

3.4 Cultural Resources

3.4.1 Introduction

This section of the Environmental Impact Report (EIR) describes and evaluates potential impacts to cultural and Tribal cultural resources that could result from implementation of the Proposed Project. The analysis in this section is based on the *Phase I Cultural Resources Assessment Report* and the *Paleontological Resources Assessment Report*, both prepared by ESA and dated January-March 2019. These reports are included as Appendix XX and Appendix XXX, respectively of this Draft EIR.

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Comments received in response to the NOP for the EIR regarding cultural resources can be found in Appendix B. Any applicable issues and concerns regarding potential impacts related to cultural resources as a result of implementation of the Project are analyzed within this section.

3.4.2 Environmental Setting

Natural Setting

The Project Site is located within the fully urbanized City of Inglewood. The Project Site is surrounded by residential and commercial development to the west, south, and east, and the former Hollywood Park to the north (currently the Hollywood Park Plan Area). Phase I of the Hollywood Park Specific Plan (HPSP) is under construction. The HPSP includes commercial, office, residential, parking, and sports stadium uses. Prior to the development of the area, historic topographic maps dating to the 1920's and 1930's indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and ending just north of the Project Site's northern boundary. The drainage was eventually impacted by the development of Hollywood Park in the 1940's.

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Hollywood Park to the north. Phase I of the Hollywood Park Specific Plan (HPSP) is under construction. The HPSP, part of which is currently under development and will result in includes new commercial, office, residential, parking, and sports stadium uses.

Prior to the development of the area, historic topographic maps indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and formerly running extending to just north of the Project Site's northern boundary.

Geological Setting

The Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.¹ The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone,

¹ Ingersoll, R. V. and P. E. Rumelhart. 1999. Three-stage basin evolution of the Los Angeles basin, southern California. *Geology* 27: 593-596.

with subsidence occurring 18 – 3 million years ago (Ma).² While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma).³ Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation.⁴ Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the Project Site occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick.⁵ The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across.⁶

Prehistoric Setting

Based on recent research in the region,⁷ the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish Contact in A.D. 1542).

Paleocoastal Period (12,000–8,000 B.P.)

While it is not certain when humans first came to California, their presence in southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.⁸ During this time period, the climate of southern California became warmer and more arid and the human

² Critelli, S. P. Rumelhart, and R. Ingersoll. 1995. Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. *Journal of Sedimentary Research* A65: 656-667.

³ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁴ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁵ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁶ Yerkes, R. F., T. H. McCulloh, J. E. Schollhamer, and J. G. Vedder. 1965. Geology of the Los Angeles Basin – an introduction. Geological Survey Professional Paper 420-A.

⁷ Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors). 2014. Paleoenvironment and Culture History. In *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California*, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California.

⁸ Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.⁹

Millingstone Period (8,000–3,000 B.P.)

During the Millingstone period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first definitive evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures.^{10,11}

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.^{12,13} Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Intermediate Period (3,000–1,000 B.P.)

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.^{14,15,16} The native populations of southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.¹⁷ Evidence indicates that the overexploitation of larger, high-

⁹ Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

¹⁰ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214-230.

¹¹ Warren, C. N. 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1-14.

¹² Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

¹³ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214-230.

¹⁴ Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

¹⁵ Wallace, W. J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11(3):214-230.

¹⁶ Warren, C. N. 1968. Cultural Traditions and Ecological Adaptation on the Southern California Coast. *Archaic Prehistory in the Western United States*, edited by Cynthia Irwin-Williams. Eastern New Mexico University Contributions in Anthropology 1(3):1-14.

¹⁷ Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*. Plenum Press, New York.

ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.¹⁸

This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and non-utilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl.¹⁹ Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P.²⁰

Late Period (1,000 B.P.–A.D. 1542)

The Late Period is associated with the florescence of the people who later became known as the “Gabrielino”, and Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.²¹ This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.^{22,23} Settlement at this time is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.

Ethnographic Setting

Protohistoric Period (A.D. 1542 to 1771)

The Project Site is located in a region traditionally occupied by the Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juafieno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and

¹⁸ Byrd, Brian F., and L. Mark Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium, in California Prehistory: Colonization, Culture, and Complexity, edited by Terry L. Jones and Kathryn A. Klar, pp. 215-227.

¹⁹ Homburg, Jeffrey A., John G. Douglass, and Seeths N. Reddy (editors). 2014. Paleoenvironment and Culture History. In People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California, Volume 1, series edited by D.R. Grenda, R. Ciolek-Torello and J.H. Altschul. Statistical Research, Redlands, California.

²⁰ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. Pacific Coast Archaeological Society Quarterly 31(3):3–27.

²¹ Kroeber, A.-L. 1925. Handbook of the Indians of California. Dover Publications, Inc., New York, reprinted 1976.

²² Erlandson, Jon M. 1994. Early Hunter-Gatherers of the California Coast. Plenum Press, New York.

²³ Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. Pacific Coast Archaeological Society Quarterly 31(3):3–27.

regional influence.²⁴ The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

At the time of Spanish contact in A.D. 1542, also the beginning of what is known as the Protohistoric Period (A.D. 1542 to 1771), many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.²⁵ This religion may have been relatively new when the Spanish arrived, and at that time was spreading to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.²⁶ Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

Spanish Period (A.D. 1769 – 1821)

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.²⁷ Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.²⁸

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples as well as exposing them to diseases that they had no resistance to. Mission San Gabriel Arcángel was founded on September 8, 1771 and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing. This lifestyle

²⁴ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁵ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁶ Bean, L.J., and C.R. Smith. 1978. Gabrielino, in California, edited by R.F. Heizer, pp. 538-549 Handbook of North American Indians, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.

²⁷ McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California.

²⁸ Johnson, J. R., and D. D. Earle. 1990. Tataviam Geography and Ethnohistory. Journal of California and Great Basin Anthropology, Vol. 12, No. 2, pp. 191-214.

change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

A Gabrielino village, or “rancheria,” known as Guaspet, or Guasna or Gaucha, appears to have been located northwest of the Project Site. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820.²⁹ At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the Project Site vicinity, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.³⁰

A ~~1938~~ 1937 map titled *The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D.* (Kirkman map) depicts approximate locations of Gabrielino villages in Los Angeles. It depicts the location of unnamed villages about 2 to 5 miles north of the Project Site but does not show any roads, landforms, or locations overlapping with the Project Site.

Mexican Period (A.D. 1821-1848)

After Mexico gained its independence from Spain in 1821, Los Angeles became the capital of the California territory in 1835.³¹ Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the California missions, reclaiming the majority of mission lands and redistributing them as land grants throughout California. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.³² Because of the disbursement that the Gabrielino populations suffered during the Mission period no land was returned to the Gabrielino Tribes.

During the Mexican Period many ranchos continued to be used by settlers for cattle grazing. Hides and tallow from cattle became a major export for Mexican settlers in California, known as Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.^{33,34}

²⁹ Reedy, Seetha N. 2015. Feeding Family and Ancestors: Persistence of Traditional Native American Lifeways during the Mission Period in Coastal Southern California. *Journal of Anthropological Archaeology*, No. 37, pp. 48--66.

³⁰ Stoll, Anne Q., John G. Douglass, and Richard Ciolek-Torrello. 2009. Searching for Guaspet: A Mission Period Rancheria in West Los Angeles. *SCA Proceedings*, Vol. 22.

³¹ Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³² Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz. 2009. *Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.

³³ Pitt, Leonard. 1994. *The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890*. University of California Press, Berkeley.

³⁴ Starr, Kevin. 2007. *California: A History*. Modern Library, New York.

American Period (A.D. 1848-present)

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hildalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.³⁵

When the discovery of gold in northern California was announced in 1848, an influx of people from other parts of North America flooded into California and the population of Los Angeles tripled between 1850 and 1860. The increased population led to additional demand of the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.^{36,37} These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.^{38,39}

History of Inglewood

During the rancho period, the City of Inglewood was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834 Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe, located approximately 2.5-miles from the Project Site, was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*. In 1834 Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe, located 2.5 miles from the Project Site, in the center of what was became a 2,200-acre ranch overlooking the now-gone Centinela Creek, on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, and built his adobe on a portion of the *Rancho Sausal Redondo*, which was granted to him as the *Rancho Aguaje de la Centinela*.

³⁵ Starr, Kevin. 2007. California: A History. Modern Library, New York.

³⁶ McWilliams, Carey. 1946. Southern California: An Island on the Land. Gibbs Smith, Layton, Utah.

³⁷ Dinkelspiel, Frances. 2008. Towers of Gold. St. Martin's Press, New York.

³⁸ Gumprecht, Blake. 2001. Los Angeles River: Its Life, and Possible Rebirth. The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.

³⁹ McWilliams, Carey. 1946. Southern California: An Island on the Land. Gibbs Smith, Layton, Utah.

Soon after Machado traded ~~the Rancho Aguaje de la Centinela~~ for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnett who eventually added the much larger *Rancho Sausal Redondo* to his holdings, ~~and~~ once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel ~~Freeman~~. In spite of drought and other hardship Freeman ~~was successfully with farming~~ barley on the ranch, and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.⁴⁰

Centinella Springs (~~California Historical Landmark 363~~), or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* ~~and the spring is~~ described as continuously existing since the Pleistocene Era, ~~and is now California Historical Landmark 363~~. ~~The site spring is memorialized and is still located at the corner of Centinela Avenue and Florence Boulevard, approximately 2-miles north of the Project Site in the City of Inglewood.~~⁴¹

Excursion trains from Los Angeles brought many prospective land buyers to Inglewood and it was able to grow to 300 residents by 1888. On May 21, 1888, a school opened with 33 students. ~~Around this time.~~ Businesses, including Mrs. Belden's Boarding House, two grocery stores, a drug store, a planning mill, a wagon repair shop, a plumbing shop, a livery stable, and five real estate offices, were built on Commercial Street (now La Brea)⁴² With a population of about 1,200, Inglewood was incorporated on February 10, 1908. That same year, the high school building was completed.⁴³

On the evening of June 21, 1920, a large earthquake struck Inglewood. While there was a lot of damage to buildings, there was no loss of life. The next few days saw a large number of tourists coming to Inglewood to ~~check-out~~ view the damage. The climate impressed ~~many of the~~ visitors who had previously never been to Inglewood, and ~~as a result~~, many settled there. The population grew to 3,286 in 1920, and in the next two years, the population doubled, making Inglewood the fastest growing city in the nation at that time.⁴⁴

The 1932 Olympic Games ~~was were~~ held in Los Angeles, ~~which was big news in Inglewood,~~ ~~as and~~ three Inglewood High School alumni won medals. Many buildings in Inglewood were used as training facilities, and the marathon route went through the town.⁴⁵ Until World War II, Inglewood had largely been supported by agricultural industry. The defense industries, in

⁴⁰ Kielbasa, John, 1998. *Historic Adobes of Los Angeles County*. Dorrance Publishing Co. Pittsburg, Pennsylvania.

⁴¹ Office of Historic Preservation, 2019. [HYPERLINK "http://ohp.parks.ca.gov/ListedResources/Detail/363.%20Accessed%20January%209"], 2019.

⁴² Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴³ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁴ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁵ Waddingham, Gladys, 1994. *The History of Inglewood*. Historical Society of Centinela Valley. Los Angeles, California.

response to WWII, transformed Inglewood into an urban community when industrial activities brought more people to live in the city. In 1946, major airlines moved operations to the LAX airport and two new hangars needed to be constructed.⁴⁶ In 1949, the airport was designated as an intercontinental air terminal by the federal government.⁴⁷

In 1967, The Forum, located less than one mile north of the Project Site, was opened as the home of the Los Angeles Lakers of the National Basketball Association and Los Angeles Kings of the National Hockey League. It also hosted a number of events such as concerts, rodeos, boxing, the circus, and ice shows.⁴⁸ The Forum is located approximately three-quarters of a mile north of the Project Site, near the intersection of South Prairie Avenue and Manchester Boulevard.

In the 1970s, a new health center was built on Manchester, north of the Project Site, and high-rise office buildings were being constructed on La Brea, to the northwest of the Project Site.⁴⁹ A new civic center was dedicated in 1973. Airport Park Hotel opened between Hollywood Park Race Track and The Forum.⁵⁰ Many senior housing developments were also built in Inglewood during the 1970s.

~~More recent developments include the closure of the Hollywood Park Race Track, in 2013, located adjacent and to the north of the Project Site, and demolition of the track in 2016. In 2016, a new NFL stadium was approved and is currently under construction on the site of the former race track, and a new Hollywood Park Casino was opened next door. Additionally, The Forum underwent a rehabilitation and reopened in 2014. "Following the rehabilitation, the Forum retains significant character-defining features... It retains integrity of location, design, setting, materials, workmanship, feeling, and association."⁵¹ (NRHP, 2014).~~

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⁴⁶ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁷ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁸ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

⁴⁹ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

⁵⁰ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

⁵¹ NRHP, 2014. National Register of Historic Places Registration Form, Forum, Los Angeles, Ca. August, 2014.

Architectural Themes

The following themes were developed to provide a context for evaluation of the existing buildings on the Project Site and their potential to qualify as historical resources: Hotels and Motels, and Apartment Hotels.

Hotels and Motels

In early America, lodging for travelers typically took the form of the public house or tavern, establishments which ~~that~~ were granted licenses to serve alcohol in exchange for offering public lodging.⁵² Following the Revolution and the War of 1812, a new generation of American hotels emerged, with a boom in hotel construction from about 1820 to 1830. By 1840, the hotel was ubiquitous across the eastern half of the United States.⁵³ The first hotel in the City of Los Angeles was the Bella Union, built on Main Street in downtown Los Angeles in 1835. The Bella Union was typical of mid-19th century hotels in Los Angeles, which tended to be small operations in modest buildings. After the Civil War, larger and more luxurious hotels began to appear in downtown Los Angeles, including the Pico House Hotel built in 1864, and the Hotel Nadeau, which opened in 1882.⁵⁴

At the end of the 19th century, American tourism began to expand rapidly as a result of increased leisure time and the availability of long-distance transportation in the form of the railroad. By the first decades of the 20th century, Los Angeles was experiencing tremendous growth. In the first thirty years of the century, the population of Los Angeles grew from 100,000 to 1,000,000, surpassing San Francisco as the largest city in the state. In accordance with this impressive growth, Los Angeles moved away from its humble pueblo beginnings as the commercial core shifted south to the new major thoroughfares of Main, Spring, Broadway, Hill, and Olive streets. Major hotels in early 20th century Los Angeles included the Alexandria Hotel (1906), the Rosslyn Hotel (1914), and the Biltmore Hotel (1923).

The early 20th century also marked the beginning of a business model that would come to dominate the hotel industry by the postwar period: the chain hotel. Rather than catering to an elite class looking for luxurious accommodation, the chain hotels of the 20th century focused on appealing to the masses. The rising importance of the automobile had a profound influence on the American hotel. Initially, car owners abandoned the hotel for “autocamping,” but the rise of the new motor hotel, or motel, offered the highway traveler a hotel experience along the roadside, often far from urban centers. By about 1940, motels outnumbered hotels in the United States and became the dominant form of lodging for the American traveler during the postwar years.⁵⁵

The middle of the 20th century also saw the rise of the hotel chain. Among the largest and most successful American hotel chains were Holiday Inn, Hilton, and Sheraton. Conrad Hilton entered

⁵²Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press.

⁵³ Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press

⁵⁴ Wallach, Ruth, Linda McCann, Dave Taube, Claude Zachary, and Curtis C. Roseman, 2008. *Historic Hotels of Los Angeles and Hollywood*. Images of America. California.

⁵⁵ Sandoval-Strausz, A.K., 2007. *Hotel: An American History*. New haven: Yale University Press.

the hotel business in Texas in 1919 and opened the first Hilton in Dallas in 1925. His company expanded across the nation and in 1943 Hilton became the first coast-to-coast hotel chain. Many smaller hotel chains also emerged during the postwar years. The Doric Company was a relatively small operator of hotels and motels in the western United States during this period. In 1963, operations included eight hotels or motels in Washington State, one in Oregon, three in Idaho, and eight in California. In contrast, while Holiday Inn had humble beginnings in the motor hotel sector it grew into a successful hotel chain in the second half of the 20th century.

Apartment Hotels

Apartment hotels are structures that provide a room or a suite of rooms, which include facilities for food preparation as well as amenities found in standard hotels such as traditional common spaces and housekeeping services. Buildings that were advertised as apartment hotels began to be built prior to World War I. Most of these structures were large, with around 100 units per building. They were fully furnished and usually located in central business districts.⁵⁶ The construction of apartment hotels tapered after the Great Depression and did not resume again after World War II ~~since because~~ they were not well suited to the automobile. Their function was replaced with motels with kitchenettes after World War II.

3.4.3 Adjusted Baseline Environmental Setting

~~As described in Chapter 3.0, Section 3.0.5, Section 3.4, Cultural Resources, assumes the Adjusted Baseline Environmental Setting. Related to Cultural Resources, the changes associated with the HPSP Adjusted Baseline development include excavation in the HPSP area and construction of new uses on the HPSP site.~~

~~As discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the Proposed Project is not anticipated to be constructed and begin operations until mid-2024 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the City has issued building permits for, and construction has commenced on, significant portions of the HPSP Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000-seat performance venue, 518,077 sq ft of retail and restaurant use, 466,000 sq ft of office space, 744 residential units, and approximately 9,900 parking spaces. All of Due to the certainty of these projects will be being constructed and in operation prior to opening of the Proposed Project. For this reason, the City of Inglewood determined that it is appropriate to include these projects in an adjusted environmental setting for the Proposed Project. Moreover, due to the certainty that these projects will be constructed and in operation, the City has concluded that it would be misleading to describe the environmental setting without taking into account these projects. Accordingly, the changes associated with these developments within the HPSP Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline environmental setting.~~

⁵⁶ SurveyLA. 2017. Los Angeles Citywide Historic Context Statement, Hotels, 1870-1980. City of Los Angeles.

~~There is no evidence that~~ The development in the HPSP area ~~does not~~ would affect the baseline for analysis of the archaeological, paleontological, or Tribal resources, ~~as at this time it is not known if any~~. No archaeological or Tribal resources have been discovered and documented during construction of the HPSP ~~that would~~ which could, if discovered and documented, provide additional information on ~~the presence or sensitivity of these resources in the area~~. In addition, ~~While views to or from~~ The Forum, which is listed on the National Register of Historic Places and the California Register of Historical Resources (California Register), is currently visible from the Project Site, and these views ~~will~~ would be obscured as a result of baseline development in the HPSP area altering the baseline conditions with regards to architectural resources. ~~If these views, however, are considered insignificant~~ insignificant due to the distance (approximately one mile) between The Forum and the Project Site, and the urban character of these views ~~the surrounding views from the~~ The Forum beyond adjacent properties and streets are not character-defining features of the resource and alterations to the surrounding setting would not affect the resource's integrity. ~~For this reason, views to or from The Forum in the direction of the Project Site, views in and of themselves do not constitute an environmental impact to a historic resource.~~ Therefore, the development in the HPSP area under adjusted baseline conditions would not affect the baseline for analysis of the historic resources as there are no historic resources present ~~in~~ on the HPSP ~~are~~ site that could be impacted by baseline development and the surrounding views of the Forum are not relevant to its significance.

3.4.4 Regulatory Setting

Numerous laws and regulations require state and local agencies to consider the effects a project may have on cultural resources. These laws and regulations define important cultural resources, stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies.

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at Public Resources Code (PRC) section 21000 et seq. CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (PRC section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations (CCR) section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the ~~California Register of Historical Resources~~ (California Register); (2) a resource included in a local register of historical resources, as defined in PRC section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or

significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of section 21084.1 of CEQA and section 15064.5 of the CEQA Guidelines apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site may be treated in accordance with the provisions of section 21083, which is as a unique archaeological resource. As defined in PRC section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or,
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

Pursuant to PRC section 21083.2, if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (PRC section 21083.1(a)). If preservation in place is not feasible, mitigation measures are required. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (CEQA Guidelines section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines section 15064.5(a). Substantial adverse change is defined as "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" (CEQA Guidelines section 15064.5(b)(1)). According to CEQA Guidelines section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or

- B. 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 PRC section 5024.1(g), 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. Convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA.

In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Standards)⁵⁷ is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines section 15064.5(b)(3)).

California Register of Historical Resources

The ~~California Register of Historical Resources~~ (California Register) is "an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register criteria (PRC section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four criteria:

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

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

⁵⁷ Weeks, Kay D. and Anne E. Grimmer, 1995. *The Secretary for the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstruction Historic Buildings*. U.S. Department of the Interior. Washington, D.C.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the State Office of Historic Preservation (OHP) and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

Public Resources Code Section 5097.98

PRC section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery until certain required steps have been taken, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. The MLD has 48 hours from the time of being granted access to the site by the landowner to inspect the discovery and Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

The State CEQA Guidelines (Title 14, Chapter 3 of the California Code of Regulations, Section 15000 *et seq.*), are prescribed by the Secretary of Resources to be followed by state and local agencies in California in their implementation of the CEQA. Appendix G of the State CEQA

Guidelines includes an Environmental Checklist Form with questions that may be used by public agencies in their assessment of impacts on the environment. The question within Appendix G that relates to paleontological resources states: "Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" The City of Los Angeles uses this question as their threshold of significance for determining whether impacts of paleontological resources are significant.

The loss of any identifiable fossil that could yield information important to prehistory, or that embodies the distinctive characteristics of a type of organism, environment, period of time, or geographic region, would be a significant environmental impact. Direct impacts to paleontological resources primarily concern the potential destruction of nonrenewable paleontological resources and the loss of information associated with these resources. This includes the unauthorized collection of fossil remains. If potentially fossiliferous bedrock or surficial sediments are disturbed, the disturbance could result in the destruction of paleontological resources and subsequent loss of information (significant impact). At the project-specific level, direct impacts can be mitigated to a less than significant level through the implementation of paleontological mitigation.

In general, for project sites that are underlain by paleontologically sensitive geologic units, the greater the amount of ground disturbance, the higher the potential for significant impacts to paleontological resources. For project sites that are directly underlain by geologic units with no paleontological sensitivity, there is no potential for impacts on paleontological resources unless sensitive geologic units which underlie the non-sensitive unit are also affected.

Public Resources Code Section 5097.5 and Section 30244

Other state requirements for paleontological resource management are included in PRC Section 5097.5 and Section 30244. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, district) lands.

California Health and Safety Code Section 7050.5

California Health and Safety Code section 7050.5 requires that in the event human remains are discovered, the County Coroner is required to be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by Governor Brown on September 25, 2014. The act amended PRC section 5097.94, and added PRC sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a

NOP or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.

The primary intent of AB 52 is to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans, known as Tribal cultural resources, that require consideration under CEQA. PRC section 21074(a)(1) and (2) defines Tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a Tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for Tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a Tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency’s formal notification and the lead agency must begin consultation within 30 days of receiving the Tribe’s request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

PRC section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of Tribal cultural resources; the significance of the project’s impacts on the Tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC section 21080.3.2(b)).

If a California Native American Tribe has requested consultation pursuant to PRC section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American Tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the Tribal cultural resources, that is submitted by a California Native American Tribe during the environmental review process shall not be included in the

environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the Tribe that provided the information. If the lead agency publishes any information submitted by a California Native American Tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the Tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

Senate Bill 18 (SB 18) (Statutes of 2004, Chapter 905), which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American Tribes before ~~We~~ will need to add some sections making certain planning decisions and to provide notice to Tribes at certain key points in the planning process. The intent is to “provide California Native American Tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places”.⁵⁸

The purpose of involving Tribes at these early planning stages is to allow consideration of cultural places in the context of broad local land use policy, before individual site-specific, project-level, land use designations are made by a local government. The consultation requirements of SB 18 apply to general plan or specific plan processes proposed on or after March 1, 2005.

According to the *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*,⁵⁹ the following are the contact and notification responsibilities of local governments:

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate Tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government’s jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the Tribe (Government Code section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed action to those Tribes that are on the NAHC contact list and have traditional lands located within the city or county’s jurisdiction. The referral must allow a 45-day comment period (Government Code section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local government must send a notice of a public hearing, at least 10 days prior to the hearing, to Tribes who have filed a written request for such notice (Government Code section 65092).

⁵⁸ Governor’s Office of Planning and Research, 2005. State of California Tribal Consultation Guidelines. Sacramento, California.

⁵⁹ Governor’s Office of Planning and Research, 2005. State of California Tribal Consultation Guidelines. Sacramento, California.

Local

The City of Inglewood's General Plan does not identify any goals or policies related specifically to cultural, paleontological, or Tribal resources.

3.4.5 Analysis, Impacts and Mitigation

Significance Criteria

A significant impact would occur if the Proposed Project would:

1. Cause a substantial adverse change in the significance of a historical resource ~~as defined pursuant to~~ CEQA Guidelines Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;
- ~~3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;~~
- ~~4. Disturb any human remains, including those interred outside of formal-dedicated cemeteries;~~
or
- ~~5. Cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:~~
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k); and
 - A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

Methodology and Assumptions

Historic Architectural Resources

The analysis of impacts to historic architectural resources is based on the ~~Phase I Cultural Resources Assessment Report~~ (Appendix ~~XXX~~) prepared by qualified personnel who meet or exceed the Secretary of the Interior's Professional Qualification Standards in history and architectural history. Key steps in completing the assessment included a ~~review of the existing properties~~ ~~survey of historic-age building~~ within the Project Site, archival research, and field documentation. Research into the Project Site's development history included a review of historic permits for improvements to the property, ~~Sanborn Fire Insurance maps~~, historic photographs, aerial photographs, and local histories. The California State Historic Resources Inventory for Los Angeles County, records housed at the California Historic Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC), were consulted to identify any

previous evaluations of potential historic resources on, or immediately adjacent to, of the Project Site or and potential historic resources immediately adjacent to the property. The only National or California Register-listed architectural historical resource within one-mile of the Project Site is the Forum. Sanborn Fire Insurance maps were not available for the area.

Under CEQA, the evaluation of impacts to historic resources consists of a two-part inquiry: (1) a determination of whether the Project Site contains or is adjacent to any historic resources that may be impacted by the Project; and, if any such resources exist, (2) a determination of whether the Project would result in a “substantial adverse change” to the significance of any such resources.

Archaeological Resources

The analysis of impacts to archaeological resources is also based on the *Phase I Cultural Resources Assessment Report*, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a quarter-~~1/20.5-~~ mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file; (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings; (3) a Sacred Lands File (s-SLF) search commissioned through the NAHC; (4) a review of available Sanborn Maps, historic aerial imagery; and other technical studies; and (5) a pedestrian survey of the Project Site.

The potential for the Project Site to contain buried archaeological resources is assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources) and SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters (maximum depth of 35 feet below ground disturbance surface) for the Project.

Paleontological Resources

The analysis of paleontological resources is based on the Paleontological Resources Assessment Report (Appendix ~~XX~~), which includes a review of the LACM paleontological records search results and other documentation regarding disturbances to the Project Site and its subsurface geological condition. The objective of the record search through the LACM was to determine the geological formations underlying the Project Site, whether any paleontological localities have previously been identified within the Project Site or in the same or similar formations near the Project Site, and the potential for excavations associated with the Project to encounter paleontological resources. These methods are consistent with the Society for Vertebrate Paleontology (SVP) guidelines for assessing the importance of paleontological resources in areas of potential environmental effect.

There are no plans, policies, or regulations with which the project is required to comply with regard to treatment of paleontological resources. However, it is accepted professional practice to recognize standard guidelines promulgated by the SVP that outline professional protocols and

practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

As defined by the SVP,⁶⁰ significant nonrenewable paleontological resources are:

Fossils and fossiliferous deposits here restricted to vertebrate fossils and their taphonomic and associated environmental indicators. This definition excludes invertebrate or paleobotanical fossils except when present within a given vertebrate assemblage. Certain invertebrate and plant fossils may be defined as significant by a project paleontologist, local paleontologist, specialists, or special interest groups, or by lead agencies or local governments.

As defined by the SVP,⁶¹ significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (Johnston and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years BP (before present).

Based on the significance definitions of the SVP,⁶² all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit known to contain significant fossils is considered to be "sensitive" to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock

⁶⁰ Society of Vertebrate Paleontology (SVP), 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 165:20-27.

⁶¹ Society of Vertebrate Paleontology (SVP), 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 165:20-27.

⁶² Society of Vertebrate Paleontology (SVP), 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 165:22-27.

unit will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case.⁶³

Fossils are contained within surficial sediments or bedrock, and are therefore not observable or detectable unless exposed by erosion or human activity. In summary, paleontologists cannot know either the quality or quantity of fossils prior to natural erosion or human-caused exposure. As a result, even in the absence of surface fossils, it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken in order to prevent adverse impacts to these resources.

Paleontological Sensitivity

Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey. In its "Standard Guidelines for the Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontologic Resources," the SVP⁶⁴ defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcaniclastic formations (e.g., ash or tephra), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e.g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).
- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in

⁶³ Society of Vertebrate Paleontology (SVP). 1993. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 16:22-27.

⁶⁴ Society of Vertebrate Paleontology (SVP). 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available at: http://vertepaleo.org/paleo/wp-content/uploads/number-16-01-10-impacts_mitigation_guidelines.pdf. Accessed January 3, 2017.

rare circumstances and the presence of fossils is the exception, not the rule, e.g., basalt flows or Recent alluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.

- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources; for instance, high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance. For geologic units with low potential, protection or salvage efforts will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontologic potential of the rock units present within the study area.

Paleontological Resources Significance Criteria

Fossils are considered to be significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
1. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
2. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
3. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
4. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.⁶⁵

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that

⁶⁵ Scott, B. and K. Springer. 2003. CEQA and Fossil Preservation in California. The Environmental Monitor.

might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.^{66,67}

Although no known resources were identified within the Project Site from the LACM search, this does not preclude the possibility of previously unknown buried paleontological resources within the Project Site that may be impacted during construction. The potential to encounter paleontological resources during construction was determined by reviewing the results of the records search, the depth of native versus fill soils, land use history, past disturbances, and the proposed excavation parameters for the Project.

Tribal Cultural Resources

The analysis of impacts to Tribal cultural resources is based on the consultation between the City and the Tribes, information provided by the tribes, and the *Phase I Cultural Resources Assessment Report*. The potential for the Project Site to contain Tribal cultural resources was assessed based on information provided by Tribes and supplemented by the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project. The NAHC was contacted on April 24, 2018 to request a search of the SLF of the Project Site.

Human Remains

The analysis of impacts to human remains is based on the *Phase I Cultural Resources Assessment Report*. The potential for the Project Site to contain human remains was assessed based on the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project.

Cultural Resources & Archival Research

A records search for the Proposed Project was conducted on May 7, 2018 by ESA staff at the CHRIS-SCCIC housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the Project Site and a 0.5-mile radius of the Project Site, and historic architectural resources within or adjacent to the Project Site.

Previous Cultural Resources Investigations

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two studies (LA-10567

⁶⁶ Scott, B. and C. Springer. 2002. CIPCA and fossil preservation in California. *The Environmental Monitor*.

⁶⁷ Scott, B., K. Brummen, and J. C. Sagarin. 2004. Vertebrate paleontology in the Mojave Desert: the continuing importance of "follow-through" in preserving paleontologic resources in the human journey and present life in California's deserts. Proceedings from the 2004 4th Annual California Ridgecrest Management Forum Publication 15-63-74.

and 11150) were performed in areas that ~~are~~ adjacent to the Project Site along West Century Boulevard. ~~None of the study areas, there are none which~~ overlap with the Project Site. LA-10567 is a linear survey report that covers several communities for a pipeline alignment, and LA-11150 is a memorandum from the Office of Historic Preservation regarding the Section 106 process for the same project.

Previously Recorded Cultural Resources

The records search results indicate that ~~no cultural resources, including archaeological or historical architectural resources,~~ have been previously recorded within the Project Site or the 0.5-mile records search radius. ~~It also indicated that no historical architectural resources have been previously recorded within or adjacent to the Project Site. The Forum is located approximately within one 1/4-mile north of the Project Site and is listed on the National Register. It is the only National Register-listed property within one mile of the Project Site. There are no California Register or California Landmarks within one mile of the Project Site.~~

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on April 24, 2018 to request a search of the SLF. ~~On April 25, 2018, the NAHC responded that there was no record of sacred lands in the SLF for the Project Site⁶⁸ to the request in a letter dated April 25, 2018 with negative findings.~~

Geoarchaeological Review

~~The desktop geoarchaeological review is provided to characterize the geology of the Project Site and assess the potential for the presence of subsurface archaeological resources in the Project Site. The desktop review was informed by study of the geological mapping of the Project Site and vicinity, historic topographic maps, historic aerial photographs, mapped soils, and a review of the geotechnical data for the site. The Project Site is located on the alluvial Torrance Plan and is situated approximately 0.6-miles east of the Newport-Inglewood Fault Zone at the intersection of West Century Boulevard and Crenshaw Boulevard. Elevation within the Project Site ranges between 87 and 106 feet above mean sea level and slopes towards the south and west. Presently, the majority of the Project Site is previously disturbed, and previously contained residences but is currently vacant land except for some utilities. The remainder (six parcels) of the Project Site ~~is~~ developed with ~~with~~ the exception of commercial properties including a motel, manufacturing, and warehouse land uses, utilities, and paved roads and parking. In addition, the Arena Site includes a parcel containing an existing City water supply well and associated infrastructure.~~

Geologically, the Project Site is situated within the West Coast Basin portion of the greater Los Angeles Basin, a broad trough formed by tectonic activity and stream erosion of nearby mountains, and filled with Quaternary-aged terrestrial and shallow marine sediments overlying

⁶⁸ Patton, Gayle, 2018, SLF Search Results for the Clippers Arena Project, On file at RSA.

Tertiary-aged marine sediments. Older geological mapping⁶⁹ depicts shallow sediments underlying the Project Site as Pleistocene-aged Lakewood Formation sand, silt, silty sand, and silty clay with occasional gravel lenses. Jennings⁷⁰ identifies sediments beneath the Project Site as river terrace deposits. Recent maps by Dibblee and Minch⁷¹ and Saucedo et al.⁷² are generally consistent with earlier maps in identifying Pleistocene-aged alluvium beneath the Project Site; however, these maps additionally identify a small area of Late Pleistocene to Holocene alluvial sediment in the vicinity of South Doty Avenue. A review of historic topographic maps (1923, 1924 and 1930) and aerial photos (1923 and 1928)⁷³ shows an intermittent stream flowing from north to south across the Project Site ~~in this location~~ suggesting a source of the sediment. As a result of the construction of the Hollywood Park racetrack in 1938, the stream is no longer evident on maps and aerial ~~photographs~~ photographs.

Geologic Map & Paleontological Literature Review

Geologic mapping by Dibblee and Minch⁷⁴ indicates that the surface of the Project Site is covered with Pleistocene-aged older alluvium (mapped as Qoa). These sediments consist of pebble-gravel, sand, and silt-clay deposited from erosion of the surrounding highlands that has since been dissected by recent erosion.⁷⁵ Older alluvium is poorly constrained in age, but is generally considered to have been deposited during the Pleistocene, 11,700 to 2.58 Ma.⁷⁶

These sediments are old enough to preserve fossil resources (i.e., over 5,000 years, as per the NHP,⁷⁷ and have a rich fossil history in Los Angeles^{78,79} and throughout southern

⁶⁹ California Department of Water Resources. 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County. Bulletin 104.

⁷⁰ Jennings, C.W., 1962. Long Beach Sheet, Geologic Map of California: California Division of Mines and Geology, scale 1:250,000.

⁷¹ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷² Saucedo, G.J., H.G. Greene, M.P. Kennedy, and S.P. Bezore. 2016. Geologic Map of the Long Beach 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, 1:100,000 Scale.

⁷³ [Historicaerials.com](http://historicaerials.com). 2018. *Historic Aerials*. Electronic database accessed October 25, 2018.

⁷⁴ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷⁵ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷⁶ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷⁷ Society of Vertebrate Paleontology. 2016. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available: http://www.paleo.org/membership/membership-subsite/SVP/Impact_Mitigation_Guidelines.aspx. Accessed January 5, 2017.

⁷⁸ Crockett, B. H. and A. Stein. 1956. A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil turtles from western North America. Bulletin of the Southern California Academy of Sciences 53:65-73.

⁷⁹ Steadman, D. W. 1980. A review of the osteology and paleontology of turtles (Aves: Mesangulimorpha). Contributions in Science, Natural History Museum of Los Angeles County 310:131-207.

California.^{80-81,82,83,84} The most common fossils include the bones of mammoth, bison, horse, lion, bearesh, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, as well as small animals such as rodents and lizards.⁸⁵ In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction,^{87,88} ecology,⁸⁹ and climate change.⁹⁰

LACM Records Search

On April 24, 2018, ESA requested a database search from the LACM for records of fossil localities and paleontological sensitivity in and around the Project Site. The purpose of the museum records search was to: (1) determine whether any previously recorded fossil localities occur in the Project Site, (2) assess the potential for disturbance of these localities during construction, and (3) evaluate the paleontological sensitivity within the Project Site and vicinity. The records search returned no known localities within the Project Site, however a number of vertebrate fossils are known from similar sedimentary deposits in Los Angeles.⁹¹ These are summarized here.

The closest locality known to the LACM from older alluvial sediments is approximately 2.0 miles west of the Project Site on Bellanca Avenue south of 98th Street, where a fossil mammoth was recovered from 40 feet bgs.⁹² North of that locality, 2.2 miles northwest of the Project Site near the intersection of Bellanca Avenue and Manchester Avenue, specimens of mammoth (*Mammuthus*), rodent (*Rodentia*), and a speckled sanddab (*Citharichthys stigmaeus*), were

⁸⁰ Hasboun, Oren & Baskin, J. 1977. A small theropod from the Late Pleistocene of Newport Beach, Orange County, California. Bulletin of the Southern California Academy of Sciences 76: 16-20.
⁸¹ Jepsen, G. E. 1991. A catalogue of Late Quaternary Vertebrates from California. Part One, nonmarine lower vertebrates and avian taxa. Natural History Museum of Los Angeles County Technical Reports No. 3.
⁸² Jepsen, G. E. 1991. A catalogue of Late Quaternary Vertebrates from California. Part Two, Mammals. Natural History Museum of Los Angeles County Technical Reports No. 3.
⁸³ McDonald, H. G. and G. E. Jepsen. 2008. Distribution of Pleistocene Notoutheriops (Neurhina, Notoutheriidae) in North America. In Wang, X. and L. J. Flynn, eds., Geology and Vertebrate Paleontology of Western and Southern South America. Natural History Museum of Los Angeles County Science Series 41: 313-331.
⁸⁴ Miller, W. E. 1974. Pleistocene Vertebrates of the Los Angeles Basin and Vicinity, exclusive of Rancho La Brea. Los Angeles County Museum of Natural History, 300-34.
⁸⁵ Springer, K. E., Smith, J., Sogohian, J., and L. Murray. 2010. The Diamond Valley Lake local fauna: late Pleistocene vertebrates from inland southern California. In: Albright, L., ed., *Papers on Geology, Vertebrate Paleontology, and Biogeography in Honor of Michael O. Woodburne*. Museum of Northern Arizona Bulletin 65: 217-227.
⁸⁶ Graham, R. W., and B. J. Lundelius. 1984. FAUNMAP: A database documenting the late Quaternary distributions of mammal species in the United States. Illinois State Museum Scientific Papers (NSV(1)).
⁸⁷ Sanderson, G. B., Faury, B., Swadlow, J., and J. C. Boersma. 2014. Global late Quaternary megafauna extinctions linked to human and climate change. Proceedings of the Royal Society B 281: 9 p.
⁸⁸ Barnosky, A. C., Ball, S., Blomke, H. E., Goodwin, J., Moad, C., Raparun, B., Scott, and A. Shabel. 2004. Ecological record of mid-Miocene vertebrates helps differentiate climate from anthropogenic ecosystem perturbations. Proceedings of the National Academy of Sciences 101: 6057-6061.
⁸⁹ Curran, S., J. H. Betsworth, and J. Quade. 1988. Late Pleistocene *C4* grass dominance and mammal remains in the Southwestern United States: from isotopic study of herbivore teeth. Quaternary Research 30: 179-183.
⁹⁰ Roy, T., T. Valantine, D. Jablonka, and S. Lidwell. 1996. Scale of climatic variability and time averaging in Pleistocene herbivore isotope data for ecology and evolution. Trends in Ecology and Evolution 11: 458-462.
⁹¹ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236-00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.
⁹² McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236-00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.

collected from 14 feet below the surface.⁹³ Near the intersection of Airport Boulevard and Manchester Avenue, fossil specimens of horse (*Equus*), mammoth (*Mammuthus*), bison (*Bison*), and rabbit (*Lepus*) were collected from 13–16 feet below surface.⁹⁴ Further west, during construction of Tom Bradley International Terminal 3.75 miles from the Project Site, a fossil elephant (*Proboscidea*) was collected from 25 feet below surface.⁹⁵

Historic Maps and Aerial Photographs

The available historic maps and aerial photographs indicate that the vicinity of the Project Site was largely rural until the early 1920s. An aerial image of the area from 1923 shows a mixture of residential development and agricultural properties. In 1928, the area remained sparsely developed but the agricultural properties appear uncultivated or developed with residential buildings. Between 1928 and 1963, the area became nearly fully developed with single- and multi-family residences, while the properties in the Project Site along West Century Boulevard and South Prairie Avenue transitioned from residential to commercial use. Between 1952 and 1963 many of the single family residences and lower density multi-family residences east of South Prairie Avenue were replaced with apartment buildings, hotels and commercial buildings that took up most of any given parcel with zero or minimal lot line setbacks.

Building permit information obtained from the City of Inglewood’s Building Safety Division provide a history of ownership and construction within the Project Site for the two parcels (3940 West Century Boulevard and 10212 South Prairie Avenue) containing historic age buildings. ~~The history and status of these buildings are described and are included in the Cultural Resources Assessment Technical Report in Appendix XX.~~

Pedestrian Survey

ESA archaeologists and historians conducted an intensive survey of the entire Project Site for historic, ~~and archaeological,~~ and paleontological resources. The surveys were aimed at identifying historic architectural resources, ~~and archaeological, and paleontological~~ resources within ~~or immediately adjacent to~~ the Project Site. Areas with visible ground surface were subject to pedestrian survey using transect intervals spaced no more than 10 meters (approximately 30 feet) apart. Existing on-site buildings and structures, as well as the immediate surroundings, were photographed. ~~In addition, a reconnaissance survey of the adjacent residential neighborhood south of the Project Site was conducted in order to assess the potential for a historic district and to assist in the assessment of indirect impacts to offsite historical resources. The survey area was bounded by West 102nd Street to the north, South Doty Avenue to the east, West 106th Street to the south, and South Freeman Avenue to the west. Due to the highly developed nature of the area surrounding the Project Site the possibility of impacts to offsite architectural historical resources diminished greatly as distance from the Project Site increased. Additionally, South~~

⁹³ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.

⁹⁴ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.

⁹⁵ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.

Prairie Avenue and West Century Boulevard are wide, four-lane roads that provide additional buffer between the Project Site and the areas to the west and north.

The Project Site is comprised of four discontinuous areas as described above in Chapter 2 of this EIR. Project Description. All but six parcels (4032-001-039 and -049, 4032-007-035, and 4032-008-002, -006, and -035) that make up the Project Site are currently vacant or undeveloped. The developed six parcels are all within the Arena Site. These areas are largely undeveloped with the exception of the Arena Site. The northern portion of the Arena Site contains buildings within its northwestern and south-central portions, as well as a construction staging yard in its eastern half. The undeveloped portions of the Project Site were subject to pedestrian survey and all seven parcels contain low-lying non-native grasses, which obscured ground surface resulting in ground surface visibility ranging from 30 to 70 percent. All undeveloped five parcels on the Project Site contained modern and building debris including plastic, glass, metal, ceramic, cement, and brick fragments. One historic-period isolate, a clear-glass beverage bottle (EAN-1), and one abalone shell fragment (WSN-1), were identified as a result of the survey.

Two historic-age architectural resources were identified on the Project Site as a result of the survey. These buildings include including the former Turf and Sky Motel (currently the Rodeway Inn & Suites motel), located at 3940 West Century Boulevard within the northwest portion of Arena Site, and a commercial building (currently Let's Have a Cart Party) located at 10212 South Prairie Avenue, within the southern portion of the Arena Site. In addition, the neighborhood south of the Project Site dates from the early 20th century and was surveyed in order to analyze potential indirect impacts. Also, two historic-age architectural resources were identified within the Project Boundary Expansion Alternate Prairie Access Variant; 10204 South Prairie Avenue and 10226 South Prairie Avenue. Detailed descriptions and significance evaluations of these resources are provided in the Phase I Cultural Resources Assessment Report included as Appendix XX of this Draft EIR.

Impacts and Mitigation Measures

Impact 3.4-1: Implementation of the Proposed Project could cause a substantial adverse change in the significance of a historical resource as defined in pursuant to Section 15064.5. (Less Than Significant with Mitigation)

Direct Impacts

Historic Architectural Resources

As discussed in the Cultural Resources Assessment Report (Appendix X), the Rodeway Inn & Suites (formerly the Turf and Sky Motel) located at 3940 West Century Boulevard, and other buildings at 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue are the only extant, historic-age buildings on the Project Site. All both of these buildings were constructed more than 45 years ago, meaning they meet the general age requirement to qualify as historical resources. As such, the buildings were evaluated for eligibility for listing under the National and California Registers.

As discussed under Existing Conditions, above, the Rodeway Inn & Suites at 3940 West Century Boulevard (4032-001-049) was evaluated against the following theme: Hotels and Motels. The Rodeway Inn & Suites is a two-story hotel designed in a contemporary and modest interpretation of the Spanish Colonial Revival style. The hotel was originally constructed in 1955 and has an "O" shaped footprint with a rectangular courtyard situated in the middle that includes a driveway providing access to the surface parking lot at the rear of the property. The hotel building is oriented toward the north with horizontal massing. It is clad in stucco and has a mansard roof with clay tiles. The hotel is set back from the road behind an asphalt parking lot. Planters are located on the east and west sides of the parking lot with mature palm trees and shrubbery. There is also a planter centered on the front property line and flanked by two driveways. There is a concrete wall present at the side (east and west) and rear (south) property lines.

The other on-site, existing, historic-age buildings on the Project Site is at 10212 South Prairie Avenue (4032-008-035), which is not associated with an established theme. 10212 South Prairie Avenue includes a commercial building that abuts the west property line and one smaller accessory building. The primary (west) façade of the main building faces South Prairie Avenue. It is rectangular in plan and does not represent any particular architectural style. It has a flat roof with a mansard parapet covered in Spanish-style roof tiles. The primary façade is symmetrical and features a pair of glazed, metal-frame doors flanked by two large plate glass windows. This façade is clad in stucco and large rocks while the secondary façades are clad only in stucco. One smaller accessory building, which is noted on one building permit application as a detached garage, is located along the east property line. This building is clad in stucco and has a hipped roof with shallow eaves and composite shingles.

10204 South Prairie Avenue, and 10226 South Prairie Avenue are residential buildings located within the Altonville Prairie Access. Various other properties are also not associated with, and also did not fall under an established theme. There are two buildings on parcel 4032-008-002 (10204 South Prairie Avenue) which were constructed in 1952.²⁹ The first building is a single-story tri-plex. Entrances for the residences appear to be on the north and south sides of the main building with a secondary (side) façade fronting South Prairie Avenue. The tri-plex has an irregular footprint and a cross-hipped roof that is clad in composite shingles. The exterior walls are clad in stucco. Windows and doors are modern replacements and there are no distinct architectural details. The second building is a detached double garage. The garage has an L-shaped footprint and a flat roof. Modern roll-up garage doors are located on the west façade. It is also clad in stucco and devoid of architectural detailing. A single-family home currently occupies 10226 South Prairie Avenue (parcel 4032-008-006) (Figure 29). The residence appears to have been rectangular in plan originally. A large addition on the south side is visible from the right-of-way. A small addition is visible on aerial photographs. The front gabled roof projects out over a porch that runs the full length of the original, west (primary) façade. The west façade is asymmetrical

²⁹ City of Inglewood Building Permit Application 300726.

~~and includes a single pedestrian door and two aluminum slider windows. The exterior is clad in stucco. Security bars cover most of the windows.~~

All of the historic-age buildings present were evaluated using the criteria for the National and California registers. The buildings at 3490 West Century Boulevard, 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue are not ~~recommended~~ considered eligible for listing in the National Register or California Registers. As such, they do not meet the definition historical resources as outlined in CEQA Guidelines section 15064.5(a)(1) or (2), and the Proposed Project would not have a ~~direct~~ impact on historical resources. Accordingly, no further analysis of ~~direct~~ impacts on historic architectural resources qualifying as historical resources is required pursuant to CEQA.

Archaeological Resources

As a result of the archival research and archaeological resources survey two archaeological resources consisting of one historic-period isolate (EANS-1) and one shell isolate of ~~undetermined~~ ~~undetermined~~ age (WSN-1) were identified within the Project Site. Due to their isolate nature and lack of clear cultural context, EAN-1 and WSN-1 are not eligible for listing in the California Register and do not otherwise qualify as historical or unique archaeological resources pursuant to CEQA.

Based on previous geological and geotechnical work, the Project Site is likely to contain alluvial sedimentary deposits dating to the Late Pleistocene and Holocene. These deposits are expected to be most prevalent in the vicinity of South Doty Avenue between the northern portion of the Arena Site and East Parking ~~Garage~~ and Hotel Site, which formerly contained a channel drainage. Based on age and environment, these middle/late Holocene sediments are considered more sensitive for buried, intact cultural resources than areas to the east and west, which are underlain by older alluvium. The older alluvial unit has low sensitivity to contain buried cultural resources ~~since~~ ~~because~~ these landforms ~~remained~~ have remained relatively stable through the Holocene; if cultural remains had been left behind they would have tended to remain at or near ground surface, and subject to decay or other destructive forces, ~~including from the extensive disturbance at the Project Site.~~

The entirety of the Project Site has been ~~subject to prior~~ ~~disturbed, including development that includes some or all of the following:~~ historic development, demolition of development, and removal of foundations and other components; and the surface of the portions of the Project Site that are currently ~~undeveloped, vacant~~ have been graded and/or plowed. The likely net effect of these actions, particularly in areas with little to no younger alluvium, would be to destroy or disturb any cultural resources that may have existed on the site, further reducing the prehistoric archaeological sensitivity of these areas.

Although the likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, there remains the possibility that Project-related ground disturbance, which could extend to depths of 35 feet below ground disturbance, could encounter archaeological deposits that

qualify as historical resources or unique archaeological resources. ~~If such resources were encountered, the Project, and would be considered~~ have a **potentially significant impact** on those resources.

Indirect Impacts/Offsite Resources

Historic Architectural Resources

~~Indirect impacts~~The Proposed Project ~~was~~ analyzed to determine if ~~it~~ the Proposed Project would result in a substantial adverse change to the integrity of adjacent or nearby historical resources. The ~~indirect impacts study area for offsite resources~~ was defined as the area adjacent to the Project Site. A reconnaissance survey was performed to assess the possibility of indirect impacts. ~~Currently, there are~~ While ~~no~~ National or California register-listed historic resources located adjacent to the Project Site, ~~likely because they have not been previously evaluated or have not been added to the listing.~~ However, historic aerial photographs indicate that there are historic-age residences along West 102nd Street to the south and west of the West Parking and Transportation Hub Site. The West Parking and Transportation Hub Site is currently undeveloped vacant land; however, it was previously developed with residences along West 101st and West 102nd Streets with commercial buildings along South Prairie Avenue and West Century Boulevard and the larger surrounding area has been developed since the 1920s. While the proposed six-story parking garage would be taller than the buildings that previously occupied this portion of the Project Site, redevelopment in an urban setting such as this does not generally constitute a substantial adverse change.

Also, The Forum, located approximately one mile north, is the nearest listed historic resource to the Project Site. The Forum has been listed on ~~under~~ the National Register and California Registers under Criterion C/3, respectively, for its representative work of a master. It was designed by Charles Luckman and Associates in the New Formalist architectural style. The Forum is a multi-purpose indoor arena built in 1966 and hosted its first event in 1967. The following character-defining features were identified in the National Register Nomination:

~~-----~~ Exterior:

- ~~--~~ Symmetrical façade
- ~~--~~ Central location on an open site with high visibility from adjacent streets and properties
- ~~--~~ Low profile landscaping
- ~~--~~ Raised podium
- ~~--~~ Concrete ramps and railings
- ~~--~~ Sculptural columnar supports that form an arcade and covered passage at the exterior
- ~~--~~ Smooth surfaces of the exterior concrete columns
- ~~--~~ Original roof fascia profile
- ~~--~~ Flat roof
- ~~-----~~ Suspension roof system

- Metal panel exterior walls set back from colonnade
- Four main entrances with multiple personnel doors
- Original ticket windows

The Forum is located outside of the Project Site impact study area approximately one mile north of West Century Boulevard along South Prairie Avenue and the Proposed Project would not physically alter the building. The character-defining features that are associated with setting include landscaping surrounding the Forum and views from adjacent streets and properties. While the Forum is currently visible from some points in and around the Project Site, it is likely that these views will be at least partially blocked by the Phase 4 development in the HPSP. However, whether or not the Forum is visible from the Project Site is not relevant to its continued eligibility. No listed historic resources are present adjacent to any of the four areas that constitute the Project Site and altered views to and from the Forum would not result in its ineligibility; therefore, there would be no indirect impact resulting from the Proposed Project. The Project Site is approximately one mile away and would not be considered adjacent. For this reason, views to or from the Forum from the Project Site would not be relevant in assessing potential Project impacts to the Forum. The Forum is currently visible from some points in and around the Project Site, and these views will be obscured as a result of HPSP Adjusted Baseline development in the HPSP area. Any such views will be blocked by development currently under construction in Phase 4 associated with the Adjusted Baseline portion of the HPSP. For this reason, the Proposed Project will not be visible from the Forum, and therefore will have no effect on the visual context for the Forum. If the Proposed Project were visible from the Forum, the Proposed Project would not affect the continued eligibility of the Forum as a historic resource. However, the setting is already highly urbanized, and the distance between the Forum and the Project Site (approximately three quarters of a mile) is too great for either to alter the context of the Forum, the other and the Proposed Project would not impact any of the character-defining features of the Forum. Altered views to and from the Forum would not result in its ineligibility; therefore, a significant indirect impact would not result from the Proposed Project.

Archaeological Resources

Archaeological resources are not evaluated for offsite indirect impacts as they are typically underground or buried resources within the Project Site and would not be impacted indirectly by Project development.

Mitigation Measures

Mitigation Measure 3.4-1

Retention of Qualified Archaeologist. Prior to the start of ground-disturbing activities associated with the Project, including demolition, trenching, grading, and utility installation, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology.

(U.S. Department of the Interior, 2008) to carry out all mitigation related to cultural resources.

- a) Monitoring and Mitigation Plan. Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved prior to the issuance of the first grading permit.
- b) Cultural Resources Sensitivity Training. The qualified archaeologist and Native American Monitor shall conduct construction worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (i), for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.
- c) Archaeological and Native American Monitoring. The qualified archaeologist will oversee archaeological and Native American monitors who shall be present during construction excavations such as grading, trenching, or any other construction excavation activity associated with the Project and as defined in the Monitoring and Mitigation Plan. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American monitor.
- d) In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50-feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).
- e) If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation.

- Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.
- f) In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource.
- g) If the resource is identified as a Native American, the qualified archaeologist and project applicant shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered, to the extent feasible.
- h) Prepare a final monitoring and mitigation report for submittal to the Applicant, and the SCCIC, in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report which will be submitted to the appropriate repository, SCCIC, and the applicant. The final monitoring report shall be submitted to the Applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.
- a) Retention of Qualified Archaeologist. Prior to the start of ground-disturbing activities associated with the Project, including demolition, trenching, grading, and utility installation, the City project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources.
- b) Cultural Resources Sensitivity Training. Prior to start of ground-disturbing activities associated with the Project, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel conducting, supervising, or that is associated with demolition and ground disturbance, including utility work, for the Project. The training shall be offered in additional languages as necessary to train all construction personnel on the Project. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be enacted implemented in the event of an inadvertent discovery of archaeological resources or human remains. The City project applicant shall require the inclusion in construction contracts a requirement that all construction personnel conducting, supervising, or that is associated with demolition and ground disturbance,

~~including utility work for the Project are made available for and attend the training and retain documentation demonstrating attendance.~~

~~e) **Inadvertent Discoveries.** In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 100 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the City project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).~~

~~i. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.~~

Level of Significance After Mitigation: Mitigation Measures 3.4-1(a) through 3.4-1(e) would avoid and/or lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-1(a) through 3.4-1(e) for the retention of a qualified archaeologist, cultural resources sensitivity training, and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-1(a) through 3.4-1(e), the impact to archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

Impact 3.4-2: Implementation of the Proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Less Than Significant with Mitigation)

Archaeological resources not qualifying as historical resources under CEQA are considered for their potential to qualify as unique archaeological resources. Review of previous investigations undertaken in the vicinity of the Project Site, as well as review of the prehistoric context for the area, provides an understanding of the potential for encountering prehistoric archaeological resources in the Project Site during Project construction. When completing analysis of subsurface archaeological sensitivity, important factors to consider include elevation, soil conditions, proximity to water, proximity to raw materials, and ethnographic and historic information. It is

also necessary to evaluate the historic land use and past development and disturbances on the Project Site in determining the possibility for the preservation of subsurface prehistoric archaeological materials.

As discussed above under Impact 3.4-1, no archaeological resources have been previously recorded within or adjacent to the Project Site, and two archaeological resources consisting of one historic-period isolate (EAN-1) and one shell isolate of undetermined age (WSN-1) were identified within the Project Site during survey. Due to their isolate nature and lack of clear cultural context, EAN-1 and WSN-1 are not eligible for listing in the California Register and do not otherwise qualify as historical or unique archaeological resources pursuant to CEQA.

The geoarchaeological review indicates that much of the Project Site is underlain by Pleistocene-aged alluvium which has low potential for intact archaeological deposits. An area of Late Pleistocene to Holocene alluvium is mapped along South Doty Avenue between the Arena Site and the East Parking Garage and Hotel Site; the Late Pleistocene to Holocene alluvium has higher potential to contain buried archaeological deposits. Furthermore, the historic map and aerial photograph review indicates the Project Site was developed by the 1920s with residential subdivisions, which were largely replaced by commercial buildings sometime in the 1960s. As such, there may be historic-period archaeological deposits associated with the early residential development of the Project Site. Given the degree of disturbance within the Project Site, which has included the prior construction and demolition of residential and commercial buildings, prehistoric and/or historic-period archaeological deposits that may have underlain the Project Site could have been destroyed.

Although the likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, there remains the possibility that Project-related ground disturbance, which could extend to depths of 35 feet below ground disturbance on the Arena Site, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources, and would be considered a **potentially significant impact**.

Mitigation Measures

Mitigation Measure 4.3-2

Implement Mitigation Measure 4.3-1.

Level of Significance After Mitigation: Mitigation Measure 3.4-2 would avoid and/or lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. Therefore, the recommended Mitigation Measure 3.4-2 for the retention of a qualified archaeologist, cultural resources sensitivity training, archaeological and Native American monitoring and inadvertent discovery protocols is proposed to address potential impacts. With implementation of Mitigation Measure 3.4-2,

the impact to archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

Impact 3.4-3: Implementation of the Proposed Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

The review of the scientific literature and geologic mapping, as well as the records search from LACGM, were used to assign paleontological sensitivities following the guidelines of the SVP^{97, 98} to the geologic units present at the surface and subsurface of the Project Site that would be subject to ground-disturbing activities. As a result of this study, the surficial sediments of the Project Site identified as Older Quaternary Alluvium which is present on the surface and assigned high paleontological sensitivity, as they have a proven record of preserving scientifically significant fossils throughout Los Angeles. A wide variety of Ice Age fossils are known from these sediments across the Los Angeles Basin, as reviewed above, including multiple specimens belonging to ten taxa known from within 2- to 4-miles of the Project Site.⁹⁹ Excavation within the Project Site during construction for is planned at depths up to 25-foot bgs, which would impact Older Quaternary Alluvium determined to have a high sensitivity for fossils. As a result, Project construction would have the potential to directly or indirectly destroy a previously unknown unique paleontological resource not identified in the analysis conducted for the Project. This would be considered a potentially significant impact.

Mitigation Measures

Mitigation Measure 3.4-3

- a) *A qualified paleontologist meeting the Society of Vertebrate Paleontology (SVP) Standards (SVP-2010) shall be retained prior to the approval of demolition or grading permits. The qualified paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project construction kick-off meeting and Project construction progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered during demolition and ground disturbing activities.*
- b) *The qualified paleontologist shall prepare, design, and implement a monitoring and mitigation program for the project consistent with Society of Vertebrate Paleontology Guidelines. This Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project Site, data recovery (including*

⁹⁷ Society of Vertebrate Paleontology. 1993. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 16(2):22-27.

⁹⁸ Society of Vertebrate Paleontology. 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontologic resources. Available: http://verteps.org/membership/member-fiches/SVP_impact_mitigation_guidelines.pdf. Accessed January 2, 2017.

⁹⁹ Maloney, S. 2018. Rare Paleontological Resources for the proposed Chippewee Arena Project, Project # 171226-00, at the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz, May 8, 2018.

halting or diverting construction so that fossil remains can be salvaged in a timely manner, fossil treatment, procurement, and reporting.

ci) The qualified paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting, prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (b). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground disturbing activities. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.

ci) Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SDP, 2016) under the direction of the qualified paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed older Quaternary alluvial sediments which have been determined to be present at the surface as mapped, which have high sensitivity for encountering paleontological resources. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist. Monitors shall have the authority to and shall temporarily halt or divert work away from exposed fossils or potential fossils, and establish a 50-foot radius temporarily halting work around the find. If fossils are encountered, the qualified paleontologist shall determine their significance, and, if significant, supervise their collection for curation. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.

ci) Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The qualified paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.

Level of Significance After Mitigation: Implementation of Mitigation Measures 3.4-3(a) and through (c) would ensure that paleontological resources would be identified before they had been damaged or destroyed, and then properly evaluated and treated. Thus, the impact would be considered less than significant.

Impact 3.4-43: Implementation of the Project could cause a substantial adverse change in the significance of a Tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:

- i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k).
- ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe. (Less Than Significant)

Tribal Consultation

Letters, meeting notes, and other materials reflecting the City's consultations with Native American Tribes are provided in Appendix XXX. The following discussion summarizes those consultations.

On February 12, 2018, the City submitted request-to-consult letters requesting consultation to five Native American individuals and organizations on the City's AB 52 Notification List on February 12, 2018. Consultation materials including letters, meeting notes, and materials provided by the Tribe are provided in Appendix XXX. In response, on both February 16, 2018 and March 2, 2018, the City received letters via email from the Gabrieleno Band of Mission Indians – Kizh Nation (Tribe) requesting formal consultation.

On February 23, 2018 the City received a letter from the NAHC in response to the receipt of the NOP for the DEIR. In summary, this letter makes recommendations for the lead agency to determine if there are historical resources within the area of project effect, as well as satisfy all statutes in accordance with AB 52 and SB 18 and consult with California Native American Tribes that are affiliated with the geographic area of the proposed project.

On March 21, 2018 and again on March 20, 2019, the City met with representatives of the Gabrieleno Band of Mission Indians – Kizh Nation on Wednesday, March 21, 2018 regarding consultation. The Tribe provided their knowledge of the Project Site and their concerns about the proposed project as it is located in their ancestral territory, and they consider the project area to have a high sensitivity for finding cultural resources and human remains related to trade routes and village activity. The Tribe also indicated that the Project Site is archaeologically sensitive, but did not identify any known Tribal cultural resources (as defined in Public Resources Code Section 21074) within the Project Site. The Tribe provided a map, consistent with Figure 3.4-1, 1937 Kirkman Map showing the nearest known Native American village sites and trade routes, none of which overlapped with the Project Site—the nearest one is over two miles to the west labeled "Old Salt Road" which curves around to the north of the Project Site also a distance of

over two miles to the north of the Project Site.¹⁰⁰ The Tribe also submitted images of four pages from what appears to be an uncited, untitled report that did not have a title provided. These pages include reproductions of four historic hand drawn maps that include: "Rancho del paso de las carretas" (located approximately 4.875 miles northwest of the Project Site), "Rancho Sausal Redondo" (located approximately 4 miles north of the Project Site), a portion of the Kirkman map identifying the location of "Guacha" (located approximately 6 miles northwest of the Project Site), and the Johnston 1952 map depicting the villages "Sa'angna" (located approximately 5.61 miles northwest of the Project Site).^{101,102,103,104} The tribe further referenced the 1920 topographic map and the presence of the ephemeral drainage to the north of the Project Site, which they expressed, could have indicated the presence of tribes in the area utilizing the available natural resources. Additionally, the Tribe also provided their standard recommended mitigation measures, which include consist of Native American monitoring, protocols to follow in the event of unanticipated discovery of cultural resources, protocols to follow in the event of unanticipated discovery of human remains, and professional standards descriptions for archaeological staff during construction projects. During the meeting the Tribe stated that indicated that they consider the Project Site to have a high sensitivity for cultural resources and human remains. According to the Tribe, the Project Site is located in an area featuring, related to trade routes in the area and village activity. The Tribe asked if whether a Phase I (Cultural Resources) study had been prepared. The Tribe also stated, and emphasized that site surveys and SLF database searches are only a starting point, and that resources might be present even if they had not been detected by previous surveys even though resources have not been recorded in the area doesn't mean that they aren't there (have not yet been discovered). The Tribe also requested (1) that the City require made preliminary requests that included, sensitivity training, "having a Tribal Native American monitor on-site to monitor ground disturbance activity in order to ascertain if there is a high potential for resources, and in order to do this they must be present at the site."; (2) that (The Tribe be provided also requested the opportunity to that they would like to review the EIR's description of Tribal history; and (3) that the Tribe be provided the opportunity to review proposed mitigation measures addressing Tribal resources. The meeting minutes and materials provided are provided in Appendix XX.¹⁰⁵

The Tribe also submitted images of four pages from what appears to be an uncited report with no title provided. These pages include reproductions of four historic hand drawn maps, including one entitled "Rancho del paso de las carretas," which is a hand drawing showing the location of the

¹⁰⁰ George W. Kirkman, 1937, The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D., 1887, Map on File, Map Room of the History Department, Los Angeles Public Library, Los Angeles, CA.

¹⁰¹ California State Archives, n.d. Plano for the Rancho Sausal Redondo.

¹⁰² California State Archives, n.d. Location of Guacho on the 1839 plano for the Rancho La Ballena.

¹⁰³ George W. Kirkman, 1937, The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D., 1887, Map on File, Map Room of the History Department, Los Angeles Public Library, Los Angeles, CA.

¹⁰⁴ Johnston, Bernice Eastman, 1952, *California's Gabrielino Indians*, Southwest Museum, Los Angeles, California.

¹⁰⁵ Murphy & Bowl, 2018, Gabrielino Band of Mission Indians Consultation, Wednesday, March 21, 2018, Meeting Minutes on EIR at ESA.

village of Guacho on a map of the Rancho La Ballona. The Ballona land grant (or rancho) is approximately 4.87 miles to the northwest of the Project Site, just to the north of the Sausan Redondo land grant.

language regarding their history and mitigation language that will be considered during the EIR process:

The Tribe presented a map from 1938¹⁰⁶, created for Los Angeles County, and described the map as illustrating trading routes and main villages in the county. According to the Tribe, and that “the *Agua de Centinela* is shown on the map as a prominent site within the vicinity of the Project location.” Tribe members also cited the presence of mentioned another historical landmark around Florence Avenue and South Prairie Avenue where a “landmark/plaque marks the spot where an old spring (Centinela Springs) served as the primary water source for tribes in that area; a village was located and there are trading routes extending from the area down south to the Project location). The map shows the trading routes and where features are located or likely to be located and informs the tribe where tribal resources are concentrated.” The Tribe described the role of trade in ancient society and that trade was the fabric of life for them the Tribe: “Every family was involved in the trade and their fundamental beliefs were that the creator provided them with so many gifts it was their job to share with surrounding nations, including gifts from the ocean and the land.” The Tribe described stated that these were traded along trade routes that had been used for thousands of years and that activity “could indicate a high likelihood of cultural resources or human remains along these routes.” The Tribe stated expressed that “these trade routes have the highest amount of burials along them and there are recent cases [no specific information was given] where the Project team did not implement proper mitigation programs and remains were encountered and destroyed as oral information provided by the tribes was not considered and impacts were not analyzed.”

The Tribe asked if whether any research had been done performed for the area and provided several maps with descriptions detailing the documented history of the area which indicate prominent locations with native settlements. These locations included including *Guachongos* (Playa Vista area — main subcenter of the village site) and *Soyja* (smaller villages off the main site, utilized for trade). The Tribe explained that these locations traded with Catalina Island and Santa Barbara, utilizing the routes from inland to the coast, and described stated that “a Mr. Avila resided near this location where they called it Los Carriles which was associated with Ballona Creek.” The Tribe explained that “these areas have a higher degree of sensitivity because of resources found previously and this includes areas such as Venice Beach and Culver City where resources are found constantly. The families in this area owned oak trees and resources such as the Baldwin Hills were used by many families. Oil was an important resource to tribes for water proofing and medicine. Because of the oil the people were able to be a sedentary society.

¹⁰⁶ George W. Kirkman, 1937, The Kirkman-Harrison Pictorial and Historical Map of Los Angeles County 1860 A.D. - 1937 A.D., 1937, Map on Film - Map Room of the History Department, Los Angeles Public Library, Los Angeles, CA.

Earthquake faults like the Inglewood Fault allowed for opening in the ground to make oil, water, and other resources accessible on the surface.¹⁰⁷

The City responded that research would be conducted by the Planning Department City and its consultants to identify previous studies that may have been conducted in the area.

In response to this, Tribe members stated mentioned that “their main concern are projects that don’t have information or any previous studies, however, even if a study has been conducted, they are still finding remains in areas that have been previously impacted.” The Tribe cited an example of. They provided a case example where “there was a project site that had studies dating back to 1997-2003 and yet in 2018 they found remains, and this leads to the question of whether other remains have been found in the past? And if so, what happened to these remains?”

The Tribe stated indicated that “their goal now is to inform decision makers so that they can make an educated decision to protect that last remains of their ancestors.” In closing, the Tribe stated that “this meeting is only an introductory. We also have books and oral history. In regard to the maps, we have provided [them] to show the significance of the land surrounding the area.”

The Tribe submitted (The Kirkman map was submitted to the City on March 21, 2018 via two separate emails, the first as an attachment that includes an image of the map itself, and second second as a second email a graphic that depicts an overlay of the original map on an aerial photo from Google Earth with the location of the Project Site on the map. There are two versions of this graphic: the second (aerial) map shows a more expansive area around the Project Site. These graphics, results of the Project Site location on the overlay are consistent with Figure 3.4-1 produced as part of the cultural analysis.)¹⁰⁷

The Tribe also submitted images of four pages from what appears to be an uncited report with no title provided. These pages include reproductions of four historic hand-drawn maps,

including one entitled “*Rancho del paso de los cerros*,” which is a hand drawing showing the location of the village of *Cuervo* on a map of the *Rancho La Ballona*. The *Ballona* land grant (or rancho) is approximately 4.87 miles to the northwest of the Project Site, just to the north of the *Sauan Redondo* land grant.

¹⁰⁷ George W. Kirkman, 1937, The Kirkman Historical and Historical Map of Los Angeles County 1860 A.D. 1937 A.D. 1887, Map on File, Dep. Res. of the History Department, Los Angeles Public Library, Los Angeles, CA.

Figure 3.4-1 1937 Kirkman Map

The second hand-drawn map is of the *Rancho Sausal Redondo*. The *Rancho Sausal Redondo*'s boundaries end at West Century Boulevard to the north of the Site and South Prairie Avenue to the west of the Project Site, and extend northwest over 4 miles to just south of Jefferson Boulevard. This map is also depicted in McCawley¹⁰⁸ who describes the map as a "Map of *Rancho Sausal Redondo* showing the Mexican land grant of *Guaspita* located on the east bank of Ballona Creek." This grant included the site of the Gabrielino community of *Waachnga* and McCawley¹⁰⁹ explains that the name *Guaspita* was probably derived from that earlier Gabrielino placename *Waachnga*. *Guaspita* is depicted on the map a short distance from the coast on the hill overlooking Ballona Creek¹¹⁰, which is located approximately 5 miles to the northwest of the Project Site. The third hand-drawn map is a portion of the Kirkman map which calls out the location of *Guacha*, which is again depicted near Playa del Rey near the banks of the Ballona Creek. The final hand-drawn map is cited as "Johnston 1962"¹¹¹, which depicts geographical features and known Gabrielino villages at the time of the Portola Expedition. The map depicts a village called *Sa'angna* just to the south of the Ballona Creek, northwest of the Project Site. It does not depict any labeled villages in the immediate vicinity of the Project Site. McCawley indicates that *Sa'angna* was a Gabrielino village located near the banks of the Ballona.¹¹²

On March 21, 2018 the Tribe submitted another document entitled "Cultural Resources Mitigation Measures, regarding Tribal Cultural Resources and Human Remains and associated funerary objects within Kizh Gabrieleno Tribal Territory" which provides recommendations for project applicants to follow during project construction, which include the retention of a qualified Native American Monitor during construction-related ground disturbance, unanticipated discovery of tribal cultural resources mitigation, unanticipated discovery of human remains and associated funerary objects mitigation, as well as professional standards descriptions.

Analysis

In support of the Project, the The Phase I Cultural Resources Assessment Report includes a prehistoric and historical context of the Project Site and vicinity, and summarizes the Rancho prehistory of Inglewood. The study report also includes a summary of the record search results, a land use analysis, and geoaerchaeological analysis of the Project Site. This information was analyzed in order to assess the sensitivity for cultural resources during ground disturbance.

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two ~~run are~~ adjacent to the Project Site along West Century Boulevard. None of the previous studies and there are none which overlap with the Project Site. The previous studies include a linear survey report that

¹⁰⁸McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

¹⁰⁹ McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

¹¹⁰ McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

¹¹¹ Johnston, Bernice Eastman. 1962. *California's Gabrielino Indians*. Southwest Museum, Los Angeles, California.

¹¹² McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

covers several communities for a pipeline alignment, and a memorandum from the Office of Historic Preservation regarding the Section 106 process for the same project. The NAHC responded to the SLF request in a letter stating that the SLF search did not reveal the presence of Native American cultural resources within or adjacent to the Project Site.

Historic maps, including the Kirkman Map and the other maps provided or referenced by the Tribe, were reviewed as part of the background research for the Proposed Project in order to identify historic land uses and the location of Native American villages in the historic era. The Kirkman map is identified by the Tribe as a source providing the locations of Gabrielino village sites and trails, or old roads that followed aboriginal trails throughout Los Angeles County. In order to accurately determine the location of the Project Site on the Kirkman map, it was georeferenced in GIS to Los Angeles County boundaries (see Figure 3.4-1). The georeferencing is based off of three control points throughout the County including: the southwest corner near Malibu, California; the northwest corner near Gorman, California; and northeast corner near Kramer Junction, California. ~~It was taken into account that georeferencing the map reflected changes in the boundaries of the Los Angeles County boundary has changed somewhat from the 1938 boundary that existed in 1937, at the time the Kirkman map was prepared.~~ At this referenced scale, the Kirkman map does not show any roads, villages, trails, landforms, or locations overlapping with the Project Site. ~~The map does show a dot which is noted as “(Inglewood) Aguaje de la Centinela” approximately two miles to the northwest of the Project Site. This location is generally consistent with, which is consistent with the location of the Centinela Adobe, which was and still is located near the banks of the Centinela Creek. Over two miles to the south of the Project Site the City of “(Hawthorne)” is also indicated on the map.²²~~ There are no trails or old roads depicted on the Kirkman map in the vicinity of the Project Site, the nearest one is over two miles to the west and is labeled “Old Salt Road”; this feature ~~and then which curves around to the north of the Project Site continuing east at a distance of over two miles to the north of the Project Site. These are the closest places~~ locations of Gabrielino village sites, old roads, or possible trails, to the Project Site as indicated on the Kirkman map.

~~During consultations, the Tribe also stated that The map does not depict the location of the Centinela Springs represented a significant source of water for Tribes in the area and, as a result, Tribal resources might be located there. The Kirkman map does not show the location of such a resource, which were also mentioned by the Tribe during consultation. The, however, the Centinela Springs are commemorated with a plaque at their former location, which is in a park located two miles to the north of the Project Site. The nearest Gabrielino villages that are depicted on the Kirkman map are three to four, over 3 to 4 miles to the north and north west of the Project Site located near the Baldwin Hills (approximately three miles north) and west toward the Ballona Wetlands (approximately four miles northwest).~~

~~The four historic hand drawn maps provided by the tribe, include one entitled “Rancho del paso de las carretas,” which is a hand drawing showing the location of the village of Guacho on a map of the Rancho La Ballona. The Ballona land grant (or rancho) is approximately 4.87 miles to the northwest of the Project Site, just to the north of the Sausan Redondo land grant.~~

The second hand drawn map is of the *Rancho Sausal Redondo*. The *Rancho Sausal Redondo*'s boundaries end at West Century Boulevard to the north of the Project Site, and South Prairie Avenue to the west of the Project Site, and continue to extend northwest over 4-miles to just south of Jefferson Boulevard. This map is also depicted in McCawley¹¹³ who describes the map as a "Map of *Rancho Sausal Redondo* showing the Mexican land grant of *Guaspita* located on the east bank of Ballona Creek." *Guaspita* is depicted on the map a short distance from the coast on the hill overlooking Ballona Creek, which is located approximately 5-miles to the northwest of the Project Site. The third hand drawn map is a portion of the Kirkman¹¹⁴ map which calls out the location of *Guacha*, which is again depicted near Playa del Rey near the banks of the Ballona Creek. The final hand drawn map is cited as "Johnston 1962" which depicts geographical features and known Gabrielino villages at the time of the Portola Expedition. The map depicts a village called *Sa'angna* just to the south of the Ballona Creek, northwest of the Project Site. It does not depict any labeled villages in, or within the immediate vicinity of the Project Site. McCawley indicates that *Sa'angna* was a Gabrielino village located near the banks of the Ballona, over 5-miles from the Project Site.

On March 21, 2018 the Tribe submitted another document entitled "Cultural Resources Mitigation Measures, regarding Tribal Cultural Resources and Human Remains and associated funerary objects within Kizh Gabrieleno Tribal Territory," which provides recommendations for project applicants to follow during project construction, which include the retention of a qualified Native American Monitor during construction related ground disturbance, unanticipated discovery of tribal cultural resources mitigation, unanticipated discovery of human remains and associated funerary objects mitigation, as well as professional standards descriptions.

As described above, the materials submitted by the Tribe were provided in order to illustrate provided information the Tribe's knowledge of regarding the Project Site and vicinity as discussed during the meetings between the City and the Tribe on March 21, 2018 and March 20, 2019. The maps provided are historic maps of Gabrielino village locations throughout Los Angeles County, as well as hand drawn maps of two ranchos which were established to the north and west of the Project Site. The historic documentation provided by the Tribe has been included as context in the considered as part of Phase I Cultural Resources Assessment Report and considered for and this analysis.

The determination that the Project Site itself is of low sensitivity for archaeological resources is based on many factors described in this chapter. In addition, The, but the main issue is the distance to water, and as the only known source, appears to be an intermittent stream or seasonal wash that ran north-south through the East Parking and Hotel Site and would likely not have been a significant source of water to provide for habitation in this area. Additionally, Centinela Creek and the location of Centinela Springs were over two miles north of the Project Site and as

¹¹³ McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Maiki Museum Press, Banning, California pp. 62-63.

¹¹⁴ George W. Kirkman, 1937. *The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County, 1850 A.D.-1937 A.D., 1887*. Map on File: Map Room of the History Department, Los Angeles Public Library, Los Angeles, CA.

depicted on the Kirkman map near the known Gabrieleno trade routes and early roads. The Tribe also provided evidence of the location of at least two villages which persisted into the rancho era near Ballona Creek, approximately 5 five to six miles to the northwest of the Project Site. Centinola Creek and Springs likely provided a more sustainable source of fresh water for prehistoric occupation. Ballona Creek and the associated wetlands and bluffs are areas well known for their archaeological site sensitivity as well as known and documented village sites. However, these locations are between two four to five six 2 to 5 miles from the Project Site and were much more desirable areas than the Project Site for prehistoric and early historic Native American habitation as evidenced by the known archaeological sites and ethnographic evidence of the villages in these locations.

the maps provided by the Tribe do not indicate the presence of any known village sites within the Project Site or the immediate vicinity. The historic maps, the geoarchaeological analysis, and the land use history, were all used in order to determine the proximity of a sustainable source of water and other natural resources such as wetlands that can be indicators of prehistoric habitation. The materials studied did not indicate that such resources existed in the Project Site and immediate vicinity. Although evidence was provided by the Tribe that indicates the location of villages and known archaeological sites, none of these resources are within two miles of the Project Site (i.e., all are from two 2 to five 5 miles away from the Project Site). The locations of these villages and archaeological sites are close to known trade routes and old roads known to have been used by prehistoric and early historic era peoples to travel ~~from~~ from the inland to the coast. There are no such trade routes, old roads, or known villages documented within 2 miles of the Project Site. No substantial evidence was provided to support the Tribal claim that any known sacred lands or Tribal cultural resources overlap with or occur within the Project Site. ~~The~~ and the City's review of the Tribal documentation did not change ~~the~~ its conclusion that the Project Site does not contain any previously known Tribal cultural resources, and has a low sensitivity for buried archaeological resources that, if encountered, could potentially be considered a Tribal cultural resource as defined in PRC Sections 21074, 5020.1(k), or 5024.1.

Based on all available information, including the information provided by the Tribe during consultations, there does not appear to be no substantial evidence of known Tribal cultural resources. There is no conclusive evidence to support the assertion that there are Tribal cultural resources within the Project Site. As stated above, consultation between the City and the Gabrieleno-Band of Mission Indians-Kojih Nation was conducted under the requirements of AB 52. No Tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1 (k), or that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to PRC Section 5024.1, have been identified within the Project Site. The Tribe did ~~provid~~ provided information to the City during the consultation process under AB 52. This information indicates that sites which ~~that~~ are likely to contain sensitive resources due to their importance to Tribal culture the Tribe are located two or more miles from the Project Site.

~~As describe above, no sensitive Tribal cultural resources have been found on or near the Project Site. The single shell identified during survey (WSN-1) is likely related to historic subsistence practices at the site; however, should similar resources be encountered during construction the qualified archaeologist should/would evaluate the find as described in Mitigation Measure 3.4-1. In addition, based on available information, the site does not appear likely to contain sensitive/contain any known Tribal cultural resources. For this reason, the potential for finding such resources on the Project Site appears to be low. However, there remains the potential that However, an unanticipated discovery of a sensitive Tribal cultural resource could occur/be discovered during ground disturbing activities; therefore, there would be no impacts less than significant impact on Tribal cultural resources, the impact is potentially significant.~~

~~[Note to City: further consultation and/or the conclusion of consultation may influence this conclusion.]~~

Mitigation Measures

None required.

Mitigation Measure 3.4-43 Implement Mitigation Measure 3.4-1.

~~Level of Significance After Mitigation: Mitigation Measure 3.4-43 would avoid and/or lessen the above impact by ensuring that any unanticipated archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA are appropriately identified, documented, evaluated, and treated promptly, so they are not inadvertently damaged or destroyed. The City would be required to implement Mitigation Measure 3.4-1 regarding the treatment of any archaeological resources in the unlikely event that they be encountered, and protocol is included in the measure should those resources be considered Tribal cultural resource discoveries. Additionally, this mitigation measure requires the retention of a qualified archaeologist, immediate halt of construction activities in the vicinity of the discovery, and the development and implementation of appropriate measures for treating the discovery. Should cultural resources that may be important to Tribes be encountered during construction activities, PRC Section 21084.3 would apply, and should the lead agency determine that the Project may cause a substantial adverse change to a Tribal cultural resource, the agency will need to consider avoidance and preservation of the resources as well as mitigation measures outlined in PRC Section 21084.3 (b)(1)-(4) which can be considered to avoid or minimize the significant adverse impacts. With implementation of Mitigation Measure 3.4-43, the impact to archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be less than significant.~~

Impact 3.4-4: Implementation of the Project could disturb any human remains including those interred outside of dedicated cemeteries. (Less Than Significant with Mitigation)

No human remains were identified during the pedestrian survey of the Project Site and no known human remains have been recorded within the Project Site or a 0.50-mile radius. The overall sensitivity of the Project Site with respect to archaeological resources, including human remains,

is low. Project grading and excavation would extend into previously undisturbed subsurface areas or other locations where there is some possibility that they may encounter buried human remains. As a result, although unlikely, construction may disturb human remains, including those interred outside of dedicated cemeteries, which would be a **potentially significant impact**.

Mitigation Measure 3.4-5.4.3.1:

Inadvertent Discovery of Human Remains. In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Project, all work shall immediately cease within 100 feet of the discovery and the County Coroner shall be contacted in accordance with PRC section 5097.98 and Health and Safety Code section 7050.5. The Applicant shall also be notified. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) shall be notified in accordance with Health and Safety Code section 7050.5, subdivision (c), and PRC section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, the Applicant shall ensure that a 50-foot radius around where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the Project, all work shall immediately cease within 100 feet of the discovery and the County Coroner shall be contacted in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. The City shall also be notified. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) shall be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC shall designate a Most Likely Descendant (MLD) for the remains per PRC Section 5097.98. Until the project applicant, or his/her representative, has conferred with the MLD, the City shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further ground-disturbing activities take into account the possibility of multiple burials.

Level of Significance After Mitigation: Mitigation Measure 3.4-5.4.3.1 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a proscribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC, and subsequent Tribal coordination if remains are determined to be of Native American descent. Mitigation Measure 3.4-5.4.4 requires interment of the human remains in an appropriate location. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of PRC Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Thus, the impact would be considered **less than significant with mitigation**.

Cumulative Impacts

The cumulative setting for cultural, paleontological, and Tribal resources varies by resource type, as is described below. The Project Site, in the southwestern portion of the fully urbanized City of Inglewood, is surrounded by residential and commercial development to the west, south, and east, and Hollywood Park. The HPSP area, located to the north, part of which is currently under development; and will result in new commercial, office, residential, parking, open space, and sports stadium uses. Prior to the development of the area, historic topographic maps indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and formerly ~~running~~ extending to the East Parking Garage and Transportation Hub Site and the Hotel Site. The area is within the ethnographic territory of the Gabrielino Tribe. Geologically, the Project Site is situated within the West Coast Basin portion of the greater Los Angeles Basin, a broad trough formed by tectonic activity and stream erosion of nearby mountains, and filled with Quaternary-aged terrestrial and shallow marine sediments overlying Tertiary-aged marine sediments.

In addition to the Proposed Project, there are ~~108~~ ~~146~~ projects, ~~31~~ of which are in the City of Inglewood, that have been taken into consideration when developing the cumulative context, although the context varies by resource type. The closest ~~active~~ cumulative project is the proposed development associated with the development of the HPSP area, located immediately to the north of the Arena Site. As noted above, Phase I of the HPSP is currently under construction, and portions of the HPSP area will be operational prior to the time that the Proposed Project is completed.

Impact 3.4-~~65~~~~45~~: Implementation of the Proposed Project, in combination with other development, would not/could result in contribute to cumulative impacts/cumulatively considerable impacts/too historical resources. (Less Than Significant)

Historic Architectural Resources

A cumulative impacts analysis for historic architectural resources evaluates whether impacts of a project and related projects, when taken as a whole, would have significant environmental impacts on historical resources. If these projects would result in a significant impact, then the Proposed Project's contribution would need to be determined. The cumulative context for historic resources can be defined by a number of factors depending on the conditions ~~on the project site(s)~~ and the presence or absence of known historic resources in the area. For the Proposed Project the cumulative context for historical resources considers impacts to significant historical resources in Inglewood. There are ~~31-32~~ ~~cumulative~~ projects in the City of Inglewood, with the HPSP project the only one in the same neighborhood as the Proposed Project. The majority of the ~~31-32~~ projects are residential developments, many of which are small scale, while the HPSP accounts for a large portion of the cumulative development. The HPSP EIR was certified in 2009 and concluded that the HPSP would result in a less-than-significant impact to historic resources. Given the long history of Inglewood and large number of historic-age buildings and structures throughout the City it is likely that historical resources were significantly impacted as a result of at least one of the ~~31-32~~ projects that constitute the cumulative context. Therefore, ~~cumulatively~~

these projects, the cumulative impact on historic architectural resources would result in a be potentially **significant** impact to historical resources.

As discussed above, the Proposed Project would not contribute to environmental impacts on any historic architectural resources qualifying as historical resources under CEQA, either to resources as a direct impact within the Project Site or as an indirect impact to offsite historical resources within the surrounding area. For these reasons, the Proposed Project's contribution to cumulative impacts to historic architectural resources qualifying as historical resources under CEQA would not be have a cumulatively considerable contribution to a potentially significant cumulative impact. Therefore, and the Proposed Project, considered together with related projects, would have a **less-than-significant cumulative impact** that is less than significant on historic resources or districts in the immediate vicinity.

Mitigation Measures

None required.

Archaeological Resources

The cumulative context for archaeological resources, which may be historical resources under CEQA, is within the fully urbanized City of Inglewood, and has been defined by a number of factors depending on the Project Site itself and the related projects and the known archaeological resources or level of archaeological sensitivity in the area. The City is included within the Gabriolano Tribal territory and has been subject to experienced historic development within the City since the ranch period, with more wide-scale development occurring at the turn of the century. The Project Site itself lies more than two miles from the nearest known village site or known prehistoric archaeological sites within the City. There is a lack of year-round water sources in the Project vicinity that make it unlikely to contain the presence of prehistoric resources. The site and its vicinity were developed around the turn of the century, and there are no known historic archaeological sites within a 0.5 mile of the Project Site. However, unknown, subsurface, historic or archaeological resources, that may be historical resources under CEQA, could be preserved under the surface of vacant land or under the current development. As such, development in these areas could have a significant impact to archaeological resources. Mitigation for unanticipated archaeological resources is included in Mitigation Measure 3.4-1. The related projects, like the Project, would be required to comply with regulatory requirement governing archaeological resources. Any loss of these resources as a result of the Project or related projects within the City of Inglewood, would have a considerable contribution to a significant impact, therefore the cumulative impact is potentially significant to archaeological resources.

Mitigation Measure 3.4-5

Implement Mitigation Measure 3.4-1.

Level of Impact Significance After Mitigation: Mitigation Measure 3.4-5 would ensure that archaeological and Native American monitoring would discover unanticipated

archaeological resources during construction that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant Project impacts on archaeological resources that are historical resources under CEQA. Therefore, the Project's potential cumulative impact would be less than significant with mitigation.

Mitigation Measures

None required.

Impact 3.4-4: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on archaeological resources.

The cumulative context for archaeological resources, which may also be historical resources under CEQA, is within 0.5-mile of the Project Site, which includes areas within the fully urbanized City of Inglewood and other urbanized areas. Within these areas, the context has been defined by the known archaeological resources or level of archaeological sensitivity in the area. The site and its vicinity were developed around the turn of the century, and there are no known historic archaeological sites within a 0.5-mile of the Project Site. However, unknown, subsurface, historic or archaeological resources, some of which may be historical resources under CEQA, could be preserved under the surface of vacant land or under the current development. As such, development in these areas could have a potentially significant cumulative impact to archaeological resources. While the Project Site is not known to contain archaeological resources, it is possible that the Project Site could contain previously undiscovered archaeological resources. The Proposed Project could have a cumulatively considerable contribution to the loss of archaeological resources, and the impact would be potentially significant.

Mitigation Measure 3.4-5

Implement Mitigation Measure 3.4-1.

Level of Significance After Mitigation: Mitigation Measure 3.4-5 would ensure that archaeological monitoring would discover unanticipated archaeological resources during construction that will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant Project impacts on archaeological resources that are historical resources under CEQA. Therefore, the cumulative impact would be less than significant with mitigation.

The cumulative context for archaeological resources is within the fully urbanized City of Inglewood, and has been defined by a number of factors depending on the project site(s) Project Site itself and the related projects, and the known archaeological resources or level of archaeological sensitivity in the area. The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide-scale development occurring at the turn of the century. The Project Site itself has more than

two miles from the nearest known village sites or known prehistoric archaeological sites within the City. There is a lack of natural year-round water resources in the Project vicinity that could make it unlikely to contain the presence of prehistoric resources and it is unlikely the presence of prehistoric resources. The site and its vicinity were developed around the turn of the century, and there are no known historic archaeological sites within a 0.5-mile of the Project Site. However, unknown subsurface archaeological resources could be preserved under the surface of vacant land or under the current development. As such, development in these areas could have a significant impact to archaeological resources. Mitigation for anticipated archaeological resources is included in Mitigation Measure 3.4-1. The related projects, like the Project, would be required to comply with regulatory requirement governing archaeological resources, which would require evaluation and mitigation of these resources. However, unknown historic or archaeological resources they could be preserved under the surface of vacant land or under the current development. Due to the current development and disturbance at the surface of the Project Site it is not currently possible to identify any sites or resources that may exist subsurface and it is possible that historic and prehistoric period resources are present under the surface of the Project Site.

Any loss of these resources as a result of the Project or related projects within the City of Inglewood, would have a considerable contribution to a significant impact, therefore the cumulative impact is potentially significant to archaeological resources. Any loss of these resources would contribute to a cumulatively significant impact to archaeological resources within the vicinity.

Mitigation Measure 3.4-7(ii)

Implement Mitigation Measure 3.4-1.

Level of Impact Significance After Mitigation: Mitigation Measure 3.4-7(ii) would ensure that archaeological and Native American monitoring would discover unanticipated archaeological resources during construction and they will be identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant Project impacts on archaeological resources. Therefore, the Project's potential contribution to this potential cumulative impact would be less than significant with mitigation.

Impact 3.4-8: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on paleontological resources.

Projects within the Project vicinity and within the City of Inglewood will also be within Quaternary-aged terrestrial and shallow marine sediments overlying Tertiary-aged marine sediments which have been found to contain significant fossil resources. Potential future development increases the likelihood that paleontological resources will be uncovered, and it is therefore possible that cumulative development could result in the demolition or destruction of

significant paleontological resources. This is considered a significant cumulative impact. The Project could contribute to this impact if paleontological resources are located beneath the Project Site.

Mitigation Measures

Mitigation Measure 3.4-8

Implement Mitigation Measure 3.4-8.

Impact Significance After Mitigation: Mitigation Measure 3.4-8 would lessen the Project contribution toward the loss of paleontological resources by requiring that work stop if such resources are discovered until the resource can be evaluated, collected, properly treated, and curated with accredited repository with retrievable storage. The Project contribution to the cumulative loss of paleontological resources would therefore be less than significant with mitigation.

Impact 3.4-9: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on human remains.

The Project Site itself is located within the developed City of Inglewood. The City itself was developed historically around the turn of the century. The cumulative projects are spread throughout the City of Inglewood but would likely not have a cumulative significant impact on human remains. Based on the SLF search and sensitivity analysis for cultural resources, there are no known burial grounds or unmarked cemeteries within the Project Site or the Project vicinity within a 0.5-mile radius. The overall sensitivity of the Project Site with respect to archaeological resources, including human remains, is low. The Project Site itself lies more than two miles from the nearest known village sites or known prehistoric archaeological sites within the City. There is a lack of natural resources in the Project vicinity that could indicate makes unlikely the presence of prehistoric resources including human remains. During the rancho period, the settlers on the rancho were residing near Centinela Creek, which is outside of the Project vicinity. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The site and vicinity were developed around the turn of the century, at which time in 1905, the Inglewood Park Cemetery was established. The cemetery is still in operation and located 1.5 miles to the north of the Project Site, so the likelihood of unmarked historic in age graves is low in the Project vicinity and the City of Inglewood. However, due to the current development and disturbance at the surface of the Project Site and its vicinity, it is not currently possible to identify any sites or resources that may exist subsurface. Any disturbance of these resources within the Project Site or related projects would contribute to a potential cumulatively significant impact to human remains within the vicinity.

Mitigation Measures

Mitigation Measure 3.4-9.7

Implement Mitigation Measure 3.4-4.

~~Impact Significance After Mitigation: Implementation of Mitigation Measure 3.4-9.7 would ensure that all work immediately cease within 100 feet of the discovery and that all relevant PRC and Health and Safety Codes that pertain to human remains discovery are followed and the identified appropriate actions have taken place. The impact would therefore not result in cumulative significant impacts and be less than significant with mitigation.~~

Impact 3.4-10.7: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on the significance of a Tribal cultural resource, defined in Public Resources Code § 21074.

The cumulative context for Tribal cultural resources is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. ~~The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. This area~~The Gabrielino Tribal territory has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects throughout this territory. ~~Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a Tribal cultural resource are mapped and documented between two to five miles from the Project Site. As such, development in these areas could have a significant impact to a tribal cultural resource. Cumulatively this the large amount of development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites could have significant and unavoidable impacts to Tribal cultural resources. All related projects would, like the Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b).~~

~~As demonstrated, described above, the Proposed Project would not result in a significant impact on a known Tribal cultural resource. Specifically, there are no resources listed or determined eligible for listing, on the national, state, or local registers of historical resources. The City has consulted with Tribal representatives, and during these consultations no sensitive Tribal cultural resources have been identified on the Project Site and the Lead Agency determined that resources identified during AB 52 Tribal consultation are not eligible for listing under the criteria in subsection (c) of the PRC Section 5024.1 located within the Project Site, or within a 0.5-mile radius of the Project Site. Known Tribal village locations, trade routes, and known significant~~

prehistoric archaeological sites that have a higher potential to represent might be considered a Tribal cultural resource are mapped and documented between two to five miles from the Project Site. As such, development in these areas could have a significant impact to a Tribal cultural resource. Because there are no known Tribal resources on the Project Site, the Proposed Project's contribution to the cumulative loss of Tribal cultural resources would be less than considerable. The Project's impacts on known Tribal cultural resources were determined to be less than significant with no mitigation, however mitigation for anticipated archaeological resources that could be considered Tribal cultural resources is included in Mitigation Measure 3.4.4. The related projects would, like the Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b). As such, the Proposed Project's contribution would be less than cumulatively considerable, and therefore, the cumulative impacts to Tribal cultural resources would be **less than significant to a significant cumulative impact would not be considerable, and therefore, there would be no cumulative impact** to Tribal cultural resources.

Mitigation Measures

None required.

Impact 3.4-78: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on human remains.

The cumulative context for the discovery of human remains is 0.5-mile. The Project Site itself is located within the developed City of Inglewood. The City This area itself was developed since the rancho period with more wide scale development occurring historically around the turn of the century. The cumulative projects are spread throughout the City of Inglewood but would likely not have a cumulative significant impact on human remains. Based on the SLF search and sensitivity analysis for cultural resources, there are no known burial grounds or unmarked cemeteries in, or within a 0.5-mile radius of the Project Site or the Project vicinity within a 0.5-mile radius. The and the overall sensitivity of the Project Site area, with respect to archaeological resources, including human remains, is low. The Project Site and surrounding 0.5-mile radius itself is less than two miles (1.5 miles) from the nearest known village sites or known prehistoric archaeological sites within the City. There is a lack of year round water resources in the Project vicinity that makes unlikely the presence of prehistoric resources including human remains unlikely.

During the rancho period, the settlers on the rancho were residing near Centinela Creek, over two miles north of the Project Site, and which is outside of the Project vicinity. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The site and vicinity were developed around the turn of the century, at which time (i.e., in 1905), the Inglewood Park

~~Cemetery was established. The cemetery is still in operation and located 1.5 miles to the north of the Project Site, and outside of the cumulative context established for human remains. Because the cemetery was close by, available, and in use, so the likelihood of unmarked historic-age graves is low in the Project vicinity and the City of Inglewood 0.5-mile radius of the Project Site is low. However, due to the current development and disturbance at the surface of the Project Site and its vicinity in the cumulative context area, it is not currently possible to identify any sites or resources that may exist subsurface. Any disturbance of potential subsurface human remains these resources within the Project Site or by related projects as a result of cumulative development would be a potentially significant cumulative impact on human remains.~~

~~The Proposed Project site is not known to contain any unmarked graves or human remains. However, the loss of any previously unknown human remains would be significant, and the Proposed Project would have a considerable contribution to a significant impact. and therefore, the cumulative impact to human remains is potentially significant. to human remains within the vicinity.~~

Mitigation Measures

Mitigation Measure 3.4-78

Implement Mitigation Measure 3.4-34.

Level of Impact Significance After Mitigation: Implementation of Mitigation Measure 3.4-78 would ensure that all work immediately cease within 100 feet of the discovery, and that all relevant PRC and Health and Safety Codes that pertain to human remains discovery are followed, and the identified appropriate actions have taken place. The Project's contribution would be reduced to a impact would therefore not be cumulatively considerable, and be **less than significant impact with mitigation.**