

3.4 Cultural Resources

3.4.1 Introduction

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

Commented [A1]: Global comment: Per the amendments to Appendix G in the revised CEQA Guidelines, discuss moving paleontological resources analysis to the Geology and Soils section.

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

3.4.2 Environmental Setting

Natural Setting

The Project Site is located within the fully urbanized City of Inglewood. The Project Site is surrounded by residential and commercial development to the west, south, and east, and Hollywood Park to the north, part of which is currently under development and will result in new commercial, office, residential, parking, and sports stadium uses. Prior to the development of the area, historic topo maps indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and formerly running to just north of the Project Site's northern boundary.

Geological Setting

The Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.¹ The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 – 3 million years ago (Ma).² While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma).³ Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation.⁴ Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the

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

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

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

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

Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

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

Prehistoric Setting

Based on recent research in the region⁷, the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish Contact in A.D. 1542).

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

While it is not certain when humans first came to California, their presence in southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.⁸ During this time period, the climate of southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.⁹

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

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

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

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

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

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

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

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

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

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

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

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.^{14,15,16} The native populations of southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.¹⁷ Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.¹⁸

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

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

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

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

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

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

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

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

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

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

Late Period (1,000 B.P.–A.D. 1542)

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

Ethnographic Setting

Protohistoric Period (A.D. 1542 to 1771)

The Project Site is located in a region traditionally occupied by the Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the 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.²⁴ The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

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

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.²⁶ Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino

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

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

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

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

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

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

descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

Spanish Period (A.D. 1769 – 1821)

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

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

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

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

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

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

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

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

Mexican Period (A.D. 1821-1848)

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

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

American Period (A.D. 1848-present)

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

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

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

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

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

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

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

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

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

to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.^{38,39}

History of Inglewood

During the rancho period, the City of Inglewood was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed 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, located 2.5-miles from the Project Site, in the center of what ~~was~~ became a 2,200-acre ranch overlooking the now gone Centinela Creek, on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, and built his adobe on a portion of the *Rancho Sausal Redondo*, which was granted to him as the *Rancho Aguaje de la Centinela*.

Soon after Machado traded it for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnette who eventually added the much larger *Rancho Sausal Redondo* to his holdings, ~~and~~ once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel ~~Freeman~~ Freeman. In spite of drought and other hardship, Freeman was successful with farming barley on the ranch and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.^{40,41}

Centinella Springs, or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* described as continuously existing since the Pleistocene Era, and is now California Historical Landmark 363. 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.⁴²

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. 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

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

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

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

⁴¹ Merl, Jean, 2009. *Historic Westside Adobe reflects Diversity of its Owners*. Los Angeles Times. Accessed January 9, 2019.

⁴² Office of Historic Preservation, 2019. <http://ohp.parks.ca.gov/ListedResources/Detail/363>. Accessed January 9, 2019.

on Commercial Street (now La Brea)⁴³ With a population of about 1,200, Inglewood was incorporated on February 10, 1908. That same year, the high school building was completed.⁴⁴

On the evening of June 21, 1920, a large earthquake struck Inglewood. While there was a lot of damage to buildings, there was no loss of life. The next few days saw a large number of tourists coming to Inglewood to check out the damage. The climate impressed many of 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.⁴⁵

The 1932 Olympic Games ~~was~~ held in Los Angeles, which was big news in Inglewood, as three Inglewood High School alumni won medals. Many buildings in Inglewood were used as training facilities, and the marathon route went through the town.⁴⁶ 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.⁴⁷ In 1949, the airport was designated as an intercontinental air terminal by the federal government.⁴⁸

In 1967, The Forum, located less than one-mile north of the Project Site, was opened as the home of the Los Angeles Lakers of the National Basketball Association and 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.⁴⁹

In the 1970s, a new health center was built on Manchester, north of the Project Site, and high-rise office buildings were being constructed on La Brea, northwest of the Project Site.⁵⁰ A new civic center was dedicated in 1973. Airport Park Hotel opened between Hollywood Park Race Track and The Forum.⁵¹ Many senior housing developments were also built in Inglewood during the 1970s.

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

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

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

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

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

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

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

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

⁵¹ Waddingham, Gladys, 1994. The History of Inglewood. Historical Society of Centinela Valley. Los Angeles, California.

Architectural Themes

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

Hotels and Motels

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

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

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

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

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

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

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

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

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

Apartment Hotels

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

3.4.3 Adjusted Baseline Environmental Setting

As discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the Proposed Project is not anticipated to be constructed and begin operations until mid-2023 for the 2023-24 NBA basketball season. Also as discussed in Section 3.0, Environmental Impacts, Settings, and Mitigation Measures, the City has issued building permits for, and construction has commenced on, significant portions of the Hollywood Park Specific Plan, including the construction of the 70,000-seat NFL Stadium, a 6,000 seat performance venue, 518,077 sf of retail and restaurant uses, 466,000 sf of office space, 314 residential units, and approximately 9,900 parking spaces. Due to the certainty of these projects being constructed and in operation prior to opening of the Proposed Project, the City of Inglewood determined that it is appropriate to include these projects in an adjusted environmental setting for the Proposed Project. Accordingly, the changes associated with these developments within the Hollywood Park Specific Plan area are considered as part of the adjusted environmental baseline.

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The development in the HPSP area does not affect the baseline for analysis of the archaeological, paleontological, or tribal resources as at this time it is not known if any resources have been discovered and documented during construction of the HPSP which could, if discovered and documented, provide additional information on sensitivity of these resources. While views to or from The Forum, which is listed on the National Register of Historic Places and the California Register of Historical Resources, would be obscured as a result of baseline development in the HPSP area, views in and of themselves do not constitute an environmental impact to a historic resource. Therefore, the development in the HPSP area under baseline conditions would not

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

affect the baseline for analysis of the historic resources as there are no historic resources present on the HPSP site that could be impacted by baseline development.

3.4.4 Regulatory Setting

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

State

California Environmental Quality Act

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

The *CEQA Guidelines* (Title 14 California Code of Regulations (CCR) section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC sections 5020.1(j) or 5024.1.

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

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

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

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

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

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

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

California Register of Historical Resources

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

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

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

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

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

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

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

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;

- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

Public Resources Code Section 5097.98

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

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

The State CEQA Guidelines (Title 14, Chapter 3 of the California Code of Regulations, Section 15000 *et seq.*), are prescribed by the Secretary of Resources to be followed by state and local agencies in California in their implementation of the CEQA. Appendix G of the State CEQA Guidelines includes an Environmental Checklist Form with questions that may be used by public agencies in their assessment of impacts on the environment. The question within Appendix G that relates to paleontological resources states: "Will the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?" The City of Los Angeles uses this question as their threshold of significance for determining whether impacts of paleontological resources are significant.

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

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

Public Resources Code Section 5097.5 and Section 30244

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

California Health and Safety Code Section 7050.5

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

Assembly Bill 52 and Related Public Resources Code Sections

Assembly Bill (AB) 52 was approved by Governor Brown on September 25, 2014. The act amended PRC section 5097.94, and added PRC sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. AB 52 applies specifically to projects for which a NOP or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.

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

PRC section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of

California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency's formal notification and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

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

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

PRC section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

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

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

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

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

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

Local

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

3.4.5 Analysis, Impacts and Mitigation

Significance Criteria

A significant impact would occur if the Proposed Project would:

1. Cause a substantial adverse change in the significance of a historical resource as defined pursuant to CEQA Guidelines Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5;

3. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature;

Commented [A3]: Revisions to criteria below to conform to Appendix G, per global comment above. Text throughout section would need to be modified/moved to conform.

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

4.3 Disturb any human remains, including those interred outside of ~~formal-dedicated~~ cemeteries;
or

§.4 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Methodology and Assumptions

Historic Architectural Resources

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

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

Archaeological Resources

The analysis of impacts to archaeological resources is also based on the *Phase I Cultural Resources Assessment Report*, which included: (1) a cultural resource records search conducted at the SCCIC to review recorded archaeological resources within a quarter mile radius of Project Site, as well as a review of cultural resource reports and historic topographic maps on file, (2) a review of the California Points of Historical Interest (CPHI), the California Historical Landmarks (CHL), the California Register, the National Register, and the California State HRI listings, (3) ~~and~~

a Sacred Lands File (SLF) search commissioned through the NAHC, (4) a review of available Sanborn Maps, historic aerial imagery; and other technical studies, and (5) a pedestrian survey of the Project Site.

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

Paleontological Resources

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

There are no plans, policies, or regulations with which the project is required to comply with regard to treatment of paleontological resources. However, it is accepted professional practice to recognize standard guidelines promulgated by the SVP that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

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

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

⁶⁰ Society of Vertebrate Paleontology (SVP). 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.

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

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

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

A geologic unit known to contain significant fossils is considered to be “sensitive” to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case.⁶³

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

⁶¹ Society of Vertebrate Paleontology (SVP). 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.

⁶² Society of Vertebrate Paleontology (SVP). 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.

⁶³ Society of Vertebrate Paleontology (SVP). 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.

Paleontological Sensitivity

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

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcanoclastic formations (e.g., ashes or tephras), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e.g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).
- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.
- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available, paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance. For geologic units with low potential, protection or salvage

⁶⁴ Society of Vertebrate Paleontology (SVP). 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available: http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed January 3, 2017.

efforts will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontologic potential of the rock units present within the study area.

Paleontological Resources Significance Criteria

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

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

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important.^{66,67}

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

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Tribal Cultural Resources

The analysis of impacts to tribal cultural resources is based on the consultation between the City and the Tribes and the *Phase I Cultural Resources Assessment Report*. The potential for the

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

⁶⁶ Scott, E. and K. Springer. 2003. CEQA and Fossil Preservation in California. The Environmental Monitor.

⁶⁷ Scott, E., K. Springer, and J. C. Sagebiel. 2004. Vertebrate paleontology in the Mojave Desert: the continuing importance of "follow-through" in preserving paleontologic resources. In *The human journey and ancient life in California's deserts: Proceedings from the 2001 Millennium Conference*. Ridgecrest: Maturango Museum Publication 15: 65-70.

Project Site to contain tribal cultural resources was assessed based on information provided by Tribes and supplemented by the findings of the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the Project. The NAHC was contacted on April 24, 2018 to request a search of the SLF of the Project Site.

Human Remains

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

Cultural Resource Archival Research

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

Previous Cultural Resources Investigations

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two (LA-10567 and 11150) run adjacent to the Project Site along West Century Boulevard, there are none which overlap with the Project Site. LA-10567 is a linear survey report that covers several communities for a pipeline alignment, and LA-11150 is a memorandum from the Office of Historic Preservation regarding the Section 106 process for the same project.

Previously Recorded Cultural Resources

The records search results indicate that no cultural resources, including archaeological or historical architectural resources, have been previously recorded within the Project Site or the 0.5-mile records search radius.

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. The NAHC responded to the request in a letter dated April 25, 2018 with negative findings.

Geoarchaeological Review

The Project Site is located on the alluvial Torrance Plan and is situated approximately 0.6-miles east of the Newport-Inglewood Fault Zone at the intersection of West Century Boulevard and Crenshaw Boulevard. Elevation within the Project Site ranges between 87 and 106 feet above

mean sea level and slopes towards the south and west. Presently, the majority of the Project Site is previously disturbed, and previously contained residences but is currently vacant except for some utilities. The remainder (six parcels) of the Project Site ~~are~~ is developed with commercial properties, motel, manufacturing, and warehouse land uses, utilities, and paved road and parking. In addition, the Arena Site includes a parcel containing an existing City water supply well and associated infrastructure.

Commented [A5]: Confirm.

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 mapping⁶⁸ depicts shallow sediments underlying the Project Site as Pleistocene-aged Lakewood Formation sand, silt, silty sand, and silty clay with occasional gravel lenses. Jennings⁶⁹ identifies sediments beneath the Project Site as river terrace deposits. Recent maps by Dibblee and Minch⁷⁰ and Saucedo et al.⁷¹ are generally consistent with earlier maps in identifying Pleistocene-aged alluvium beneath the Project Site; however, these maps additionally identify a small area of Late Pleistocene to Holocene alluvial sediment in the vicinity of South Doty Avenue. A review of historic topographic maps (1923, 1924 and 1930) and aerial photos (1923 and 1928) shows an intermittent stream flowing from north to south across the Project Site in this location suggesting a source of the sediment. As a result of the construction of the Hollywood Park racetrack in 1938, the stream is no longer evident on maps and aerial photos.

Geologic Map & Paleontological Literature Review

Geologic mapping by Dibblee and Minch⁷² indicates that the surface of the Project Site is covered with Pleistocene-aged older alluvium (mapped as Qoa). These sediments consist of pebble-gravel, sand, and silt-clay deposited from erosion of the surrounding highlands that has since been dissected by recent erosion.⁷³ Older alluvium is poorly constrained in age, but is generally considered to have been deposited during the Pleistocene, 11,700 to 2.58 Ma.⁷⁴

⁶⁸ California Department of Water Resources. 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County. Bulletin 104.

⁶⁹ Jennings, C.W., 1962. Long Beach Sheet, Geologic Map of California: California Division of Mines and Geology, scale 1:250,000.

⁷⁰ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷¹ Saucedo, G.J., H.G. Greene, M.P. Kennedy, and S.P. Bezore. 2016. Geologic Map of the Long Beach 30' x 60' Quadrangle, California. California Geological Survey, Regional Geologic Map Series, 1:100,000 Scale.

⁷² Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

⁷³ Dibblee, T. W. and T. Minch, 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Foundation Map DF-322. 1:24,000.

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

These sediments are old enough to preserve fossil resources (i.e., over 5,000 years, as per the SVP,⁷⁵ and have a rich fossil history in Los Angeles^{76,77} and throughout southern California.^{78,79,80,81,82,83} The most common fossils include the bones of mammoth, bison, horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, as well as small animals such as rodents and lizards.⁸⁴ In addition to illuminating the striking differences between Southern California in the Pleistocene and today, this abundant fossil record has been vital in studies of extinction,^{85,86} ecology,⁸⁷ and climate change.⁸⁸

LACM Records Search

On April 24, 2018, ESA requested a database search from the LACM for records of fossil localities and paleontological sensitivity in and around the Project Site. The purpose of the museum records search was to: (1) determine whether any previously recorded fossil localities occur in the Project Site, (2) assess the potential for disturbance of these localities during construction, and (3) evaluate the paleontological sensitivity within the Project Site and vicinity. The records search returned no known localities within the Project Site, however a number of vertebrate fossils are known from similar sedimentary deposits in Los Angeles.⁸⁹ These are summarized here.

⁷⁵ Society of Vertebrate Paleontology, 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available: http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed January 3, 2017.

⁷⁶ Brattstrom, B. H. and A. Sturm. 1959. A new species of fossil turtle from the Pliocene of Oregon, with notes on other fossil *Clemmys* from western North America. *Bulletin of the Southern California Academy of Sciences* 58:65-71).

⁷⁷ Steadman, D. W. 1980. A Review of the osteology and paleontology of turkeys (Aves: Meleagridinae). *Contributions in Science, Natural History Museum of Los Angeles County* 330:131-207.

⁷⁸ Hudson, D. and B. Brattstrom. 1977. A small herpetofauna from the Late Pleistocene of Newport Beach Mesa, Orange County, California. *Bulletin of the Southern California Academy of Sciences* 76: 16-20.

⁷⁹ Jefferson, G. T. 1991. A catalogue of Late Quaternary Vertebrates from California: Part One, nonmarine lower vertebrate and avian taxa. *Natural History Museum of Los Angeles County Technical Reports No. 5.*

⁸⁰ Jefferson, G. T. 1991. A catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals. *Natural History Museum of Los Angeles County Technical Reports No. 7.*

⁸¹ McDonald, H. G. and G. T. Jefferson. 2008. Distribution of Pleistocene Nothrotheriops (*Xenartha*, Nothrotheriidae) in North America. In: Wang, X. and L. Barnes, eds., *Geology and Vertebrate Paleontology of Western and Southern North America*. *Natural History Museum of Los Angeles County Science Series* 41: 313-331.

⁸² Miller, W. E. 1971. Pleistocene Vertebrates of the Los Angeles Basin and Vicinity: exclusive of Rancho La Brea. *Los Angeles County Museum of Natural History, No. 10.*

⁸³ Springer, K., E. Scott, J. Sagebiel, and L. Murray. 2009. The Diamond Valley Lake local fauna: late Pleistocene vertebrates from inland southern California. In: Albright, L., ed., *Papers on Geology, Vertebrate Paleontology, and Biostratigraphy in Honor of Michael O. Woodburne*, *Museum of Northern Arizona Bulletin* 65: 217-237.

⁸⁴ Graham, R. W., and E. L. Lundelius. 1994. FAUNMAP: A database documenting the late Quaternary distributions of mammal species in the United States. *Illinois State Museum Scientific Papers* XXV(1).

⁸⁵ Sandom, C., S. Faurby, B. Sandel, and J.-C. Svenning. 2014. Global late Quaternary megafauna extinctions linked to humans, not climate change. *Proceedings of the Royal Society B* 281, 9 p.

⁸⁶ Barnosky, A., C. Bell, S. Emslie, H. T. Goodwin, J. Mead, C. Repenning, E. Scott, and A. Shabel. 2004. Exceptional record of mid-Pleistocene vertebrates helps differentiate climatic from anthropogenic ecosystem perturbations. *Proceedings of the National Academy of Sciences* 101: 9297-9302.

⁸⁷ Connin, S., J. Betancourt, and J. Quade. 1998. Late Pleistocene C4 plant dominance and summer rainfall in the Southwestern United States from isotopic study of herbivore teeth. *Quaternary Research* 50: 179-193.

⁸⁸ Roy, K., J. Valentine, D. Jablonski, and S. Kidwell. 1996. Scales of climatic variability and time averaging in Pleistocene biotas: implications for ecology and evolution. *Trends in Ecology and Evolution* 11: 458-463.

⁸⁹ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz. May 8, 2018.

The closest locality known to the LACM from older alluvial sediments is approximately 2.0 miles west of the Project Site on Bellanca Avenue south of 98th Street, where a fossil mammoth was recovered from 40 feet bgs.⁹⁰ North of that locality, 2.2 miles northwest of the Project Site near the intersection of Bellanca Avenue and Manchester Avenue, specimens of mammoth (*Mammuthus*), rodent (*Rodentia*), and a speckled sanddab (*Citharichthys stigmaeus*), were collected from 14 feet below the surface.⁹¹ Near the intersection of Airport Boulevard and Manchester Avenue, fossil specimens of horse (*Equus*), mammoth (*Mammuthus*), bison (*Bison*), and rabbit (*Lepus*) were collected from 13 – 16 feet below surface.⁹² Further west, during construction of Tom Bradley International Terminal 3.75 miles from the Project Site, a fossil elephant (Proboscidea) was collected from 25 feet below surface.⁹³

Historic Maps and Aerial Photographs

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

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

Pedestrian Survey

ESA archaeologists and historians conducted an intensive survey of the entire Project Site for historic, archaeological, and paleontological resources. The surveys were aimed at identifying historic architectural resources, archaeological, and paleontological resources within or immediately adjacent to the Project Site. Areas with visible ground surface were subject to pedestrian survey using transect intervals spaced no more than 10 meters (approximately 30 feet) apart. Existing on-site buildings and structures, as well as the immediate surroundings, were photographed. In addition, a reconnaissance survey of the adjacent residential neighborhood

⁹⁰ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz. May 8, 2018.

⁹¹ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz. May 8, 2018.

⁹² McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz. May 8, 2018.

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

south of the Project Site was conducted in order to assess the potential for a historic district and to assist in the assessment of indirect impacts. The survey area was bounded by West 102nd Street to the north, South Doty Avenue to the east, 106th Street to the south, and Freeman Avenue to the west.

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

Commented [A6]: Before this sentence, should explain that the Arena Site contains X vacant parcels and six parcels with existing buildings and structures.

Commented [A7]: Which 5 parcels? Confusing.

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

Commented [A8]: Should identify names for current users of these two buildings.

Impacts and Mitigation Measures

Impact 3.4-1: Implementation of the Proposed Project could cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.

Direct Impacts

Historic Architectural Resources

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

As discussed under Existing Conditions, above, the Rodeway Inn & Suites at 3940 West Century Boulevard was evaluated against the following theme: Hotels and Motels. The other onsite, existing buildings at 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue did not fall under an established theme. All of the historic-age buildings present

were evaluated using the criteria for the National and California registers. The buildings at 3490 West Century Boulevard, 10212 South Prairie Avenue, 10204 South Prairie Avenue, and 10226 South Prairie Avenue are not recommended 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), and the Proposed Project would not have a direct impact on historical resources. Accordingly, no further analysis of direct impacts on historic architectural resources qualifying as historical resources is required pursuant to CEQA.

Archaeological Resources

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

Based on previous geological and geotechnical work, the Project Site is likely to contain alluvial sedimentary deposits dating to the Late Pleistocene and Holocene. These deposits are expected to be most prevalent in the vicinity of South Doty Avenue between the northern portion of the Arena Site and East Parking and Hotel Site, which formerly contained a channel drainage. Based on age and environment, these middle/late Holocene sediments are considered more sensitive for buried, intact cultural resources than areas to the east and west, which are underlain by older alluvium. The older alluvial unit has low sensitivity to contain buried cultural resources since 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.

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

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

Indirect Impacts

Historic Architectural Resources

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

~~Also,~~ The Forum, a multi-purpose indoor arena built in 1967 and listed on the National Register of Historic Places and the California Register of Historical Resources, is located ~~outside of the impact study area~~ approximately one mile north of West Century Boulevard along South Prairie Avenue. While The Forum is currently visible from some points in and around the Project Site, it is likely that these views will be at least partially blocked by the Phase 1 development in the HPSP. However, whether or not The Forum is visible from the Project Site is not relevant to its continued eligibility. No listed historic resources are present adjacent to any of the four areas that constitute the Project Site and altered views to and from The Forum would not result in its ineligibility; therefore, there would be no indirect impact resulting from the Proposed Project.

Archaeological Resources

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

Mitigation Measures

Mitigation Measure 3.4-1

- a) *Retention of Qualified Archaeologist. Prior to the start of ground-disturbing activities associated with the Project, including demolition, trenching, grading, and utility installation, the City shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources.*
- b) *Cultural Resources Sensitivity Training. Prior to start of ground-disturbing activities associated with the Project, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel conducting,*

*supervising, or ~~that is~~ associated with demolition and ground disturbance, including utility work, for the Project. The training shall be offered in additional languages as necessary to train all construction personnel on the Project. Construction personnel shall be informed of the types of archaeological resources that may be encountered, and of the proper procedures to be ~~executed~~ *implemented* in the event of an inadvertent discovery of archaeological resources or human remains. The City shall require the inclusion in construction contracts a requirement that all construction personnel conducting, supervising, or ~~that is~~ associated with demolition and ground disturbance, including utility work, for the Project are made available for and attend the training and retain documentation demonstrating attendance.*

- c) **Inadvertent Discoveries.** *In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 100 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the City regarding recommendation for treatment and ultimate disposition of the resource(s).*
- i. *If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.*
- ii. *In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the City, 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.*

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

Impact 3.4-2: Implementation of the Proposed Project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

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

As discussed above under Impact 3.4-1, the geoarchaeological review indicates that much of the Project Site is underlain by Pleistocene-aged alluvium which has low potential for intact archaeological deposits. An area of Late Pleistocene to Holocene alluvium is mapped along South Doty Avenue between the Arena Site and the East Parking and Hotel Site; the Late Pleistocene to Holocene alluvium has higher potential to contain buried archaeological deposits. Furthermore, the historic map and aerial photograph review indicates the Project Site was developed by the 1920s with residential subdivisions, which were largely replaced by commercial buildings sometime in the 1960s. As such, there may be historic-period archaeological deposits associated with the early residential development of the Project Site. Given the degree of disturbance within the Project Site, which has included the prior construction and demolition of residential and commercial buildings, prehistoric and/or historic-period archaeological deposits that may have underlain the Project Site could have been destroyed.

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

Mitigation Measures

Mitigation Measure 4.3-2

Implement Mitigation Measure 4.3-1.

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

implementation of Mitigation Measure 3.4-2, the impact to archaeological resources that qualify as historical resources or unique archaeological resources pursuant to CEQA would be **less than significant**.

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

The review of the scientific literature and geologic mapping, as well as the records search from LACM, were used to assign paleontological sensitivities following the guidelines of the SVP⁹⁴ to the geologic units present at the surface and subsurface of the Project Site that would be subject to ground-disturbing activities. As a result of this study, the surficial sediments of the Project Site identified as Older Quaternary Alluvium which is present on the surface and assigned high paleontological sensitivity, as they have a proven record of preserving scientifically significant fossils throughout Los Angeles. A wide variety of Ice Age fossils are known from these sediments across the Los Angeles Basin, as reviewed above, including multiple specimens belonging to ten taxa known from within 2- to 4-miles of the Project Site.⁹⁶ Excavation within the Project Site during construction ~~is~~ is planned at depths up to 35 feet bgs, which would impact Older Quaternary Alluvium determined to have a high sensitivity for fossils. As a result, Project construction would have the potential to directly or indirectly destroy a previously unknown unique paleontological resource not identified in the analysis conducted for the Project. This would be considered a **potentially significant impact**.

Mitigation Measures

Mitigation Measure 3.4-3

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

⁹⁴ Society of Vertebrate Paleontology. 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.

⁹⁵ Society of Vertebrate Paleontology. 2010. Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. Available: http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx Accessed January 3, 2017.

⁹⁶ McLeod, S. 2018. Re: Paleontological resources for the proposed Clippers Arena Project, Project # 171236.00, in the City of Inglewood, Los Angeles County, project area. Letter response to Vanessa Ortiz. May 8, 2018.

- disturbance planned for each portion of the Project Site, data recovery (including halting or diverting construction so that fossil remains can be salvaged in a timely manner), fossil treatment, procurement, and reporting.*
- c) *The qualified paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Plan as outlined in (b). In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the qualified paleontologist demonstrating that the appropriate construction personnel attended the training.*
 - d) *Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the direction of the qualified paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed older Quaternary alluvial sediments which have been determined to be present at the surface as mapped, which have high sensitivity for encountering paleontological resources. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the qualified paleontologist. Monitors shall have the authority to ~~and shall~~ temporarily halt or divert work away from exposed fossils or potential fossils, and establish a 50-foot radius temporarily halting work around the find. If fossils are encountered, the qualified paleontologist shall determine their significance, and, if significant, supervise their collection for curation. Monitors shall prepare daily logs detailing the types of ground disturbing activities and soils observed, and any discoveries.*
 - e) *Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage. The qualified paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition will be included with the final report which will be submitted to the appropriate repository and the City.*

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

Impact 3.4-4: Implementation of the Project could cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

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

Tribal Consultation

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

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

The City met with the Gabrieleno Band of Mission Indians – Kizh Nation on Wednesday, March 21, 2018 regarding consultation. During the meeting the Tribe indicated that they consider the Project Site to have a high sensitivity for cultural resources and human remains, related to trade routes in the area and village activity. The Tribe asked if a Phase I [Cultural Resources] study has been prepared and emphasized that site surveys and SLF database searches are only a starting point, and even though resources have not been recorded in the area doesn't mean that they aren't there (have not yet been discovered). The Tribe made preliminary requests that included: "having a tribal monitor on-site to monitor ground disturbance activity in order to ascertain if there is a high potential for resources, and in order to do this they must be present at the site." The Tribe also requested that they would like to review the language regarding their history and mitigation language that will be considered during the EIR process.

The Tribe presented a map from 1938⁹⁷ created for Los Angeles County, and described the map as illustrating trading routes and main villages in the county, and that “the *Agua de Centinela* is shown on the map as a prominent site within the vicinity of the Project location.” Tribe members also mentioned another historical landmark around Florence Avenue and South Prairie Avenue where a “landmark/plaque marks the spot where an old spring (Centinela Springs) served as the primary water source for tribes. In that area, a village was located and there are trading routes extending from the area down south (to the Project location). The map shows the trading routes and where features are located or likely to be located and informs the tribe where tribal resources are concentrated”. The Tribe described the role of trade in ancient society and that trade was the fabric of life for them. “Every family was involved in the trade and their fundamental beliefs were that the creator provided them with so many gifts it was their job to share with surrounding nations, including gifts from the ocean and the land.” The Tribe described that these were traded along trade routes that had been used for thousands of years and that activity “could indicate a high likelihood of cultural resources or human remains along those routes.” The Tribe expressed that “these trade routes have the highest amount of burials along them and there are recent cases [no specific information was given] where the Project team did not implement proper mitigation programs and remains were encountered and destroyed as oral information provided by the tribes was not considered and impacts were not analyzed.”

The Tribe asked if any research had been done for the area and provided several maps with descriptions detailing the documented history of the area which indicate prominent locations with native settlements including *Guachanga* (Playa Vista area – main subcenter of the village site), *Sunja* (smaller villages off the main site, utilized for trade). The Tribe explained that these locations traded with Catalina Island and Santa Barbara, utilizing the routes from inland to the coast, and described that “a Mr. Avila resided near this location where they called it Los Cerritos which was associated with Ballona Creek.” The Tribe explained that “these areas have a higher degree of sensitivity because of resources found previously and this includes areas such as Venice Beach and Culver City where resources are found constantly. The families in this area owned oak trees and resources such as the Baldwin Hills were used by many families. Oil was an important resource to tribes for water proofing and medicine. Because of the oil the people were able to be a sea faring society. Earthquake faults like the Inglewood Fault allowed for opening in the ground to make oil, water, and other resources accessible on the surface.” The City responded that research would be conducted by the Planning Department to identify previous studies that may have been conducted in the area. In response to this, Tribe members mentioned that “their main concern are projects that don’t have information or any previous studies, however, even if a study has been conducted, they are still finding remains in areas that have been previously impacted.” They provided a case example where “there was a project site that had studies dating back to 1997, 2003 and yet in 2018 they found remains, and this leads to the question of whether other remains have been found in the past? And if so, what happened to these remains?” the Tribe

⁹⁷ George W. Kirkman, 1937. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.-1937 A.D, 1887, Map on File: Map Room of the History Department, Los Angeles Public Library. Los Angeles, CA.

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

The Kirkman map was submitted to the City on March 21, 2018 via two separate emails, the first as an attachment that includes an image of the map itself, and in a second email a graphic that depicts an overlay of the original map on an aerial photo from Google Earth with the location of the Project Site on the map. There are two versions of this graphic: the second (aerial) map shows a more expansive area around the Project Site. The results of the Project Site location on the overlay are consistent with **Figure 3.4-1** produced as part of the cultural analysis.⁹⁸ The Tribe also submitted images of four pages from what appears to be an uncited report with no title provided. These pages include reproductions of four historic hand drawn maps including one entitled “*Rancho del paso de las carretas*,” which is a hand drawing showing the location of the village of *Guacho* on a map of the *Rancho La Ballona*. The *Ballona* land grant (or rancho) is approximately 4.87-miles to the northwest of the Project Site, just to the north of the *Sausan Redondo* land grant.

The second hand drawn map is of the *Rancho Sausal Redondo*. The *Rancho Sausal Redondo*’s boundaries end at West Century Boulevard to the north of the Project Site and South Prairie Avenue to the west of the ~~Project Site~~ *Project Site*, and extend northwest over 4 miles to just south of Jefferson Boulevard. This map is also depicted in McCawley⁹⁹ who describes the map as a “Map of *Rancho Sausal Redondo* showing the Mexican land grant of *Guaspita* located on the east bank of Ballona Creek.” This grant included the site of the Gabrielino community of *Waachnga* and McCawley¹⁰⁰ explains that the name *Guaspita* was probably derived from that earlier Gabrielino placename *Waachnga*. *Guaspita* is depicted on the map a short distance from the coast on the hill overlooking Ballona Creek¹⁰¹ which is located approximately 5 miles to the northwest of the Project Site. The third hand drawn map is a portion of the Kirkman map which calls out the location of *Guacha*, which is again depicted near Playa del Rey near the banks of the Ballona Creek. The final hand drawn map is cited as “Johnston 1962”¹⁰² which depicts geographical features and known Gabrielino villages at the time of the Portola Expedition. The map depicts a village called *Sa’angna* just to the south of the Ballona Creek, northwest of the Project Site. It

⁹⁸ George W. Kirkman, 1937. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County 1860 A.D.–1937 A.D., 1887, Map on File: Map Room of the History Department, Los Angeles Public Library, Los Angeles, CA.

⁹⁹ McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California pp. 62-63.

¹⁰⁰ McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California pp. 62-63.

¹⁰¹ McCawley, William. 1996. The First Angelinos: The Gabrielino Indians of Los Angeles. Malki Museum Press, Banning, California pp. 62-63.

¹⁰² Johnston, Bernice Eastman, 1962. *California’s Gabrielino Indians*. Southwest Museum. Los Angeles, California.

does not depict any labeled villages in the immediate vicinity of the Project Site. McCawley indicates that *Sa'angna* was a Gabrielino village located near the banks of the Ballona.¹⁰³

Figure 3.4-1 1937 Kirkman Map

¹⁰³ McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*. Malki Museum Press, Banning, California pp. 62-63.

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

Analysis

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

The records search results indicate that four cultural resources studies have been conducted within a 0.5-mile radius of the Project Site. Of the four previous studies, two run adjacent to the Project Site along West Century Boulevard, and there are none which overlap with the Project Site. The previous studies include a linear survey report that covers several communities for a pipeline alignment, and a memorandum from the Office of Historic Preservation regarding the Section 106 process for the same project. The NAHC responded to the SLF request in a letter stating that the SLF search did not reveal the presence of Native American cultural resources within or adjacent to the Project Site.

Historic maps, including the Kirkman Map and the other maps provided by the Tribe were reviewed as part of the background research for the Proposed Project in order to identify historic land uses and the location of Native American villages in the historic era. The Kirkman map is identified by the Tribe as a source providing the locations of Gabrielino village sites throughout Los Angeles County. In order to accurately determine the location of the Project Site on the Kirkman map, it was georeferenced in GIS to Los Angeles County boundaries (see Figure 3.4-1). The georeferencing is based off of three control points throughout the County including: the southwest corner near Malibu, California, the northwest corner near Gorman, California, and northeast corner near Kramer Junction, California. It was taken into account that the Los Angeles County boundary has changed somewhat from the 1938 boundary. At this referenced scale, the map does not show any roads, villages, trails, landforms, or locations overlapping with the Project Site. It does show a dot which is noted as “(Inglewood) Aguaje de la Centinela” approximately 2 miles to the northwest of the Project Site which is consistent with the location of the Centinela Adobe which was and still is located near the banks of the Centinela Creek. Over 2 miles to the south of the Project Site the City of “(Hawthorne) is indicated on the map.” These are the closest places of Gabrielino village sites to the Project Site indicated on the map. The map does not depict the location of the Centinela Springs, which were also mentioned by the Tribe during consultation. The Centinela Springs are commemorated with a plaque at their former location which is in a park located 2 miles to the north of the Project Site. The nearest Gabrielino villages

that are depicted on the Kirkman map are over 3 to 4 miles to the north and northwest of the Project Site near the Baldwin Hills and west toward the Ballona Wetlands.

As described above, the materials submitted by the Tribe were provided in order to illustrate the Tribe's knowledge of the Project Site and vicinity as discussed during the meeting between the City and the Tribe on March 21, 2018. The maps provided are historic maps of Gabrieleno village locations throughout Los Angeles County, as well as hand drawn maps of two ranchos which were established to the north and west of the Project Site. The historic documentation provided by the Tribe has been considered as part of *Phase I Cultural Resources Assessment Report* and this analysis. The determination that ~~the~~ Project Site itself is of low sensitivity is based on many factors described in this chapter, but the main issue is the distance to water, ~~and as~~ the only known source appears to be an intermittent stream or seasonal wash that ran north-south through the East Parking and Hotel Site and would likely not have been a significant source of water to provide for habitation in this area. Centinela Creek and the location of Centinela Springs were over 2 miles north of the Project Site and depicted on the Kirkman map near the known Gabrieleno trade routes and early roads. The Tribe also provided evidence of the location of at least two villages which persisted into the rancho era near Ballona Creek, approximately 5 miles to the north of the Project Site. Centinela Creek and Springs likely provided a more sustainable source of freshwater for prehistoric occupation. Ballona Creek and the associated wetlands and bluffs are areas well known for their archaeological site sensitivity as well as known and documented village sites. However, these locations are between 2 to 5 miles from the Project Site and were much more desirable areas than the Project Site for prehistoric and early historic Native American habitation as evidenced by the known archaeological sites and ethnographic evidence of the villages in these locations.

The maps provided by the Tribe do not indicate the presence of any known village sites within the Project Site or the immediate vicinity. The historic maps, the geoarchaeological analysis, and the land use history, were all used in order to determine the proximity of a sustainable source of water and other natural resources such as wetlands that can be indicators of prehistoric habitation. The materials studied did not indicate that such resources existed in the Project Site and immediate vicinity. Although evidence was provided by the Tribe that indicates the location of villages and known archaeological sites, they are all from 2 to 5 miles away from the Project Site. The locations of these villages and archaeological sites, are close to known trade routes and old roads known to have been used by prehistoric and early historic era peoples to travel ~~from from~~ the inland to the coast. There are no such trade routes, old roads, or known villages documented within 2 miles of the Project Site. No substantial evidence was provided to support the Tribal claim that any known sacred lands or Tribal cultural resources overlap with or occur within the Project Site, and the City's review of the Tribal documentation did not change the conclusion that the Project Site does not contain any previously known Tribal cultural resources and has a low sensitivity for buried archaeological resources that, if encountered, could potentially be considered a Tribal cultural resource as defined in PRC Sections 21074, 5020.1(k), or 5024.1.

There is no conclusive evidence to support the assertion that there are Tribal cultural resources within the Project Site. As stated above, consultation between the City and the Gabrieleno Band of Mission Indians–Kizh Nation was conducted under the requirements of AB 52. No Tribal cultural resources as defined in PRC Section 21074(a)(1) that are listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1 (k), or that are determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to PRC Section 5024.1, have been identified within the Project Site.

However, an unanticipated discovery of a sensitive Tribal cultural resource could occur during ground disturbing activities; therefore, the impact is **potentially significant**.

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

Mitigation Measures

Mitigation Measure 3.4-4

Implement Mitigation Measure 3.4-1.

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

Impact 3.4-5: Implementation of the Project could disturb any human remains including those interred outside of dedicated cemeteries.

No human remains were identified during the pedestrian survey of the Project Site and no known human remains have been recorded within the Project Site or a 0.50-mile radius. The overall sensitivity of the Project Site with respect to archaeological resources, including human remains, is low. Project grading and excavation would extend into previously undisturbed subsurface areas or other locations where there is some possibility that they may encounter buried human remains. As a result, although unlikely, construction may disturb human remains, including those interred outside of dedicated cemeteries, which would be a **potentially significant impact**.

Mitigation Measures

Mitigation Measure 3.4-5:

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

Level of Significance After Mitigation: Mitigation Measure 3.4-5 requires notification of the County Coroner in the event of the unanticipated discovery of human remains and a proscribed protocol for their disposition in accordance with applicable regulations, notification of the NAHC and subsequent tribal coordination if remains are determined to be of Native American descent. Mitigation Measure 3.4-5 requires interment of the human remains in an appropriate location. If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance. Thus, the impact would be considered **less than significant with mitigation**.

Cumulative Impacts

The cumulative setting for cultural, paleontological, and tribal resources varies by resource type, as is described below. The Project Site, in the southwestern portion of the fully urbanized City of Inglewood, is surrounded by residential and commercial development to the west, south, and

east, and Hollywood Park to the north, part of which is currently under development; and will result in new commercial, office, residential, parking, and sports stadium uses. Prior to the development of the area, historic topographic maps indicate a north-south trending ephemeral drainage originating north from the Baldwin Hills and formerly running to the East Parking and Hotel Site. The area is within the ethnographic territory of the Gabrielino Tribe. Geologically, the Project Site is situated within the West Coast Basin portion of the greater Los Angeles Basin, a broad trough formed by tectonic activity and stream erosion of nearby mountains, and filled with Quaternary-aged terrestrial and shallow marine sediments overlying Tertiary-aged marine sediments. In addition to the Proposed Project, there are 128 projects, 31 of which are in the City of Inglewood, that have been taken into consideration when developing the cumulative context. The closest active cumulative project is the proposed development associated with the development of the HPSP area, located immediately to the north of the Arena Site.

Impact 3.4-6: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on historical resources.

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

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

Mitigation Measures

None required.

Impact 3.4-7: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on archaeological resources.

The cumulative context for archaeological resources is within the fully urbanized City of Inglewood, and has been defined by a number of factors depending on the project site(s) and the known archaeological resources or level of archaeological sensitivity in the area. The City is included with the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. The Project Site itself lies more than two miles from the nearest known village sites or known prehistoric archaeological sites within the City. There is a lack of natural resources in the Project vicinity that ~~could indicate~~ makes unlikely the presence of prehistoric resources. The site and its vicinity were developed around the turn of the century, and there are no known historic archaeological sites within a 0.5 mile of the Project Site. ~~However, unknown historic or archaeological resources~~ they could be preserved under the surface of vacant land or under the current development. Due to the current development and disturbance at the surface of the Project Site it is not currently possible to identify any sites or resources that may exist subsurface and it is possible that historic and prehistoric period resources are present under the surface of the Project Site. Any loss of these resources would contribute to a cumulatively **significant impact** to archaeological resources within the vicinity.

Mitigation Measures

Mitigation Measure 3.4-7

Implement Mitigation Measure 3.4-1.

Impact Significance After Mitigation: Mitigation Measure 3.4-7 would ensure that unanticipated archaeological resources are identified, evaluated and treated promptly before they can be damaged or destroyed during construction, and reducing significant Project impacts on archaeological resources. Therefore, the Project's potential contribution to this impact would be **less than significant** with mitigation.

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

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

Project could contribute to this impact if paleontological resources are located beneath the Project Site.

Mitigation Measures

Mitigation Measure 3.4-8

Implement Mitigation Measure 3.4-3.

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

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

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

Commented [A9]: Suggest moving this after the discussion of tribal cultural resources impacts, so that issues are addressed for cumulative impacts in the same order as project-specific impacts

Mitigation Measures

Mitigation Measure 3.4-9

Implement Mitigation Measure 3.4-4.

Impact Significance After Mitigation: Implementation of Mitigation Measure 3.4-9 would ensure that all work immediately cease within 100 feet of the discovery and that all relevant PRC and Health and Safety Codes that pertain to human remains discovery are followed and the identified appropriate actions have taken place. The impact would therefore not result in cumulative significant impacts and be **less than significant** with mitigation.

Impact 3.4-10: Implementation of the Proposed Project, in combination with other development, would not contribute to cumulative impacts on the significance of a tribal cultural resource, defined in Public Resources Code § 21074.

The cumulative context for tribal cultural resources is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. This area has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects throughout this territory. Cumulatively this large amount of development within the Tribal territory could have significant and unavoidable impacts to Tribal cultural resources. As demonstrated above, the Project would not result in a significant impact on a Tribal cultural resource. Specifically, there are no resources listed or determined eligible for listing, on the national, state, or local register of historical resources and the Lead Agency determined that resources identified during AB 52 Tribal consultation are not eligible for listing under the criteria in subsection (c) of the PRC Section 5024.1 located within the Project Site or within a 0.5-mile radius of the Project Site. Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that might be considered a Tribal cultural resource are mapped and documented between two to five miles from the Project Site. The Project's impacts on Tribal cultural resources were determined to be less than significant with ~~no~~ mitigation ~~required~~. The related projects would, like the Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b). The impact would therefore not result in cumulative significant impacts and be **less than significant**.

Mitigation Measures

None required.

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