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INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER PROJECT, INGLEWOOD, CALIFORNIA

Cultural Resources Assessment Report

Prepared for

City of Inglewood

One Manchester Boulevard
Inglewood, CA 90301-1750

May 2019



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One Manchester Boulevard
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Prepared by:

ESA

Project Director:

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Project Location:

Inglewood (CA) USGS 7.5-minute Topographic Quad Section 3 and Unsectioned Portions of Township 3 South, Range 14 West

Acreage: Approx. 28 acres

Assessor Parcel Numbers: 4034-004-900 – 4034-004-909, 4034-004-911 –4034-004-913, 4034-005-900 – 4034-005-905, 4034-005-907 – 4034-005-912, 4032-001-005 and 4032-001-006, 4032-001-033, 4032-001-039, 4032-001-048 and 4032-001-049, 4032-001-900 – 4032-001-913, 4032-002-913 – 4032-002-917, 4032-003-912, 4032-003-914 and 4032-003-915, 4032-004-913 and 4032-004-914, 4032-007-035, 4032-007-901 – 4032-007-905, 4032-008-001, 4032-008-034, 4032-008-900 – 4032-008-902, 4032-008-904 and 4032-008-905, 4032-008-907 and 4032-008-908

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This report contains confidential cultural resources location information and distribution of this report is restricted. Cultural resources are nonrenewable, and their scientific, cultural, and aesthetic values can be significantly impaired by disturbance. To deter vandalism, artifact hunting, and other activities that can damage cultural resources, the locations of cultural resources are confidential. The legal authority to restrict cultural resources information is in subdivision (r) of Section 6254 and Section 6254.10 of the California Government Code; subdivision (d) of Section 15120 of Title 14 of the California Code of Regulations; Section 304 of the National Historic Preservation Act of 1966, as amended; and Section 9 of the Archaeological Resources Protection Act. [Note to reviewers: We will have to create a redacted version when the final version of this complete report is approved by the team. Archaeological data and locations of sites are confidential and exempt from the CA public records act.]

Statement of Confidentiality

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EXECUTIVE SUMMARY

Introduction and Project Description Summary. The City of Inglewood (City) has retained Environmental Science Associates (ESA) to conduct a cultural resources assessment for the Inglewood Basketball and Entertainment Center (Proposed Project) in support of an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA). The Project proposes the construction and operation of the Inglewood Basketball and Entertainment Center (IBEC), which would include an approximately 915,000-square-foot (sf), 18,000-fixed-seat arena suitable for National Basketball Association (NBA) games, public plaza, outdoor stage, community space, practice facility, sports medicine clinic, team offices, retail/restaurants, a hotel, employee access pavilion, and a parking facilities for team and public parking. These activities are referred to collectively as the Proposed Project. The City is the lead agency pursuant to CEQA.

The Project Site is located in the southwestern portion of the City of Inglewood within Los Angeles County, approximately 10 miles south/southwest of downtown Los Angeles. The 28-acre Project Site consists of five components (the Arena Site, the West Parking Garage Site, the East Transportation and Hotel Site, and the Well Relocation Site) situated on the south side of West Century Boulevard, near the intersection of South Prairie Avenue. There are two Project Variants that, while not part of the Proposed Project, are being identified and analyzed to provide the flexibility to allow the City to approve them. The West Century Boulevard Pedestrian Bridge Variant would result in the construction of a second pedestrian bridge across West Century Boulevard, connecting a retail portion of the Arena Site to the Hollywood Park Specific Plan (HPSP) area to the north. The Alternate Prairie Access Variant would expand the boundary of the Arena Site portion of the Project Site by adding two additional properties to the Proposed Project: 10204 South Prairie Avenue and 10226 South Prairie Avenue.

Archival Research Summary. A records search for the Proposed Project was conducted on May 7, 2018 by ESA staff at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of recorded archaeological resources and previous studies within the Project Site and a 0.5-mile radius of the Project Site, and historic architectural resource studies within or adjacent to the Project Site. Additionally, the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register) were reviewed to determine if listed resources are located within one mile of the Project Site. The records search indicates that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, only two studies (LA-10567 and LA-11150) are adjacent. None of the previous studies overlaps the Project Site. The records search also indicates that no archaeological resources have been previously recorded within the Project Site or the 0.5-mile records search radius. The only National or California Register-listed architectural historical resource within one mile of the Project Site is The Forum (19-190892).

The California Native American Heritage Commission (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. The NAHC responded to the request in a letter dated April 25, 2018 with negative finding. Assembly Bill 52 (AB 52) consultation conducted for the Proposed Project by the City is separately documented in Section 3.4, Cultural and Tribal Cultural Resources, of the Draft EIR.

A desktop geoarchaeological review was conducted by ESA. 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 purpose of the review was to characterize the geology of, and assess the potential for the presence of, subsurface archaeological resources in the Project Site. 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 northern portion of the Arena Site and East Transportation and Hotel Site; the Late Pleistocene to Holocene alluvium has high potential to contain buried archaeological deposits. However, the entirety of the Project Site has been subject to prior disturbance that includes some or all of the following: previous development, demolition of structures and removal of foundations and other components, and regular maintenance including grading and/or plowing. The likely net effect of these actions, particularly in areas with little to no younger alluvium, would have caused the disturbance or removal of cultural resources, which further reduces the prehistoric archaeological sensitivity of these areas.

Historic maps and aerial photographs were examined for historical information about the development of land uses on the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. The review indicates the Project Site and its vicinity remained undeveloped until the 1920s—when residential development began. Between 1928 and 1963, the area became nearly fully developed with single- and multi-family residences, while the properties within 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 encompassed most of any given parcel with zero or minimal lot line setbacks.

Survey Summary. Cultural resources surveys of the Project Site were conducted by ESA cultural resources specialists on April 24 and May 10, 2018. All individuals that conducted surveys are specialists in their field and meet the Secretary of the Interior's Professional Qualifications Standards. The surveys were aimed at identifying historic architectural resources and archaeological resources within 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. Two historic-age architectural resources (Turf and Sky Motel and 10212 South Prairie Avenue) were identified on the Project Site that required evaluation to determine if they are historical resources for the purposes of CEQA. Two archaeological resources were identified on the Project Site as a result of the archaeological resources survey: one historic-period isolate

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(EAN-1 [beverage bottle]) and one isolate of undetermined age (WSN-1 [abalone shell fragment]).

Conclusions and Recommendations. There are two historic-age architectural resources (Turf and Sky Motel and 10212 South Prairie Avenue) on the Project Site. They were evaluated and are not recommended eligible for listing in the National Register or California Register under Criteria A/1-D/4. As such, they do not qualify as historical resources under CEQA and the Proposed Project would not result in a direct impact to historical resources. Impacts to offsite historical resources were also analyzed. The only listed historical resource is The Forum, which is approximately one mile to the north. It was determined that the Proposed Project would not materially alter The Forum; therefore, the Proposed Project would not result in impacts to offsite historical resources. No further work is recommended for these resources.

The archaeological survey identified two archaeological resources consisting of one historic-period isolate (EAN-1) and one possible prehistoric isolate (WSN-1) within the Project Site. Due to their isolated nature and lack of clear cultural context, EAN-1 and WSN-1 are not eligible for listing in the National Register or California Register and do not otherwise qualify as historical or unique archaeological resources pursuant to CEQA. The likelihood of encountering prehistoric and/or historic-period archaeological deposits is low, especially given the degree of disturbance within the Project Site, which has included the construction and demolition of residential and commercial buildings; deposits that may have underlain the Project Site have likely been destroyed. However, there still exists the possibility that Project-related ground disturbance, which will extend to a maximum depth of 35-feet below ground surface, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources pursuant to CEQA. Therefore, recommended mitigation measures for the retention of a qualified archaeologist, cultural resources sensitivity training, archaeological and Native American monitoring, and inadvertent discovery protocols are provided in the *Conclusion and Recommendations* section at the close of this report.

Executive Summary

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INGLEWOOD BASKETBALL AND ENTERTAINMENT CENTER PROJECT

Cultural Resources Assessment Report

Introduction

The City of Inglewood (City) has retained Environmental Science Associates (ESA) to conduct a cultural resources assessment for the Inglewood Basketball and Entertainment Center Project (Proposed Project) in support of an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA). The Project would include the construction and operation of the Inglewood Basketball and Entertainment Center (IBEC), an approximately 915,000 square foot (sf), 18,000-fixed-seat arena suitable for National Basketball Association (NBA) games, public plaza, outdoor stage, community space, practice facility, sports medicine clinic, team offices, retail/restaurants, employee access pavilion, and a parking facilities for team and public parking. These activities are referred to collectively as the Proposed Project. The City is the lead agency pursuant to CEQA.

ESA personnel involved in the preparation of this report are as follows: Monica Strauss, M.A., RPA, Project Director; Sara Dietler, B.A., Project Manager; Amber Grady, M.A. and Michael Vader, B.A., report authors; Chris Taylor, M.H.P., Vanessa Ortiz, M.A., RPA, and Amber-Marie Madrid, B.A., surveyors; Chris Lockwood, Ph.D. geoarchaeological review, and Jessie Lee, GIS specialist. Resumes of key personnel are included in **Appendix A**.

Project Location and Description

The Project Site is located in the southwestern portion of the City of Inglewood within Los Angeles County, approximately 10 miles south/southwest of downtown Los Angeles (**Figure 1**). The 28-acre Project Site consists of five components (the Arena Site, the West Parking Garage Site, the East Transportation and Hotel Site, and the Well Relocation Site), situated south of West Century Boulevard, near its intersection with South Prairie Avenue (**Figure 2**). The Arena Site is bounded by West Century Boulevard on the north, South Prairie Avenue on the west, South Doty Avenue on the east, and an imaginary straight line extending east from West 103^{rd} Street to South Doty Avenue to the south. A portion of West 102^{nd} Street between South Prairie Avenue and the halfway point between South Prairie Avenue and South Doty Avenue would be vacated to allow construction on the Arena Site. The Arena Site would be occupied by a proposed event arena, team offices, a sports medicine clinic, a parking garage, a public plaza, community facilities, and retail and restaurant uses.

Figure 1 Regional Location

Figure 2 Project Detail

The West Parking Garage Site is an approximately 5-acre site on the north and south sides of West 101st Street, bounded by West Century Boulevard to the north, hotel and residential uses to the west, South Prairie Avenue to the east, and West 102nd Street to the south. A portion of West 101st Street between South Prairie Avenue and the western edge of the Project Site would be vacated to allow construction of the parking garage. This site would accommodate a new parking garage, and would include a pedestrian bridge across South Prairie Avenue connecting the parking garage to retail uses on the Arena Site.

The East Transportation and Hotel Site is an approximately 5-acre site bounded by West Century Boulevard to the north; vacant, industrial and commercial uses to the east and west; and West $102^{\rm nd}$ Street to the south. This site would include a two-story parking garage with the first floor serving as a transportation hub. The transportation hub includes a staging area for private or charter buses and a drop-off, staging, and pick-up area for Transportation Network Company (TNC) vehicles and taxis serving the Arena Site. The second floor of the garage would provide parking for patrons of the Arena Site.

The Well Relocation Site is an approximate 0.7-acre site located at 3812 West 102nd Street, surrounded by vacant land to the west and south and bounded by residential uses to the east. This parcel would accommodate a new Water Well #8, including its associated infrastructure.

The Project Site is located within Section 3 and unsectioned portions of Township 3 South, Range 14 West on the Inglewood, CA (2018) 7.5-minute US Geologic Survey (USGS) topographic quadrangle (Figure 3).

The Proposed Project would include demolition of approximately 54,098 sf of existing on-site vacant and commercial uses across multiple parcels for the construction of the Proposed Project.

Project Variants

The Proposed Project includes two Project Variants that would alter circulation infrastructure. These Project Variants are briefly described in this chapter and are fully described in Chapter 5, Project Variants, of the EIR. These Project Variants are not proposed as part of the Project because there is some uncertainty about their feasibility. They are being identified and analyzed to provide the flexibility to allow the City to approve them as part of the Proposed Project, if desired. Therefore, analysis of the Project Variants is included in Chapter 5, Project Variants, of the EIR.

Each Project Variant would include the same parking/loading, mechanical equipment, vehicular circulation, Transportation Demand Management program, streetscape improvements, and sustainability features as the Proposed Project. The Project Variants are not mutually exclusive—the City potentially could approve either or both.

Figure 3 Project Location

West Century Boulevard Pedestrian Bridge Variant

The West Century Boulevard Pedestrian Bridge Variant would result in the construction of a second pedestrian bridge across West Century Boulevard, connecting a retail portion of the Arena Site to the HPSP area to the north. The pedestrian bridge would provide a vertical clearance of approximately 14-15 feet over West Century Boulevard. The pedestrian bridge would connect with similar retail uses on the north side of West Century Boulevard. The pedestrian bridge would be constructed of materials similar to the Proposed Project's retail building in the plaza or the Arena Structure. The West Century Boulevard Pedestrian Bridge Variant could be incorporated into the development of either the Proposed Project or the Alternate Prairie Access Variant. No additional parcels would need to be acquired to implement this Project Variant.

This Project Variant is being included because it is unknown whether the property owner north of the Project Site would agree to connect a pedestrian bridge to their property on the north side of West Century Boulevard. The pedestrian bridge connection north of West Century Boulevard could tie into future retail or other uses planned on that site. Because there is uncertainty about whether a pedestrian bridge could tie into the property to the north, this element is being evaluated as a Project Variant.

Alternate Prairie Access Variant

This Project Variant would expand the boundary of the Arena Site portion of the Project Site by adding two additional properties to the Proposed Project: 10204 South Prairie Avenue and 10226 South Prairie Avenue (**Figure 4**). These two properties currently contain residential buildings; a single-family home and a triplex. Under this Project Variant, the properties would be acquired through voluntary sales by the property owners to the project applicant. The residential buildings on these two properties would be acquired and demolished as part of the Proposed Project, if this variant were implemented. The acquisition and demolition of these two structures would allow the Arena Structure to be shifted slightly. As part of the Alternate Prairie Access Variant, the drop-off area for employees, team members, and visitors to the Arena Site would also shift slightly south, and site access to South Prairie Avenue would be slightly shifted south to more closely align with West 103rd Street. However, the overall circulation plan for the Project Site would not change.

This Project Variant is being included because whether the owners of these residential properties will agree to sell them to the project applicant is unknown at this time. For this reason, there is uncertainty about whether these parcels will be acquired.

Figure 4 Project Variants

Background

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 HPSP Area to the north. HPSP Adjusted Baseline project is under construction. The HPSP includes commercial, office, residential, parking, and sports stadium uses. Historic topographic maps dating to the 1920s and 1930s 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 1940s.

Prehistoric Setting

Based on recent research in the region (Homburg et al., 2014), 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). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture

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. (Byrd and Raab, 2007). During this time period, the climate of southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab, 2007).

Possible evidence of a Paleocoastal occupation comes from site CA-LAN-61, located on a bluff top east of Lincoln Boulevard about 4.75 miles northwest of the Project Site, and site CA-LAN-63, located to the west of Lincoln Boulevard about 4.80 miles northwest of the Project Site. The evidence of occupation includes artifact types that generally date to early periods, although no radiocarbon dates from either site confirm an early occupation (Homburg et al., 2014).

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 8,000 years B.P. and is associated with the Millingstone cultures (Wallace, 1955; Warren, 1968).

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals (Byrd and Raab, 2007; Wallace, 1955). 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.

The earliest confirmed human occupation associated with the Millingstone Period dates to approximately 8,000 to 7,000 B.P. Site CA-LAN-64, located at the top of the Westchester Hills about 5.1 miles northwest of the Project Site, appears to have been occupied by small seasonal foraging groups subsisting on a mix of terrestrial and marine resources (Altschul et al., 2007).

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 (Erlandson, 1994; Wallace, 1955; Warren, 1968). 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 (Erlandson, 1994). Evidence indicates that the overexploitation of larger, high-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 (Byrd and Raab, 2007).

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 (Homburg et al., 2014). 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. (Raab et al., 1995).

Archaeological sites with components that also date to this period include CA-LAN -61, -62, -63, -64, and -206, which are within 4.75 to 5.1 miles of the Project Site. Current data suggests that during the Intermediate Period, sites on bluff tops and lowland areas were occupied at the same time. At least some permanent settlements on bluff tops (CA-LAN-63, -64, and -206) appear to have been highly structured, with areas set aside for refuse disposal, burials, ritual activities, and food-processing. Sites in the lowland areas (CA-LAN-62) appear to have been utilized primarily for resource procurement and processing. Recovery of numerous microblades from CA-LAN-61 and the prevalence of stone beads with a decrease in shell beads, coupled with linguistic and osteological data, have been interpreted as representative of a migration of desert (or nonmaritime) groups in to the area (Homburg et al., 2014; Sutton, 2009).

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 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 (Kroeber, 1925). 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 (Erlandson, 1994; Raab et al., 1995). 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.

In contrast to other parts of southern California, occupation appears to decrease during the Late Period, possibly due to drier conditions in the area. Sites with Late Period components include CA-LAN-61, -62, and -63, which are within about 5 miles of the Project Site. During this time period, a formal or dedicated cemetery was established at site CA-LAN-62, which would continue in use into the Historic Period, which began after contact (Homburg et al., 2014).

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 Juañeno 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 regional influence (Bean and Smith, 1978). 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 (Bean and Smith, 1978). 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 (Bean and Smith, 1978). Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless,

¹ 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. Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina. Some modern tribal groups use alternative spellings.

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 (McCawley, 1996). 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 (Johnson and Earle, 1990).

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

On September 4, 1781, El Pueblo de la Reina de los Angeles was established not far from the site where Portolá and his men camped during their 1769 excursion, with a land grant of 28 acres issued to California Governor Felipe de Neve in 1781 (Gumprecht, 2001). The pueblo was established in response to the increasing agricultural needs of Spanish missions and presidios in California. The original pueblo consisted of a central square surrounded by twelve houses and a series of agricultural fields. Thirty-six fields occupied 250 acres between the town and the river to the east (Gumprecht, 2001).

By 1786, the flourishing pueblo attained self-sufficiency and funding by the Spanish government ceased. Fed by a steady supply of water and an expanding irrigation system, agriculture and ranching grew; and by the early 1800s the pueblo produced surplus wheat, corn, barley, and beans for export. A large number of livestock, including cattle and sheep, grazed in the surrounding lands (Gumprecht, 2001).

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 (Reedy, 2015). 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 (Stoll et al., 2009). Two archaeological sites with components dating to the Spanish era (CA-LAN-62 and -211), located

within about 4.75 miles from the Proposed Project, may be the location of Guaspet, although this has not been confirmed in the historical record (Reedy, 2015).

A 1937 map titled *The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County* 1860 A.D.-1937 A.D. depicts approximate locations of Gabrielino villages in Los Angeles (**Figure 5**). It depicts the location of unnamed villages about 2 to 5 miles north of the Project Site.

Figure 5 1937 Kirkman Map

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 (Gumprecht, 2001). 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 (Milliken et al., 2009). 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 (Pitt, 1994; Starr, 2007).

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 (Starr, 2007).

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 (McWilliams, 1946; Dinkelspiel, 2008). 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 (Gumprecht, 2001; McWilliams, 1946).

Los Angeles was connected to the Transcontinental Railroad via San Francisco on September 5, 1876 and the population again exploded. The city would experience its greatest growth in the 1880s when two more direct rail connections to the East Coast were constructed. The Southern Pacific Railroad completed its second transcontinental railway, the Sunset Route from Los Angeles to New Orleans, in 1883 (Orsi, 2005). In 1885, the Santa Fe Railroad completed a competing transcontinental railway to San Diego, with connecting service to Los Angeles (Mullaly and Petty, 2002). The resulting fare wars led to an unprecedented real estate boom. Despite a subsequent collapse of the real estate market, the population of Los Angeles increased 350 percent from 1880 to 1890 (Dinkelspiel, 2008). Los Angeles continued on its upward

trajectory in the first few decades of the 20th century with the rise of tourism, automobile travel, and the movie industry (McWilliams, 1946).

History of Inglewood

Settlement 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*.

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 nobleman named Robert Burnett, who eventually added the much larger *Rancho Sausal Redondo* to his holdings and once again combined 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 Freemen. In spite of drought and other hardship Freeman successfully farmed barley on the ranch, and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood (Kielbasa, 1998).

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 was described as continuously existing since the Pleistocene Era. The site 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 (OHP 2019).

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) (Waddingham, 1994). With a population of about 1,200, Inglewood was incorporated on February 10, 1908. That same year, the high school building was completed (Waddingham, 1994).

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 view the damage. The climate impressed the visitors who had previously never been to Inglewood, and 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 (Waddingham, 1994).

The Andrew Bennett Ranch was leased by the City of Los Angeles and converted into Mines Field in 1927, the airport of Los Angeles. National Air Races were held on Mines Field in 1927, and the first passenger flight landed in 1928. In 1929, the Graf Zeppelin (a German hydrogen filed ridged airship) landed on the Mines Field (Waddingham, 1994).

The 1932 Olympic Games were held in Los Angeles, 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 (Waddingham, 1994). Until World War II, Inglewood had largely been supported by agricultural industry. The defense industries, in 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 hangers needed to be constructed (Waddingham, 1994). In 1949, the airport was designated as an intercontinental air terminal by the federal government (Waddingham, 1994).

In 1967, The Forum was opened as the home of the Los Angeles Lakers of the National Basketball Association and the 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 (Waddingham, 1994). The Forum is located approximately one-mile north of the Project Site, near the intersection of South Prairie Avenue and Manchester Boulevard. The Forum underwent a rehabilitation, was listed on the National Register of Historic Places (National Register) and the California Register of Historical Resources (California Register), and reopened in 2014. Additionally, at that time, The Form underwent an adaptation from an arena primarily designed for sporting events to an arena primarily used for music and entertainment events.

In the 1970s, a new health center was built on Manchester, north of the Project Site, and high-rise office buildings were constructed on La Brea, northwest of the Project Site (Waddingham, 1994). A new civic center was dedicated in 1973. Airport Park View Motel opened between Hollywood Park Race Track and The Forum (Waddingham, 1994). 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 2015, 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.

Project Site-specific history is included in the following sections.

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 that were granted licenses to serve alcohol in exchange for offering public lodging (Sandoval-Strausz, 2007). 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 (Sandoval-Strausz, 2007). The first hotel in the City of Los Angeles was the Bella Union, built on Main Street in downtown Los Angeles in 1835 (Figure 6). 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 (Figure 7) (Wallach, et al., 2008).



SOURCE: University of Southern California

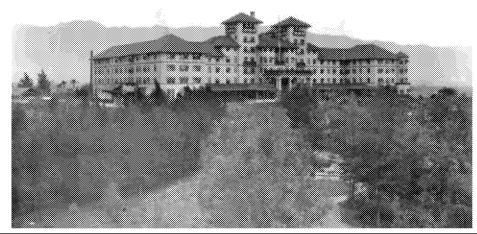
Figure 6
The Bella Union hotel, as it appeared in 1871 after several remodels



SOURCE: University of Southern California

Figure 7
The Hotel Nadeau circa 1905 in downtown Los Angeles

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. The expansion of the rail lines to the West Coast allowed many middle-class Americans the chance to venture west, tempted by reports of dramatic landscapes and healthful climates. The first major hotel in southern California was the Hotel Raymond, built in the fledgling town of Pasadena in 1886 (Figure 8). The success of the Hotel Raymond and subsequent hotels established Pasadena as a resort destination and helped bring tourists and settlers to the greater Los Angeles area (Wallach et al., 2008). 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. The buildings (including hotels) that rose up in this new commercial district were architect-designed structures meant to rival the architecture of San Francisco and the cities of the East Coast. Major hotels in early 20th century Los Angeles included the Alexandria Hotel (1906), the Rosslyn Hotel (1914), and the Biltmore Hotel (1923) (Figure 9).



SOURCE: University of Southern California

Figure 8
The Hotel Raymond in Pasadena circa 1890



SOURCE: University of Southern California

Figure 9
The Biltmore Hotel (1923) in downtown Los Angeles,
as pictured circa 1937-1938

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. An early champion of this model was E.M. Statler, who opened his first hotel in Buffalo, New York in 1908. Statler poured his money into designs and furnishings that exuded home comfort, de-emphasizing location and luxury in the process. For a price aimed to draw salesmen and families on the road, Statler's hotel offered many of the amenities that are now the staple of every hotel in America, including "private baths, telephones, clocks, full-length mirrors, readings lamps, and stationery" (Wallach et al., 2008). The hotel was an instant success and launched Statler into a career running a national hotel chain, based on a foundation of standardization and affordability that became the new standard for American hotels (Wallach et al., 2008). Indeed, Statler's influence was even felt in Los Angeles when in 1950 he opened the Hotel Statler at the corner of Figueroa Street and Wilshire Boulevard (Figure 10).

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 (Sandoval-Strausz, 2007).



SOURCE: University of Southern California

Figure 10
The Hotel Statler at Figueroa and Wilshire, circa 1950s

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 (discussed further below), Hilton, and Sheraton. Conrad Hilton entered 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. In 1954, Hilton acquired the Statler Hotels. Similarly, Sheraton began

in Springfield, Massachusetts in 1937 and quickly grew into a large chain with hotels stretching the length of the east coast from Florida to Maine (Sheraton, 2016). Both Sheraton and Hilton became publicly traded companies in the 1940s and ultimately became large international corporations.

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/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. The first Holiday Inn was opened by Kemmons Wilson in Memphis, Tennessee, in 1952. Wilson developed his hotel after finding his lodging options during family road trips expensive and lacking in amenities. With considerable government funds pouring into highway expansion in 1956, Wilson expanded his operation to cover growing demand for motels on the nation's roads. The company went public in 1967. Holiday Inn grew to be an international hotel chain and in 1972 became the first chain to exceed \$1 billion in revenues (Orrill, 2015).

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 (SurveyLA, 2017). The construction of apartment hotels tapered after the Great Depression and did not resume again after World War II because they were not well suited to the automobile. Their function was replaced with motels with kitchenettes after World War II (SurveyLA, 2017).

Regulatory Framework

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, 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 PRC 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) (Weeks and Grimer, 1995) 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 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.

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.

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.

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 implementation of a project. PRC section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that until certain required steps have been taken 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 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.

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 Notice of Preparation (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 CEOA, 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 [T]ribe" 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 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" (Governor's Office of Planning and Research, 2005).

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* (Governor's Office of Planning and Research, 2005), 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).

Archival Research

SCCIC Records Search

A records search for the Proposed Project was conducted on May 7, 2018 by ESA staff at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (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 within a 0.5-mile radius of the Project Site, as well as listed historic architectural resources within one mile of 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 (**Table 1**). Of the four previous studies, two studies (LA-10567 and 11150) were performed in areas that are adjacent to the Project Site along West Century Boulevard. None of the study areas overlaps 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.

TABLE 1
PREVIOUS CULTURAL RESOURCES INVESTIGATIONS ON FILE WITH SCCIC

Author	LA-	Title	Year
Gary E. Stickel, ERA	02904	Draft Report: A Phase 1 Cultural Resources Literature Search for the West Basin Water Reclamation Project	1993
Michael Hogan, Bai "Tom" Tang, Josh Smallwood, Laura Hensley Shaker, and Casey Tibbitt, CRM TECH	10567*	Identification and Evaluation of Historic Properties: West Basin Municipal Water District Harbor-South Bay Water Recycling Project Proposed Project Laterals	2005
Pamela Maxwell, US Army Corps of Engineers	11150*	West Basin Municipal Water District Harbor/ South Bay Water Recycling Project	2003
Metro	11973	Crenshaw/LAX Transit Corridor Project FEIS/FEIR	2011
NOTE: *Indicates study overlaps the Project Site.			

Previously Recorded Cultural Resources

The records search results indicate that no archaeological resources have been previously recorded within the Project Site or the 0.5-mile records search radius. The records search also indicated that no historical architectural resources have been previously recorded within or adjacent to the Project Site. The Forum (19-190892) is located approximately one-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. Upon listing on the National Register a property is automatically listed on the California Register. There are no 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 Site (Totton, 2018) (Appendix B).

Geoarchaeological Review

The following 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.

Geology

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. The majority of the Project Site is previously disturbed, and previously contained residences but is currently vacant land 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 a 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 Tertiary-aged marine sediments. Older geological mapping (DWR, 1961) depicts shallow sediments underlying the Project Site as Pleistocene-aged Lakewood Formation sand, silt, silty sand, and silty clay with occasional gravel lenses (EKI, 2017). Jennings (1962) identifies sediments beneath the Project Site as river terrace deposits. Recent maps by Dibblee and Minch (2007) and Saucedo et al. (2016) 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 (labeled Qae on the geological maps) in the vicinity of South Doty Avenue (Figure 11). A review of historic topographic maps (1921, 1924, and 1934) and aerial photos (1923 and 1928) shows an intermittent stream flowing from north to south across the Project Site suggesting a source of the sediment (USGS, 1921, 1924, 1934 and EDR, 1923, 1928). As a result of the construction of the Hollywood Park racetrack in 1938, the stream is no longer evident on maps and aerial photographs.

Soils

Mapped soils for the Project Site consist of Urban land-Windfetch-Centinela complex east of South Doty Avenue, and Urban land-Windfetch-Typic Haploxerolls complex west of South Doty (NRCS, 2018). These soils develop on uplifted alluvial terraces and fan remnants in human transported material overlying alluvial parent material. The alluvial soil constituents exhibit well

developed and deep soil B-horizons, which imply substantial landform stability over a long-period of time. However, the Urban land designation reflects a high degree of urbanization and development, which tends to obscure natural soil or pedological characteristics, and impart anthropogenic or artificial soil characteristics. Urban land is recognized by human disturbances to natural soil characteristics resulting from development such as grading and filling.

Prehistoric Archaeological Sensitivity

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 the East Transportation and Hotel Site, which formerly contained a drainage channel. 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 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.

Figure 11 Project Site Geology

The entirety of the Project Site has been subject to prior disturbance that includes some or all of the following: development, demolition of development, and removal of foundations and other components; portions of the Project Site that are currently undeveloped have also 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 cultural resources-further reducing the prehistoric archaeological sensitivity of these areas.

Additional Research

Additional research included a review of online newspaper databases and photo collections, and census data. The results of this research have been incorporated into the *Historic Setting* section of this report. A review of historic maps, aerial photographs, and building permits was also conducted, and the results of this research are provided in the following section.

Historic Maps and Aerial Photographs

Historic maps and aerial photographs were examined for historical information about land uses of the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. Available topographic maps include the 7.5-minute series 1924 and 1934 Venice Quadrangles, the 7.5-minute series 1948 Inglewood Quadrangle, the 1896 and 1944 Redondo Quadrangles, and the 1902 and 1921 Santa Monica Quadrangles. Sanborn Fire Insurance maps were not available for the area (USGS, 1896, 1902, 1921, 1924, 1934, 1944, and 1948). However, aerial photographs were available for the years 1923, 1928, 1938, 1947, 1952, 1963, 1977, 1979, 1981, 2002, 2005, 2009, 2010, and 2012 (EDR, 1923, 1928, 1938, 1947, 1952, 1963, 1977, 1979, 1981, 1983, 1989, 1994, 2002, 2005, 2009, 2010, and 2012).

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 (Figure 12). In 1928, the area remained sparsely developed but the agricultural properties appear uncultivated or developed with residential buildings (Figure 13). 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 (Figure 14). 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. By 1972, the majority of the parcels on and around the project site west of South Prairie Avenue remained smaller, single-family homes; however, the project area east of South Prairie Avenue appears to be dominated by apartment buildings with some commercial and single family homes present. This level and type of development appears to have remained consistent according to the 1972 and 1980 aerials. By 2003, large portions of land were vacant on the north side of West 102nd Street in the project area on either side of South Prairie Avenue.

Building Permits

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 four parcels (3940

West Century Boulevard and 10212, 10204, and 10226 South Prairie Avenue) containing historic age buildings (**Table 2** and Figure 4).

Figure 12 1923 Aerial Photograph

Figure 13 1928 Aerial Photograph

Figure 14 1963 Aerial Photograph

TABLE 2
CITY OF INGLEWOOD BUILDING PERMITS

Issued	Permit# (BLARC-)	Owner	Contractor	Architect	Valuation	Description
3940 West C	entury Blvd.					
6/25/1993	1993-06- 00446	-	-	-	\$18,000	Mansard and canopy
8/19/1993	1993-08- 00603	-	-	-	\$80,000	Remodel 32 units. Create arches along interior exit balconies
12/17/1993	1993-12- 00910	-	-	-	\$3,600	10 foot high monument sign and 3 foot by 9 foot wall sign
3/30/1994	1994-03- 00183	-	-	-	\$20,000	Add two laundry rooms on 1st floor and two linen rooms on 2nd floor
1/22/1999	1999-01- 00037	-	-	-	\$20,000	Add two laundry rooms on 1st floor and two linen rooms on 2nd floor (renewed previous permit)
10212 South	Prairie Ave.					
12/11/1953	41617	Chris Leserer	Chris Leserer	None	\$100	One room, one story, 25 sq. ft., wash room
5/27/1965	53687	Joseph Rosetti	Anthony J. Fisher	None	\$5,000	New building, 990 sq. ft., one story, stucco & masonry, delicatessen and beauty shop
5/27/1965	53689	None listed	Anthony J. Fisher	None	\$250	Demolish commercial building
9/27/1965	57686	Rosetti's Pizza	Hayden Small Associates	None	\$500	New building, 800 sq. ft., one story, stucco exterior walls, restaurant and beauty shop
5/24/1976	125586	Hoges B- B-Q	Lamb Sign Maintenance	None	\$1,000	Replace sign panel on existing pole structure, existing signs on parapet to be removed
3/7/1977	(Not legible)	(Not legible)	United Fire Intelligence	None	\$400	Dry chem hood system, piping and dry extinguisher system over hood
6/22/1977	141361	None listed	Owner	None	\$567	Interior alterations, 6' x 6' addition, café
7/10/1974		Talmus Hodges	Jim's Lighting	None	None listed	Change face of existing double faced sign (5'x5'), additional painted window sign
7/28/1998	8237-0109	Victor Morales	Victor Morales	Darrull Smith	\$30,000	Interior remodel
8/30/2000	0238-0238	Mi Terra	Alpha Systems	None	\$1,200	Hood & duct fire suppression system
10204 South	Prairie Ave.					
10/20/1952	03226	Lottie T. Blake	Max Porter	None	\$12,480	New three unit apartment building, stucco, comp. roof, 12 rooms, 1560 sq. ft., lot size 58.6x87
10/20/1952	03227	Lottie T. Blake	Max Porter	None	\$1,020	New double garage, two rooms, stucco, comp. roof, 408 sq. ft., lot size 58.6x87
05/17/2005	5137-0118	(Not legible)	Five Constru.	None	\$5,900	Replace shingles
03/07/2011	1106601-1- 222	Mohamad (Not legible)	(same as owner)	None	\$30,000	Remodel kitchens & baths in three (3) units; remove and install windows, doors and drywall throughout as needed.
10226 South						
No permits v	vere on file for	this property.				

Cultural Resources Survey

Methods

An initial site visit was conducted on April 24, 2018 by ESA staff Sara Dietler, B.A. and Christian Taylor, M.H.P, to develop the appropriate survey methodology. On May 10, 2018, ESA staff Vanessa Ortiz, M.A., RPA, and Amber-Marie Madrid, B.A. conducted an intensive survey of the entire Project Site for archaeological resources. The archaeological survey was aimed at identifying archaeological resources within 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. Due to the highly developed nature of the area surrounding the Project Site the possibility of impacts to offsite architectural historical resources diminishes greatly as distance from the Project Site increased. Additionally, South 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. All resources on the Project Site meeting the OHP's 45-year age threshold were documented on California Department of Parks and Recreation (DPR) 523 forms (Appendix C). Survey coverage is depicted in Figure 15.

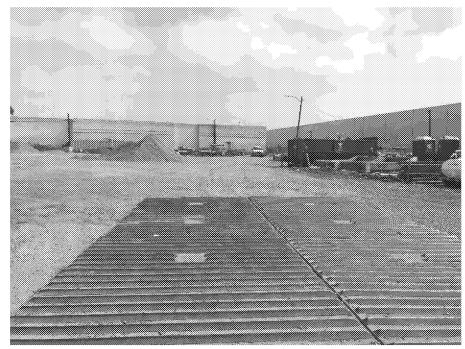
Results

The Project Site is comprised of five discontinuous areas as described on page 1 under Project Description and Location, above. 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. The northern portion of the Arena Site contains buildings within its northwestern and south-central portions, and disturbed vacant/undeveloped land in its eastern half (**Figure 16**). The undeveloped portions of the Project Site were subject to archaeological pedestrian survey and contain low-lying non-native grasses which obscured ground surface resulting in ground surface visibility ranging from 30 to 70 percent (**Figures 17, 18, and 19**). All undeveloped parcels contained modern 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 (see Figure 15).

Two historic-age architectural resources were identified on the Project Site as a result of the survey. These buildings are 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 (see Figure 15). Also, two historic-age architectural resources were identified within the Alternate Prairie Access Variant: 10204 South Prairie Avenue and 10226 South Prairie Avenue.

The resources documented as part of the survey are described in detail below.

Figure 15 Survey Coverage



SOURCE: ESA 2018

Figure 16
Undeveloped Area within northern portion of Arena Site
(previously used as a temporary construction staging area)
(view to East)



SOURCE: ESA 2018

Figure 17
Survey conditions in Well Relocation Site (view to south)



Figure 18
Survey conditions in East Transportation and Hotel Site (view to SE)



Figure 19
Survey conditions in West Parking Garage Site
(view to north)

Resource Descriptions

Archaeological Resources

EAN-1

This resource is a historic-period isolate consisting of a concave-base beverage bottle with a screw top finish and a stippled base with "6" embossed on it (**Figure 20**). The bottle contains no diagnostic markings; however, the screw top finish indicates that it was manufactured on an automatic bottling machine and most likely postdates 1905 (Society for Historical Archaeology, 2018). Given the degree of previous disturbances within the Project Site, it is unclear whether the isolate originated from on site. The isolate was identified within the northwestern portion of Arena Site.

WSN-1

This resource is an isolate consisting of an abalone shell fragment identified within the northern portion of the West Parking Garage Site. The shell fragment is worn, possibly due to surficial exposure to the elements, and does not exhibit any modification (**Figure 21**). It is unclear whether the shell fragment is the result of cultural processes, such as prehistoric or historic subsistence practices, or is modern debris.

Architectural Resources

The following includes evaluations of all historic-age architectural resources on the Project Site as well as within the footprint of the Alternate Prairie Access Variant. **Table 3** provides a list of all existing buildings located on the Project Site or on the project boundary expansion variant.

TABLE 3
BUILDINGS PRESENT ON PROJECT SITE AND ALTERNATE PRAIRIE ACCESS VARIANT

Address	Parcel #	Building Date(s) of Construction	Evaluated (Y/N)	Project Site or Projec Variant
3940 West Century Boulevard	4032-001-049	1955	Y	Project Site
10212 South Prairie Avenue	4032-008-035	1965	Υ	Project Site
10204 South Prairie Avenue	4032-008-002	1952	Υ	Project Variant
10226 South Prairie Avenue	4032-008-006	1928	Υ	Project Variant
10004 South Prairie Avenue	4032-001-039	1977	N	Project Site
3838 West 102nd Street	4032-007-035	1990	N	Project Site



SOURCE: ESA 2018

Figure 20 Detail of EAN-1



SOURCE: ESA 2018

Figure 21 Detail of WSN-1

Turf and Sky Motel (Rodeway Inn & Suites)

Architectural Description

The former Turf and Sky Motel (now the Rodeway Inn & Suites) is located at 3940 West Century Boulevard on the south side of West Century Boulevard and the east side of South Prairie Avenue (see Figure 15). It 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 (Figure 22). There is a concrete wall present at the side (east and west) and rear (south) property lines.



Figure 22

Landscaping and hardscaping of the Hotel

The north (front) façade has a large portico in the center leading to the courtyard and rear parking lot. On the second story, there are column and arch detailing. There are four aluminum sliding windows. The entrance is a wood and glass door located west of the portico under an awning. There are six aluminum sliding windows. There are box planters to the west of the entrance door (Figure 23). The hotel rooms are accessed from entrances in the center courtyard. All the hotel rooms have inward facing windows. There are balconies and stairs leading to the second story hotel rooms (Figure 24). The east and west (side) façades have no windows (Figure 25).



SOURCE: ESA 2018

Figure 23 North (front) façade, view facing south



SOURCE: ESA 2018

Figure 24 North (primary) façade with a view into the courtyard



SOURCE: ESA 2018

Figure 25 East (side) façade, view facing west

Construction History

The building located at 3940 West Century Boulevard **Figure 26** was originally constructed in 1955 ((Los Angeles County Assessor's Records). A limited number of building permits were available for this property, and all were filed during the 1990s. Based on a review of available building permits, historic aerial photographs, and other archival materials, it is apparent that the building been significantly altered from its original date of construction. A number of alterations have been completed, including the removal of the pool, addition of a mansard roof and arches along the interior exit balconies, removal or stuccoing over of first floor siding, replacement of windows, alteration of window openings, and interior remodeling of rooms (addition of two laundry room, two linen rooms, and signs).



SOURCE: [HYPERLINK "https://picclick.com/"]

Figure 26
Turf and Sky Apartment Motel Postcard

10212 South Prairie Avenue

Architectural Description

The property at 10212 South Prairie Avenue (Figure 15) includes a one-story commercial building (Figure 27) that was constructed in 1965. The commercial building abuts the west property line, and the primary (west) façade 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 facades 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 eves and composite shingles.



SOURCE: ESA. 2018

Figure 27 10212 South Prairie Avenue, looking east

Construction History

Early topographic maps and aerials indicate that the site was developed as early as 1930, likely with a residential building(s) similar to those still present in the neighborhoods to the south and west of the Project Site. The existing building located at 10212 South Prairie Avenue was constructed in 1965, replacing an earlier building (Los Angeles County Assessor's Records). In 1965, the one-story building measured 800 square feet, was clad in stucco, and featured a roof-mounted sign (City of Inglewood, 1965). The roof sign was altered and a new painted window sign was added in 1974 (City of Inglewood, 1974). In 1976, the signs on the parapet were removed and the sign panels on the existing pole sign were replaced (City of Inglewood, 1976). In 1977, a 36-square foot addition was constructed at the "left rear corner" of the building and a dry chemical hood system was installed (City of Inglewood, 1977a and 1977b). The interior was remodeled between 1998 and 2000 ((City of Inglewood, 1998). The site plan included in the permit application in 2000 shows a 1,158-square foot restaurant at the property line adjacent to the sidewalk; a detached two-car garage at the rear (east) property line; and a concrete block enclosure around a trash bin at the northeast corner of the parcel.

10204 South Prairie Avenue

Architectural Description

There are two buildings on parcel 4032-008-002 (Figures 15, 28, and 29), addressed as 10204 South Prairie Avenue. 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.

Construction History

The existing buildings located at 10204 South Prairie Avenue were constructed in 1952 (City of Inglewood, n.d.). A permit was issued in 2005 for replacement of roof shingles. In 2011, a permit was issued to remodel the kitchens and baths in all three units and install new windows, doors and drywall throughout as needed.

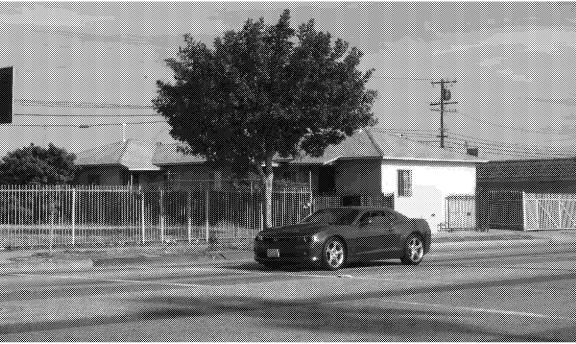


Figure 28
10204 South Prairie Avenue, looking southeast



Figure 29
10204 South Prairie Avenue, looking west

10226 South Prairie Avenue

Architectural Description

A single family home currently occupies 10226 South Prairie Avenue (parcel 4032-008-006) (Figures 15 and 30). 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 and includes a single pedestrian door and two aluminum slider windows. The exterior is clad in stucco. Security bars cover many of the windows.

Construction History

Assessor's records indicate that the residence was constructed in 1928. No permit records were on file; however, there are a number of obvious additions and alterations including the large addition to the south façade, the smaller addition on the east (rear) façade at the southeast corner, replacement of the windows and front door, and the addition of security bars over the window and door openings.

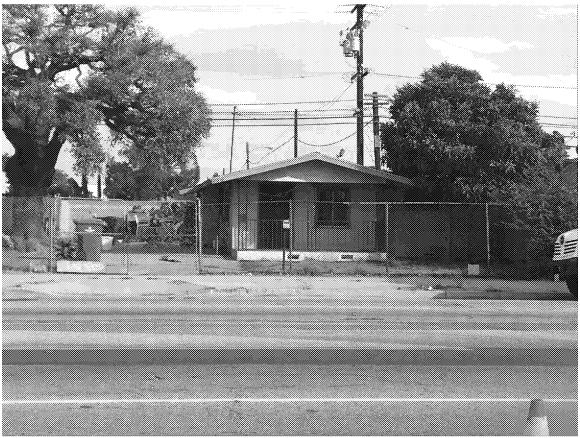


Figure 30
10226 South Prairie Avenue, looking west

Significance Evaluations

Archaeological Resources

EAN-1 and WSN-1

Two isolates were documented as a result of the cultural resources survey. EAN-1 is an historic-period isolate consisting of a machine-made, concave base beverage bottle, and WSN is an isolate consisting of an abalone shell fragment of unknown age. Given the degree of previous disturbance associated with the Project Site it is unclear whether the isolates are in-situ. Due to the isolated nature and lack of clear cultural context, isolates are generally considered ineligible for inclusion in the California Register unless the artifact itself is of exceptional significance. EAN-1 and WSN-1 do not appear to be of exceptional significance nor do they have the potential to yield information important to the study of history. Therefore, neither isolate is eligible for listing in the California Register, nor do they meet the criteria for an historical or unique archaeological resource under CEQA.

Architectural Resources

Turf and Sky Motel (Now the Rodeway Inn)

The building located at 3940 West Century Boulevard was evaluated for eligibility for listing on the National and California registers under the following architectural theme: Hotels and Motels.

Criterion A/1: Events

Inglewood began to take shape in the late 19th century as the Butterfield Overland Stage route opened in 1858, followed by the California Southern Railroad line in 1882, which greatly increased the number of people coming to Southern California. Specifically, in 1888 excursion trains brought people to the area now known as Inglewood. The Project Site was initially developed for residential uses, generally single-family homes and low-density multi-family residences, on parcels measuring one-half acre or larger. Over time, portions of the Project Site were converted to denser multi-family residences, hotel/motels, commercial uses such as restaurants, and other community-serving uses such as churches and schools.

The building at 3940 West Century Boulevard was constructed in 1955 as the Turf & Sky Motel, and it was not one of the first commercial lodgings in Inglewood. The building contributed to the transition of this area from primarily single-family residences to commercial uses between 1953 and 1963.

The building at 3940 West Century Boulevard does not reflect the early settlement patterns of Inglewood. Although it is associated with the transition of this area from residential to more commercial uses during the mid-20th century, that is not considered a significant event in the history of the City of Inglewood or the more specific historic context of the vicinity. No evidence relating the building to any specific, significant historic events was identified during the course of this evaluation. Therefore, 3940 West Century Boulevard is not recommended eligible for listing under National Register Criterion A or California Register Criterion 1.

Criterion B/2: Significant Persons

The building at 3940 West Century Boulevard is listed in city directories as the "Turf & Sky Motel" until 1964, at which time it is listed as the "Turf Sky Apts Motel." A limited number of building permits were available for this property, and all were filed during the 1990s. Archival research identified only one individual associated with the property: "H. Chittenden" is listed in the 1964 city directory. Research on H. Chittenden did not reveal that he/she was a prominent member of the local community or an important person in the development of the City of Inglewood.

There does not appear to be any known significant association between 3940 West Century Boulevard and persons important to national, state, or local history. For this reason, 3940 West Century Boulevard is not recommended eligible for listing under National Register Criterion B or California Register Criterion 2.

Criterion C/3: Design/Construction

A limited number of building permits were available for this property, and all were filed during the 1990s. Based on a review of available building permits, historic aerial photographs, and other

archival materials, it is apparent that the building been significantly altered from its original construction. Alterations include the removal of the swimming pool, addition of a mansard roof and arches along the interior exit balconies, removal or stuccoing over of first-floor siding, replacement of windows, alteration of window openings, and interior remodeling of rooms (e.g., addition of two laundry rooms, two linen rooms, and signage). The building is not architecturally distinctive and does not exemplify any particular architectural style. The architect is unknown, and the building does not appear to represent a notable work of a master builder or architect. Therefore, it is not recommended eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: Data Potential

While most often applied to archaeological districts and sites, Criterion D/4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D/4, they themselves must be, or must have been, the principal source of the important information. The building at 3940 West Century Boulevard does not appear to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known. Therefore, 3940 West Century Boulevard has not yielded and is not likely to yield information important to prehistory or history and do not appear to satisfy National Register Criterion D or California Register Criterion 4.

Integrity Analysis

In order to be eligible for listing in the National and/or California registers, a property must be significant under one or more of the four criteria and retain sufficient integrity to convey that significance. As stated above, 3940 West Century Boulevard does not appear to be eligible for listing under any criteria. Therefore, an integrity analysis is not necessary.

Eligibility Assessment

In summary, the building is not recommended eligible under any of the four criteria and is therefore not considered to be a historical resource pursuant to CEQA.

10212 South Prairie Avenue

The building located at 10212 South Prairie Avenue was evaluated for eligibility for listing on the National and California registers.

Criterion A/1: Events

Inglewood began to take shape in the late 19th century as the Butterfield Overland Stage route opened in 1858, followed by the California Southern Railroad line in 1882, which greatly increased the number of people coming to Southern California. Specifically, in 1888 excursion trains brought people to the area now known as Inglewood. The Project Site was initially developed for residential uses, generally single-family homes and low-density multi-family residences, on parcels measuring one-half acre or larger. Over time, portions of the Project Site were converted to denser multi-family residences, hotel/motels, commercial uses such as restaurants, and other community-serving uses such as churches and schools.

While the 10212 South Prairie Avenue property was developed as early as 1930, likely with a single-family residence, it is currently developed with a commercial building, a detached garage, and a walled enclosure. The detached garage likely predates the main building that now occupies the site. According to building permits, the main building at 10212 South Prairie Avenue was constructed in 1965 as a small commercial building to house Rosetti's Pizza, and/or a delicatessen, and a beauty shop. The owner is listed as Joseph Rosetti. City directories indicate that Joseph and Angela Rosetti were residents of Los Angeles and that Angela Rosetti is associated with Angela's Hair Fashion. It is likely that Angela's Hair Fashion occupied 10212 South Prairie in 1965. A variety of business have occupied the site since its construction including Hoges (Hodges) BBQ, Mi Terra, and "Let's Have a Cart Party."

The buildings at 10212 South Prairie Avenue do not reflect the early settlement patterns of Inglewood. Furthermore, no evidence relating the buildings to any other specific significant historic events was identified during the course of this evaluation. Therefore, 10212 South Prairie Avenue is not recommended eligible for listing under National Register Criterion A or California Register Criterion 1.

Criterion B/2: Significant Persons

The commercial building currently at 10212 South Prairie Avenue was constructed in 1965 for commercial uses as a restaurant and beauty shop. Permit records indicated that by 1974 the property was owned by Talmus Hodges. Research on Joseph and Angela Rosetti and Talmus Hodges does not indicate that these individuals were significant to the development of the City of Inglewood or any other significant events.

There do not appear to be any known significant associations between 10212 South Prairie Avenue and persons important to national, state, or local history. The property is not recommended eligible for listing under National Register Criterion B or California Register Criterion 2.

Criterion C/3: Design/Construction

The buildings on the subject property are not architecturally distinctive and have undergone alterations including the addition of the mansard roof and various interior alterations. Research did not reveal any significant architects associated with either the original construction or any subsequent alterations to the property. Only one contractor was identified on the 1965 permit, Anthony J. Fisher. City directories indicate that in 1942 Mr. Fisher was an aircraft worker and in 1947 he was plasterer. The property does not represent a notable work of a master builder or architect.

For these reasons, 10212 South Prairie Avenue is not recommended eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: Data Potential

While most often applied to archaeological districts and sites, Criterion D/4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D/4, they themselves must be, or must have been, the principal source of the important information. 10212 South Prairie Avenue does not appear to

yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known and it is not likely to yield information important to prehistory or history. Therefore, 10212 South Prairie Avenue is recommended not eligible under National Register Criterion D or California Register Criterion 4.

Integrity Analysis

In order to be eligible for listing in the National and/or California registers, a property must be significant under one or more of the four criteria and retain sufficient integrity to convey that significance. As stated above, 10212 South Prairie Avenue does not appear to be eligible for listing under any criteria. Therefore, an integrity analysis is not necessary.

Eligibility Assessment

In summary, 10212 South Prairie Avenue is not recommended eligible under any of the four criteria and is therefore not considered to be a historical resource pursuant to CEQA.

10204 South Prairie Avenue

The building located at 10204 South Prairie Avenue was evaluated for eligibility for listing on the National and California registers.

Criterion A/1: Events

Inglewood began to take shape in the late 19th century as the Butterfield Overland Stage route opened in 1858, followed by the California Southern Railroad line in 1882, which greatly increased the number of people coming to Southern California. Specifically, in 1888 excursion trains brought people to the area now known as Inglewood. The Project Site was initially developed in 1920s for residential uses, generally single-family homes and low-density multifamily residences, on parcels measuring one-half acre or larger. Over time, portions of the Project Site were converted to denser multi-family residences, hotel/motels, commercial uses such as restaurants, and other community-serving uses such as churches and schools.

The 10204 South Prairie Avenue property is currently developed with a multi-family residence and a detached, double garage; it was constructed in 1952, well outside of the initial period of development for the neighborhood. The original owner is listed as Mrs. Lottie T. Blake. In the 1933 City Directory she is listed as living at 10200 South Prairie Avenue and in the 1947 City Directory she is listed as living at 10202 South Prairie Avenue. It is unclear whether this listing refers to one of the units on the subject property or to a residence next door.

The building at 10204 South Prairie Avenue does not reflect the early settlement patterns of Inglewood. Furthermore, no evidence relating the buildings to any other specific significant historic events was identified during the course of this evaluation. Therefore, 10204 South Prairie Avenue is not recommended eligible for listing under National Register Criterion A or California Register Criterion 1.

Criterion B/2: Significant Persons

The residential building currently at 10204 South Prairie Avenue was constructed in 1952 as a triplex. It is likely that the original owner, Lottie T. Blake, occupied one of the units, along with her husband Fred Blake, and rented out the other two. Research on Lottie and Fred Blake did not indicate that these individuals were significant to the development of the City of Inglewood or any other significant events. As a rental property there have likely been numerous tenants over the years. No evidence has been found regarding the identity of these tenants, or whether any of these individual were significant to the development of the City of Inglewood or other significant events. It is highly unlikely that, even if a previous resident were an important figure in history, the resident's association with a rental property would be relevant to that significance.

There do not appear to be any known significant associations between 10204 South Prairie Avenue and persons important to national, state, or local history. The property is not recommended eligible for listing under National Register Criterion B or California Register Criterion 2.

Criterion C/3: Design/Construction

The buildings on the subject property are not architecturally distinctive and have undergone alterations including the replacement of doors and windows and various interior alterations. Research did not reveal any significant architects associated with either the original construction or any subsequent alterations to the property. One contractor was identified on the 1952 permit: Max Porter No evidence has been found indicating that Mr. Porter was a master builder or architect and, therefore the property does not represent a notable work of a master builder or architect.

For these reasons, 10204 South Prairie Avenue is not recommended eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: Data Potential

While most often applied to archaeological districts and sites, Criterion D/4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D/4, they themselves must be, or must have been, the principal source of the important information. 10204 South Prairie Avenue does not appear to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known and it is not likely to yield information important to prehistory or history. Therefore, 10204 South Prairie Avenue is recommended not eligible under National Register Criterion D or California Register Criterion 4.

Integrity Analysis

In order to be eligible for listing in the National and/or California registers, a property must be significant under one or more of the four criteria and retain sufficient integrity to convey that significance. As stated above, 10204 South Prairie Avenue does not appear to be eligible for listing under any criteria. Therefore, an integrity analysis is not necessary.

Eligibility Assessment

In summary, 10204 South Prairie Avenue is not recommended eligible under any of the four criteria and is therefore not considered to be a historical resource pursuant to CEQA.

10226 South Prairie Avenue

The building located at 10226 South Prairie Avenue was evaluated for eligibility for listing on the National and California registers.

Criterion A/1: Events

Inglewood began to take shape in the late 19th century as the Butterfield Overland Stage route opened in 1858, followed by the California Southern Railroad line in 1882, which greatly increased the number of people coming to Southern California. Specifically, in 1888 excursion trains brought people to the area now known as Inglewood. The Project Site was initially developed for residential uses, generally single-family homes and low-density multi-family residences, on parcels measuring one-half acre or larger. Over time, portions of the Project Site were converted to denser multi-family residences, hotel/motels, commercial uses such as restaurants, and other community-serving uses such as churches and schools.

The residential building currently at 10226 South Prairie Avenue was constructed in 1928 likely as a single family residence. The building does not reflect the early settlement patterns of Inglewood. Furthermore, no evidence relating the buildings to any other specific significant historic events was identified during the course of this evaluation. Therefore, 10226 South Prairie Avenue is not recommended eligible for listing under National Register Criterion A or California Register Criterion 1.

Criterion B/2: Significant Persons

The residential building currently at 10226 South Prairie Avenue was constructed in 1928 likely as a single family residence. City directories revealed a number of occupants including J.A. Evans in 1933 and 1935, Mrs. A.B. Evans in 1940, D.R. Adams in 1942, F.B. Clay in 1947, R.O. Madden in 1950, and J. Anger in 1964. No evidence has been found that these individuals were significant to the development of the City of Inglewood or any other significant events. No other residents have been identified. It is highly unlikely that, even if a previous resident were an important figure in history, the resident's association with the building would be relevant to that significance.

There do not appear to be any known significant associations between 10226 South Prairie Avenue and persons important to national, state, or local history. The property is not recommended eligible for listing under National Register Criterion B or California Register Criterion 2.

Criterion C/3: Design/Construction

The buildings on the subject property are not architecturally distinctive and have undergone alterations including the large addition to the south façade, the smaller addition on the east (rear) façade at the southeast corner, replacement of the windows and front door, and the addition of security bars over the window and door openings. Research did not reveal any significant

architects associated with either the original construction or any subsequent alterations to the property. The property does not represent a notable work of a master builder or architect.

For these reasons, 10226 South Prairie Avenue is not recommended eligible under National Register Criterion C or California Register Criterion 3.

Criterion D/4: Data Potential

While most often applied to archaeological districts and sites, Criterion D/4 can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D/4, they themselves must be, or must have been, the principal source of the important information. 10226 South Prairie Avenue does not appear to yield significant information that would expand our current knowledge or theories of design, methods of construction, operation, or other information that is not already known and it is not likely to yield information important to prehistory or history. Therefore, 10226 South Prairie Avenue is recommended not eligible under National Register Criterion D or California Register Criterion 4.

Integrity Analysis

In order to be eligible for listing in the National and/or California registers, a property must be significant under one or more of the four criteria and retain sufficient integrity to convey that significance. As stated above, 10226 South Prairie Avenue does not appear to be eligible for listing under any criteria. Therefore, an integrity analysis is not necessary.

Eligibility Assessment

In summary, 10226 South Prairie Avenue is not recommended eligible under any of the four criteria and is therefore not considered to be a historical resource pursuant to CEQA.

Impacts Analysis

Direct Impacts

The buildings at 3490 West Century Boulevard, 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue are not recommended eligible for listing in the National Register or California Register. As such, they do not meet the definition historical resources as outlined in CEQA Guidelines section 15064.5(a)(1) or (2). For this reason, the Proposed Project, including the Alternate Prairie Access Variant, would not have a direct impact on historical resources.

Offsite Resources

The Proposed Project was analyzed to determine if it would result in a substantial adverse change to the integrity of listed historical resources within one-mile of the Project Site. Currently, there are no National or California register-listed historic resources located adjacent to the Project Site. The Forum, located approximately one-mile north, is the nearest listed historic resource to the Project Site (see Figure 3). The Forum underwent a rehabilitation, was listed on the National Register and the California Register, 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." The Forum has been listed on the National and California Registers under Criterion C/3, respectively, for its embodiment of the distinctive characteristics of a type, period, or method of construction and 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, which 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

Interior:

- The interior bowl spatial volume, including the elliptical seating rows, an elliptical cross aisle at the main concourse level, congruent elliptical wall at the lower event level, and the circular wall enclosure at the top
- Seating tier: risers and treads that form the lower and upper seating bowls
- Perforated metal wall cladding
- Vomitoria, truck tunnel, and other exit passages
- Two public concourses formed by an exterior circular wall and an interior elliptical seating cross aisle
- Passages from concourses to cross aisles

² NRHP, 2014. National Register of Historic Places Registration Form, Forum, Los Angeles, CA., August 2014.

Ceiling shape, texture, and light fixtures in the public concourses

The Forum is located outside of the Project Site approximately one-mile north of West Century Boulevard along South Prairie Avenue. The Proposed Project would not involve the demolition, destruction, relocation, or alternation of the resource or its immediate surroundings. The character-defining features that are associated with setting include landscaping surrounding The Forum and views of The Forum from adjacent streets and properties. However, the surrounding views of The Forum from beyond properties and streets adjacent to The Forum (for example, from the Project Site) are not character-defining features of the resource and alterations to the surrounding setting in the area of the Project Site would not affect the resource's integrity. Therefore, the development of the HPSP Adjusted Baseline project under Adjusted Baseline Environmental Setting conditions would not affect the baseline for analysis of the historic resource. These features would be preserved and would not be materially altered in a manner as a result of the Proposed Project. The Project Site is approximately one mile away and would not be considered to be the resource's immediate surroundings. For these reasons, views to or from The Forum from the Project Site would not be relevant in assessing potential Project-related impacts to The Forum. The Forum is currently visible from the Project Site, and these views will be obscured as a result of the HPSP Adjusted Baseline project. However, the setting is highly urbanized, the distance between The Forum and the Project Site (approximately one mile) is too great to alter setting of The Forum, and the Proposed Project would not materially impair any of the character-defining features of The Forum. Altering the views to and from The Forum would not result in alterations to The Forum's integrity. The Forum would continue to retain all aspects of integrity and would remain eligible for listing in the National and California registers.

Conclusions and Recommendations

Historic Architectural Resources

Two historic-age buildings (Rodeway Inn & Suites, formerly the Turf and Sky Motel and 10212 South Prairie Avenue) were identified within the Project Site and two additional historic-age buildings (10202 and 10226 South Prairie Avenue) were identified within the Alternate Prairie Access Variant. None is considered eligible for listing in the National or California registers under Criteria A/1-D/4. As such, they do not qualify as historical resources under CEQA and the Proposed Project, including the Alternate Prairie Access Variant, would not result in a direct impact to historical resources. Additionally, the only listed resource in the vicinity of the Proposed Project is The Forum. The Forum is listed on the National Register and is located approximately one-mile north of the Project Site. Potential impacts to offsite historical resources were analyzed; the Proposed Project, including the Alternate Prairie Access Variant, would not result in an impact to offsite historical resources. No further work with regards to historic architectural resources is recommended.

Archaeological Resources

Known Resources

As a result of the archival research and archaeological resources survey 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. 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.

Unknown Resources

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 Transportation 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 construction and demolition of residential and commercial buildings, prehistoric and/or historic-period archaeological deposits that may have underlain the Project Site were likely destroyed.

Tribal consultation conducted in accordance with AB 52 and summarized in Section 3.4, Cultural and Tribal Cultural Resources of the EIR, did not result in the finding of any known Tribal cultural resources within the Project Site. However, due to Tribal concerns about possible prehistoric archaeological sensitivity, archaeological and Native American monitoring is recommended, and mitigation measures are provided below.

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 surface, could encounter archaeological deposits that qualify as historical resources or unique archaeological resources pursuant to CEQA. Therefore, recommended mitigation measures for the retention of a qualified archaeologist, cultural resources sensitivity training, archaeological and Native American Monitoring, and inadvertent discovery protocols are provided below.

Mitigation Measure CUL-1.

- 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 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.
 - i. 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 by the City prior to the issuance of the first grading permit.
- Cultural Resources Sensitivity Training. The qualified archaeologist ii. 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.
- iii. Archaeological and Native American Monitoring. The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Project as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Tribe declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. 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 quantity, 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.
- iv. 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).
- v. 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.

- In the event that preservation in place is demonstrated to be infeasible vi. 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 through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. In the case of materials determined to be Native American in origin, they will first be offered to the Tribe for permanent curation or repatriation as appropriate. If no institution or Tribe accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.
- vii. 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.
- viii. Prepare a final monitoring and mitigation report for submittal to the Applicant, City, and the SCCIC, 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 SCCIC, the Applicant, and the City. 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.
- b) 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.

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Appendix A [TO COME] Personnel

Appendix B [TO COME] Sacred Lands File Search

Appendix C [TO COME] DPR 523 Forms [Confidential]