
IV. ENVIRONMENTAL IMPACT ANALYSIS

E. CULTURAL RESOURCES

The following analysis pertaining to historic resources is based on the Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts, Final, Hollywood Park Project, California, July 24, 2007. This report is included in its entirety as Appendix E-1 of this Draft EIR. The analysis pertaining to archaeological and paleontological resources is based on the results of a Cultural Resources Records Search for the Hollywood Park Redevelopment Project, City of Inglewood, provided by the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology, dated July 24, 2007. The Cultural Resources Records Search is included in its entirety as Appendix E-2 of this Draft EIR.

ENVIRONMENTAL SETTING

Regulatory Setting

National Register of Historic Places

The National Register of Historic Places (National Register) is “an authoritative guide to be used by 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.” The National Register is administered by the National Park Service, which is part of the U.S. Department of the Interior. Typically, to be eligible for listing in the National Register, a property must be at least fifty years of age and possess significance in American history and culture, architecture, or archaeology. However, properties under fifty years of age can be determined eligible for listing if it can be determined that they are of “exceptional importance,” or if they are contributors to a potential historic district. Properties may qualify for the National Register when they meet any of four basic criteria:

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

A final critical component of eligibility is integrity. Integrity is the ability of a property to convey its significance and whether the property retains the identity, including physical and visual attributes, for

which it is significant under the four basic criteria. The National Register criteria recognize seven aspects or qualities of integrity: location, design, setting, materials, workmanship, feeling, and association.

California Register of Historical Places

The California Register of Historical Resources (California Register) is a state version of the National Register of Historic Places program. The California Register of Historical Resources was enacted in 1992, and became official January 1, 1998. The criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. The California Register also requires application of integrity of criteria paralleling National Register criteria, as described above, with one exception. Title 14 of California Code of Regulations §4852 (c) provides, "It is possible that historical resources may not retain sufficient integrity to qualify to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." OHP has consistently interpreted this provision to require substantial integrity.

California State Historical Building Code

The California State Historical Building Code (SHBC)¹ protects California's architectural heritage by providing alternative building regulations for the rehabilitation, preservation, restoration or relocation of structures designated as historic buildings. SHBC regulations are intended to facilitate restoration or accommodate change of occupancy so as to preserve a historic structure's original or restored architectural elements and features. While the code provides for a cost-effective approach to preservation, it also provides for occupant safety, encourages energy conservation and facilitates access for people with disabilities. To be qualified, designation must come from federal, state or local authority and be given any level of significance other than "not eligible". Listed below are some of the issues the SHBC addresses, with the intent of encouraging sensitive and cost-effective rehabilitation:

- Accessibility - Both the Americans with Disabilities Act and the SHBC make provisions for reasonable levels of equivalency for, and - under special circumstances - exemption from, accessibility mandates.
- Seismic/Structural - SHBC governs these issues, permitting design based on real values of archaic materials, and solutions based on engineering principles and judgment rather than on prescriptive formulas.
- Energy - Qualified historic buildings are exempt from California energy standards, which most vintage structures cannot meet without alteration or loss of historic features.

¹ Quoted in part from information contained on the State Architect's website, including material available at:
http://www.dsa.dgs.ca.gov/SHBSB/shbsb_general.asp and,
http://www.dsa.dgs.ca.gov/SHBSB/shbsb_incentives.asp.

- Triggers - The “triggers” for full upgrading to current standards, with respect to length of vacancy, change of occupancy, or percentage of value of the work proposed, and which exist in other codes, are not recognized by the SHBC, which concentrates instead on the sensitive resolution of genuine safety considerations.

Architectural Context and Environmental Setting

History of Inglewood

Prior to the arrival of the Spanish in California, the Los Angeles basin was inhabited by the Gabrielino Indians. The earlier explorers to the region arrived in 1769 with the Gaspar de Portola Expedition. In 1781, Mexican settlers under the direction of Spanish Governor Felipe de Neve founded El Pueblo de La Reina de Los Angeles. The vast acreage surrounding the pueblo in all directions was divided into numerous ranchos of various sizes during the Mexican period (1822 - 1848). The San Francisquito, Potrero Grande, and San Antonio ranchos were established east of the pueblo. Portions of the land to the north of the pueblo became part of Rancho San Rafael. The area in which the City of Inglewood is now located was part of the Rancho Aguahe de la Centinela and the Rancho Sausal Ranando. Of these two ranchos, the former was especially well known for its Centinela Springs, an abundant water source that supported vast pasture lands in the immediate area. Ignacio Machado was one of the first to settle permanently in the Rancho Aguahe de la Centinela, constructing what is today known as the still extant Centinela Adobe in 1834 for his growing family.

In 1850, California was admitted as the 31st state in the Union and, in the same year, the City of Los Angeles was formally incorporated. Many Americans flocked to California in hopes of finding gold. During the 1860s and 1870s, land to the west and north of the present-day Harbor Freeway (State Highway 110) was settled as Los Angeles began to expand. By the 1880s, southern California began attracting Midwesterners and Easterners with its new railroad lines. Streetcars also made possible development of residential neighborhoods beyond downtown Los Angeles during the late 1880s and early 1890s.

Ignacio Machado traded the Centinela Rancho to Bruno Avila in exchange for a modest parcel with a three-room house near downtown Los Angeles in the late 1840s. Avila lost the rancho to American Hilliard Dorsey in foreclosure for an unpaid mortgage loan. The property went through a number of hands in the following decades until Daniel Freeman, a young lawyer from Canada, obtained title to the now vast 25,000 acre ranch. Following the severe 1875-76 drought and the loss of a majority of his sheep, Freeman switched to the dry farming of barley and wheat. Freeman’s great success in dry farming and the nationwide export of his crops soon made him wealthy, leading to his prominence as the second president of the Los Angeles Chamber of Commerce and a charter member of the exclusive California Club. With the advent of the 1880s Southern California real estate boom, Freeman established the Inglewood-Centinela Land Company and sold 11,000 of his acres for development. In 1888, despite the recent collapse of the real estate market, the town of Inglewood was established.

For the next twenty years, until Inglewood was incorporated as a City in 1908, the town was known primarily as a rural agricultural community with a small downtown and less than 1,200 residents. However, the events of a few years earlier, in 1905, would have a profound impact on the growth of Inglewood in the coming decades. That year saw the arrival of Henry Huntington's Pacific Electric interurban railway with its famous red cars to Inglewood. As with other Southern California communities through which the red cars traversed, convenient access to Los Angeles and nearby recreational beach areas would make Inglewood a desirable suburban location for residential development. Also in 1905, the sprawling Inglewood Park Cemetery was established within the city limits. At the same time, an unusual Poultry Colony with its newly arrived colonists was established in North Inglewood that would become the City's chief industry for several decades.

During the first quarter of the 20th Century, the success of the motion picture business, discovery of oil within the region, a successful citrus industry, and a booming real estate market continued to entice immigrants, particularly Midwesterners, to the Los Angeles region. In 1920, a localized earthquake struck Inglewood that damaged a number of brick masonry buildings in the City. As a result, thousands of curious Angelenos arrived in the following days to witness the damage, which, it is said, led to a two-year doubling of its 3,286 population by visitors who returned to settle in the city. As Inglewood continued to grow economically and in population during the booming 1920s, it still retained its agricultural roots. In 1925, a Chinchilla farm was established that became a highly successful business and tourist attraction, achieving nationwide renown. The City of Los Angeles leased Inglewood's Andrew Bennett Ranch near the Pacific Ocean in 1927 for conversion into Mines Field (later LAX), a modest airport that hosted National Air Races starting in 1928 in which Charles Lindbergh was one of the flyers.

The Great Depression of the 1930s slowed Inglewood's growth, as it did in many communities of the Los Angeles region. Nonetheless, the 1932 Olympic Games, hosted by Los Angeles, saw three Inglewood High School alumni become medal winners (which is the origin of the City's slogan, "The City of Champions"). Following the approval of horse racing by the California State Legislature in 1933, Hollywood Park (the subject property) became the second thoroughbred racing complex to open in Los Angeles County in 1938. The first horse racing complex was Santa Anita in 1934.

Situated just south of the Inglewood city limits, Hollywood Park was a spectacular magnet for bringing attention to the Inglewood area due to the track's Hollywood celebrity connections. World War II served as the final catalyst in transforming the remaining remnants of Inglewood's agricultural past into wartime manufacturing plants and residential housing for thousands of newly arriving defense workers. After the war, Inglewood became a densely populated bedroom community similar to numerous others spread across the Los Angeles region. During the 1960s and 1970s, Inglewood became increasingly racially integrated following the outlawing of racial covenants in 1948. It also became known as the home of the Los Angeles Lakers basketball team following the construction of The Forum sports arena in 1967. A large new Civic Center containing City Hall, police and fire department headquarters, main library, County Courts, and County health facilities was constructed in 1973. Since that time, numerous businesses associated with the rapidly expanding air freight industry have located in Inglewood. Today, the City boasts a population of more than 100,000 residents.

California Racetracks

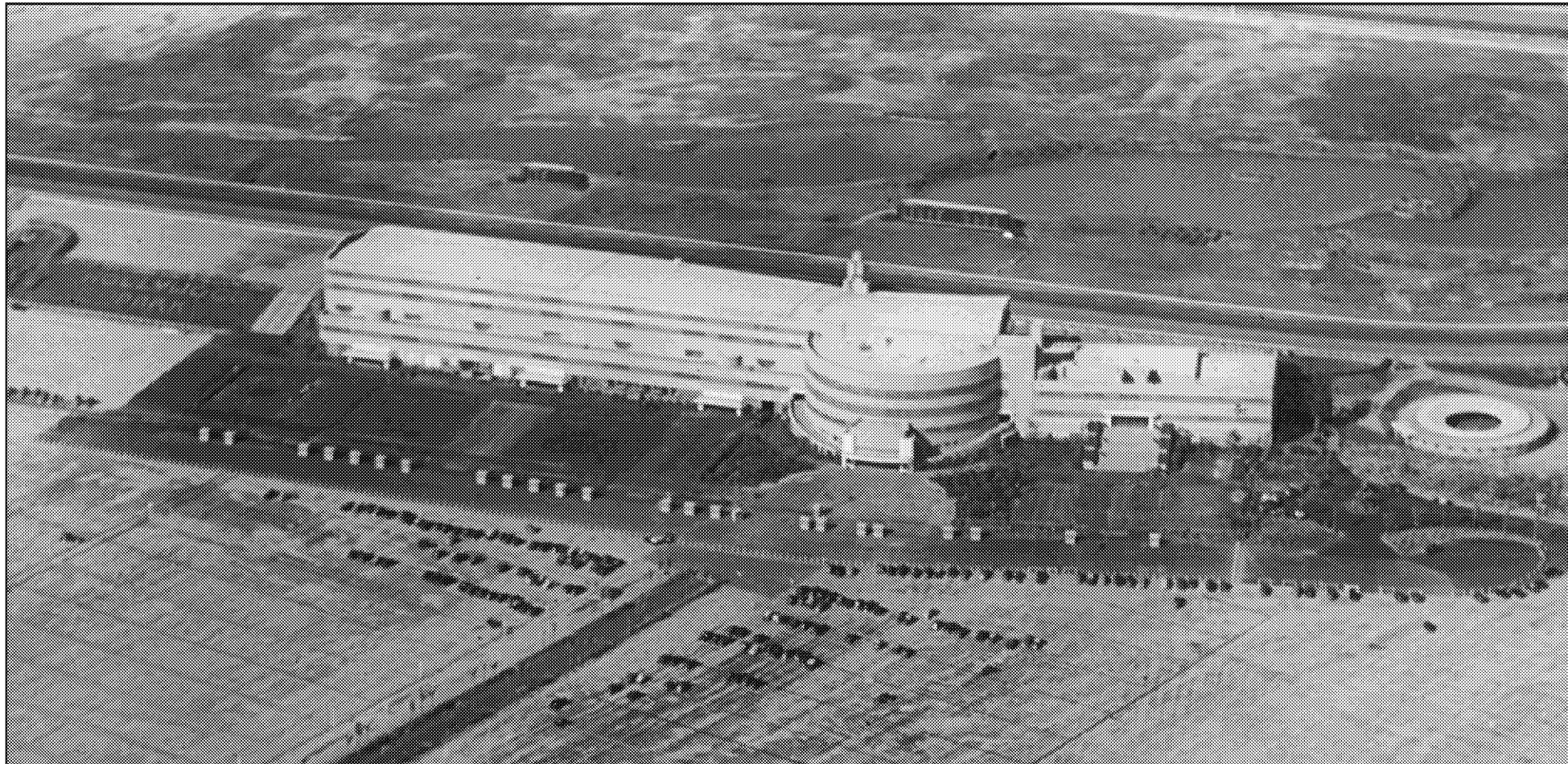
The Great Depression of the 1930s was the catalyst necessary for the California state legislature to support the 1933 bill to legalize horse racing following a twenty-five year hiatus. The stated purpose of the racing law was the “encouragement of agriculture and breeding of horses,” and included a provision for the continuous funding of California’s County Fairs with a four percent annual allotment of racing revenues to be used for health, safety, and maintenance projects of the fairs and fairgrounds. Additionally, the new law regulated pari-mutuel wagering under the auspices of a newly established California Horse Racing Board. Further, the 1933 law required that four percent of revenues be earmarked for the benefit of California Polytechnic schools and the University of California. One year later, Bay Meadows Race Track in the San Francisco Bay Area became the state’s first thoroughbred pari-mutuel horse track to be completed. Its opening day was November 3, 1934. Santa Anita Racetrack in the San Gabriel Valley quickly followed Bay Meadows’ opening, becoming Southern California’s first thoroughbred pari-mutuel horse racing facility when it opened on Christmas Day in 1934. Santa Anita’s immediate success served as a beacon to other horseracing aficionados in Southern California, such as Bing Crosby, who along with other investors opened Del Mar Racetrack near San Diego in 1936. One of the movie industry’s most powerful moguls, Jack Warner of Warner Brothers Studios, was impressed with the success of the two tracks and proposed that another horse racing plant, to be known as Hollywood Park (the subject property), be built in Southern California. It opened in 1938. The last of the state’s thoroughbred racetracks to open was Golden Gate Fields near San Francisco in 1941. This sudden spur of interest from investors and racing enthusiasts was consistent with the tenor of the time when horse racing ranked second in popularity with Americans, outranked only by Major League Baseball.

In Southern California, the racing season is currently divided as follows (although there have been modifications to the schedule over the years): Del Mar in summer, Hollywood Park in spring, summer and fall, and Santa Anita in fall and winter.

History of Hollywood Park Racetrack and Turf Club

In 1936, under the leadership of Hollywood’s Jack Warner, the newly formed Hollywood Park Turf Club commenced selling blocks of stock in the venture to stars of the silver screen. Some of the entertainment industry’s most prominent members became investors, including Al Jolson, Ralph Bellamy, Edward G. Robinson, Joe E. Brown, Walt Disney, Daryl Zanuck, Sam Goldwyn, Mervyn LeRoy, and Jack Warner’s brother Harry. In fact, several early investors also started their own stables at this time, including Harry Warner, Mervyn LeRoy (Harry Warner’s son-in-law), Don Ameche, Barbara Stanwyck, and Zeppo Marx. However, the approval of a new track by the California Horse Racing Board was significantly delayed due to a successful lobbying campaign by Santa Anita Racetrack interests. Following several years of protracted struggle, the California Racing Board acquiesced in 1937, and granted a permit for the construction of the Hollywood Park Racetrack. The site chosen was a 315-acre bean field in the semi-rural City of Inglewood located just over the Baldwin Hills from the world’s glamour capital, Hollywood.

The Los Angeles Turf Club commissioned architect Stiles O. Clement to design the new Hollywood Park racetrack (See Figure IV.E-1, Historic Photograph of Hollywood Park, 1938). Opening day at Hollywood



Hollywood Park, 1938.

Source: Huntington Library Photograph Archives.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.E-1
Historic Photograph of Hollywood Park, 1938

Park took place on June 10, 1938, and Hollywood's royalty turned out in full force, thus setting the tone for Hollywood Park as the racetrack of the stars. During the track's first season perhaps the most significant race was the inaugural \$50,000 Hollywood Gold Cup won by the nationally adored racehorse Seabiscuit and witnessed by over 35,000 fans. When the books were closed on that first successful thirty-four-day season at Hollywood Park, the total attendance was 551,333 with an average of almost \$500,000 in daily wagers, known as daily "handle." The animosity between Santa Anita and Hollywood Park continued through the 1939-1941 racing seasons, with each racetrack lobbying state officials for advantages in the number of racing days and seasonal schedules. Despite the bickering, both tracks provided excellent returns to their investors during these years. (see Figure IV.E-2 Historic Photographs of Hollywood Park, circa 1939-1940)

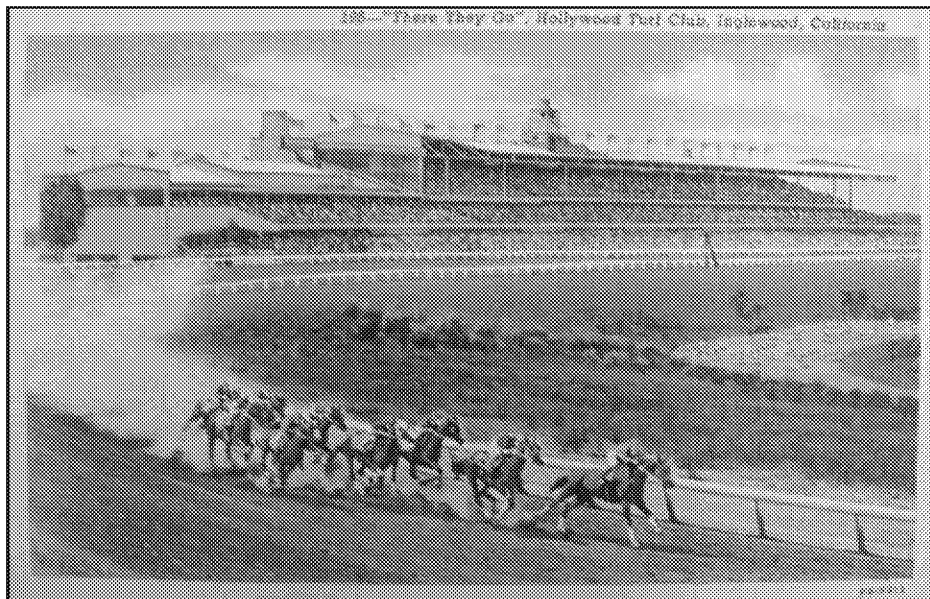
World War II interrupted racing at Hollywood Park. From 1942-44, the park was used as a storage facility in association with the war effort. Of the many jockeys closely associated with Hollywood Park, John Longden was one of the earliest jockeys to become widely regarded for his racing skill and track record of victories. In 1943, he won the Triple Crown with the horse Count Fleet, and then won the Hollywood Park riding title in 1945. He repeated this feat four more times before Willie Shoemaker arrived on the scene. In 1948, Longden won 105 races at the 55-day Hollywood Park meet, a record that stood for twenty-two years until Laffit Pincay broke it with 106 victories in 1971 during a meeting that was twenty days longer than when Longden had set his mark. In all, Longden chalked up 1,038 victories at Hollywood Park, including eighty-nine victories at stakes races. Before he retired in 1966 as history's all-time leading rider with 6,032 winning rides, he had registered success in four Hollywood Park Gold Cup races with the horses Noor, Royal Serenade, Correspondent, and Prince Blessed.

Hollywood Park was also the location of MGM mogul Louis B. Mayer's stable of champion thoroughbreds that produced consistent winners from 1940 until 1946; many of which were ridden by jockey John Longden. Mayer's stud farm in Perris, California was where he bred the famous racehorse Alibhai that produced consistent champions, including Cover Up (Hollywood Cold Cup winner in 1947), Solidarity (winner of the 1948 Hollywood Derby), On Trust (with lifetime winnings of over \$500,000), and Moonrush (Santa Anita Handicap winner), among others. However, in 1947, increasing demands on his time as head of MGM and an expensive divorce convinced Mayer to exit the horse business. He disposed of almost all of his holdings through a series of blockbuster auctions at Hollywood Park with attendance often surpassing 7,000. When the last horse was sold in 1950, a total of 248 thoroughbreds had been sold for \$4.5 million with "each of the half-dozen dispersal sales a production befitting the most powerful man in Hollywood."

During the last half of the 1940s, Hollywood Park continued to set attendance records. In addition to outstanding racing during meets, publicity was generated by Louis B. Mayer's dispersal sales, hosting the International Flower Show or the popular Huck Finn Day, the latter of which involved costumed children fishing in the track's lakes for prizes. Motion picture celebrities continued to frequent Hollywood Park with stars, such as Lana Turner, Hedy Lamarr, and Marlene Dietrich, often making trophy presentations. According to author Biff Lowry, "Weekend after weekend, pictures of twosomes such as Randolph Scott and Dorothy Lamour, Carole Landis and Franchot Tone, Olivia de Haviland and Jimmy Stewart, and Mickey Rooney and Judy Garland would be pictured in the rotogravure sections [of newspapers] enjoying



Racetrack and grandstands, circa 1939. View east from grandstands.
Source: Los Angeles Public Library Historical Photograph Collection.



"There They Go." Postcard of Hollywood Park, circa 1940.
Source: Los Angeles Public Library Historical Photograph Collection.



the races” at Hollywood Park. Racing was fun, and Hollywood Park was the place to see and be seen. In no small part, this was due to the influence of people, such as Mervyn LeRoy - one of Hollywood Park’s founding fathers and one of Hollywood’s top directors during this era. He was known to regularly invite stars to the track or to present trophies.

Following the departure of L.B. Mayer from the scene as a major owner and breeder of racehorses, Rex C. Ellsworth took the mantle as the “big man” at Hollywood Park. Ellsworth, along with his business partner and horse trainer Meshach Tenney, produced seventy-five stakes victories at Hollywood Park, which was “more stakes wins than any other owner in the long colorful history of the racetrack.” This remarkable accomplishment was due to Ellsworth’s horses, which were not the product of expensive, well-bred bloodlines; conversely, the Ellsworth’s stable winners were considered to be less than fashionably bred, raised, and trained. Some of Ellsworth’s most successful horses included Silver Cord, Arigotal, Roman In, Flying Choice, Overdrive, Khaled, U-Time, and Swaps. Of these, Swaps with jockey Willie Shoemaker in the saddle was perhaps the most famous, since the team won the Kentucky Derby over the favorite Nashua in 1955. Following the end of his racing career in 1956, Hollywood Park commissioned equine sculptor Albert Stewart to create a statue of Swaps, which was unveiled at the entrance to the Clubhouse where it graces the entrance to this day.

On May 6, 1949, just twelve days before opening day, a disastrous fire destroyed the majority of Hollywood Park’s Main Building. Due to the extensive damage, the 1949 meet was held at Santa Anita’s track in Arcadia. The reconstruction of the damaged portions of Hollywood Park was undertaken by architect Arthur Froehlich. (See photo 1 in Figure IV.E-3.) Froehlich’s work included the reconstruction and redesign of the Main Building (Grandstands, Clubhouse, Turf Club, Concessions, pari-mutuel betting areas, etc.), and the new construction of the Turf Club Entrance Pavilion. (See photos 2 and 3 in Figure IV.E-3.)

It was during the 1949 Hollywood Park/Santa Anita racing season that the great jockey Willie Shoemaker arrived in Southern California. It was the beginning of one of the most remarkable careers in the history of the sport, with Shoemaker becoming perhaps history’s greatest jockey. During his forty year career, Shoemaker won a total of 2,416 races just at Hollywood Park, eclipsed only by Laffit Pincay. Additionally, Shoemaker won five national riding championships, ten national money-winning titles, 250 victories in races worth \$100,000 or more, more than any rider in history. Further, his career wins numbered 8,833, and was considered to be the world record for twenty-nine years until Pincay broke it in 1999 at Hollywood Park.

From its opening in 1938 through the 1960s, the presidency of Hollywood Park passed from Beverly Hills developer Walter McCarty to oilman/real estate mogul Earl Gilmore (famous for his Gilmore Field ballpark in Los Angeles’ Fairfax District), and finally to the renowned film producer-director Mervyn LeRoy. During the 1960s, Hollywood Park continued to break its own attendance records and the park’s fame was stoked by numerous Willie Shoemaker wins and by the remarkable achievements of a horse called Native Driver and his trainer Buster Millerick. Native Driver won three straight Gold Cups, Hollywood Park’s signature race, prior to his premature death in 1967 at the age of eight. An ornate



Photograph 1: Hollywood Park, 1954.

Source: Huntington Library Photograph Archives.



Photograph 2: Grandstands, 1954.

Source: Huntington Library Photograph Archives.



Photograph 3: Turf Club entrance, 1957.

Source: USC Digital Archives.



CHRISTOPHER A. JOSEPH & ASSOCIATES
Environmental Planning and Research

Figure IV.E-3
Historic Photographs of Hollywood Park,
circa 1954-1957

monument designed by the renowned Southern California-based artist and architect Millard Sheets marked Native Driver's grave near the track.

In the late 1960s, facing competition for the sports dollar from two major league baseball clubs, the Dodgers and Angels, plus the basketball Lakers and the NFL Rams, Hollywood Park and Santa Anita racetracks were desirous of more racing dates, particularly more Saturdays. Meanwhile, the harness racing interests, including Los Alamitos Racetrack in Orange County, were lobbying for a change in the racing law that prohibited racing at night. Starting in 1968, an agreement was reached whereby harness and quarter horse racing would be permitted to have night races.

Under this new agreement, Santa Anita and Hollywood Park obtained additional racing dates. Of the two thoroughbred tracks, Hollywood Park was alone in leasing its track for nighttime harness racing, which commenced in 1969. Two years earlier, in 1967, the Forum Arena became the new home of the Los Angeles Lakers and the National Hockey League Kings with its signature round building, erected directly north of Hollywood Park in Inglewood.

During the 1970s, Hollywood Park continued to have strong attendance and an average handle of \$3,000,000 per day. With jockey Laffit Pincay Jr. leading the field, newcomers appeared, including Chris McCarron who would eventually challenge Pincay for the top spot among jockeys. Equine luminaries, such as Triple Crown winners Affirmed and Seattle Slew, competed at Hollywood Park along with other Horses of the Year. Major renovations to Hollywood Park's Main Building included new exterior paint with a poorly received color scheme, best described as a combination of "Ringling Brothers" meets Ice Cream Parlor. By the end of the decade, Pincay remained Hollywood Park's top jockey.

The decade of the 1980s started well at Hollywood Park with attendance on the rise from a few years earlier. A cantankerous horse named John Henry dominated the field for the first half of the decade winning stakes races at each Hollywood Park meet. The horse drew big crowds to the racetrack, as did superstars such as Spectacular Bid and the ill-fated Landaluce. In contrast, the second half of the decade lacked any notable equine heroes with the charisma to stir the crowds. As a result, business went into a pronounced decline. Perhaps the most significant event of the 1980's for Hollywood Park was its hosting of the inaugural Breeders' Cup in 1984, which became one of the signature horseracing events in the sport; Hollywood Park hosted the event again in 1987 and 1997. Also, in 1984, a substantial investment was made in a new "Pavilion of the Stars" building with luxury suites and seating for 13,000 (now the Casino/Conference Center) located south of the Main Building.

The Pavilion was meant to bring a higher-end crowd back to horse racing at Hollywood Park. Unfortunately, this was not to be the case and by the end of the decade Hollywood Park's financial condition had become dire. In 1991, a new board of directors took over Hollywood Park following a protracted battle for control. The new management team immediately converted the Pavilion of the Stars into a simulcast racetrack and betting facility, and eventually a card club casino. During this time, the infield lakes were restored and an upgraded landscaping plan was implemented.

The last half of the 1990s included jockey Laffit Pincay's monumental accomplishment of eclipsing Willie Shoemaker's career victory record of 8,833 wins, the continued expansion of Hollywood Park into the gaming industry, and a failed attempt to purchase the Santa Anita Racetrack. As the 20th century came to a close, Hollywood Park was sold to the Churchill Downs family of tracks for \$140 million. However, attendance has continued to decline since that time. In 2005, the Bay Meadows Land Company purchased Hollywood Park for \$260 million, and one year later, a new 'Polytrack' racing surface was installed prior to the Fall 2006 season.

Architectural Description

The Hollywood Park complex consists of a series of buildings and structures located around a central one-and-one-eighth mile oval-shaped racetrack. This complex includes a multi-story Main Building (inclusive of the grandstands, press box, Clubhouse, Turf Club, food service areas, wagering areas, and restrooms), a large complex of stable buildings (comprised of eighteen barns, dormitories, an equine clinic and research center, horseman's lounge, offices, and a half-mile training track), a large six-story grandstand and casino, and various outbuildings, including guard booths, ticket and wagering pavilions, and service buildings.

Main Building: The Main Building is a five-story building, measuring 1,450 feet in length, with an elongated plan, reinforced concrete foundation, and flat roof. The Main Building's north-south plan features three primary sections: the elongated grandstand area, comprising approximately two-thirds of the building's footprint; a circular tower; and the slightly "doglegged" Clubhouse and Turf Club wing at the south end.

Originally constructed in 1938, the Main Building was largely rebuilt in 1950 after a devastating fire, which destroyed most of the building above the ground floor and much of the original 1938 horse racing complex. Due to the fire, the new building was designed to be entirely fireproof, utilizing steel frame and reinforced concrete construction. The original 1938 Main Building was designed in the Streamline Moderne architectural style; however, the rebuilt 1950 version is stylistically Late Moderne, and has had numerous alterations and additions over the years, which have altered portions of the 1950s design.

The Main Building's primary façade faces west, and consists of the elongated rectangle, which contains the grandstand seating area. (See photo 1 in Figure IV.E-4.) This grandstand, located to the north of the circular tower, features a large, unadorned, horizontal façade that is punctuated by three rows of square window vents. (See photo 2 in Figure IV.E-4.) These vents, now covered by square wood panels decorated with multi-colored painted owners' silks, once provided airflow to the enormous multi-level grandstand seating area on the opposite side. (See photo 3 in Figure IV.E-4.) Interrupting this expanse are two tall projecting elevator shafts with west-facing ground level entrances. An uncovered second floor terrace enclosed by a concrete railing spans the width of this portion of the west façade with entrances to the grandstand seating. Several staircases with steps parallel to the building lead up to the second story terrace. The widest of these staircases is centered on the façade, and contains a row of electronic wagering windows.



Photograph 1: Main building, primary (west) facade. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 2: Main building, detail of window vents on west facade, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 3: Detail of wood vent covers decorated with owners' silks, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Flanking the staircases and elevator shafts beneath the terrace are numerous tunnels buttressed by curved, angled concrete piers leading through the building to the grandstand's lower levels, interior office areas, and the racetrack itself.

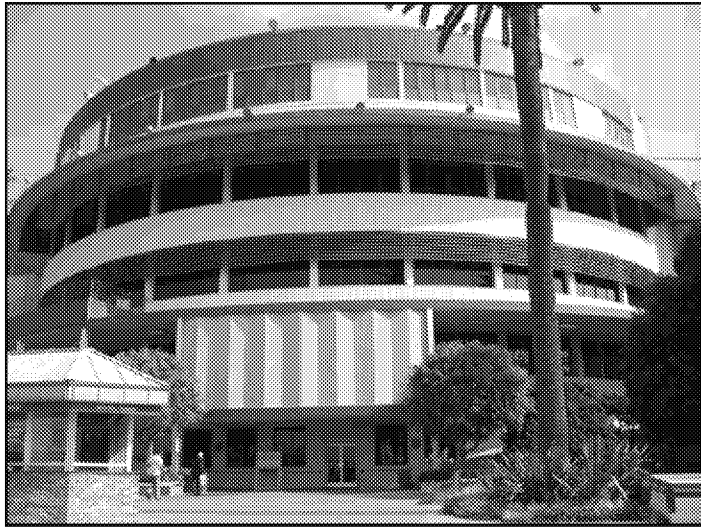
Multi-pane steel-sash casement windows provide light to the west-facing interior office areas adjacent to tunnel entrances. Above the grandstand section of the Main Building is a recessed fifth floor area that is sheltered by a flat roof with a canted, enameled, corrugated-steel fascia.

The circular tower, located south of the elongated grandstand area, is five stories in height and contains a portion of the Clubhouse. (See photo 4 in Figure IV.E-5.) The tower's ground floor level is characterized by a curved concrete ramp and a series of smaller window and door openings.

The upper stories are characterized by bands of steel-framed fixed windows. The curved concrete ramps are enclosed by concrete railings and steel posts, and lead up to the upper Clubhouse entrances. The ramps feature a large, bezeled, zigzag plaster panel that once supported abstract metal horse sculptures. A narrow (non-original) third story terrace is situated near the north end of the circular tower and is defined by a series of metal handrails. On the second and fourth floors is a curved, cantilevered canopy. On the third and fourth floors, the windows feature horizontal slat screens that provide additional shade. The tower's fifth floor was added in 1975, and features unsheltered bands of windows and a corrugated metal parapet with exterior lighting.

Located to the south of the circular tower is the angled Clubhouse and Turf Club wing. (See photo 5 in Figure IV.E-5) This wing is comprised of a series of projecting and recessed spaces and is the building's most architecturally complex façade. The Turf Club is demarcated by a tall enclosed staircase fronted by a non-original exterior elevator mechanism, and a non-original Regency style entrance canopy. To the south of this elevator is a perforated screen wall with a grid of circular openings and a ground floor entrance. (See photo 6 in Figure IV.E-5). Behind the screen wall is the three story elongated Clubhouse section, which is characterized by steel-sash ribbon windows, semi-circular trim on the first floor, and a corrugated metal canopy. The three-story Clubhouse is accessed by a pair of curved concrete steps with non-original pipe handrails, and a pair of non-original escalators. At the base of the stairs and escalators is a series of brick planters. The stair and escalator landing is covered by a flat, tongue-like canopy featuring a decorative oval cutout, a pair of round posts, and two soaring metal flagpoles.

Interconnected into this canopy and above the escalator is an awkward (non-original) ski-jumplike stucco canopy supported by angled metal posts. (See photo 7 in Figure IV.E-6.) Above the three-story Clubhouse is a non-original fourth floor addition that features a windowless rectangular façade and a wide band of metal-frame windows. The east façade of the Main Building (See photo 8 in Figure IV.E-6) is characterized by massive steel posts and an enormous metal-truss flat roof, which covers the Main Building's terraced grandstand seating area. Above the grandstand seating area is a wide, glazed structure containing the press box. Atop the roof in the same area as the press box are several small glazed sheds, which house track officials, the racetrack announcer, and other functions. Large floodlights span the width of the roof to illuminate the track during night races.



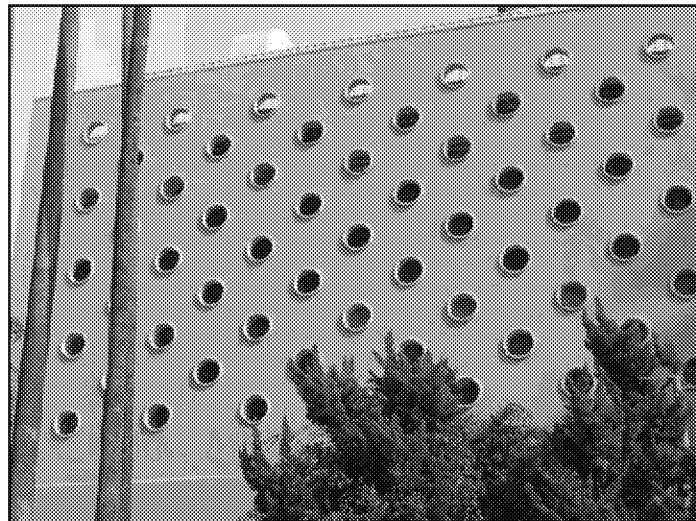
Photograph 4: Main building, circular Clubhouse tower. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 5: Main building, Turf Club and Clubhouse wing. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 6: Detail of perforated screen wall of Turf Club. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.





Photograph 7: Main building, Clubhouse entrance. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 8: Main building, grandstands. View northwest from racetrack. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 9: Main building, north elevation. View southwest from racetrack. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 10: Main building, Clubhouse wagering windows. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



The north façade of the Main Building reveals the wedge-shaped profile of the grandstand seating crowned by the building's corrugated steel roof (See photo 9 in Figure IV.E-6) The south façade is similar except for the incorporation of a glazed steel grid that protects Turf Club seats from coastal breezes.

The seating arrangement for Hollywood Park includes areas adjacent to the Racetrack and the grandstand area of the Main Building. These seating areas are divided into several sections with the least expensive seats located on the open air asphalt pavement nearest the track followed by the numerous rows of covered grandstand seating occupying the north two-thirds of the structure. Box seats, the Clubhouse restaurant, and other more exclusive seats (with television monitors) front the Clubhouse and Turf Club on the south end of the structure. Wagering windows, concession areas, the food court, restrooms, and other public facilities are located behind the seating areas on most levels of the Main Building. (See photo 10 in Figure IV.E-6) The elite Turf Club offers a comfortable lounge, dining room, meeting areas, and other amenities. Since 1950, virtually all of the public areas within the Main Building have been remodeled and reconfigured numerous times.

Turf Club Entrance Pavilion: Completed in 1950, the Turf Club Entrance Pavilion (Gate B) is a small, elegant, freestanding pavilion, located west of the main Turf Club entrance towards the property's parking area. The Turf Club Entrance Pavilion is a one-story wood-frame building with a concrete foundation and flat roof, designed vernacular Moderne style structure. (See photo 11 in Figure IV.E-7) It has a rectangular plan, and is clad with stucco and Palo Verde rock. The building's main façade faces south and is largely characterized by floor to ceiling aluminum-framed plate glass windows, which flank a pair of glazed double-door entrances. Slate pavers front the entrance area and west elevation. Perched atop the flat canopy roof above the entrance doors are three-dimensional metal letters spelling "Turf Club," rendered in a period script typeface. Of the many buildings associated with Hollywood Park, the Turf Club Entrance Pavilion (Gate B) appears relatively unaltered with a very high level of historic and architectural integrity.

Hollywood Park Racetrack: Hollywood Park's main racetrack is one-and-one-eighth miles. The length of the final stretch from the last turn to the finish line is 990 feet. An infield turf course was added in 1967, and features a one-mile, 165-foot oval with a diagonal chute. In 2006, a new "Polytrack" racing surface was inaugurated for the park's fall meeting. In the center of the racetrack is an infield park containing two large lakes linked by a canal. (See photo 12 in Figure IV.E-7.) The park and lakes were reconfigured in 1991. Facing the Main Building's grandstand seating areas is the electronic Tote Board and a large color video screen. (See photo 13 in Figure IV.E-7)

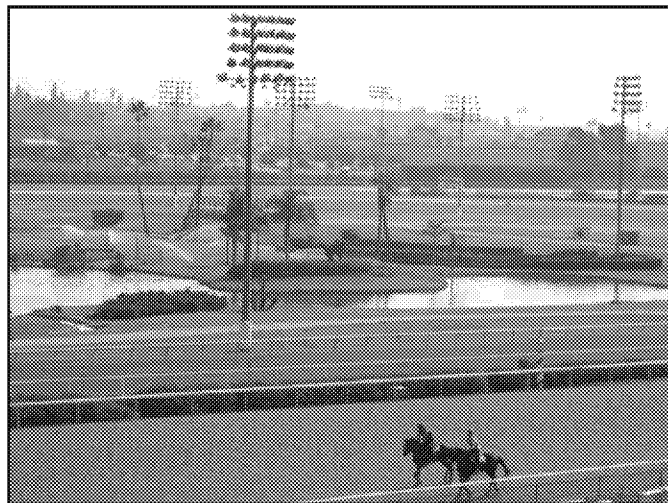
The Winner's Circle is a formally landscaped area between the track and the Clubhouse seating area, where each race's winning horse, jockey, and others are congratulated and photographed.

Paddock: The Paddock is an outdoor area near the Winner's Circle. According to the original 1938 design, the Paddock was located in the circular tower at the structure's ground floor level. In the 1950 reconstruction, the Paddock was relocated to its current location. Today, the Paddock includes a walking ring that is situated in the plaza area outside the grandstand near Hollywood Park's main pedestrian



Photograph 11: Turf Club Entrance Pavillion (Gate B), southwest (primary) facade. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



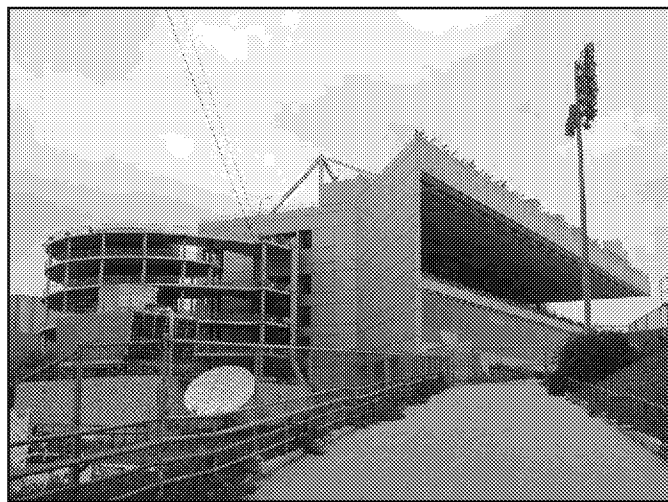
Photograph 12: Racetrack and infield area. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 13: Racetrack and infield area, detail of tote board and video screen. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 14: Pavilion of the Stars. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



entrance pavilions. The former indoor Paddock was reconfigured and the circular space filled with offices and maintenance facilities.

Horse Stables & Training Track: An entire complex of horse facilities is located on the east side of the main racetrack. These facilities include eighteen barns with 1,958 stalls, 619 tack rooms, 216 feed rooms and accommodation for 489 grooms; the Equine Clinic and Research Center, which features an operating theater, recovery stalls, and laboratory facilities; and a half-mile oval training track.

Pavilion of the Stars: Completed in 1984, the Pavilion of the Stars (formerly known as the Cary Grant Pavilion) is located to the south of the Main Building, and is a large six-story building with grandstand seating, concrete frame construction, and a flat roof. (See photo 14 in Figure IV.E-8) The building is characterized by its scored concrete exterior, six-story pedestrian ramp, and its hot pink decorative panels. In 1994, the Pavilion of the Stars was expanded with a spacious two-story casino. (See photo 15 in Figure IV.E-8) The design of this new addition draws upon the Late Moderne architectural style, and features neon signage, a large canopy with glass-block posts, and aluminum cladding with speed line decoration. The Pavilion of the Stars is connected to the Main Building by an elevated walkway.

Landscape Features: Hollywood Park features numerous landscape features, which are contained within the area between the park's freestanding ticket booths and the Main Building, and within the inner ring of the racetrack. The site's landscape features include Canary Island Date Palms, sculpted olive trees, clipped hedges, grassy lawns, a large circular fountain, red brick planters, park benches, and red brick paved walkways. Additionally, several prominent memorials have been erected. The largest memorial is the bronze sculpture of the great thoroughbred Swaps with jockey Willie Shoemaker located in the Clubhouse entrance garden. (See photo 16 in Figure IV.E-8) This sculpture is attached onto the west face of a marble slab that also features a replica of the Hollywood Gold Cup trophy and a list of all Hollywood Gold Cup winners since the 1938 opening. The design and setting of this monument was completed by renowned Southern California architect and artist Millard Sheets, while the bronze sculpture was completed by artist Albert Stewart. It was dedicated July 1, 1958, in honor of Swaps' four Hollywood Park track records (three of them world marks), including seasonal money-won record, first race winner, first stakes winner, and nine career stakes wins at Hollywood Park.

The other prominent monument is located within the landscaped Garden Paddock and marks the burial place of Native Driver, the only three-time winner of the Gold Cup and California's first \$1 million winner. (See photo 17 in Figure IV.E-8) The twenty-foot long ceramic tile monument, also designed by Millard Sheets, celebrates Native Driver's successive Gold Cup triumphs from 1965-67. The monument was erected after Native Driver's sudden death in September, 1967, and was dedicated on April 11, 1969. Native Driver holds record of ten career stakes wins at Hollywood Park.

Late Moderne Style

The Main Building of Hollywood Park erected in 1950 is a good example of a large building designed in the Late Moderne architectural style typical of the early postwar years in Southern California. World War II essentially halted the evolution of architectural styles, such that immediately following the war, until



Photograph 15: Hollywood Park Casino. View northeast from parking lot. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 16: Hollywood Gold Cup/Swaps monument. View east from Clubhouse entrance garden. December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



Photograph 17: Native Driver monument. View from Garden Paddock, December 2006.

Source: Page and Turnbull, Inc. and Peter Moruzzi, Historic Consulting.



the early 1950s, many Southern California commercial buildings were strongly influenced by architectural designs popular in the late 1930s. The Late Moderne style was based on a blend of the International Style of architecture with the Streamline Moderne architectural style. The result was a stylistic melding of the curve and teardrop forms of the Streamline Moderne complemented by the sharp angularity of the International Style. Notably, Hollywood Park's original Main Building, which had been designed by architect Stiles O. Clements in 1938, but destroyed by fire in 1949, was an exceptional example of Streamline Moderne styling. Its curved forms and horizontal window banding were key character-defining elements of the idiom. It is not surprising, therefore, given the acclaimed success of the original design, that architect Arthur Froehlich's 1950 Late Moderne design of the new Main Building would be influenced by its predecessor.

The Late Moderne style of the late 1940s and early 1950s typically featured smooth stucco surfaces with horizontal window bands often accentuated by bezels. Excellent representative examples of the Late Moderne style of the time period in Southern California include the Mirror Building at Second and Spring Streets (1948, Roland H. Crawford) and the General Petroleum Building at 612 South Flower Street (1947, Wurdeman and Becket), both located in downtown Los Angeles, and the Milliron Department Store at 8739 Sepulveda Boulevard located in nearby Westchester (1949, Gruen and Krummeck).

Character-defining features of the Late Moderne style exhibited by Hollywood Park's Main Building include:

- An emphasis on horizontality, as expressed by the continuous window bands of the curved Clubhouse tower;
- The cantilevered, curved canopy sheltering the Clubhouse's fourth floor window bands;
- The grid of square windows framed by prominent bezels since covered by painted wooden owners' silks punctuating the grandstand's west elevation;
- The wide bezeled fourth floor window, located south of the Clubhouse tower;
- The projecting curved canopy with the oval cutout that partially shelters the curving staircase leading to the main Clubhouse entrance;
- The blocky International Style vertical Turf Club elevator tower (now fronted by an exterior elevator) situated south of the Clubhouse tower;
- The large bezeled zigzag plaster panel centering the Clubhouse ramps that once supported a semi-abstract herd of galloping racehorses rendered in metal (since removed); and
- The remaining ground floor steel frame casement windows.

Prior to its numerous alterations and additions, the Main Building was a good example of the blending of the pre-war Streamline Moderne and soon-to-be dominant postwar International Style as expressed in a large building.

Evaluation of Historic Significance

Period of Significance

Under the early leadership of movie mogul Jack Warner, the Hollywood Park Turf Club enlisted prominent members of Southern California's entertainment industry in the financing of the third and last thoroughbred horseracing facility in the region. Following Hollywood Park's completion in 1938, MGM studio head Louis B. Mayer became a renowned horse breeder with stables directly associated with Hollywood Park. In the late 1940s, the dispersal of Mayer's world famous stable was a spectacular multi-year event held at the facility. During its first few decades, Hollywood Park was the site of numerous noteworthy races featuring horses such as the beloved Seabiscuit as well as Triple Crown winner Count Fleet and Kentucky Derby winner Swaps. Acclaimed jockeys John Longden, Willie Shoemaker, and Laffit Pincay Jr. achieved great success at races held at Hollywood Park from the 1940s through the 1990s. Some of the film industry's biggest stars who were regularly invited to the track or to present trophies by then-Hollywood Park president and renowned film producer-director Mervyn LeRoy.

Additionally, well-known horse breeders, including Rex C. Ellsworth and trainer Meshach Tenney, became intimately associated with the property, since their stable produced seventy-five stakes victories at Hollywood Park. In 1984, Hollywood Park was the site of the inaugural Breeders' Cup, which quickly became one of the most prestigious events in thoroughbred racing nationwide. It appears that Hollywood Park's important contributions to the history of thoroughbred horseracing in Southern California constitute a period of significance spanning the years 1938 to 1950. Even though Hollywood Park was the site of the inaugural Breeders' Cup in 1984, the period of significance does not span from Hollywood Park's opening in 1938 to the Breeders' Cup in 1984 because while an important event, the inaugural Breeders' Cup was not significant enough in the overall history of Hollywood Park given that the event is not a yearly Hollywood Park event; it is held at different locations every year.

National Register

As discussed in the Regulatory Setting section, in order for a property to be eligible for listing in the National Register, it must be found significant under one or more of the following criteria: Event, Persons, Design/Construction, and Information Potential. In addition to possessing significance, a property must also be found to possess historic integrity. Hollywood Park Turf Club and Racetrack is evaluated against each of the four criteria, below:

Criterion A (Event): Hollywood Park is eligible for listing in the National Register under Criterion A (Events) as a property associated with events that have made a significant contribution to the broad patterns of our history. Hollywood Park was the fourth thoroughbred racetrack to be built in California, and is significant on a local level as one of three thoroughbred racetracks located in Southern California. Its significance is associated with the history of thoroughbred horse breeding and racing in Southern California. For the entirety of its history, Hollywood Park was directly associated with prominent horse breeders and racing stables; it was the site of numerous famous horse races and series; and was the site of prominent jockey's successes.

Criterion B (Person): Hollywood Park is not eligible for listing in the National Register under Criterion B (Person) since the property has not been associated with the lives of significant persons. Although many entertainment industry executives and celebrities were associated with Hollywood Park over the years, federal and state criteria require that the property be the location that best illustrates the important lifetime achievements of the individual. For Hollywood's luminaries, the subject property does not meet this criterion. For similar reasons, the majority of jockeys, breeders, and trainers associated with Hollywood Park were also affiliated with the region's two other thoroughbred racetracks such that the subject property cannot make a unique claim to their important achievements.

Criterion C (Design/Construction): Hollywood Park is eligible for listing in the National Register under Criterion 3 (Architecture) as a property that represents the work of a master, Arthur Froehlich. Hollywood Park was the first of many horse-racing facilities that Arthur Froehlich, FAIA designed during a long career in which he became known as the world's premier racetrack architect. Froehlich's work includes many of the most renowned racetracks of the past half-century, including the renovations at Hollywood Park (Reconstruction completed in 1950), Aqueduct Racetrack in Jamaica, New York (Rebuilt in 1959), Belmont Park in Elmont, New York (Rebuilt between 1963 and 1968), and Meadowlands in East Rutherford, New Jersey (1976) in the United States. Froehlich also designed Venezuela's Hipodromo and horse racing facilities in France, Canada, and other parts of the world. Of these, the Hipodromo in Venezuela was Froehlich's most advanced and innovative horseracing facility with its dramatic cantilevered grandstand canopy. Froehlich was responsible for renovating and rebuilding the majority of the racetracks on the East Coast according to his own designs, which was similar to his role at Hollywood Park. Hollywood Park was Froehlich's first racetrack commission, and is much more conservative and traditional in comparison with his later work exemplified at the Hipodromo. Froehlich was able to design and explore some of his earlier design ideas and propensities towards the Late Moderne architectural style in Hollywood Park.

Criterion D (Information Potential): The evaluation of Hollywood Park for listing in the National Register under Criterion D (Information Potential) is beyond the scope of the Historic Resources Technical Report. Given its determined period of significance, Hollywood Park is not considered a resource likely to yield information important to pre-history or history.

California Register

As discussed in the Regulatory Setting section, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. In addition to possessing significance, a property must also be found to possess historic integrity. Hollywood Park Turf Club and Racetrack is evaluated against each of the four criteria, below:

Criterion 1 (Event): As a property determined eligible under National Register Criterion A (Events), Hollywood Park is considered significant under California Register Criterion 1 (Event).

Criterion 2 (Persons): Hollywood Park is not eligible for listing in the California Register under Criterion 2 (Persons), since the property has not been associated with the lives of persons important to local, California or national history.

Criterion 3 (Architecture): As a property determined eligible under National Register Criterion C (Design/Construction), Hollywood Park is considered significant under California Register Criterion 3 (Architecture).

Criterion 4 (Information Potential): The evaluation of Hollywood Park under California Register Criterion 4 (Information Potential) is beyond the scope of the Historic Resources Technical Report and thus not applicable to this analysis. However, Hollywood Park is not considered a resource likely to yield information important to history or pre-history.

Integrity

As discussed in the Regulatory Setting section, in order to qualify for listing in the National Register or California Register, a property must possess significance under one of the aforementioned criteria and have historic integrity. The process of determining integrity is similar for both the California Register and the National Register. The same seven variables or aspects that define integrity—location, design, setting, materials, workmanship, feeling and association—are used to evaluate a resource’s eligibility for listing in the California Register and the National Register.

Integrity-National Register

Hollywood Park does not retain sufficient historic integrity to qualify for listing in the National Register of Historic Places. Due to the 1949 fire at Hollywood Park, little fabric remains from the original design of the 1938 Main Building. In 1950, Arthur Froehlich undertook a reconstruction of Hollywood Park’s Main Building. This reconstruction is significant as a representation of Arthur Froehlich’s first work on a racetrack. Despite the significance of the 1950 Reconstruction, the property’s integrity of design, materials, and workmanship has been substantially compromised due to numerous alterations and new construction that occurred after the period of significance. These alterations have included, but are not limited to, the installation of the exterior escalators and staircase in the Clubhouse (1954), the addition of the perforated screen wall (1961), the addition of the fifth floor on the Main Building (1975), and the new construction of new horse barns and tack rooms (1980).

The various alterations have largely affected much of the original Late Moderne detailing. The building’s affected Late Moderne elements have included the horizontal emphasis, primarily achieved by the continuous window bands of the curved Clubhouse tower (since altered by the addition of an ungainly fifth story); the cantilevered, curved Clubhouse fourth floor canopy (similarly affected by the fifth story addition); the grid of square windows framed by prominent bezels on the grandstand’s west elevation (since covered); the wide bezeled fourth floor window located south of the Clubhouse tower; and the projecting curved canopy with oval cutout at the top of the Clubhouse entry staircase (negatively impacted by the addition of a sloping escalator canopy).

Integrity-California Register

Even with the integrity threshold at the state level, Hollywood Park does not appear to retain sufficient historic integrity to qualify for listing in the California Register. In general, the alterations, demolition and new construction to the Main Building, the site, and the majority of the outbuildings have caused a negative effect upon the property's integrity of design, setting, materials, and workmanship. Alterations include the addition of an entire fifth floor to the roof of the Clubhouse tower, Turf Club, and the Clubhouse wing, which has had an especially deleterious effect on architect Arthur Froehlich's 1950 design; the addition of an exterior elevator to the Turf Club staircase tower; the erection of an exterior perforated wall south of the Turf Club staircase tower; the construction of the sloping ski jump-like canopy between the Clubhouse entrance staircases; the covering of all square louvered windows with "owners' silks" on the Main Building's west elevation; the enclosure of the Clubhouse loggia; the addition of red brick planters fronting the Main Building's entrance areas; the construction of the Regency style Turf Club pavilion elevator entrance; and the removal of the semi-abstract herd of galloping metal racehorses from the large beveled zigzag plaster panel centering the Clubhouse tower ramps.

Additional impacts to the surrounding site include the alterations to the lakes and landscaping of the infield track; the relocation of the Paddock to the Main Building's front entrance area; the replacement of virtually all of the original barns, stables, and dormitories located on the east side of the racetrack; and the complete remodeling of food and beverage concession areas, pari-mutuel betting windows, and other public areas of the Main Building. Additionally, a large and highly prominent five-story grandstand Pavilion/Casino erected in 1984/1994 situated near the south end of the Main Building has compromised the spatial relationships of the subject property's original layout. Due to these enumerated modifications, the character-defining features of the subject property's Late Moderne architectural style have also been negatively affected.

Overall, the property's historic integrity has been eroded to the point that the property does not convey its historical significance, which has been defined as the period from 1938 to 1950. Even though the overall property does not possess historic integrity, individual buildings and features do remain that are strong in their association with Park's history. These buildings and elements include the Turf Club Entrance (Gate B), the spatial relationships between the Main Building and racetrack, and the overall character of the property as a racetrack.

Although Hollywood Park was found to be significant under National Register Criterion A (Events) and Criterion C (Design/Construction), and California Register Criterion 1 (Events) and Criterion 3 (Architecture), the property was not found to possess sufficient historical integrity to qualify it for listing in the National Register or California Register. In order for a property to be eligible for listing in the National or California Registers, the property must possess significance under one of the aforementioned criteria and retain historic integrity. The numerous alterations, demolitions, and new construction at Hollywood Park have affected the property's historic integrity to the point that it no longer conveys its historical significance. Despite the lack of historic integrity, important monuments, buildings, and

features still exist, which do have special historic character. Since Hollywood Park is not eligible for listing in the National or California Registers, it is not considered a historic resource pursuant to CEQA.

Cultural Resources Records Search

A cultural resources records search for the Hollywood Park Redevelopment Project was conducted in July 2007 by the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology. This survey included a review of all recorded cultural resource reports on file. In addition, the California Points of Historical Interest (PHI), the California Historical Landmarks (CHL), the California Register of Historic Resources (CR), the National Register of Historic Places (NR), and the California State Historic Resources Inventory (HRI) listings were reviewed for the Hollywood Park Project Site. The following includes a summary of the findings.

Archaeological Resources

The South Central Coastal Information Center concluded that no archaeological sites or isolates have been recorded on the Project Site or within a ½-mile radius of the Project Site.

Historic Resources

The California Point of Historical Interest (2006) of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

The California Historical Landmarks (2006) of the Office of Historic Preservation, Department of Parks and Recreation, lists no properties within a ½-mile radius of the Project Site.

The California Register of Historic Resources (2006) lists no properties within a ½-mile radius of the Project Site.

The National Register of Historic Places lists no properties within a ½-mile radius of the Project Site.

The California Historic Resources Inventory (2006) lists 14 properties that have been evaluated for historical significance within a ½-mile radius of the Project Site.

Previous Cultural Resource Investigations

Four studies (LA179, LA2904, LA4385, and LA6035) have been conducted within a ½-mile radius of the Project Site. Of these none are located within the Project Site. There are 10 additional investigations that are located within the Inglewood 7.5' U.S.G.S. Quadrangle that are potentially within a ½-mile radius of the Project Site. The reports are not mapped due to insufficient information.

ENVIRONMENTAL IMPACTS

Methodology

The potential impacts of the Proposed Project upon cultural resources are evaluated in the context of significant historic and archaeological resources as defined in Section 15064.5 of the State CEQA Guidelines (Determining the Significance of Impacts to Archeological and Historical Resources).

In accordance with Section 15064.5(b) of the CEQA Guidelines, a project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment. A substantial adverse change in the significance of a historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired. The significance of a historical resource is materially impaired when a project:

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

Thresholds of Significance

In accordance with Appendix G to the State CEQA Guidelines, a significant impact would occur if a project would:

- (a) Cause a substantial adverse change in the significance of a historical resources as defined in § 15064.5.
- (b) Cause a substantial adverse change in the significance of a unique archaeological resource (as defined in Section 21083.2(g) of the California Public Resources Code);
- (c) Disturb any human remains, including those interred outside of formal cemeteries; or
- (d) Directly or indirectly destroy a unique paleontologic resource or site.

A lead agency must consider a property a historic resource under the California Environmental Quality Act if it is eligible for listing in the California Register of Historical Resources. The California Register is modeled after the National Register of Historic Places. In addition, a property is presumed to be historically significant if it is listed in a local register of historic resources or has been identified as historically significant in a historic resources survey.

Impacts Determined to be Less Than Significant

Threshold questions (a) through (d) are addressed below.

Project Impacts

The Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5. Based on the findings and conclusions of the Historic Resources Technical Report, Historic Resources Survey, Evaluation, and Analysis of Project Impacts, Final, Hollywood Park Project, California (dated July 24, 2007), none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA. Nevertheless, as part of the Proposed Project, the Applicant plans to relocate the Turf Club Entrance Pavilion, Gate B, and the park's two primary monuments, Hollywood Gold Cup/Swaps and Native Driver. These Project Design Features (PDFs) are therefore recommended to be incorporated into the proposed Specific Plan as conditions of approval (See PDF E-1 and PDF E-2, below). As none of the buildings on the Project Site are classified as a historic resource pursuant to CEQA, the Project will have a less than significant impact on historic resources.

The Proposed Project would not cause a substantial adverse change in the significance of an archaeological resource as defined in § 15064.5. Based on the records search analysis conducted by the South Central Coastal Information Center there are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site. As such, the likelihood of encountering any significant archaeological resources during the grading and excavation phase is low. Nevertheless, since the Proposed Project will result in a substantial amount of earthwork during the grading phases, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown archaeological resources. In accordance with Section 21082 of the Public Resources Code, a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction. Accordingly, Mitigation Measure E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities.

The Proposed Project would not disturb any human remains, including those interred outside of formal cemeteries. The Proposed Project Site is currently developed with horseracing and casino-related facilities and is not known to contain any interred human remains. As such, no impacts are anticipated. Nevertheless, since the Proposed Project will result in a substantial amount of earthwork during the grading phases, a potentially significant impact could occur if the grading activities results in the accidental discovery of any unrecorded and/or unknown buried human remains, including those of Native

Americans. In accordance with the recommendations provided by the Native American Heritage Commission in response to the NOP, implementation of Mitigation Measure E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities.

The Proposed Project would not directly or indirectly destroy a known unique paleontologic resource or site. No known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Therefore no impacts are anticipated. Nevertheless, unforeseen impacts to paleontological resources may result from project implementation due to the extent of grading during the construction phases. As such, implementation of Mitigation Measure E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any such materials be accidentally discovered during the earthwork activities.

Land Use Equivalency Program

The Proposed Equivalency Program allows for specific limited exchanges in the types of land uses occurring within the Hollywood Park Specific Plan Area.

The exchange of office/commercial, retail, hotel and/or residential uses would occur at relatively limited locations within the Project Site, and within the proposed land use areas as shown on Figure II-4, Proposed Preliminary Land Use Plan. Furthermore, under the Equivalency Program, there would be no substantial variation in the Project's Circulation Plan, building pad elevations, or the depth of excavation. Potential changes in land use under the Equivalency Program would therefore have no substantial effect on the proposed earth moving activities and their associated impacts because all that is changing is the type of use occupying a building.

All of the recommended mitigation measures to minimize impacts on cultural and archaeological resources would be applicable to the Equivalency Program, as well as the Proposed Project. Since excavation and building placement would be the same as the Proposed Project, and the mitigation measures would be the same, potential impacts on cultural and archaeological resources would be the same. Thus, with respect to cultural and archaeological resources, the implementation of the Equivalency Program would result in less than significant impacts, which would be the same as the Proposed Project.

CUMULATIVE IMPACTS

Implementation of the proposed project in combination with the related projects would result in the continued development (or redevelopment) of residential, commercial, and office land uses in the City of Inglewood. Impacts to historical resources tend to be site-specific and are assessed on a site-by-site basis. A cultural resources records survey was performed to identify any previously recorded cultural resources including historic and archaeological resources within a ½-mile radius of the Project Site. Since it is unknown whether any of the related projects would result in significant impacts to cultural resources, a historic resources evaluation would need to be performed on a site by site basis to assess each project's impact upon significant historic, archaeological or paleontological resources. Similar to the proposed

project, such determinations would be made on a case-by-case basis and, if necessary, the applicants of each of the related projects would be required to implement the appropriate mitigation measures. Based on the findings presented above that no historical, archaeological or paleontological resources were found on the Project Site, the Proposed Project would not contribute to any cumulative impact upon cultural resources. Cumulative impacts would therefore be less than significant.

PROJECT DESIGN FEATURES

The following PDFs are proposed to be incorporated into the project description. As such, it is recommended that the lead agency incorporate the following project design features as conditions of project approval.

- PDF E-1. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve the Turf Club Entrance Pavilion Gate B, so that it later can be relocated on the Project Site.
- PDF E-2. Prior to demolition of the Project Site, the Project Applicant should take steps to preserve Hollywood Park's two primary monuments, Hollywood Gold Cup/Swaps and Native Driver, so that they later can be relocated to Bluff Park as an entry pavilion.

MITIGATION MEASURES

Although the structures located on the Project Site are not considered significant historic resources pursuant to CEQA, and thus no mitigation measures are required, the following Mitigation Measures (MM) have been identified so that the history of the track may be appropriately documented:

- MM E-1. Should any unknown archaeological materials be encountered during the course of the project development, construction activities shall be halted in the area of discovery to allow the monitor to determine the significance of such materials. The services of a professional archaeologist shall be secured to assess and evaluate the impact upon any significant archaeological resources and make recommendations to the Planning Director. Copies of any archaeological surveys, studies or reports documenting any archaeological resources found or recovered on site shall be submitted to the South Central Coastal Information Center, California Historical Resources Information System, California State University, Fullerton, Department of Anthropology.
- MM E-2. In the event of the unlikely accidental discovery or recognition of any human remains during construction, the following steps should be taken: (1) There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until: (A) The Los Angeles County Coroner is contacted to determine that no investigation of the cause of death is required, and (B) If the coroner determines the remains to be Native American the coroner shall contact the Native American Heritage Commission within 24 hours. The Native American Heritage Commission shall notify the person or persons it believes to be the most likely descended

from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code section 5097.98 and in accordance with California Health and Safety Code Section 7050.5. Excavation and/or earthwork activities may continue in other areas of the Project Site that are not reasonably suspected to overlie adjacent remains or cultural resources.

MM E-3. If any paleontological materials are encountered during the course of the project development, the project shall be halted in the area of discovery and the services of a paleontologist shall be secured by contacting the Center for Public Paleontology - USC, UCLA, Cal State Los Angeles, Cal State Long Beach, or the Los Angeles County Natural History Museum to assess the resources and evaluate the impact. Copies of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With respect to threshold question (a), the Proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5 and no impact would occur. Nevertheless, PDFs E-1 and E-2 above are recommended to retain elements of the Project Site's historic uses. As a result, the Proposed Project would result in a less than significant impact to historical resources.

With respect to threshold question (b), while there are no known recorded archaeological sites or isolates on the Project Site or within ¼ mile of the Project Site, MM E-1 is recommended to ensure that measures are in place to avoid or mitigate any unforeseen impacts to archaeological resources in the unlikely event that such resources are accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to archaeological resources.

With respect to threshold question (c), the Proposed Project Site is not known to contain any interred human remains. As such, no impacts associated with disturbance to any human remains, including those interred outside of formal cemeteries are anticipated. Nevertheless, implementation of MM E-2 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to Native American remains in the unlikely event that such remains are accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to interred human remains.

With respect to threshold question (d), no known unique paleontologic resources or sites are recorded or known to be located on site or in the immediate project vicinity. Therefore no impacts to paleontologic resources are anticipated. Nevertheless, implementation of MM E-3 would ensure that precautionary measures are in place to avoid or mitigate any unforeseen impacts to paleontologic resources should any

such materials be accidentally discovered during the earthwork activities. As a result, the Proposed Project would result in a less than significant impact to paleontologic resources.