North America. The Southwest Museum Collection is particularly strong in material from the Great Plains, Southwest, California, and the Northwest Coast. In some categories--such as Native American baskets as well as ceramics, kachinas, and textiles--the Collection is unsurpassed. In addition, the Collection includes 125,000 archaeological items, 6,000 Spanish Colonial artifacts, and 4,000 two-dimensional works of art.<sup>18</sup> With regard to the potential National Register significance of excavated archaeological artifacts removed from their original site and context and

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<sup>16</sup> *The Caracol Tower is currently vacant. The Caracol Tower sustained structural damage from the Northridge earthquake and is currently undergoing rehabilitation. The extensive collections formerly located in the Caracol Tower have been removed for conservation purposes and are currently safely stored in other areas of the building.*

<sup>17</sup> *Under the California Code of Regulations, Title 14, Chapter 3, 15064.5 (a)(3), any object, building, structure, site, area, place, record, or manuscript which meets the criteria for listing in the California Register of Historical Resources shall be considered a historical resource under CEQA. It is possible that certain records and manuscripts in the Braun Research Library may be considered historical resources under CEQA; however, these records or manuscripts would be significant in and of themselves as individual resources, and not necessarily for their association with the Southwest Museum or the Braun Library. Under the merger between the Autry and the Southwest Museum, the Braun Research Library retains its identity as a part of the Southwest Museum. The unique identity of the Braun Research Library is also maintained in the cataloging system, which clearly differentiates items in the Braun Research Library collection from those in the Autry National Center's other library collections. For the history of the library, see Patricia A. Butz, "A Selected History of the Braun Research Library of the Southwest Museum, Los Angeles, California," manuscript on file, Braun Research Library. See also, "The Braun Research Library," brochure published by the Southwest Museum. See also a description of design for the Munk Library in the Caracol Tower, typed manuscript, March 26, 1914, on file, Braun Research Library.*

<sup>18</sup> *Duane King, "Glorius Treasures: 100 Years of Collecting by the Southwest Museum: The Collection and Collectors," Spur, XVI, 4 (October-December 2003), p. 5.*

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curated for future use in research, interpretation, preservation, and resource management activities such as in a museum, the artifacts/objects recovered from an archaeological site would be important insofar as they contribute to the significance of their original site of origin.

*National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, is abundantly clear, under “Partly Excavated or Disturbed Properties” (page 23), and “Completely Excavated Sites” (page 24), that it is the site and its potential to yield important information which constitutes an historic property under Criterion D, not the artifact, object, or data assemblage recovered from the site.<sup>19</sup> A property that has been excavated may still be eligible for the National Register under Criterion D if the data recovered was of such importance that it influenced the direction of research in the discipline. However, completely excavated archaeological sites must be assessed essentially as historic sites under Criterion A, for their associative values related to the importance of the data gained, or the impact of the property’s role in the development of anthropology/archaeology. In either case, the excavated site is the historic property, not the collection or assemblage of artifacts or objects recovered from the site. The *Secretary of the Interior’s Standards and Guidelines for Archaeological Documentation*, provide guidance for archaeological documentation, data recovery and curation, and are intended to preserve the important information contained within the site.<sup>20</sup> However, once again it is the preservation of the integrity of the site or property that is the focus of documentation, recovery and curation activities under the *Standards*, and not the artifacts or assemblages recovered from the site or property. The recovered artifacts or excavated assemblages are considered as part of the site or property, and are not individual historical resources in their own right.<sup>21</sup>

## CONCLUSION

As discussed above, while the Southwest Museum collections are certainly well recognized for their importance in the history of archaeology and education, they cannot be designated individual or contributing historical resources as a part of the Southwest Museum under the National Register. These collections are certainly important for their information and/or aesthetic value, and as such may contribute to the significance of the site, property or place from which the objects/artifacts were recovered, but the objects/artifacts and assemblages of artifacts/objects cannot legally be considered contributing historical resources as a part of the Southwest Museum under CEQA. Under the merger agreement with the Autry, the Southwest Museum retains its unique identity as an institutional entity within the Autry National Center. The unique identity of the

<sup>19</sup> National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (Washington, D.C.: U.S. Department of the Interior, National Park Service, 1990; Revised 1991, 1995, 1997; revised for Internet 1995).

<sup>20</sup> Archaeology and Historic Preservation: Secretary of the Interior’s Standards and Guidelines [As Amended and Annotated] (Washington, D.C.: U.S. Department of the Interior, National Park Service), Internet version accessed 12/12/2007, [http://nps.gov/history/local-law/arch\\_stands\\_7.htm](http://nps.gov/history/local-law/arch_stands_7.htm).

<sup>21</sup> This is also confirmed by National Register Bulletin 36: Guidelines for Evaluating and Registering Archeological Properties (Washington, D.C.: U.S. Department of the Interior, National Park Service, 2000).

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Southwest Museum collections is being retained because the objects in collections and the collections themselves are clearly identified as a part of the Southwest Museum as a distinct organizational or institutional entity, and are differentiated from other collections of the Autry National Center, thus retaining their significant associations in the history of archaeology and education with the Southwest Museum organization. It is important to note that the Southwest Museum, as an organization or institution, was first founded and incorporated in 1907 after four years of work on the part of its predecessor organization, the Southwest Society, founded in 1903 by Charles Lummis. The Society's meetings were held in Lummis' Arroyo Seco home and in the Pacific Electric Building in Los Angeles where the collections were first housed. In 1908, the Museum collections were given free quarters on the sixth floor of the Hamburger Building at Eighth and Broadway in Los Angeles, by department store owner M. A. Hamburger and president of the Southwest Society. The collections remained there until the present museum was completed on Museum Hill. The collections of the Southwest Museum were taken from the Hamburger Building to the new Museum on July 16, 1914. The present Museum opened its doors on Monday, August 13, 1914.<sup>22</sup>

The objects in the Southwest Museum collections are currently being appropriately maintained in accordance with national laws, regulations, policies and ethics,<sup>23</sup> and are being preserved, conserved and curated according to state-of-the art museum and conservation practices and standards which are established by the American Association of Museums. The Autry National Center plans to dedicate the Sprague Gallery and Van Nuys Galleries for exhibits of the collections of the Southwest Museum. While portions of the Southwest Museum collections would be relocated to the Griffith Park site, they would be preserved, conserved and curated in a new facility designed specifically for this purpose under the best available museum conditions currently technologically and scientifically possible. Relocation will not impair the ability of any of the collections relocated from the original museum building to the Griffith Park site to convey their unique identity as a part of the institution known as the Southwest Museum of the American Indian, which retains its unique institutional identity under the "Agreement and Plan of Merger" between the Gene Autry Western Heritage Museum and the Southwest Museum. The institutional affiliation of the Southwest Museum collections is reflected at all levels in the collections catalog, labels, and registration documents of the Southwest Museum of the American Indian, which is distinguished from the Autry National Center of the American West.<sup>24</sup>

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<sup>22</sup> *Robinson, Story of the Southwest Museum, 6-16.*

<sup>23</sup> *See the National Park Service guidelines, NPS Archaeology Program: Managing Archaeological Collections, [http://www.nps.gov/history/archeology/collections/coll\\_07.htm](http://www.nps.gov/history/archeology/collections/coll_07.htm).*

<sup>24</sup> *Agreement and Plan of Merger (Autry National Center of the American West), March 4, 2003, between the Autry Western Heritage Museum and the Southwest Museum, on file, Autry National Center. "Autry and Southwest museums seal a deal," Los Angeles Times, newspaper clipping on file, Braun Research Library. Personal interview with Duane King, Kim Walters, and Faith Raiguel, December 6, 2007.*

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The Southwest Museum complex will be rehabilitated, and this much-needed rehabilitation is currently underway as a part of a separate project<sup>25</sup> to preserve and restore the character-defining features of the Southwest Museum, and to provide for the future use of the facility for the display and interpretation of the Southwest Museum collections to the public. Access to the Southwest Museum collections relocated to the Griffith Park site would be provided under better conditions than is presently possible at the current location, where conditions are not optimum for storage of these fragile objects. The identity, integrity and important historical associations of the Southwest Museum collections would be retained under the proposed project.

Therefore, pursuant to CEQA, the proposed project would not result in a significant impact to the Southwest Museum collections.

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<sup>25</sup> *The rehabilitation of the Southwest Museum, already underway, is not a part of the proposed Autry National Center's Griffith Park Campus Improvements Project. The rehabilitation is being conducted in accordance with the recommendations in the Southwest Museum Rehabilitation Study prepared by Levin & Associates, Architects, which was reviewed by PCR and is on file in the Braun Research Library. In addition, PCR reviewed the research files compiled by Brenda Levin, on file in the Braun Research Library. See also, Levin and Associates, and Kathryn Smith, "The Southwest Museum Historic Structures Report," June 2003, on file Braun Research Library.*