

4.D CULTURAL RESOURCES

4.D.1 INTRODUCTION

This section describes existing cultural (historic architectural, as well as prehistoric- and historic-period archaeological) resources and paleontological resources, and analyzes impacts associated with implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan on these resources. This section also addresses the potential for encountering human remains outside of formal cemeteries.

DEFINITIONS

- **Archaeological resources** include any material remains of human life or activities that are at least 100 years of age, and that are of scientific interest. A unique or significant 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 (1) contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information; (2) has a special and particular quality, such as being the oldest of its type or the best available example of its type; and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.
- **Before Present (BP)** is a time scale used to specify when events in the past occurred. BP, when placed after a number (as in 2,500 BP), means “years before the present.” This terminology is used in this section to refer to dates that were obtained through the radiocarbon dating method.
- **Cultural resources** are defined as buildings, sites, structures, or objects, each of which may have historic, architectural, archaeological, cultural, or scientific importance, according to the California Environmental Quality Act (CEQA).
- **Historic building or site** is one that is noteworthy for its significance in local, state, or national history or culture, its architecture or design, or its works of art, memorabilia, or artifacts.
- **Historic Context** refers to the broad patterns of historical development in a community or its region that is represented by cultural resources. A historic context statement is organized by themes such as economic, residential, and commercial development.
- **Historic District** means a geographical area or neighborhood containing a collection of residential and/or commercial historical buildings which generally represents a significant aspect of the community’s architectural and/or development history.
- **Historic integrity** is defined as “the ability of a property to convey its significance.”
- **Historical resources** are defined as “a resource listed or eligible for listing on the California Register of Historical Resources” (CRHR) (Public Resources Code, Section 5024.1; 14 CCR 15064.5). Under CEQA Guidelines Section 15064.5(a), the term “historical resources” includes the following:
 - (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 (Public Resources Code, Section 5024.1).

- (2) A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code or identified as significant in a historical resource survey meeting the requirements of Section 5024.1(g) of the Public Resources Code, will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
 - (3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code Section 5024.1) including the following:
 - (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
 - (B) Is associated with the lives of persons important in California's past;
 - (C) 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
 - (D) Has yielded, or may be likely to yield, information important in prehistory or history.
 - (4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified in a historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code Sections 5020.1(j) or 5024.1.
- **Paleontological resources** include any fossilized remains, traces, or imprints of organisms, preserved in or on the earth's crust, that are of paleontological interest and that provide information about the history of life on earth, except that the term does not include any materials associated with an archaeological resource or any cultural item defined as Native American human remains. Significant paleontological resources are defined as fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or important to define a particular time frame or geologic strata, or that add to an existing body of knowledge in specific areas, in local formations, or regionally.

4.D.2 APPLICABLE PLANS, POLICIES, AND REGULATIONS

Implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan is subject to a range of federal and state plans, policies, and regulations, which are described below.

FEDERAL PLANS, POLICIES, AND REGULATIONS

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) established the National Register of Historic Places (National Register), which is the official register of designated historic places. The National Register is administered by the National Park Service, and includes listings of buildings, structures, sites, objects, and districts that possess historical, architectural, engineering, archaeological, or cultural significance at the national, state, or local level.

To be eligible for the National Register, a property must be significant under one or more of the following criteria per 36 *Code of Federal Regulations* Part 60:

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

In addition to meeting one or more of the aforementioned criteria, an eligible property must also possess historic “integrity,” which is “the ability of a property to convey its significance.” The National Register criteria recognize seven qualities that define integrity: location, design, setting, materials, workmanship, feeling, and association.

Structures, sites, buildings, districts, and objects over 50 years of age can be listed in the National Register as significant historical resources. Properties under 50 years of age that are of exceptional importance or are contributors to a district can also be included in the National Register.

Properties listed in or eligible for listing in the NRHP are also eligible for listing in the California Register of Historic Resources (described below), and as such, are considered historical resources for CEQA purposes.

STATE PLANS, POLICIES, AND REGULATIONS

California Senate Bill 18

Senate Bill 18 (SB 18) (California Government Code Section 65352.3) sets forth requirements for local governments to consult with Native American tribes to aid in the protection of traditional tribal cultural places through local land use planning. The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early stage of planning for the purpose of protecting, or mitigating impacts on, cultural places. The Tribal Consultation Guidelines: Supplement to General Plan Guidelines (OPR, 2005), identifies the following 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 Native American Heritage Commission [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).

Because the proposed project requires a General Plan Amendment, it is subject to the statutory requirements of SB 18 Tribal Consultation Guidelines. The City contacted the NAHC with the Notice of Preparation for this EIR and informational letters were sent to each tribe identified on the NAHC's list.

California Assembly Bill 52

Assembly Bill 52 (AB 52), which became effective in January 2016 as Public Resource Code Section 21080.3.1, established a new requirement under CEQA to consider "tribal cultural values, as well as scientific and archaeological values when determining impacts and mitigation." Tribal Cultural Resources are defined 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 of Historical Resources or local registers of historical resources.

In addition, AB 52 implemented a new consultation process, in which lead agencies are required to offer Native American tribes that have submitted written requests to participate in consultations to protect tribal cultural resources and that Native American tribes have the opportunity to consult on CEQA documents prior to submitting an EIR. Pursuant to AB 52, lead agencies are required to provide

formal notice to the tribes requesting to participate within 14-days of the lead agency's determination that an application package is complete. Tribes have 30-days to respond to request consultation on the project.

In compliance with AB 52, the City has provided formal notification to California Native American tribal representatives identified by the NAHC to offer consultation with interested tribes regarding the proposed TOD Plan. Native American groups may have knowledge about cultural resources in the area and may have concerns about adverse effects from development on tribal cultural resources as defined in PRC Section 21074. In addition, the City of Inglewood began the public outreach process as part of preparation of the proposed TOD Plan. As described in the TOD Plan, the City conducted extensive public outreach to identify existing and future needs and important resources in the TOD Plan area.

Public Resources Code Section 5097

Section 5097 of the Public Resources Code provides procedures to be followed in the event of the unexpected discovery of human remains on nonfederal land. Section 5097.5 of the code states:

No person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over such lands. Violation of this section is a misdemeanor.

As used in this section, "public lands" means lands owned by, or under the jurisdiction of, the state or any city, county, district, authority or public corporation, or agency thereof. Consequently, the City of Inglewood is required to comply with Public Resources Code Section 5097.5 because the TOD Plan is within its jurisdiction.

Section 5097.98 further defines the standards for the handling of Native American human remains. Section 5097.993 sets requirements related to the unlawful and malicious excavation, removal, destruction, injury, or defacing of a Native American historic, cultural, or sacred site that is listed or may be eligible for listing in the California Register of Historic Resources.

Health and Safety Code Section 7052

Section 7052 of the California State Health and Safety Code makes the willful mutilation, disinterment, or removal of human remains a felony. Section 7052.5 requires that any construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If the remains are determined to be Native American, the coroner must contact the California NAHC.

LOCAL PLANS, POLICIES, AND REGULATIONS

City of Inglewood General Plan

The City of Inglewood General Plan does not contain any Cultural Resource policies that are relevant to the proposed TOD Plan.

4.D.3 ENVIRONMENTAL SETTING

Following is a brief overview of the ethnography and historic background, providing a context in which to understand the background and relevance of potential cultural resources in the TOD Plan area. This information is not intended to be a comprehensive review of the current resources available; rather, it serves as a general overview of the resources that exist.

NATIVE AMERICAN BACKGROUND – THE GABRIELINO

The Los Angeles region was traditionally occupied by the Takic-speaking Gabrielino-Tongva 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. Many contemporary Gabrielino identify themselves by the name “Tongva.” The Gabrielino-Tongva occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina.

The Gabrielino-Tongva Indians were hunter-gatherers and lived in permanent communities located near the presence of a stable food supply. Community populations generally ranged from 50 to 100 inhabitants, although larger settlements may have existed. Subsistence consisted of hunting, fishing, and gathering. Small terrestrial game was hunted with deadfalls, rabbit drives, and by burning undergrowth, while larger game such as deer were hunted using bows and arrows. Fish were taken by hook and line, nets, traps, spears, and poison. The primary plant resources were the acorn, gathered in the fall and processed in mortars and pestles, and various seeds that were harvested in late spring and summer and ground with manos and metates. The seeds included chia and other sages, various grasses, and islay or holly-leafed cherry.

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

HISTORY OF INGLEWOOD

The City of Inglewood area was first developed in the 1800s and evolved from agricultural activities to urban development. The Inglewood area was first developed as part of the 2,200-acre Rancho Aguaje del Centinela ranch. Ownership of the property changed and set the course for development of

Inglewood. Sir Robert Burnett of Scotland purchased two land grants, Rancho Aguaje de Centinela and Rancho Sausall Ranando. In 1885, Daniel Freeman, a Canadian attorney, purchased the land and became partner in the Centinela-Inglewood Land Company by 1887. The stated purpose of this land company was to create a town near Centinela Springs (City 2006). In addition, the California Central Railroad was developed in 1887, which led to development in the area (City of Inglewood, 2006).

Inglewood experienced a major earthquake in 1920 that caused significant damage to the City. The aftermath drew people to the City to witness the sight, and many stayed, causing Inglewood to be the fastest growing city in the United States from 1920 to 1925 (City, 2006; 2014). In 1938, the Hollywood Park racing facility opened, providing a major tourist destination in the City. In addition, in 1937, the City of Los Angeles purchased Mines Field (renamed as Los Angeles Airport in 1946). A number of airplane manufacturers and related businesses subsequently located their factories in the Inglewood area, and by the time of America's entry into World War II, Los Angeles had become the nation's center for aircraft industry.

HISTORIC RESOURCES

The TOD Plan areas include many historic-aged structures, some of which are designated as historic resources and some are eligible for a historic resource designation, both of which are listed below.

Downtown Inglewood Historic Resources

170 North La Brea Avenue, Citizens Savings Bank: Constructed in 1921-22, the Citizens Savings Bank, is eligible for listing in the National Register for its association with early commercial development in Inglewood. Built during the City's rapid population growth and rebuilt after the 1920 earthquake, it reflects the development of North La Brea Avenue (then Commercial Street) as the City's primary commercial arterial.

320 South La Brea Boulevard, Sparkling Cleaners: This building was constructed in 1948 and is eligible for listing in the National Register because it embodies the distinctive characteristics of Post-War Late Modern style architecture.

330 East Manchester Boulevard, Bank of America: The Bank of America building was constructed in 1948 and is eligible for listing in the National Register as an example of the Post-War Modern style. Additionally, the adjacent small building at 320 East Manchester was remodeled in 1954 as part of the bank and is potentially a contributing historic feature of the property as it is also older than 50 years.

100 North Market Street, Bank of Inglewood: Constructed in 1927 as the Bank of Inglewood, this building is eligible for listing in the National Register of Historic Places because it's an example of Mediterranean Revival style in Inglewood.

115 North Market Street, Fox Theater: The Fox Theater was constructed in 1948-49, and has been on the National Register of Historic Places since January 2013. It is an example of a late Moderne style movie theater and was designed by the architect S. Charles for Fox West Coast Theaters.

200–204 South Market Street, Scotty’s Men’s Shop: Historically known as Scotty’s Men’s Shop, this building is eligible for listing in the National Register of Historic Places because it embodies the distinctive characteristics of the Streamline Modern style which became popular beginning in the late 1930s.

233–239 Market Street, S.H. Kress Variety Store: The S.H. Kress Variety Store was built in 1927 and is eligible for listing in the National Register of Historic Places because of its association with the chain store concept of merchandizing, which developed in the 1920s. California was a significant area for S.H. Kress & Company. They opened the first store in San Diego in 1918 and by 1928 there were 28 stores statewide. The Inglewood store shares a number of the features with Kress stores that were built during the latter part of the 1920s throughout the nation.

330 East Queen Street, Inglewood Chamber of Commerce: The Chamber of Commerce building, constructed in 1948, is eligible for listing in the National Register of Historic Places because it embodies the distinctive characteristics of Post-War architecture.

260 North Locust Street, Holy Faith Episcopal Church: The Holy Faith Episcopal Church was constructed in 1913, but was altered in 1958.

320 East Manchester Boulevard, Part of Bank of America: This building was built in 1920 and remodeled in 1954 as part of Bank of America. The current tenant is a beauty and barber supply.

Fairview Heights Historic Resources

Centinela Springs: The Centinela Springs are located in Edward Vincent Jr. Park, on the corner of Park Ave and Stepney Street. Listed as a landmark under the National Register of Historic Places; the springs once flowed from their source in a deep water basin which has existed continuously since the Pleistocene Era. Prehistoric animals, Indians, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area. Thus, not only is Centinela Springs a historic site, archaeological and paleontological resources are likely to exist in this area.

The Inglewood Veteran’s Memorial Building: This building is located in Edward Vincent Jr. Park at 330 West Centinela Avenue. Built in the 1930s, it is a California State Historic Landmark and is listed on the National Register of historic places.

The Grace Chapel at Inglewood Park Cemetery: Built in 1925, Grace Chapel is a replica of a chapel in Edinburgh, Scotland. The Columbarium adjacent to it is filled with urns and adorned with stained glass windows and ceilings that cast an amber hue to the room. The chapel is not currently listed on the National or State Register but is likely eligible for designation as a resource.

In addition, because much of the City’s development occurred in the 1960s and 1970s, existing structures or buildings that are not currently historically significant could become eligible for designation as historic resources over the 20-year implementation period of the proposed TOD Plan.

PALEONTOLOGICAL RESOURCES

Paleontological resources include fossil remains, as well as fossil localities and rock or soil formations that have produced fossil material. Fossils are the remains or traces of prehistoric animals and plants. Fossils are important scientific and educational resources because of their use in (1) documenting the presence and evolutionary history of particular groups of now extinct organisms (2) reconstructing the environments in which these organisms lived, and (3) determining the relative ages of the strata in which they occur and of the geologic events that resulted in the deposition of the sediments that formed these strata and in their subsequent deformation.

Paleontological sensitivity is the potential for a particular geologic unit to produce scientifically important fossils. There is a direct correlation between fossils and the geologic units in which they are preserved; therefore, paleontological sensitivity is determined by rock type, the history of a particular geologic unit for producing significant fossils, and the recorded or known fossil localities derived from that unit.

Alluvial fan deposits from the Pleistocene epoch are considered to have high paleontological sensitivity because they are known to contain significant fossil resources. Pleistocene older alluvium in Los Angeles County and southern California has been reported to contain locally abundant and scientifically significant vertebrate, invertebrate, and plant fossils.

The TOD Plan areas are underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium and late Holocene alluvium. The Holocene deposits are generally considered too young to contain fossil resources. However, Pleistocene alluvial fan deposits, which exist in portions of the TOD Plan areas, exhibiting a composition conducive to the preservation of fossils may yield significant resources (City, 2006 and 2010 and Leighton, 2012).

4.D.4 SIGNIFICANCE CRITERIA

Criteria outlined in CEQA Guidelines were used to determine the level of significance of cultural resources impacts. Appendix G of CEQA Guidelines indicates that a project would have a significant effect if it were to:

- 4.D-1 Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5;
- 4.D-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5;
- 4.D-3 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature as defined in CEQA Guidelines Section 15064.5 (3); or
- 4.D-4 Disturb any human remains, including those interred outside of formal cemeteries.

4.D.5 PROJECT IMPACTS AND MITIGATION MEASURES

Threshold 4.D-1: Substantial adverse change in the significance of a historic resource.

Impact 4.D-1: Implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan could result in a substantial adverse change in the significance of a historic resource as the result of future site-specific development projects. However, compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to *less than significant*.

Methodology

Historic resources are usually 50 years old or older and must meet at least one of the criteria for listing in the California Register (such as association with historical events, important people, or architectural significance), in addition to maintaining a sufficient level of physical integrity (CEQA Guidelines Section 15064.5[a][3]).

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

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

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings Weeks and Grimmer (1995), is considered to have a less than significant impact.

Impact Assessment

The TOD Plan areas have a rich history as evidenced by the number of historic buildings in the area. As listed above, the TOD Plan areas contain resources designated as California State Historic Landmarks and listed in the National Register of historic places. In addition, other structures are eligible or potentially eligible for a historic designation. Also, the TOD Plan would be implemented through 2040, and over that time additional building and/or structures in the City could become 50 years of age or more and therefore potentially historic resources.

Recognizing the important role of historic resources in Inglewood, the proposed TOD Plan intends to preserve the City's historic resources, and enhance their role in the community by implementing streetscapes that would define and improve views of historic resources, such as developing a plaza in the north Market Place area that would provide views of a historic church. Additionally, the proposed TOD Plan sets forth development standards to support the preservation of historic resources. In addition, Mitigation Measure 4.D-I requires that adaptive reuse of historic structure comply with the Secretary of the Interior Standards for historic resources. Together the TOD Plan and Mitigation Measure 4.D-I ensure that new development is done in a compatible manner. These development standards involve storefront and residential building façade type requirements by zone and specific design requirements including: awnings, windows size and locations, building entrance designs, signage, towers, pass-throughs from streetscapes through alleys, etc.

Although no historically significant buildings are planned for demolition and the proposed TOD Plan aims to ensure preservation of historic resources, implementation of site-specific development projects pursuant to the proposed TOD Plan could cause a substantial adverse change in the significance of a historical resource by altering a historical resource's physical characteristics, which convey its historical significance. Therefore, Mitigation Measure 4.D-I has been included to address unidentified, potential historical resources (buildings, structures, and features aged 50 years and older) and to ensure preservation of known historic resources as new development within the TOD Plan areas occur. As described above, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, is considered to have a less than significant impact. Therefore, with implementation of the historic design standards in the TOD Plans and the mitigation measures, impacts related to a substantial adverse change in the significance of a historic resource would be less than significant.

Significance Conclusion for Impact 4.D-I

Implementation of proposed TOD Plans would not result in a substantial adverse change in the significance of a historic resource after implementation of Mitigation Measure 4.D-I. The resulting impact would be less than significant.

Mitigation Measures

Mitigation Measure 4.D-1: Prior to issuance of any permits for projects or demolition activities that would physically affect any listed or potentially eligible historic buildings, structures, or features aged 50 years old or older or negatively affect their historic setting, a cultural resource professional who meets the Secretary of the Interior's Professional Qualifications Standards for Architectural History shall be retained to determine if the proposed activities would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. The investigation shall include, as determined appropriate by the cultural resource professional and City of Inglewood, the appropriate archival research, including, if necessary, a records search at the South Central Coastal Information Center (SCCIC) of the California Historical Resources Information System (CHRIS) and a pedestrian survey of the proposed project or activity area to determine if any significant historic period resources would be adversely affected by the proposed action. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any historical resources within the project area and includes recommendations and methods for eliminating or reducing impacts on historical resources. Methods would include, but are not limited to, written and photographic recordation of the resource in accordance with the level of Historic American Building Survey (HABS) documentation that is appropriate to the significance (local, state, national) of the resource. Methods determined to reduce historic impacts, pursuant to the Secretary of the Interiors standards to a less than significant level shall be incorporated into all development plans submitted and included as conditions of approval. In addition, a qualified cultural resource professional shall monitor development activities to ensure that recommended site-specific historic related design measures are followed during construction.

Implementation: A qualified cultural resource professional shall be retained to identify potential historic resources on any site-specific development project containing one or more buildings more than 50 years old. Designers and contractors shall comply with the recommended historic design standards and other measures identified by the historic evaluation. In addition, the qualified cultural resource professional shall monitor development activities to ensure that recommended site-specific historic related design measures are followed during construction.

The historic recommendations shall be incorporated into all development plans submitted and included as conditions of approval. The City Planning Division shall review all of the historic assessment reports and the design features of development projects prior to approval of any demolition, grading, or construction permit.

Significance Conclusion for Impact 4.D-1 with Implementation of Mitigation Measures

With implementation of the historic design standards of the proposed TOD Plan and Mitigation Measure 4.D-1, impacts related to a substantial adverse change in the significance of a historic resource would be less than significant.

Threshold 4.D-2: Substantial adverse change in the significance of an archaeological resource.

Impact 4.D-2: Implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan could result in a substantial adverse change in the significance of an archaeological resource as the result of future site-specific development projects. However, compliance with existing regulations and implementation of mitigation would reduce this potential impact to *less than significant*.

Methodology

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Because, over time, this material evidence becomes buried, fragmented, or scattered or otherwise hidden from view, it is not always evident from a field survey of a project site. Thus, the possible presence of archaeological materials is often determined by the presence of geographic, vegetative, and rock features that are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the area.

Pursuant to Public Resource Code Section 21080.3.1 (AB 52), the City of Inglewood contacted the California Native American Tribes identified by the NAHC to offer consultation with the City regarding the potential effect of the proposed TOD Plan. No areas containing sensitive resources within Downtown Inglewood or Fairview Heights were identified as the result of consultation with Native American Tribes.

The analysis of impacts related to archaeology is based on a review of existing literature and previous studies within the City of Inglewood, and the likelihood of having unknown archaeological resources within the TOD Plan areas. The analysis considers the risk of loss of resources that could result from construction and development activities pursuant to implementation of the proposed TOD Plan. In determining whether a significant impact could result from the proposed project, the analysis includes consideration of the potential of the TOD Plan areas having unknown archaeological resources. The proposed TOD Plans would have a significant impact on archaeological resources if project activities

would disturb, damage, or degrade a unique archaeological resource or an archaeological historic resource, or setting of the resource.

Impact Assessment

The TOD Plan areas are located in an urbanized area, with a limited number of vacant parcels, all of which were previously disturbed by past development activities. While the TOD areas have been previously disturbed and developed, future site-specific development projects pursuant to the TOD Plan could involve grading and excavation to greater depths than previously undertaken. In addition, infill development would occur on vacant parcels, some of which may not have been previously exposed to ground disturbing activities, and therefore could result in the disturbance of unknown archaeological resources. Furthermore, it is known that the Centinela Springs and Valley areas were sites of Native American and early European settlements. Thus, the TOD Plan areas have a likelihood of containing unknown archaeological resources.

Because future site-specific development pursuant to the proposed TOD Plan could involve grading and excavation to greater depths than was previously undertaken, such future development could disturb buried archaeological resources. Thus, Mitigation Measure 4.D-2 has been included to reduce the potential for archaeological resources to be impacted during earthmoving activities and provides for preservation of any identified resources. With implementation of this mitigation measure, impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.

Mitigation Measure

Mitigation Measure 4.D-2: Prior to the issuance of a grading permit and/or action that would permit site disturbance (whichever occurs first), the applicant/ developer shall provide written evidence to the City Planning Division that a qualified archaeologist has been retained to respond on an as-needed basis to address unanticipated archaeological discoveries and any resulting archaeological requirements shall be incorporated into all development plans submitted and also included as conditions of approval. In the event that archaeological materials, including stone tools, shells, bones, glass shards, ceramics, or other materials older than 50 years in age, are encountered during ground-disturbing activities, work in the immediate vicinity of the resource shall cease until a qualified archaeologist has assessed the discovery and appropriate treatment pursuant to CEQA Guidelines Section 15064.5 is determined.

If archaeological resources are found to be significant, the archaeologist shall determine, in consultation with the City and any local Native American groups expressing interest following notification by the City, appropriate avoidance measures or other appropriate mitigation. Per CEQA Guidelines Section 15126.4(b)(3),

preservation in place shall be the preferred means to avoid impacts to archaeological resources qualifying as historical resources. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures, such as data recovery or other appropriate measures, in consultation with the implementing agency and any local Native American representatives expressing interest in prehistoric or tribal resources. If an archaeological site does not qualify as an historical resource but meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site shall be treated in accordance with the provisions of Section 21083.2.

Implementation: A qualified archaeologist shall be retained by the applicant/developer to respond on an as-needed basis to address unanticipated archaeological discoveries. In addition, any archaeological requirements established by the archaeologist evaluating the discovery shall be incorporated into all development plans submitted and included as conditions of approval.

Significance Conclusion for Impact 4.D-2 with Implementation of Mitigation Measure

With implementation of **Mitigation Measure 4.D-2**, impacts related to a substantial adverse change in the significance of an archaeological resource would be less than significant.

Threshold 4.D-3: Destruction of a unique paleontological resource or unique geologic feature.

Impact 4.D-3: Implementation of proposed Downtown Inglewood and Fairview Heights TOD Plan could destroy a unique paleontological resource or unique geologic feature as the result of future site-specific development projects. However, compliance with existing regulations and implementation of EIR mitigation measures would reduce this potential impact to be *less than significant*.

Methodology

A formation or rock unit is determined to have paleontological sensitivity based on previous studies of sediment types in the region and which contain vertebrate, invertebrate, or plant fossils. All sedimentary rocks and certain volcanic and mildly metamorphosed rocks are considered to have sensitivity for paleontological resources. Hence, a determination of the potential of paleontological resources to exist is based on the types of soils and rock that underlie a site and the potential for fossils suspected to occur in that unit; because generally the actual existence of fossils cannot be known until excavation for a development project is underway.

Thus, the potential of the future site-specific development pursuant to the proposed TOD Plan to result in impacts related to paleontological resources is based on identification of the rock and soils in the TOD Plan areas. Furthermore, a project may have a significant impact on paleontological resources if it would result in the permanent loss of, or loss of access to, a paleontological resource, as defined in CEQA Guidelines Section 15064.5, which is described above.

Impact Assessment

The TOD Plan areas are underlain by two different types of alluvium soils, undifferentiated late Pleistocene alluvium and late Holocene alluvium. The Holocene deposits are generally considered too young to contain fossil resources; however, the Pleistocene alluvial fan deposits could contain significant resources. Specifically, Pleistocene older alluvium in Los Angeles County and most of southern California has been reported to contain locally abundant and scientifically significant vertebrate, invertebrate, and plant fossils. Pleistocene alluvial fan deposits are known to exist in portions of the TOD Plan area, such as the Centinela Springs area that is known to have attracted prehistoric animals (City, 2006 and 2010), and in the Florence Avenue area between La Brea and Centinela Avenues (Leighton 2012). Thus, paleontological resources are likely to exist in these areas and potentially other portions of the TOD Plan areas.

As a result, there is potential for future site-specific development projects pursuant to the proposed TOD Plan that involve grading and excavation of vacant sites or to greater depths than previously undertaken for currently developed sites to directly or indirectly destroy a previously unknown unique paleontological resource or site. Therefore, **Mitigation Measure 4.D-3** has been included to address the potential for paleontological resources to be uncovered during earthmoving activities and provides for preservation of any uncovered resources. With implementation this mitigation measure, impacts related to a destruction of a unique paleontological resource or unique geologic feature would be less than significant.

Mitigation Measure

Mitigation Measure 4.D-3: Prior to the issuance of a grading permit and/or action that would permit site disturbance in native ground (below soils that were disturbed by previous development activities), (whichever occurs first, the applicant/developer shall provide written evidence to the City Planning Division that a qualified paleontologist has been retained to respond on an as-needed basis to address unanticipated paleontological discoveries, and the paleontological requirements shall be incorporated into all development plans submitted and included as conditions of approval. In the event that paleontological resources are encountered during grading and construction operations, all construction activities shall be halted or redirected to provide for a qualified paleontologist to assess the find for significance and, if necessary, develop a paleontological resources impact mitigation plan (PRIMP) for the review and approval by the City prior to resuming construction activities.

Projects that would not encounter previously undisturbed soils would not be required to retain a paleontologist. However, these projects shall demonstrate non-disturbance to the City through the appropriate construction plans or geotechnical studies prior to any earth disturbing activities.

Implementation: A qualified paleontologist shall be retained by the applicant/developer to respond on an as-needed basis to address unanticipated paleontological discoveries. In addition, the paleontological requirements shall be incorporated into all development plans submitted and included as conditions of approval.

Significance Conclusion for Impact 4.D-3 with Implementation of Mitigation Measure

With implementation of Mitigation Measure 4.D-3, impacts related to a destruction of a unique paleontological resource or unique geologic feature would be less than significant.

Threshold 4.D-4: Disturb any human remains, including those interred outside of formal cemeteries.

Impact 4.D-4: Implementation of the proposed Downtown Inglewood and Fairview Heights TOD Plan could disturb human remains, including those interred outside of formal cemeteries. However, compliance with existing regulations would reduce this potential impact to be *less than significant*.

Methodology

The assessment of potential impacts related to human remains consists of a qualitative review of the existing cultural resource conditions and previous land uses within the TOD Plan areas, the potential for human remains to be located within the TOD Plan areas, and a determination of whether there are adequate provisions to ensure protection of human remains, if found during project activities. An impact would be considered significant if human remains are disturbed outside of the guidelines of the California Health and Safety Code and the Public Resources Code.

Impact Assessment

The Fairview Heights TOD Plan area includes the Inglewood Park Cemetery; however, no changes are proposed for the cemetery.

As described previously, almost all of the TOD Plan area has been previously disturbed and developed; however, future site-specific development projects pursuant to the TOD Plan could involve grading and excavation to greater depths than was previously undertaken. In addition, infill development would occur on vacant parcels, some of which may not have been previously exposed to

ground disturbing activities, and therefore could result in the disturbance of unknown human remains.

In the event of an inadvertent discovery or recognition of any human remains during ground disturbance activities, regulations pursuant to California Health and Safety Code Section 7050.5 would be implemented. These regulations require that if human remains are unearthed during construction, then no further disturbance shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resource Code Section 5097.98, which outlines the NAHC notification process and the appropriate procedures if the Coroner determines the human remains to be Native American. Compliance with applicable regulations during implementation of the TOD Plan would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant.

Significance Conclusion for Impact 4.D-4

The TOD Plan would be implemented in compliance with Health and Safety Code Section 7050.5 and PRC Section 5097.98; therefore, impacts related to the potential to disturb human remains, including those interred outside of formal cemeteries would be less than significant.

REFERENCES – CULTURAL RESOURCES

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