

MEMORANDUM

Date: December 6, 2018

To: Lisa Trifiletti, Principal, Trifiletti Consulting, Inc.

From: Dillan Murray, Staff Planner, Meridian Consultants

Cc: Omar Pulido, Senior Associate, Trifiletti Consulting, Inc.
Joe Gibson, Partner, Meridian Consultants

Subject: Summary of the AB 52 Consultation Process for the Inglewood Transit Connector Project

The City of Inglewood (City), the lead agency under the California Environmental Quality Act (CEQA) for the Inglewood Transit Connector (ITC) Project (proposed Project), issued a Notice of Preparation (NOP) on July 16, 2018, stating the City has determined that an environmental impact report (EIR) should be prepared to evaluate the potential significant environmental effects of the proposed Project.

Pursuant to the requirements of Public Resources Code (PRC) Section 21080.3.1 (Assembly Bill [AB] 52), Native American tribes have the right to consult on a proposed public or private project prior to the release of an EIR should the tribe(s) be concerned there are potential impacts to tribal cultural resources. Four tribes notified the City and requested future notification of, with the possibility of providing consultation on, any projects that proceed under CEQA. These tribes include the Gabrielino–Tongva Tribe, Gabrielino Tongva Indians of California Tribal Council, Gabrielino/Tongva Nation, and the Gabrielino/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

Following the release of the NOP, the City sent letters on July 31, 2018, notifying the four tribes identified above that the City is planning the proposed Project (see **Attachment 1: AB 52 Letters**). These letters were sent via certified mail with return receipt of signature through the United States (US) Postal Service.

The letters were mailed to the following individuals who were identified as the point of contact for each tribe:

- Charles Alvarez, Chairperson, Gabrielino–Tongva Tribe, 23454 Vanowen Street, West Hills, CA 91307
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council, P.O. Box 490, Bellflower, CA 90707

- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation, 106½ Judge John Aiso Street #231, Los Angeles, CA 90012
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians, P.O. Box 693, San Gabriel, CA 91778

Letters were confirmed to be delivered to the tribes by the US Post Office as noted on the returned certified mailing receipts (see **Attachment 2: Proofs of Delivery of AB 52 Letters**) as follows:

- Gabrielino/Tongva Nation on August 2, 2018
- Gabrieleno/Tongva San Gabriel Band of Mission Indians on August 3, 2018
- Gabrielino Tongva Indians of California Tribal Council on August 7, 2018

The letter mailed to Mr. Alvarez of the Gabrielino–Tongva Tribe was determined by the US Post Office to be undeliverable. Notice of attempted delivery was left at the address, but the letter went unclaimed and was returned.

An additional attempt to deliver the letter was sent to Mr. Alvarez of the Gabrielino–Tongva Tribe via FedEx standard service without signature confirmation and was confirmed to be delivered by its tracking number on August 31, 2018 (see **Attachment 3: Proof of Delivery of AB 52 Letter to Gabrielino–Tongva Tribe**). As mentioned previously, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as an additional relevant party and was mailed an NOP on July 13, 2018 (see **Attachment 4: Receipt of NOP Mailing to Gabrieleno Band of Mission Indians–Kizh Nation**), in line with the July 16, 2018 NOP release date, to the following address:

- Andrew Salas, Chairman, Gabrieleno Band of Mission Indians–Kizh Nation, P.O. Box 393, Covina, CA 91723

Each tribe notified has 30 days from receipt of the letter to notify the City that they wish to engage in the AB 52 consultation process on the proposed Project. As such, the consultation period for each tribe (30 days starting on the date of receipt) ended as follows:

- Gabrielino/Tongva Nation - September 1, 2018
- Gabrieleno/Tongva San Gabriel Band of Mission Indians - September 2, 2018
- Gabrielino Tongva Indians of California Tribal Council - September 6, 2018
- Gabrielino–Tongva Tribe - September 30, 2018
- Gabrieleno Band of Mission Indians–Kizh Nation - August 15, 2018

To date, only the Gabrieleno Band of Mission Indians—Kizh Nation has expressed interest in consulting on the proposed Project. The Gabrieleno Band of Mission Indians—Kizh Nation would like to consult in the event that any ground disturbance occurs during implementation (see **Attachment 5: Request for Consultation—Gabrieleno Band of Mission Indians—Kizh Nation**).

It is our recommendation to start consultation with any tribes requesting such under AB 52 once the project description is complete and clearly defined. At that time, we should provide the tribes with any cultural (archaeological or paleontological) information we have regarding the proposed alignment and location of proposed support facilities for the ITC.

Further, because each tribe may have its own tribal cultural resources (TRCs), we recommend that all tribe consultations are conducted individually to respect the privacy of sacred or confidential information that may be shared with the City regarding the proposed Project.

In addition, according to information provided by PaleoWest Archaeology (see **Attachment 6: Cultural Resource Investigation**), as part of their CEQA due diligence during the EIR environmental review process, tribal representatives for the five tribes mentioned above were contacted to solicit information regarding their possible desire to consult with the City on the proposed Project. As shown in **Attachment 6**, each tribe received a letter and email from PaleoWest Archaeology, dated July 27, 2018, explaining the proposed Project and scope of the cultural resource investigation. Follow up phone calls were made to each tribe on August 29, 2018.

In a phone conversation on August 29, 2018 between Gena Granger of PaleoWest and Mr. Anthony Morales, Chairperson, the tribal representative from the Gabrieleno/Tongva San Gabriel Band of Mission Indians, Mr. Morales stated that the Project lies within a highly culturally sensitive area and that any trenching or excavation for structures such as support columns may require archaeological and Native American monitoring, further stating that he recommends monitoring and requests consultation. However, Mr. Morales's conversation did not constitute a formal request for consultation and the tribal representative was informed that the information/requests would be passed on to the lead agency via the cultural resource investigation, with official AB 52 consultation to be conducted at a later time should the tribe request it; a request for formal consultation under AB 52 was not made by the Gabrieleno/Tongva San Gabriel Band of Mission Indians.

ATTACHMENTS

Attachment 1: AB 52 Letters

Attachment 2: Proofs of Delivery of AB 52 Letters

Attachment 3: Proof of Delivery of AB 52 Letter to Gabrielino–Tongva Tribe

Attachment 4: Receipt of NOP Mailing to Gabrieleno Band of Mission Indians–Kizh Nation

Attachment 5: Request for Consultation—Gabrieleno Band of Mission Indians–Kizh Nation

Attachment 6: Cultural Resource Investigation

ATTACHMENT 1

AB 52 Letters



CITY OF INGLEWOOD

ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division



Christopher E. Jackson, Sr.
Director

Mindy Wilcox, AICP
Planning Manager

July 31, 2018

Gabrielino-Tongva Tribe
Charles Alvarez, Chairperson
23454 Vanowen Street
West Hills, CA 91307

Attn: Charles Alvarez

Subject: Notice of Proposed Project
Inglewood Transit Connector, City of Inglewood, California

Dear Mr. Alvarez:

Pursuant to the requirements of Public Resources Code Section 21080.3.1 (Assembly Bill [AB] 52), this letter is to notify you that the City of Inglewood (City), an incorporated city within Los Angeles County, is planning the Inglewood Transit Connector (proposed Project) as described below. On July 16, 2018, the City released a Notice of Preparation in compliance with the California Environmental Quality Act (CEQA) indicating the City intends to prepare an Environmental Impact Report (EIR) to evaluate the potential environmental impacts that may result from the proposed Project.

The Gabrielino-Tongva Tribe (Tribe) has previously notified the City that it would like to be contacted and possibly provide consultation on any projects that proceed under CEQA. Per AB 52, the Tribe has the right to consult on a proposed public or private project prior to the release of an EIR should the Tribe be concerned that the potential exists to impact Tribal cultural resources.

Location and Setting

The proposed Project is located entirely within the City and is generally bounded by the Metro Crenshaw/LAX Line to the north; Century Boulevard to the south; the Los Angeles Sports and Entertainment District (LASED) to the east; and La Brea Avenue to the west. A map illustrating the location of the Project is attached.

Description

The proposed Project would include an automated people mover (APM) system to transport riders between the regional Metro Rail system and Downtown Inglewood, the Forum, LASED (which includes the new NFL stadium, currently under construction and scheduled to open in 2020), and the proposed Inglewood Basketball and Entertainment Center (IBEC). The proposed Project's APM system would consist of elevated dual guideways to allow for trains to continuously travel in each direction.

The proposed Project extends from the Market Street and Florence Avenue intersection adjacent to the Metro Crenshaw/LAX Line in Downtown Inglewood, south through Market Street, then east on Manchester Boulevard, turning south on Prairie Avenue until its intersection with Century Boulevard. The APM system will be located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue.

In addition to the APM system, the proposed Project will include support facilities to provide for maintenance and additional access areas that could be either co-located or individually located at several potential sites adjacent to the APM alignment. These support facilities would include a Maintenance and Storage Facility (MSF), one or more Intermodal Transportation Facilities (ITFs) and other components, such as a power traction system. The MSF would consist of a single 4- to 6-acre facility to service the APM cars and other system components. The ITFs would provide multimodal access to the APM, as well as parking areas and drop-off and pickup locations.

Potential sites for support facilities include locations east of North Market Street, south of Manchester Boulevard between Spruce Avenue and Hillcrest Boulevard, across Prairie Avenue from the Forum, and at either the northwest or southwest corner of Prairie Avenue and Century Boulevard.

The design and construction of the APM system's elevated guideway structures, stations, and support facilities will be designed to avoid existing utility and other infrastructure to the degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations.

The proposed Project is anticipated to be implemented in part through the development of an Enhanced Infrastructure Financing District (EIFD) in accordance with Senate Bill 628 (Beal), which provides for the creation of such districts to accommodate the construction or rehabilitation of public infrastructure facilities. The City of Inglewood will be the Public Financing Authority (PFA) for the EIFD; as such, it will determine the boundaries of the EIFD. The EIFD, governed by the PFA, would implement an Infrastructure

Financing Plan adopted by the City describing the type of public facilities and development that will be financed by the EIFD. In addition to the EIFD, the City anticipates securing funding from other local, state, or federal sources, including the potential for public-private partnerships and/or joint funding and development tools.

Background

The primary goal is to provide convenient, reliable, and direct transit accessibility and connectivity to the City's major activity centers from the Metro Rail system. The City seeks to accommodate individuals traveling to and from Downtown Inglewood, the Forum, LASED, and the proposed IBEC during major events via public transportation, both for ease of access and to minimize traffic in the area. The proposed alignment is planned to have a ridership capacity of 13,500 passengers per hour. Additionally, the transit system presents an opportunity for integration with local economic activity, transit-oriented development, and other initiatives in the area.

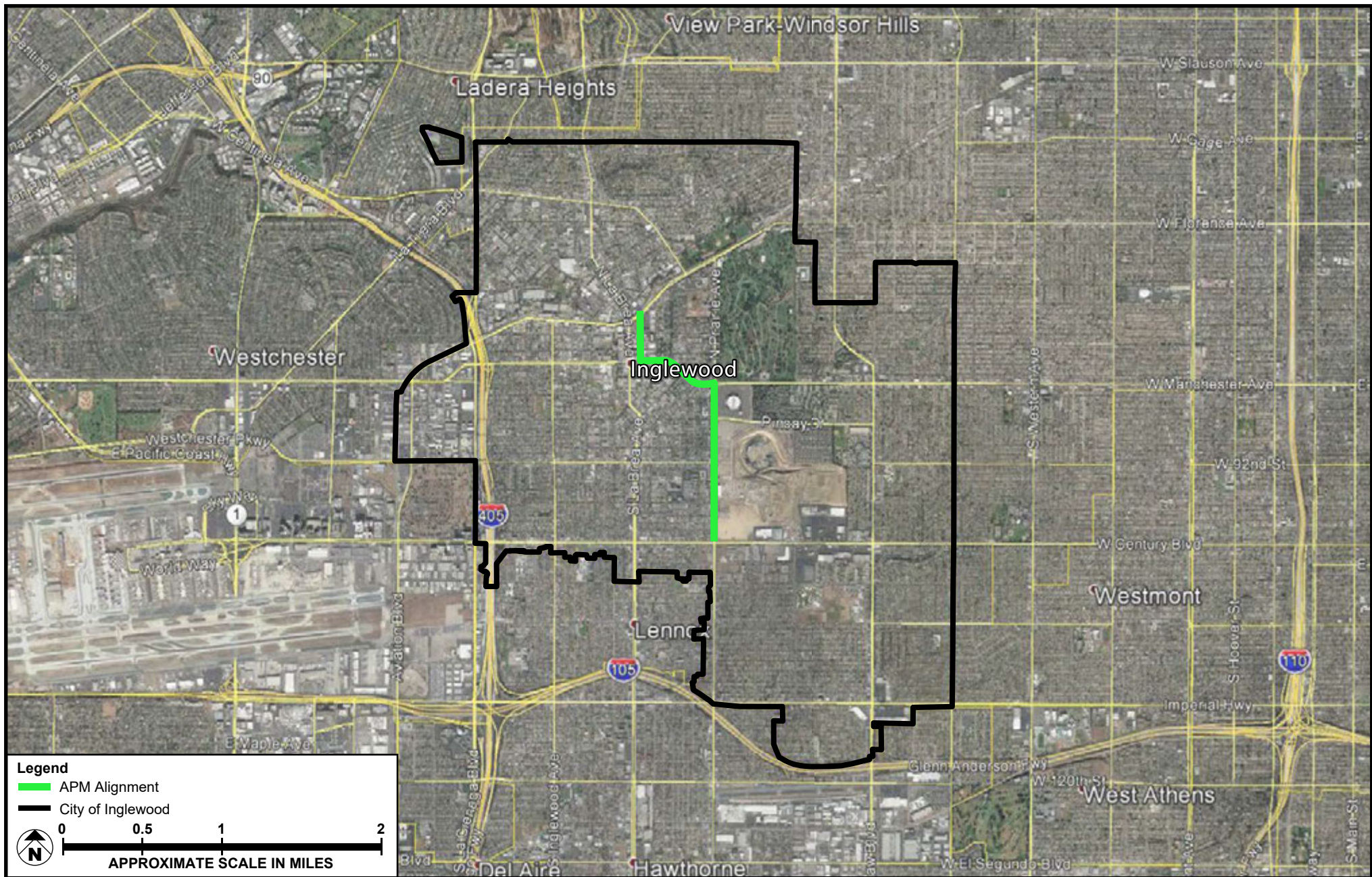
Should the Tribe elect to engage in the consultation process on this Project in accordance with the requirements of AB 52, please respond within 30 calendar days from receipt of this letter to notify the City in writing. Please provide the lead contact person's contact information in your response.

Should you have any questions, please contact Mindy Wilcox, Planning Manager, at (310) 412-5230 or at mwilcox@cityofinglewood.org.

Sincerely,


MINDY WILCOX, AICP, Planning Manager

Attachment: Project Location Map



SOURCE: Google Earth - 2018

ATTACHMENT 1



Project Location Map



CITY OF INGLEWOOD

ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division



Christopher E. Jackson, Sr.
Director

Mindy Wilcox, AICP
Planning Manager

July 31, 2018

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA 90707

Attn: Robert Dorame

Subject: Notice of Proposed Project
Inglewood Transit Connector, City of Inglewood, California

Dear Mr. Dorame:

Pursuant to the requirements of Public Resources Code Section 21080.3.1 (Assembly Bill [AB] 52), this letter is to notify you that the City of Inglewood (City), an incorporated city within Los Angeles County, is planning the Inglewood Transit Connector (proposed Project) as described below. On July 16, 2018, the City released a Notice of Preparation in compliance with the California Environmental Quality Act (CEQA) indicating the City intends to prepare an Environmental Impact Report (EIR) to evaluate the potential environmental impacts that may result from the proposed Project.

The Gabrielino Tongva Indians of California Tribal Council (Tribe) has previously notified the City that it would like to be contacted and possibly provide consultation on any projects that proceed under CEQA. Per AB 52, the Tribe has the right to consult on a proposed public or private project prior to the release of an EIR should the Tribe be concerned that the potential exists to impact Tribal cultural resources.

Location and Setting

The proposed Project is located entirely within the City and is generally bounded by the Metro Crenshaw/LAX Line to the north; Century Boulevard to the south; the Los Angeles Sports and Entertainment District (LASED) to the east; and La Brea Avenue to the west. A map illustrating the location of the Project is attached.

Description

The proposed Project would include an automated people mover (APM) system to transport riders between the regional Metro Rail system and Downtown Inglewood, the Forum, LASED (which includes the new NFL stadium, currently under construction and scheduled to open in 2020), and the proposed Inglewood Basketball and Entertainment Center (IBEC). The proposed Project's APM system would consist of elevated dual guideways to allow for trains to continuously travel in each direction.

The proposed Project extends from the Market Street and Florence Avenue intersection adjacent to the Metro Crenshaw/LAX Line in Downtown Inglewood, south through Market Street, then east on Manchester Boulevard, turning south on Prairie Avenue until its intersection with Century Boulevard. The APM system will be located within the public rights-of-way for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue.

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Potential sites for support facilities include locations east of North Market Street, south of Manchester Boulevard between Spruce Avenue and Hillcrest Boulevard, across Prairie Avenue from the Forum, and at either the northwest or southwest corner of Prairie Avenue and Century Boulevard.

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The proposed Project is anticipated to be implemented in part through the development of an Enhanced Infrastructure Financing District (EIFD) in accordance with Senate Bill 628 (Beal), which provides for the creation of such districts to accommodate the construction or rehabilitation of public infrastructure facilities. The City of Inglewood will be the Public Financing Authority (PFA) for the EIFD; as such, it will determine the boundaries of the EIFD. The EIFD, governed by the PFA, would implement an Infrastructure

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The primary goal is to provide convenient, reliable, and direct transit accessibility and connectivity to the City's major activity centers from the Metro Rail system. The City seeks to accommodate individuals traveling to and from Downtown Inglewood, the Forum, LASED, and the proposed IBEC during major events via public transportation, both for ease of access and to minimize traffic in the area. The proposed alignment is planned to have a ridership capacity of 13,500 passengers per hour. Additionally, the transit system presents an opportunity for integration with local economic activity, transit-oriented development, and other initiatives in the area.

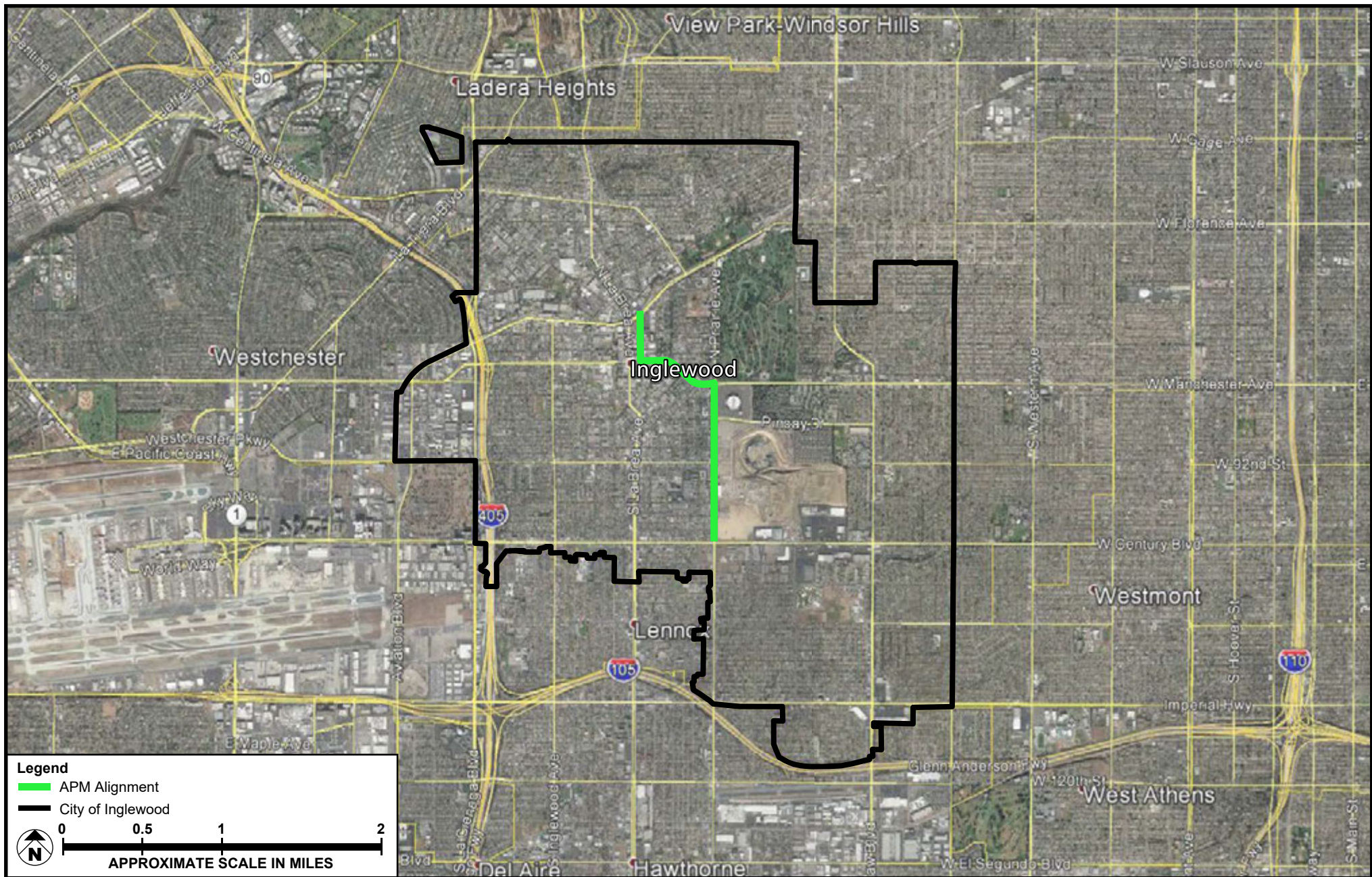
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MINDY WILCOX, AICP, Planning Manager

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ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division



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July 31, 2018

Gabrielino/Tongva Nation
Sandonne Goad, Chairperson
106½ Judge John Aiso Street #231
Los Angeles, CA 90012

Attn: Sandonne Goad

Subject: Notice of Proposed Project
Inglewood Transit Connector, City of Inglewood, California

Dear Ms. Goad:

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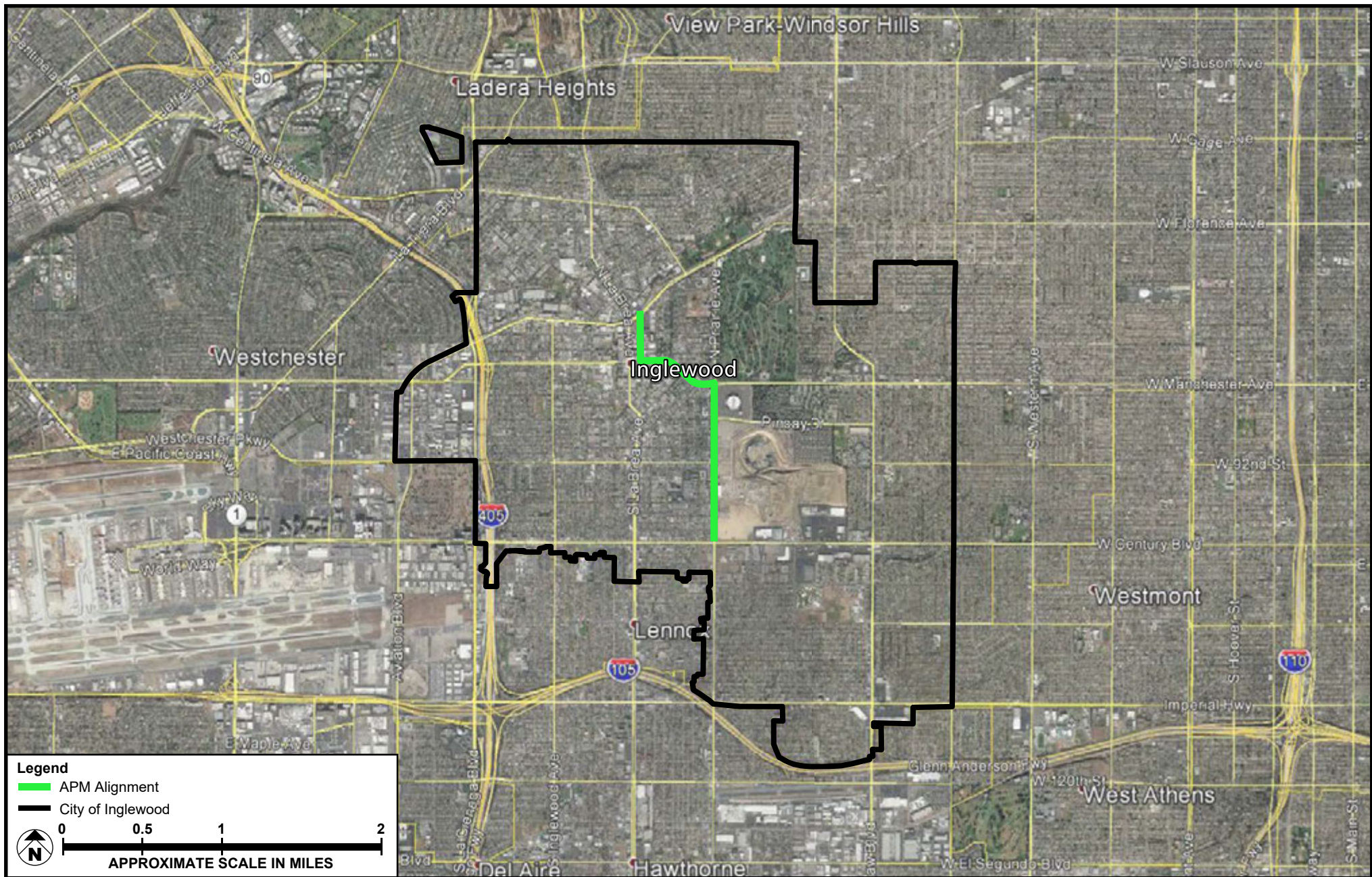
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ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division



Christopher E. Jackson, Sr.
Director

Mindy Wilcox, AICP
Planning Manager

July 31, 2018

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA 91778

Attn: Anthony Morales

Subject: Notice of Proposed Project
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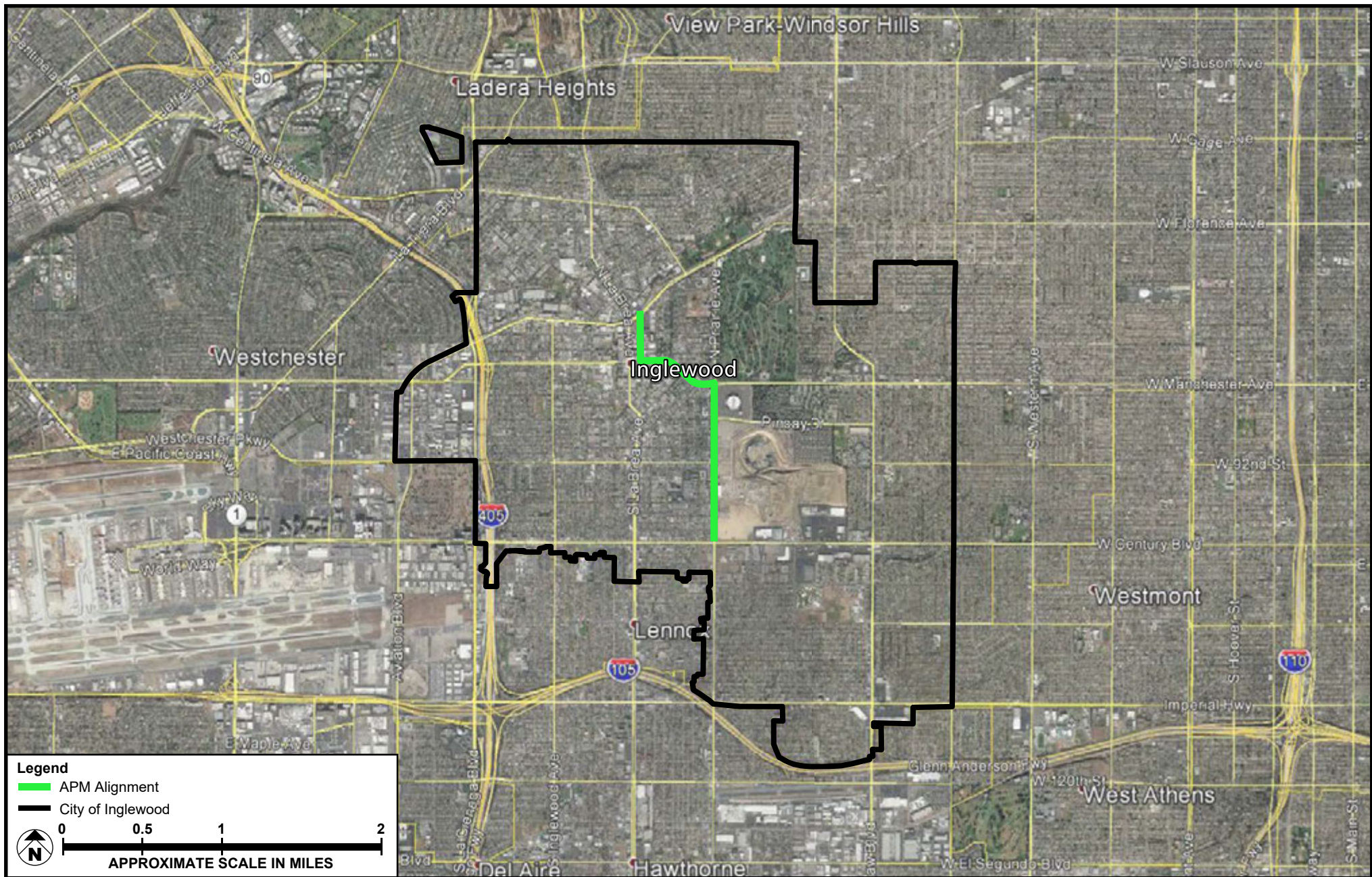
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Sincerely,


MINDY WILCOX, AICP, Planning Manager

Attachment: Project Location Map



SOURCE: Google Earth - 2018

ATTACHMENT 1



Project Location Map

ATTACHMENT 2

Proofs of Delivery of AB 52 Letters

CERTIFIED MAIL

Meridian Consultants LLC
910 Hampshire Road
Suite V
Westlake Village CA 91361



9414 7112 9837 0930 4071 64

COMPLETE THIS SECTION ON DELIVERY

A. Signature: (Please Print Clearly) *Be Anderson* 8/2
B. Received By: (Please Print Clearly)
C. Date of Delivery
D. Addressee's Address (If Different From Address Used by Sender)
Secondary Address / Suite / Apt. / Floor (Please Print Clearly)
Delivery Address
City State ZIP + 4 Code

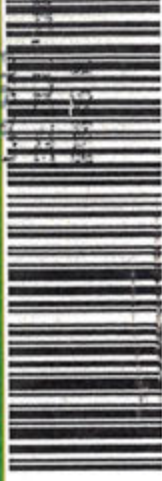
RETURN RECEIPT REQUESTED

Article Addressed To:

Sandonne Corp
Gabrielino/Tongva
1061/2 Judge
LOS ANGELES CA 90012

CERTIFIED MAIL

Meridian Consultants LLC
910 Hampshire Road
Suite V
Westlake Village CA 91361



9414 7112 9837 0930 4045 14

COMPLETE THIS SECTION ON DELIVERY

A. Signature: (Please Print Clearly) *Anthony Morales*
B. Received By: (Please Print Clearly)
C. Date of Delivery
D. Addressee's Address (If Different From Address Used by Sender)
Secondary Address / Suite / Apt. / Floor (Please Print Clearly)
Delivery Address
City State ZIP + 4 Code

RETURN RECEIPT REQUESTED

Article Addressed To:

Anthony Morales
Gabrielino/Tongva San Gabriel Band
P.O. Box 693
SAN GABRIEL CA 91778

CERTIFIED MAIL

Meridian Consultants LLC
910 Hampshire Road
Suite V
Westlake Village CA 91361



9414 7112 9837 0930 4084 06

COMPLETE THIS SECTION ON DELIVERY

A. Signature: (Please Print Clearly) *Robert Dorame*
B. Received By: (Please Print Clearly)
C. Date of Delivery
D. Addressee's Address (If Different From Address Used by Sender)
Secondary Address / Suite / Apt. / Floor (Please Print Clearly)
Delivery Address
City State ZIP + 4 Code

RETURN RECEIPT REQUESTED

Article Addressed To:

Robert Dorame
Gabrielino Tongva Indians of CA
P.O. Box 490
BELLFLOWER CA 90706

ATTACHMENT 3

Proof of Delivery of AB 52 Letter to Gabrielino-Tongva Tribe



Your package has been delivered

Tracking # 773103383972

Ship date:

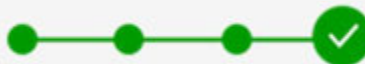
Thu, 8/30/2018

Matthew Lechuga

Meridian Consultants

Westlake Village, CA 91361

US



Delivered

Delivery date:

Fri, 8/31/2018 12:33 pm

Charles Alvarez

Gabrielino-Tongva Tribe

23454 Vanowen Street

WEST HILLS, CA 91307

US

Shipment Facts

Our records indicate that the following package has been delivered.

Tracking number:

[773103383972](#)

Status:

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ATTACHMENT 4

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ATTACHMENT 5

Request for Consultation - Gabrieleno Band of Mission Indians–Kizh Nation

From: Administration Gabrieleno Indians <admin@gabrielenoindians.org>
Date: 8/8/18 12:35 PM (GMT-08:00)
To: Mindala Wilcox <mwilcox@cityofinglewood.org>
Subject: Inglewood Transit Connector

Dear Mindy,

Thank you for your letter dated July 16, 2018. If there will be any ground disturbance regarding the project our Tribal government would like to consult.
Thank you

Sincerely,

Brandy Salas
Admin Specialist
Gabrieleno Band of Mission Indians - Kizh Nation
PO Box 393
Covina, CA 91723
Office: 844-390-0787
website: www.gabrielenoindians.org



ATTACHMENT 6

Cultural Resource Investigation



Cultural Resource Investigation in Support of the Inglewood Transit Connector Project, Los Angeles County, California

Submitted to:

Meridian Consultants
920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Technical Report 18-640

December 12, 2018

626.408.8006 | paleowest.com | 517 S. Ivy Avenue | Monrovia, CA 91016

CULTURAL RESOURCE INVESTIGATION IN SUPPORT OF THE INGLEWOOD TRANSIT CONNECTOR PROJECT, LOS ANGELES COUNTY, CALIFORNIA

Prepared by:

Roberta Thomas, M.A., RPA, and Gena Granger, M.A., RPA

Prepared for:

Meridian Consultants

Technical Report No. 18-640

PaleoWest Archaeology

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December 12, 2018

Keywords: CEQA; Inglewood; Los Angeles County; Automated People Mover

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MANAGEMENT SUMMARY

The proposed Inglewood Transit Connector Project (Project) would include an automated people mover system to transport riders to and from the regional Metro Rail system to Downtown Inglewood, the Forum, the Los Angeles Sports and Entertainment District which includes the new National Football League stadium currently under construction, and the proposed Inglewood Basketball and Entertainment Center in the city of Inglewood, California. PaleoWest Archaeology (PaleoWest) was contracted by Meridian Consultants to conduct a Phase I cultural resource assessment of the Project area in compliance with the California Environmental Quality Act (CEQA). The City of Inglewood is the Lead Agency for the purposes of the CEQA.

This report summarizes the methods and results of the cultural resource investigation of the Project area. This investigation included background research, communication with the Native American Heritage Commission (NAHC) and interested Native American tribal groups, and an intensive pedestrian survey of the Project area. The purpose of the investigation was to determine the potential for the Project to impact historic resources under CEQA.

A cultural resource records search and literature review was conducted on June 20, 2018, at the South Central Coastal Information Center of the California Historical Resource Information System housed at California State University, Fullerton. The records search indicated that no fewer than 21 previous studies have been conducted within a half-mile of the Project area; however, no prehistoric or historical archaeological resources were identified within a half-mile of the Project area.

As part of the cultural resource assessment of the Project area, PaleoWest also requested a search of the Sacred Lands File (SLF) from the NAHC. Results of the SLF search indicate that there are no known Native American cultural resources within the immediate Project area but suggested contacting five Native American tribal groups to find out if they have additional information about the Project area. Five individuals were contacted. Two responses were received as a result of the outreach efforts. The Gabrieleno Band of Mission Indians- Kizh Nation requested lead agency contact information to consult directly with the City, Gabrieleno/Tongva San Gabriel Band of Mission Indians indicated the Project area is sensitive for cultural resources and requested cultural and Native American monitoring for the Project.

PaleoWest conducted a windshield/reconnaissance survey of the proposed Project area on July 20, 2018. No prehistoric or historic archaeological resources were identified during the survey. However, ground visibility was very poor throughout the Project due the high degree of urban development disturbance. As such, the likelihood of encountering intact archaeological resources within the Project area is low. PaleoWest does not recommend any additional cultural resource management for the proposed Project.

1.0 INTRODUCTION

The proposed Inglewood Transit Connector Project (Project) would include an automated people mover (APM) system to transport riders to and from the regional Metro Rail system to Downtown Inglewood, the Forum, the Los Angeles Sports and Entertainment District (LASED) which includes the new National Football League (NFL) stadium (currently under construction), and the proposed Inglewood Basketball and Entertainment Center in the city of Inglewood, California. The proposed Project would consist of an elevated, automated people mover (APM) system with dual guideways to allow for continuous trains to travel in each direction as well as a Maintenance and Storage Facility (MSF) and Intermodal Transportation Facility (ITF). PaleoWest Archaeology (PaleoWest) was contracted by Meridian Consultants to conduct a Phase I cultural resource assessment of the Project area in compliance with the California Environmental Quality Act (CEQA). The City of Inglewood is the Lead Agency for the purposes of the CEQA.

1.1 PROJECT LOCATION AND DESCRIPTION

The proposed Project is located entirely within the city of Inglewood, in Los Angeles County, east of the San Diego Freeway (Interstate 405 [I-405]) and north of the Glen Anderson Freeway (I-105) (Figure 1-1). The proposed Project is generally bounded by the Metro Crenshaw/LAX Line to the north; Century Boulevard to the south; the LASED to the east; and La Brea Avenue to the west. The Project extends from the Market Street and Florence Avenue intersection adjacent to the Metro Crenshaw/LAX Line in Downtown Inglewood, south through Market Street, then east on Manchester Boulevard, turning south on Prairie Avenue until its intersection with Century Boulevard. The APM system will largely be located within the public right-of-way (ROW) for the streets and sidewalk areas along Market Street, Manchester Boulevard, and Prairie Avenue. The APM would include five proposed stations within the public ROW, located at North Market Street, East Manchester Boulevard, the Forum, Hollywood Park, and West Century Boulevard. The potential locations for the MSF and ITF would occupy parcels immediately adjacent to the APM alignment. The Project area is situated within Sections 28, 33, 34 as well as unsectioned areas, Township 2 South, Range 14 West, San Bernardino Baseline and Meridian (SBBM), as depicted on the Inglewood, CA 7.5' U.S. Geological Survey (USGS) topographic quadrangle (Figure 1-2). The elevation of the Project area ranges between 95 and 158 feet above mean sea level (amsl).

The proposed Project would include transit improvements that would be constructed in an area of the city of Inglewood within the public ROW from Market Street at the Metro Crenshaw/LAX line; south to the intersection of Market Street and Manchester Boulevard; east to the intersection of Manchester Boulevard and Prairie Avenue; then south to the intersection of Prairie Avenue and Century Boulevard. In addition to the APM system, the proposed Project will include support facilities to provide for maintenance and additional access areas that could be either co-located or individually located at several potential sites adjacent to the APM alignment. These support facilities would include a MSF, one or more ITF and other components such as a power traction system. The MSF would consist of a single four- to six-acre facility to service the APM cars and other system components. The ITFs would provide multimodal access to the APM as well as provide for parking areas and drop-off and pick-up locations.

The design and construction of the APM system elevated guideway structures, stations, and support facilities will be designed to avoid existing utility and other infrastructure to the greatest degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. The proposed maximum depth of

excavation for the vertical supports of the APM guideway structures outside of the stations is approximately 100 feet below ground surface and the proposed maximum depth excavation for the vertical supports of the APM guideway structures at the stations is approximately 80 feet below ground surface.

1.2 REPORT ORGANIZATION

This report documents the results of a cultural resource investigation conducted for the proposed Project. Chapter 1 has introduced the project location and description. Chapter 2 states the regulatory context that should be considered for the Project. Chapter 3 synthesizes the natural and cultural setting of the Project area and surrounding region. The results of the cultural resource literature and records search conducted at the South Central Coastal Information Center (SCCIC) and the Sacred Lands File (SLF) search, and a summary of the Native American communications is presented in Chapter 4. The field methods employed during this investigation and findings are outlined in Chapter 5 with management recommendation provided in Chapter 6. This is followed by bibliographic references and appendices.

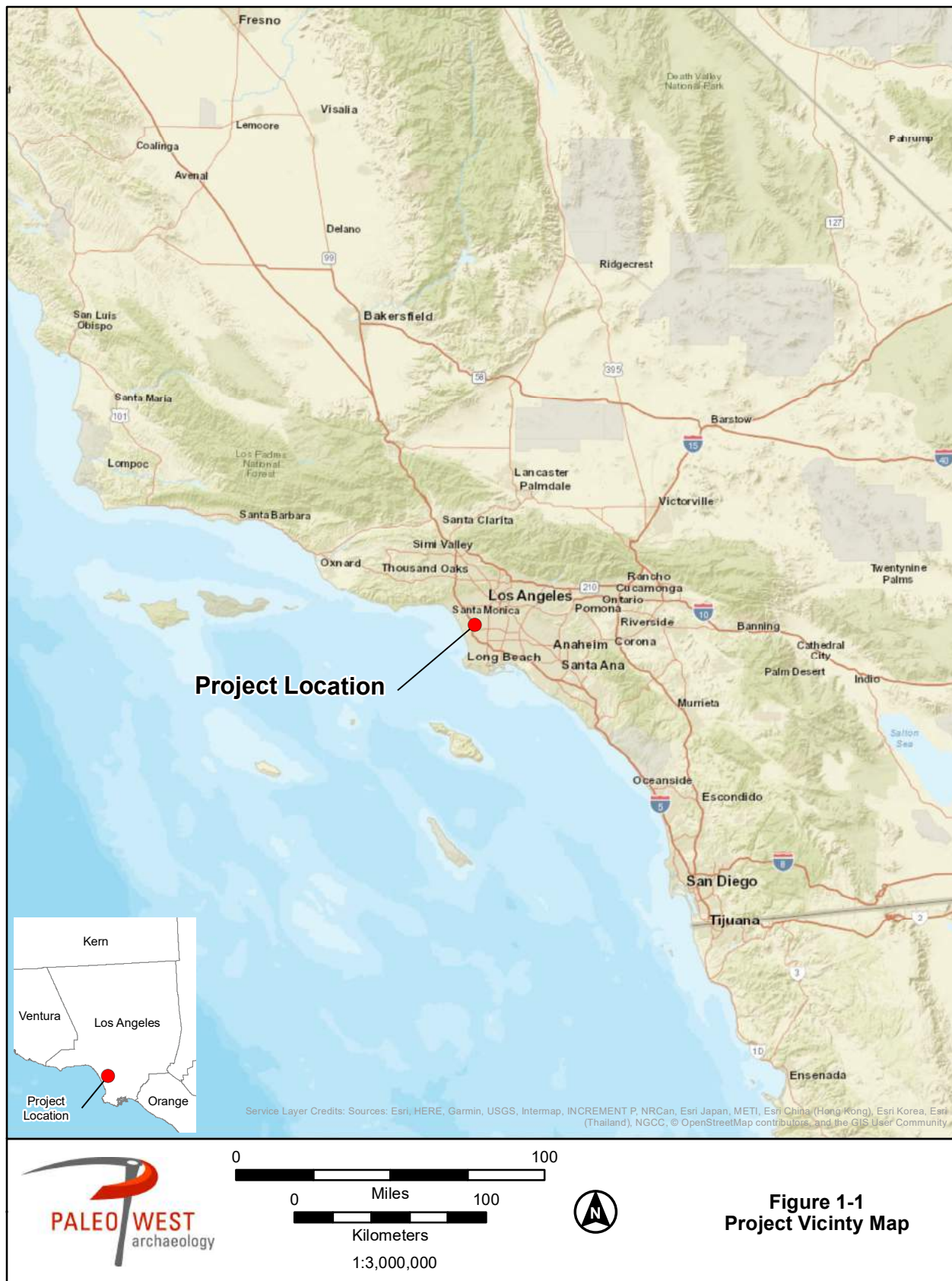


Figure 1-1 Project Vicinity Map

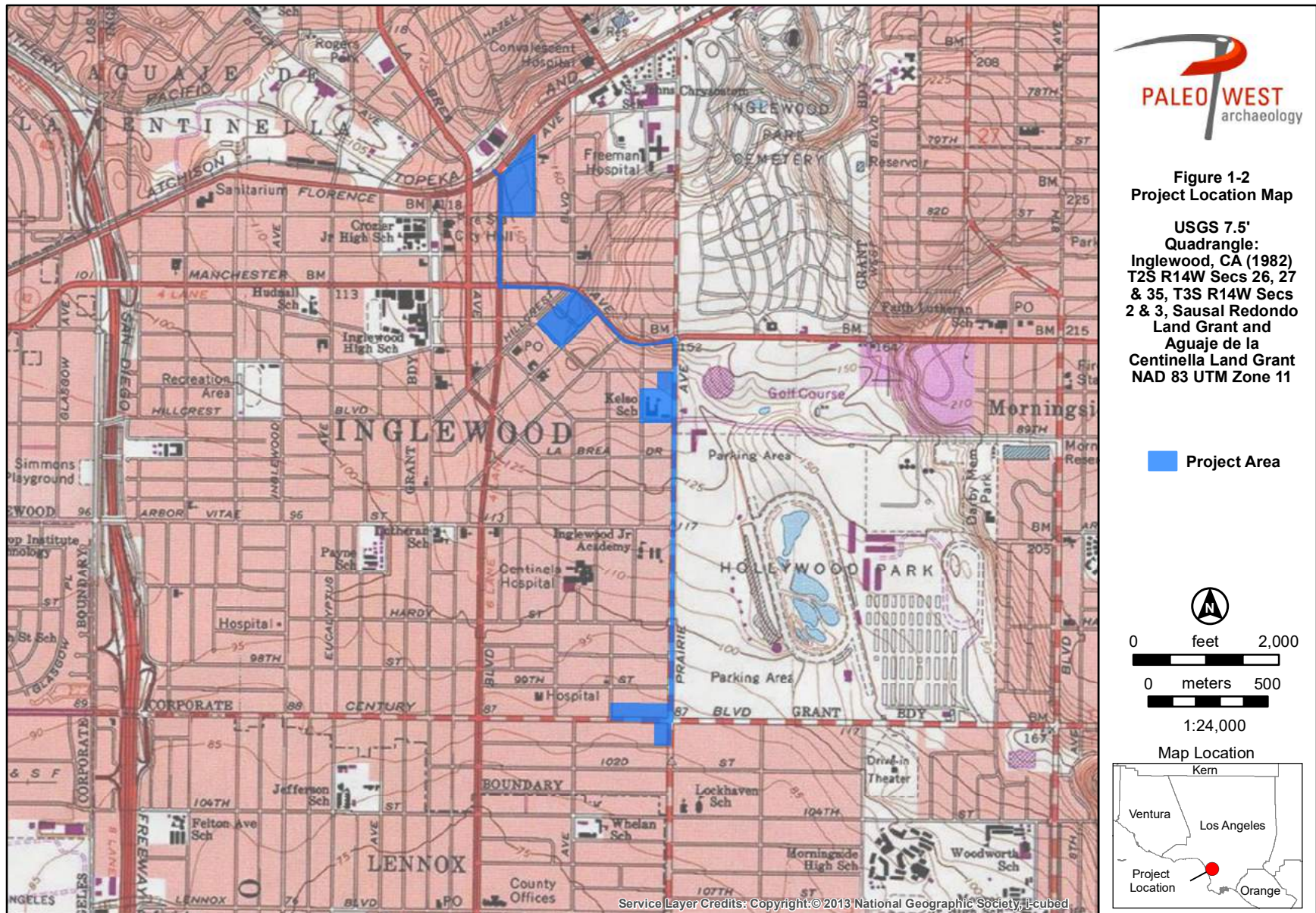


Figure 1-2 Project Location Map

2.0 REGULATORY CONTEXT

2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The proposed Project is subject to compliance with CEQA, as amended. Compliance with CEQA statutes and guidelines requires both public and private projects with financing or approval from a public agency to assess the project's impact on cultural resources (Public Resources Code Section 21082, 21083.2 and 21084 and California Code of Regulations 10564.5). The first step in the process is to identify cultural resources that may be impacted by the project and then determine whether the resources are “historically significant” resources.

CEQA defines historically significant resources as “resources listed or eligible for listing in the California Register of Historical Resources (CRHR)” (Public Resources Code Section 5024.1). A cultural resource may be considered historically significant if the resource is 45 years old or older, possesses integrity of location, design, setting, materials, workmanship, feeling, and association, and meets any of the following criteria for listing on the CRHR:

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 (Public Resources Code Section 5024.1).

Cultural resources are buildings, sites, humanly modified landscapes, traditional cultural properties, structures, or objects that may have historical, architectural, cultural, or scientific importance. CEQA states that if a project will have a significant impact on important cultural resources, deemed “historically significant,” then project alternatives and mitigation measures must be considered. Additionally, any proposed project that may affect historically significant cultural resources must be submitted to the State Historic Preservation Officer (SHPO) for review and comment prior to project approval by the responsible agency and prior to construction.

2.2 CALIFORNIA ASSEMBLY BILL 52

Signed into law in September 2014, California Assembly Bill 52 (AB 52) created a new class of resources – tribal cultural resources – for consideration under CEQA. Tribal cultural resources may include sites, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe that are listed or determined to be eligible for listing in the CRHR, included in a local register of historical resources, or a resource determined by the lead CEQA agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR. AB 52 requires that the lead CEQA agency consult with California Native American tribes that have requested consultation for projects that may affect tribal cultural resources. The lead CEQA agency shall begin consultation with participating Native American tribes prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report. Under AB 52, a project that has potential to cause a substantial adverse change to a tribal cultural resource constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

3.0 SETTING

This section of the report summarizes information regarding the physical and cultural setting of the Project area, including the prehistoric, ethnographic, and historic contexts of the general area. Several factors, including topography, available water sources, and biological resources, affect the nature and distribution of prehistoric, ethnographic, and historic-period human activities in an area. This background provides a context for understanding the nature of the cultural resources that may be identified within the region.

3.1 ENVIRONMENTAL SETTING

The City of Inglewood is located at the southern edge of the Transverse Ranges geomorphic province, which includes the San Gabriel and San Bernardino mountains to the northeast, and the Santa Monica Mountains to the north. The City is also located near the northern boundary of the Peninsular Ranges geomorphic province, which includes the San Jacinto and Santa Rosa mountains and Newport-Inglewood Fault and the Whittier-Elsinore Fault to the east and southeast (City of Inglewood 2006). Most of the City is underlain by thick (10,000 to 12,000 foot) Tertiary and Quaternary marine and continental sedimentary rocks. The Tertiary rocks, consisting primarily of sandstone, silt-stone, and shale, are almost entirely of marine origin and range in age from Eocene to Pliocene. The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel (City of Inglewood 2006).

Specifically, however in the Baldwin and Rosecrans hills are geomorphic features associated with uplift along the Newport –Inglewood structural zone. Older Quaternary units are exposed in these strongly dissected hills, and elevations range from approximately 75 feet to over 400 feet (Department of Conservation 1998). To the east, Holocene alluvium lies upon the regional coastal basin, also known as the Downey Plain. The sediments overlie an erosional surface of late Pleistocene age. To the west of the Rosecrans Hills is an elevated plain underlain by older Quaternary alluvium.

This area contains a drainage basin, with Holocene sediments, that narrows to the south into the Dominguez Channel. Southwest of the Project, Pleistocene dune sand overlies older alluvial deposits. The main drainage courses within the area are the Dominguez Channel, Compton Creek, and Centinela Creek (Department of Conservation 1998). Prior to the development of the area the dominant plant community consist of coastal sage scrub, freshwater and salt marshes, and riparian woodlands. Common flora found within a coastal sage scrub community consist of California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), white sage (*Salvia apiana*), California buckwheat (*Eriogonum fasciculatum*), coast brittle-bush (*Encelia californica*), golden yarrow (*Eriophyllum confertifolium*), and lemonade berry (*Rhus integrifolia*).

3.2 PREHISTORIC SETTING

The most widely used chronological sequence in the Project vicinity distinguishes Early, Middle, and Late periods. It was initially outlined by King (1981) and later revised to include additional radiocarbon dates (King 1990) and to incorporate refinements in our understanding of cultural developments (Arnold 1992).

3.2.1 Early Holocene (9600-5600 cal B.C.)

Archaeological data compiled over the last two decades indicate that initial settlement along the coast of Southern California began at least 12,000 years before present (B.P.). Some of the earliest evidence of human occupation specifically derives from Daisy Cave (CA-SMI-261) on San Miguel Island where radiocarbon samples date the oldest cultural layer at the site between 9600 and 9000 cal B.C. (Erlandson et al. 1996). In the Southern California coastal region, the discovery of fluted projectile points indicates human use of the area possibly as early as possibly 13,000 years ago (Erlandson et al. 1996; Stickel 2010), while sites on San Miguel and Santa Rosa islands have yielded radiocarbon dates older than 10,000 years (Erlandson 1991; Johnson et al. 2001).

However, few known sites date to this earliest period (i.e., pre-10,000 years before present [B.P.]) and relatively few sites have been identified specifically within the Los Angeles Basin that date to the early Holocene. The earliest evidence of human occupation in the Los Angeles region is represented by a set of female human remains that were discovered in association with a handstone in the tar pits of Rancho La Brea in 1914 (Merriam 1914). Possible low population densities may explain the scarcity of sites dating to the early Holocene in the region, but the few known sites do suggest that they tend to be located on elevated landforms, and their presence on the Northern Channel Islands indicates early knowledge and use of marine resources. Diagnostic tools associated with this time period for coastal California have not been identified and cultural assemblages dating to this period have fewer of the grinding implements common to subsequent periods. Research suggests that inhabitants of this period lived in small groups that had a relatively egalitarian social organization and a forager-type land-use strategy (Erlandson 1994; Glassow 1996; Greenwood 1972; Moratto 1984).

3.2.2 Middle Holocene (5600–1650 cal B.C.)

Shortly after 9,000 years ago, sites in the coastal region begin to be characterized by an abundance in milling tools, and the broader subsistence regime, including utilization of plants and seeds, terrestrial animals, and shellfish (Glassow 1996; Glassow et al. 1988; Sutton and Gardner 2010). Increasing populations composed of small, dispersed groups with more generalized tool kits, and a mixed subsistence regime indicating a heavier reliance on shellfish than on fish and terrestrial food sources are also identifiers of the period (Erlandson 1991, 1994, 1997). Population densities appear to have decreased substantially between 6500 and 5000 B.P. throughout the region, and little is known about this period. It has been suggested that the arid conditions associated with the Altithermal (a mid-Holocene period of predominantly warm/dry climate) damaged the environment to the point that only low population densities were sustainable (Glassow 1996; Glassow and Wilcoxon 1988).

After 5000 B.P., population densities increased significantly as conditions became cooler and moister. Between 5000 and 3000 B.P., mortars and pestles became increasingly common throughout the region, suggesting intensified use of acorns (Basgall 1987), as well as the possibility of pulpy roots or tubers (Glassow 1997). Large side-notched and stemmed projectile points became more prevalent, presumably reflecting increased hunting.

Coastal and inland sites of this time period exhibit shallow midden accumulations, suggesting seasonal camping. Based on the distribution of sites assigned to this period, larger groups likely occupied a base camp during a portion of the year, while smaller groups of people used satellite camps to exploit seasonally available floral resources such as grass seeds, berries, tubers, and nuts (cf. Binford 1980; Warren 1968). Site assemblages in coastal Southern California dating to this time contain numerous manos and metates, charmstones, cogged stones, discoids, and some stone balls. A significant

technological change in ground stone is seen at this time with the appearance of mortars and pestles which suggests the adoption of acorn, nut, and seed processing by coastal groups (Sutton and Gardner 2010). The quantity of projectile points also increases during this time, indicating a subsistence shift toward greater reliance on large game. Burial practices also suggest that society was primarily egalitarian (Glassow 1996). Secondary burials among coastal communities continue to be the dominant mortuary regime with a smaller number of flexed inhumations during the Middle Holocene.

3.2.3 Late Holocene (1650 cal. B.C.–cal A.D. 1542)

Cultural complexity appears to have increased around 3000–2500 B.P. Mortuary data research suggests a substantial change in social organization and political complexity during this period (King 1990). According to King, high-status positions became hereditary and individuals began to accumulate wealth and control exchange systems. Arnold (1991, 1992) proposes that this evolutionary step in socioeconomic complexity occurred around 700–800 years ago. Technological innovation as well as a continued increase in cultural complexity marks the period between 2,500 and 800 years ago. Fishing and sea mammal hunting became increasingly important. This corresponds to the development of the *tomol* (plank canoe), single-piece shell fishhooks, and harpoons (Glassow 1996; King 1990). In addition, the bow and arrow was introduced during this period. Utilization of imported obsidian continued to increase during this period as well (Jones et al. 2007).

A number of these new cultural traits have been thought to be attributable to the arrival of Takic speaking people from the southern San Joaquin Valley in the coastal California region (Sutton 2009). Biological, archaeological, and linguistic data indicate that the Takic groups who settled in the Los Angeles Basin were ethnically distinct from the indigenous Hokan-speaking Topanga populations that had inhabited the region just north of the Project. These Takic speakers are believed to be ancestral to the ethnographic Gabrielino groups (Sutton 2009).

Due to the archaeological evidence gathered it is suggested that Hokan-speaking groups were largely replaced or subsumed by the Gabrielino and Chumash by 2000 B.P. (Sutton and Gardner 2010). Several new types of material cultural appear in the archaeological record during the 700 B.C.-1800 A.D. including the presence of Cottonwood series points, birdstone and “spike” effigies, *Olivella* cupped beads, and *Mytilus* shell disk beads. Additionally, the presence of Southwestern pottery, Patayan ceramic figurines, and Hohokam shell bracelets at some of these later sites suggests interaction between populations in Southern California and the Southwest. Additionally, potential changes in trade networks at this time may be evidenced by an increase in the number and size of steatite artifacts, including large vessels, elaborate effigies, and comals in the archaeological record.

3.3 ETHNOGRAPHIC SETTING

The prehistory of California’s coast spans the entire Holocene and may extend back to late Pleistocene times. At the time of contact however, the ethnographic record indicates that the Gabrielino populations inhabited what is now known as the Los Angeles Basin and the Project region. Traditionally, the Gabrielino occupied a large territory, including the entire Los Angeles Basin, the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern part of the Santa Ana Mountains, and much of the middle and lower Santa Ana River reaches. In addition, the Gabrielino also inhabited the islands of Santa Catalina, San Clemente, and San Nicolas. The Gabrielino language was a Cupan language which is part of the Takic language family and part of a larger language group called Uto-Aztecan (Harrington 1981, Kroeber 1925).

It is believed that more than 50 communities with populations that ranged from 50-150 individuals inhabited the traditional territory of the Gabrielino pre-contact. Each autonomous community or village consisted of one or more patrilineages that maintained permanent placement and the maintenance of surrounding hunting and gathering areas, and ceremonial sites as well. The chief, his family, and elite members were typically the epicenter of the village sites. The village members would encompass and surround the homes of the chief and elite with smaller houses/structures. Other common structures found in Gabrielino villages included sweathouses, clearings for ceremonies and playing fields, as well as cemeteries or burial grounds (McCawley 1996:32-33). Management of food and resources was implemented by the chief and food stores were also kept for each family when supply was low.

The material culture of the Gabrielino is elaborate and has been compared to that of the Chumash. Sources including Padre Geronimo Boscana's accounts (Boscana 1846), Hugo Reid's 1852 letters to the *Los Angeles Star* (Reid and Heizer 1968), and Harrington's (Harrington 1981) early twentieth century interviews describe the common use of shell ornaments and beads, baskets, bone tools, flint weapons and drills, fishhooks, mortars and pestles, wooden bowls and paddles, shell spoons, wooden war clubs, and a variety of steatite items (cooking vessels, comals, ornaments) as many of artifact types common in descriptions of Gabrielino culture (Blackburn 1963). Additionally, artesian development has been observed in the artifact assemblage with the implementation of inlaid with shell (using asphalt) and in the steatite items from production centers on Catalina Island.

Trade was an important element of the Gabrielino economy. While the principal Gabrielino-produced commodity—steatite vessels from centers on Catalina Island—originated well outside the defined study region, trade in steatite items was conducted throughout local territory and involved external relations with desert, Southwestern, mountain, and coastal groups beyond Gabrielino borders (Kroeber 1925). Subsistence resources were also supplemented by additional supplies of deer skins, seeds, and acorns from interior groups such as the Serrano (Kroeber 1925:629). Additionally, *Olivella* shell callus beads, manufactured on the northern Channel Islands by the Chumash and their predecessors, were reportedly used quite frequently as a currency or as a status symbol by the Gabrielino and other Southern California groups.

As described in ethnographic sources, the subsistence resource base for the Gabrielino people included native grass seeds, six or more types of acorns, pinyon pine nuts, seeds and berries from various shrubs, fresh greens and shoots, mule deer, pronghorn, mountain sheep, rabbits and rodents, quail and waterfowl, snakes, lizards, insects, and freshwater fish, plus a wide variety of marine fish, shellfish, and sea mammals in coastal zones. Resource exploitation techniques were also described in ethnographic accounts and include rabbit drives in conjunction with seasonal controlled burning of chaparral, and the use of throwing sticks or nets in the capture of waterfowl in the low-lying marshlands. Reed rafts may have been employed for marshland hunting (Priestley 1937).

The first contact between the Europeans and the Gabrielino is thought to have occurred in 1542 when Juan Rodriguez Cabrillo's small fleet arrived at Santa Catalina Island when the Spanish exploration of North America began in the early 1500s, and Juan Rodriguez Cabrillo began exploring the Alta California coastline in 1542. Additionally, contact with the Gabrielino by the Spanish likely occurred again in 1602 with the Sebastián Vizcaíno expedition (McCawley 1996:207) and in 1769 with the Gaspar de Portolá expedition.

Mission San Gabriel was founded on September 8, 1771, but moved to its present location around 1774, due to the second location consisting of more suitable land for agriculture. A second mission, San Fernando, was established within Gabrielino territory in 1797. The assimilation of the Gabrielino people

in to the mission system had gross negative affect on the traditional Gabrielino communities as they were depopulated, had become estranged from many of their traditional cultural practices, their lands, political autonomy, and had even become enslaved and even killed, and suffered from epidemics caused by the introduction of European diseases further reduced the indigenous population. Between 1832 and 1834, as the primary result of secularization of the former mission lands, which was theoretically designed to turn over ownership of some of the lands back to the Native peoples of California, consequently increased the displacement of the Gabrielino (McCawley 1996:208). The establishment of California as a state in 1850 brought further hardships to the Gabrielino, forcing many to eventually settle into smaller groups of Native American and Mexican settlements in places like the Eagle Rock and Highland Park districts of Los Angeles as well as in Pauma, Pala, Temecula, Pechanga, and San Jacinto.

3.4 HISTORICAL SETTING

Spanish exploration of North America in the early 1500s marked some of the first European contact with the indigenous peoples of the area now known as Los Angeles and the Project region. The mission system was established by the Catholic Church and the Spaniards to settle, colonize the Native Americans to utilize their labor to develop the lands, and spread Catholicism from Baja California to what is known today as northern California. The first mission was established in 1769 in present-day San Diego. The mission system's goal was for each mission to be self-sustaining. This required the conversion of indigenous peoples in order to claim lands in the name of Spain and required the Native American population to grow crops, raise livestock, and sustain the mission settlement and provide commodities for trade. The Mission San Gabriel Archangel was the fourth mission established in Alta California in 1771. The Native Americans that traditionally inhabited the region of the Project were assimilated into the Mission San Gabriel.

In addition to establishing the mission system in 1779, Spanish settlement of Alta California also included the establishment of pueblos and presidios. These settlements were used as bases from which to colonize the rest of California. The Spanish also laid out pueblos, or towns along the coast. Providing supplies, animals, and colonists to the Spanish missions and presidios by way of ship was difficult, time-consuming, expensive, and dangerous. Thus, an overland route was necessary to initiate a strong colonizing effort in Alta California. The City of Los Angeles was initially established by a mixed group of settlers, known as the Pobladores, as a pueblo in 1781 (Starr 2005:37). The original site of the plaza was constructed within the Los Angeles River floodplain but was moved to its current location after flooding a quickly became a center for economic, political, and social/cultural activities.

While much of the land in California was under the supervision of the Spanish missions, the Spanish government granted lands to individuals that had served the government (Beedle et al, 2008). Additionally, when Mexico achieved independence from Spain in 1821, the Spanish mission system became subject to the Secularization Act in 1833 where all mission lands became property of the new Mexican government. The former mission lands were divided into smaller land grants and distributed to prominent and wealthy Mexican military officers and families. Between 1835 and 1846, more than 600 land grants in Alta California were recorded with the Mexican government, including the Rancho Palos Verdes and Rancho Sn Pedro Dominguez in the Carson and Wilmington areas which are just south of the Project (Robinson 1948: 12-13; Starr 2005:49-51). As a result of Mexican independence, marine-based trade expanded as California ports were opened to foreign trade.

With the signing of the Treaty of Guadalupe-Hidalgo on February 2, 1848, California formally became an American territory, and two years later, on September 9, 1850, California became the thirty-first state in the Union. Prior to becoming a state, California was divided into 27 counties, and Los Angeles was one of

them. In addition to California being granted statehood, the City of Los Angeles also became incorporated in 1850. In those two years (1848–1850) there was an influx of Americans to California seeking their fortunes, triggered by James Marshall’s 1848 discovery of gold at Sutter’s Mill. However, statehood and an extensive drought in the 1860s eventually ended the prosperity of the ranchos (Beedle et al, 2008).

Yet, before the drought in the 1860s, a Land Commission was established in 1851 and its purpose was to verify the ownership claims of ranchos in California. Oftentimes, ownership of the ranchos was deemed invalid, consequently opening large tracts of land for purchase. Men such as Abel Stearns, James Irvine, and Llewellyn Bixby, who were notable individuals involved in the development of Southern California were able to take advantage of these newly available lands (Starr 2005:104; Cleland 1966:57-59). Although much of the lands changed ownership, the economy of the time remained largely based on agriculture with an emphasis on raising livestock and crops.

To maintain economic independence, Los Angeles was also established as a port of entry in 1853 to compete with the previously established San Francisco port. However, the port was too shallow and consisted of a rocky shoreline. Phineas Banning, David W. Alexander, and Augustus W. Timms lead efforts to reestablish the port at the Port of Los Angeles in San Pedro. Additionally, population increases in the area was brought on with the onset of the Civil War by the U.S. government establishing military posts in the Los Angeles area on lands donated by individuals like Phineas Banning and B.D. Wilson.

Development boom also occurred with the establishment of rail lines in California that made stagecoach companies obsolete. The establishment of a Southern Pacific Railroad and its completed Los Angeles route in 1880 and the Santé Fe Railway in 1886. Banning also successfully lobbied for a branch of the Southern Pacific Railroad to connect the port to Los Angeles. The establishment of these rail lines further boosted Los Angeles’ role in the economic development of Southern California and the United States (Starr 2005:114-118).

The city of Inglewood, where the Project lies, was the first settlement to be established from the formerly known Rancho Agape de la Cantilena in 1888 shortly after a railroad station was constructed in the area. The town consisted of 300 residents at the time and in 1908 the city became incorporated. Inglewood recovered from the nationwide financial crash prior to that in 1905 and established the Poultry Colony in present-day North Inglewood. Additionally, the Inglewood Park Cemetery, located within the northern portion of the Project was developed and the street car line brought both coffins and mourners to the cemetery.

After the earthquake of 1920, many visitors came to observe the damage in Inglewood but stayed due to the pleasant climate. From 1920 to 1925 the city was the fastest growing city in the United States (City of Inglewood, 2018). Until World War II, Inglewood had been a hub for agriculture, but defense industries transformed it into an urban community when industrial activity, stimulated by the war, brought new workers and their families to the city.

During the 1960s and 1970s, the city continued taking on its more metropolitan look and became racially integrated in both residential and business sectors. The city of Inglewood continues to be valued for its access to the major freeways and the now established Los Angeles Airport.

4.0 CULTURAL RESOURCES INVENTORY

A literature review and records search was conducted at the SCCIC, housed at California State University, Fullerton, on June 20, 2018. This inventory effort included the Project area and a half-mile radius around the Project area, collectively termed the Project study area. The objective of this records search was to identify prehistoric or historical cultural resources that have been previously recorded within the study area during prior cultural resource investigations.

4.1 PREVIOUS CULTURAL RESOURCE INVESTIGATIONS

The records search results indicate that no less than 21 previous investigations have been conducted and documented within the Project study area since 1984 (Table 4-1). None of these studies appear to include the Project area. The records search also indicated that no prehistoric or historical archaeological resources have been recorded within the Project area or within one half mile of the Project area. However, six previously recorded built-environment cultural resources were identified within a half-mile radius of the Project. As a result, none of the Project area has been previously investigated by these studies.

Table 4-1
Previous Cultural Studies within the Study Area

Report No.	Date	Author(s)	Title
LA-02904	1993	Stickel, Gary E.	Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project
LA-03289	1990	Davis, Gene	Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation
LA-04385	1984	Scientific Resource Surveys, Inc.	Cultural Resource Survey Report on the Arbor Vitae Street Improvement Project
LA-04836	2000	Science Applications International Corporation	Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project
LA-06012	2001	Love, Bruce, Bai "Tom" Tang, and Mariam Dahdul	The Grevillea Mall Park City of Inglewood Los Angeles County, California
LA-06035	2002	Duke, Curt	Cultural Resource Assessment at & T Wireless Services Facility No. 04111 Los Angeles County, California
LA-07402	2004	Bonner, Wayne H.	Records Search and Site Visit for Sprint Telecommunications Facility Candidate La60xc408d (Florence Locust R1) 405 East Florence Avenue, Inglewood, Los Angeles County, California
LA-07697	2005	Wlodarski, Robert J.	Records Search Results for Cingular Telecommunications Wireless Site EI0118-01 (car Wash) Located at 10200 Hawthorne Boulevard, City of Inglewood, County of Los Angeles, California 90303
LA-07869	2006	Bonner, Wayne H.	Cultural Resources Records Search Results and Site Visit for Sprint Nextel Candidate Ca 7731d (la Colima), 405 East Florence Avenue, Inglewood, Los Angeles County, California
LA-08255	2006	Arrington, Cindy and Nancy Sikes	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California: Volumes I and II
LA-09513	2008	Bonner, Wayne H. and Kathleen Crawford	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA23650D (Inglewood Electric), 923 South Prairie Avenue, Inglewood, Los Angeles County, California
LA-09516	2008	Bonner, Wayne H.	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA03329E (Walgreens La Brea), 230 North La Brea Avenue, Inglewood, Los Angeles County, California
LA-10567	2005	Hogan, Michael, Bai "Tom" Tang, Josh Smallwood, Laura	Identification and Evaluation of Historic Properties - West Basin Municipal Water District Harbor- South Bay Water Recycling Project Proposed Project Laterals

Table 4-1
Previous Cultural Studies within the Study Area

Report No.	Date	Author(s)	Title
		Hensley Shaker, and Casey Tibbitt	
LA-10685	2010	Bonner, Wayne and Kathleen Crawford	Cultural Resources Records Search, Site Visit Results, and Direct APE Historic Architectural Assessment for Clearwire Candidate CA-LOS2089/CA6588, 336 East Hillcrest Boulevard, Inglewood, Los Angeles, California
LA-11150	2003	Maxwell, Pamela	West Basin Municipal Water District Harbor/ South Bay Water Recycling Project
LA-11174	1998	Kadara, Kayode	Inglewood Main Post Office, Inglewood, Los Angeles County
LA-11396	2011	Loftus, Shannon	Cultural Resource Records Search and Site Survey AT&T Site LA0021, Inglewood Cemetery, 724 East Manchester Boulevard, Inglewood, Los Angeles County, California 90301 CASPR# 3551015375
LA-11414	2011	Loftus, Shannon	Historic Architectural Resource Inventory and Assessment, AT&T Site LA0021, Inglewood Cemetery, 724 East Manchester Boulevard, Inglewood, Los Angeles County, California 90301 CASPR #3551015375
LA-11974	2012	Morell, Karl	Abandonment Exemption, BNSF Railway Company, Milepost 7.95 to Milepost 13.25, Los Angeles, Los Angeles County, CA
LA-12189	2013	Bonner, Wayne and Crawford, Kathleen	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02636A (LA636 Medical Building) 336 East Hillcrest Boulevard, Inglewood, California
LA-12352	2012	Rendon, Richard	Federal Land and Water Conservation Fund Program under the National Park Service Edward Vincent Park Multi-Purpose Field Rehabilitation Project, City of Inglewood

4.2 CULTURAL RESOURCES REPORTED WITHIN THE STUDY AREA

The records search indicated that no prehistoric or historical archaeological resources have been recorded within the Project area or within one half mile of the Project area. However, six previously recorded built-environment cultural resources were identified within a half-mile radius of the Project. One of these resources, 19-189809, is a multi-story commercial building that is located immediately adjacent to the Project area and may be directly or indirectly impacted by the Project. In addition, five buildings/structures, located immediately adjacent to the Project area, are listed on the Directory of Historic Properties Data File. These resources may be directly or indirectly impacted by the Project as well. PaleoWest understands that a separate built-environment resource study is being prepared for this Project. As such, these resources will not be considered further during the cultural resource study conducted by PaleoWest.

4.3 ADDITIONAL SOURCES

Additional sources consulted during the cultural resource literature review and records search include the National Register of Historic Places, the Office of Historic Preservation Archaeological Determinations of Eligibility, and the Office of Historic Preservation Directory of Properties in the Historic Property Data File. There are no listed archaeological resources recorded within the Project area or within one half mile of the Project area.

4.4 NATIVE AMERICAN COORDINATION

PaleoWest contacted the NAHC, as part of the cultural resource assessment, on June 15, 2018, for a review of the SLF. The objective of the SLF search was to determine if the NAHC had any knowledge of Native American cultural resources (e.g., traditional use or gathering area, place of religious or sacred activity, etc.) within the immediate vicinity of the Project area. The NAHC responded on June 19, 2018, stating that the SLF was completed with negative results. However, the NAHC did state that the absence of specific site information in the SLF does not indicate the absence of Native American cultural resources (Appendix A). As such, the NAHC recommended that five Native American individuals and/or tribal groups be contacted to elicit information regarding cultural resource issues related to the proposed Project. PaleoWest sent outreach letters to the recommended tribal groups on July 27, 2018 after conducting the pedestrian survey of the Project area on July 20, 2018. These letters were followed up by phone calls on August 29, 2018.

To date responses have been received from three of the five contacted individuals/tribal groups. Mr. Andy Salas of the Gabrieleno Band of Mission Indians- Kizh Nation requested that an email be sent with the lead agency's contact information so that he might contact the lead agency directly with his comments regarding the Project. Mr. Salas was informed that the City would be conducting Assembly Bill 52 consultation efforts at a later date and, at that time, the City would be contacting him directly to provide his comments. Mr. Anthony Morales of the Gabrieleno/Tongva San Gabriel Band of Mission Indians stated that the Project lies within a highly sensitive cultural area and that any trenching or excavation for structures such as support columns would likely require archaeological and Native American monitoring. Additionally, Mr. Morales recommended monitoring and requests consultation for the Project. Lastly, Mr. Robert Dorame of the Gabrielino Tongva Indians of California Tribal Council requested that the original email be resent and that he would like to consult with other Tribal Members before offering official comments and recommendations regarding the Project. The email was resent to Mr. Dorame on August 29, 2018.

5.0 FIELD INVESTIGATION

5.1 FIELD METHODS

A windshield/reconnaissance survey of the Project area was conducted by PaleoWest archaeologist Oliver Hegge on July 20, 2018. The purpose of the survey was to observe and note the conditions of the Project area including the extent of the hardscape, the overall degree of ground disturbance, and the character and nature of the Project area. The surveyor drove the length of the APM alignment to identify any areas of open ground surface. He carefully inspected any areas within the Project area likely to contain or exhibit archaeologically or historically sensitive cultural resources and inspected to ensure that if any visible, potentially significant archaeological resources were discovered that they were documented.

The Project area was recorded with digital photographs for use in the report. Photographs included general views of the topography and vegetation density, and other relevant images. A photo log was maintained to include, at a minimum, photo number, date, orientation, photo description, and comments.

One of the primary goals of the reconnaissance survey was to identify historical and prehistoric site indicators. Examples of historical indicators include fence lines, ditches, standing buildings, objects or structures such as sheds, or concentrations of materials at least 45 years in age, such as domestic refuse (e.g., glass bottles, ceramics, toys, or buttons), refuse from other pursuits such as agriculture (e.g., metal tanks, farm machinery parts, horse shoes) or structural materials (e.g., nails, glass window panes, corrugated metal, wood posts or planks, metal pipes and fittings, railroad spurs, etc.). Examples of prehistoric site indicators include areas of darker soil with concentrations of ash, charcoal, animal bone (burned or unburned), shell, flaked stone, ground stone, pottery, or human bone.

5.2 FIELD RESULTS

The windshield/reconnaissance survey revealed that the majority of the Project area includes residential or commercial structures with associated landscaping and hardscaping. As such, the ground surface within the Project area is almost entirely obscured by hardscape that includes buildings, paved driveways, curbs and sidewalks, paved roadways, and parking lots. The limited small portions of the Project area that lack hardscape are characterized by landscaped lawns and yards associated with residences and businesses as well as what appear to be two or three vacant lots. Due to the lack of ground visibility and extensive disturbance from the built environment, field documentation consisted of general observations and digital photography.

No historical or prehistoric archaeological resources were observed within the Project area during the windshield/reconnaissance survey. However, six previously recorded built-environment cultural resources were identified within a half-mile radius of the Project during the records search. These resources may be directly or indirectly impacted by the Project; however, are not discussed in this study.



Figure 5-1 Market and Regent Street intersection, view to the south



Figure 5-2 Kelso and Prairie Avenue intersection, view to the south



Figure 5-3 Overview of proposed Hollywood Park stop, view to the south



Figure 5-4 Overview of proposed facility site, view to the northwest

6.0 MANAGEMENT RECOMMENDATIONS

The cultural resource records search and field visit did not result in identifying any prehistoric or historical archaeological resources within the Project area. However, the ground visibility within the Project area was very poor; the APM alignment as well as the MSF and ITF locations are almost entirely hardscaped. The built nature of the Project area indicates a high degree of disturbance suggesting the likelihood of encountering intact archaeological deposits near the surface of the Project area to be very low. The Gabrieleno Band of Mission Indians- Kizh Nation and Gabrieleno/Tongva San Gabriel Band of Mission Indians both requested to consult the City on the Project. Additionally, the Gabrieleno/Tongva San Gabriel Band of Mission Indians indicated a high sensitivity for cultural resources in the Project and requested cultural and Native American monitoring be conducted for the proposed Project. However, as previously stated, the high degree of urban development disturbance suggests the likelihood of encountering intact archaeological resources is low. PaleoWest does not recommend any additional cultural resource management for the proposed Project.

In the event that potentially significant archaeological materials are encountered during Project-related ground-disturbing activities, all work should be halted in the vicinity of the archaeological discovery until a qualified archaeologist can visit the site of discovery and assess the significance of the archaeological resource. In addition, Health and Safety Code 7050.5, CEQA 15064.5(e), and Public Resources Code 5097.98 mandate the process to be followed in the unlikely event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Finally, should additional actions be proposed outside the currently defined Project area that have the potential for additional subsurface disturbance, further cultural resource management may be required.

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Appendix A. Native American Coordination

NATIVE AMERICAN HERITAGE COMMISSION

Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691
(916) 373-3710



June 19, 2018

Robbie Thomas
PaleoWest Archaeology

Sent by E-mail: rthomas@paleowest.com

RE: Proposed Inglewood Transit Interconnect (18-195) Project, City of Inglewood; Inglewood
USGS Quadrangle, Los Angeles County, California

Dear Ms. Thomas:

A record search of the Native American Heritage Commission (NAHC) *Sacred Lands File* was completed for the area of potential project effect (APE) referenced above with negative results. Please note that the absence of specific site information in the *Sacred Lands File* does not indicate the absence of Native American cultural resources in any APE.

Attached is a list of tribes culturally affiliated to the project area. I suggest you contact all of the listed Tribes. If they cannot supply information, they might recommend others with specific knowledge. The list should provide a starting place to locate areas of potential adverse impact within the APE. By contacting all those on the list, your organization will be better able to respond to claims of failure to consult. If a response has not been received within two weeks of notification, the NAHC requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these individuals or groups, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact via email: gayle.totton@nahc.ca.gov.

Sincerely,

A handwritten signature in cursive script that reads "Gayle Totton".

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714

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**Native American Heritage Commission
Native American Contact List
Los Angeles County
6/19/2018**

***Gabrieleno Band of Mission
Indians - Kizh Nation***

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Gabrieleno

***Gabrieleno/Tongva San Gabriel
Band of Mission Indians***

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Gabrieleno

Gabrielino /Tongva Nation

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Gabrielino

***Gabrielino Tongva Indians of
California Tribal Council***

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Gabrielino

Gabrielino-Tongva Tribe

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roadkingcharles@aol.com

Gabrielino

This list is current only as of the date of this document. Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Inglewood Transit Interconnect Project, Los Angeles County.

July 27, 2018

Andrew Salas, Chairperson
Gabrielino Band of Mission Indians – Kizh Nation
P.O. Box 393
Covina, CA 91723
Transmitted via admin@gabrielenoindians.org

Re: Cultural Resource Investigation for the Inglewood Connector Project, Inglewood, Los Angeles County, California

Dear Mr. Salas,

On behalf of Meridian Consultants, PaleoWest Archaeology (PaleoWest) is conducting a cultural resource investigation, in compliance with the California Environmental Quality Act (CEQA), for the proposed Inglewood Connector Project (Project) within the city of Inglewood, in Los Angeles County, California. The proposed Project involves development of an elevated Automated People Mover along an aerial alignment that will provide service to Downtown Inglewood, the Forum, the Hollywood Park Development/NFL Stadium, and the Basketball and Entertainment Center. The Project area is located on the Inglewood, Calif. 7.5' USGS quadrangle map, within Sections 28, 33, 34 (Civil Colonies land grant) in T2S/R14W (see attached map).

A cultural resource literature review and records search conducted at the South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton, indicates that no less than 21 cultural resource studies have been conducted within a one-half-mile radius of the Project area. Five of these studies appear to include portions or all of the Project area. The records search also indicated that no prehistoric or historic archaeological resources have been identified within a one-half-mile radius of the Project area. PaleoWest conducted a reconnaissance survey of the Project area and did not identify any archaeological resources as a result of the survey.

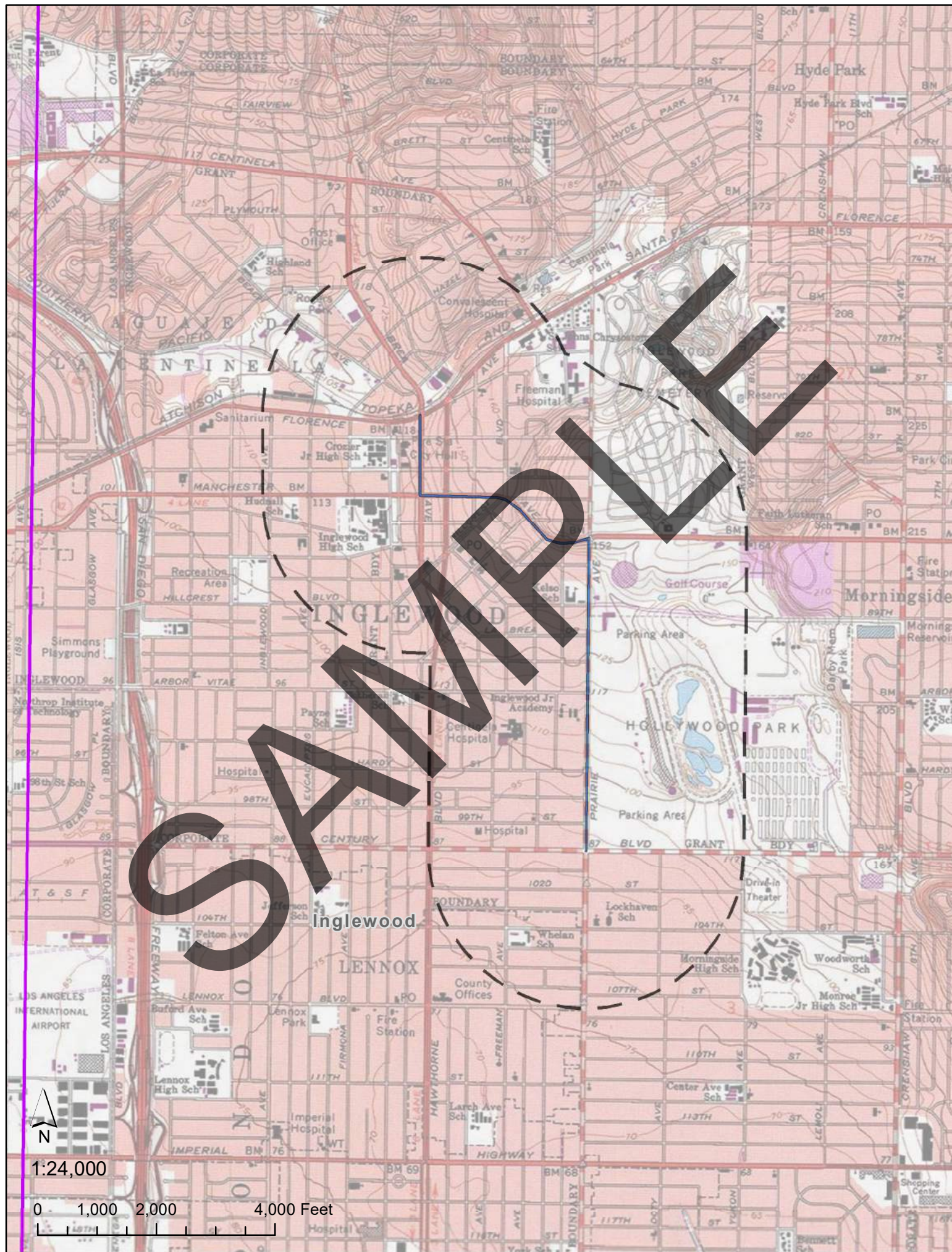
As part of the cultural resource investigation of the Project area, PaleoWest requested a search of the Native American Heritage Commission's (NAHC's) *Sacred Lands File* on June 15, 2018. The NAHC responded on June 19, 2018 indicating that no Native American cultural resources were identified within the Project area. However, should your records show that cultural properties exist within or near the Project area shown on the enclosed map, please contact me at (626) 408-8006 or via e-mail at rthomas@paleowest.com. I will follow-up phone call or email if I do not hear from you.

Your comments are very important to us, and to the successful completion of this Project. I look forward to hearing from you in the near future. Thank you, in advance, for taking the time to review this request.

Respectfully yours,



Roberta Thomas, M.A., RPA
Senior Archaeologist
PaleoWest Archaeology



Native American Contact/Response Matrix			
Recommended Contacts (Name and Tribal Affiliation)	Initial Contact	Follow up Attempts	Comments/Notes
Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation	Letter/email dated July 27, 2018	Phone call, August 29, 2018	Mr. Salas requested the lead agency's contact information so that he send his comments regarding the Project directly to the lead agency. Mr. Salas was informed that the lead agency would be conducting formal AB 52 consultation at a later date and would reach out to him directly for him comments.
Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians	Letter/email dated July 27, 2018	Phone call, August 29, 2018	Mr. Morales stated that the Project lies within a highly culturally sensitive area and that any trenching or excavation for structures such as support columns may require archaeological and Native American monitoring. He stated that he recommends monitoring and requests consultation.
Sandonne Goad, Chairperson, Gabrielino/Tongva Nation	Letter/email dated July 27, 2018	Phone call, August 29, 2018	Left a message for Ms. Goad.
Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal	Letter/email dated July 27, 2018	Phone call, August 29, 2018	Mr. Dorame requested that the original email be resent. Email resent on August 29, 2018. Mr. Dorame stated that he would like to consult with other Tribal Members before offering official comments and recommendations.
Charles Alvarez, Chairperson, Gabrielino-Tongva Tribe	Letter/email dated July 27, 2018	Phone call, August 29, 2018	Left a message for Mr. Alvarez.

Meeting Summary – AB52 Tribal Consultation with Gabrieleno Band of Mission Indians - Kizh Nation and the City of Inglewood for the Inglewood Transit Connector Project

Date of Meeting: February 6, 2019

Participants:

Gabrieleno Band of Mission Indians - Kizh Nation: Tribal Chairman Andrew Salas, Tribal Administrator Matt Salas, Administrative Specialist Brandy Salas

City of Inglewood: Mindy Wilcox, AICP, Planning Manager

Trifiletti Consulting: Omar Pulido, Senior Project Director, Perla Solis, Planning Associate

Meridian Consultants: Joe Gibson, Partner, Dillan Murray, Staff Planner

PaleoWest Archaeology: Vanessa Mirro, Vice President, Robbie Thomas, Senior Archaeologist/Project Manager

A conference call was held on February 6, 2019 at 4:30 PM with the above participants to initiate consultation under AB 52 between the City of Inglewood, Lead Agency for the Inglewood Transit Connector Project, and the Gabrieleno Band of Mission Indians - Kizh Nation.

The call was the result of the Gabrieleno Band of Mission Indians - Kizh Nation request for such a consultation for the ITC project as they noted in their August 8, 2018 email to the City in response to the Notice of Preparation (NOP). In that email, the Tribe indicated that if there would be any ground disturbance activity regarding the project, they would like to consult.

Ms. Wilcox initiated the call by provided a brief overview of the Project including the types of ground disturbance activities that could occur. These would likely include some large diameter boreholes to be drilled to allow for column placement along the ITC guideway and to support the maintenance and storage facility (MSF). The boreholes would range from 6 feet to 12 feet in diameter and extend up to 80 feet deep. No other ground disturbing activities are anticipated.

Ms. Wilcox also note that the City, through its consultants, has completed record searches to date to identify existing archaeological records, and that that information would be made available to the Tribe if the requested.

Chairman Salas provided an overview of the Tribes experience with other projects in the Los Angeles Basin including work that the Tribe has completed LA Metro and other transit efforts. As part of the other project, he noted that artifacts had been unearthed as part of ground disturbing activities. Chairman Salas noted that many of these discoveries were the result many of the transit routes following historic roads and routes in the LA Basin, He noted that the existing networks of major roadways followed historic and prehistoric trading routes in the area that were used by Native American tribes that resided in the area and along the west coast.

Meeting Summary

Re: AB52 Tribal Consultation with Gabrieleno Band of Mission Indians - Kizh Nation and the City of Inglewood for the Inglewood Transit Connector Project

February 6, 2019

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Chairman Salas noted that significant among these historic and pre-historic trading routes were those that Rancho Sausal Redondo (translated as “round clump of willows”), Rancho Ajuaje de la Centinela (the name means "Sentinel of Waters" in Spanish, and refers to the artesian water in the area exemplified by Centinela Springs.¹ Rancho Ajuaje de la Centinela included parts of present-day Westchester and Inglewood), and Rancho Centinela, which included the present-day cities of El Segundo, Gardena, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Manhattan Beach, and Playa del Rey.

The natural steams of the area near the La Brea tar pits were used to collect materials that would line baskets and boats. The traditional landscape, which including the tribal trading routes, have numerous burial sites that have been discovered as part of other projects and excavations in the area. The tribal traditions were to bury individuals who died on the trading route at the location of their passing.

The Chairman noted, that the location of the proposed ITC project is in an area that is known for these historic and pre-historic trading routes. It was added that there are known streams to the east and trading routes to the west. Because of this, the Chairman noted that the Tribe has concerns that Native American artifacts could be unearthed as part of the drilling and digging activities during construction of the ITC project.

Tribal Administrator Matt Salas indicated that the Tribe would share information including maps of the area that depict the historic and pre-historic trading routes. In addition, they would share suggested mitigation measures that may be considered to assist in reducing impacts to any artifacts that could be unearthed during ground disturbing activities. The materials are not included in this Memo pursuant to PRC section 21080.3.1 which states 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.

The conference concluded about 5:30 PM with the City indicating that they were anxious to receive and review the materials that the Tribe would provide. Upon review, the City would contact the Tribe for a follow up discussion.

¹ Centinela Springs was registered as Historical Landmark in October 9, 1939 and is located in the City of Inglewood. It's description on the Office of Historic Preservation (OHP) website notes that bubbling springs once flowed here from their source in a deep water basin that 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.



Gabrieleno Band of Mission Indians – Kizh Nation

Protection of Tribal Cultural Resources (TCRs)

Most Important Things for Agencies to Know About AB52:

- An EIR, MND, or ND can not be certified until AB-52 tribal consultation has concluded.
- Agreed mitigation measures with the tribe, **MUST** be recommended for inclusion in the environmental document.
- Signature confirming acceptance of these mitigation measures recommended by our Tribal Government is required within 14 days of receipt to conclude AB52 consultation.

Tribal Cultural Resources Mitigation Measures within Kizh Nation Tribal Territory:

Note: To avoid compliance issues with the following laws, all Native American Monitoring shall be conducted by a documented lineal descendant from the ancestral Tribe of the project area (NAGPRA Law 10.14)

- The Native American Graves Protection and Repatriation Act (NAGPRA), Public Law-101-601, 25 U.S.C. 3001 et seq., 104 Stat. 3048.
- CEQA Guidelines Section 15064.5, PRC 5097.98 (d)(1).
- The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).

If you are receiving these measures, The Gabrieleno Band of Mission Indians Kizh -Nation are the direct lineal descendants of your project area. The Kizh Nation ONLY responds and consults on projects within their ANCESTRAL tribal territory. Therefore, to remain in compliance with above referenced laws and to enable our Tribe with the ability to protect and preserve our last remaining and irreplaceable Tribal Cultural Resources, it is recommended that the project applicant retain a qualified professional tribal monitor/consultant from the Gabrieleno Band of Mission Indians Kizh -Nation. The Kizh Nation possesses Tribal archives including documented historical information as well as multiple members who possess unique knowledge derived from oral tradition passed down through generations of the Tribe in order to provide the expertise needed to identify whether a project is located within a culturally sensitive area given its proximity to village areas, commerce areas, recreation areas, ceremonial areas, and burial locations.

Native American Heritage Commission (NAHC) Guidelines for Native American Monitors/Consultants

(approved 9/13/05): By acting as a liaison between Native American, archaeologist, developers, contactors and public agency, a Native American monitor/consultant can ensure that cultural features are treated appropriately from the Native American point of view. This can help others involved in a project to coordinate mitigation measures. These guidelines are intended to provide prospective monitors/consultants, and people who hire monitors/consultants, with an understanding of the scope and extent of knowledge that should be expected.

Mitigation Guidelines for Tribal Cultural Resources (TCRs): CEQA now defines TCRs as an independent element separate from archaeological resources. Environmental documents shall address a separate Tribal Cultural Resources section that includes a thorough analysis of the impacts to only TCRs and includes separate and independent mitigation measures created with tribal input under AB-52 consultations. Therefore, all agreements, mitigation, and conditions of approval regarding TCRs shall be handled solely with the Tribal Government and conversely all agreements, mitigation, and conditions of approval regarding Archaeological Resources shall be handled by an Archaeological resource company.



MITIGATION MEASURES

Retain a Native American Monitor/Consultant: The Project Applicant shall be required to retain and compensate for the services of a Tribal monitor/consultant who is both approved by the Gabrieleño Band of Mission Indians-Kizh Nation Tribal Government and is listed under the NAHC's Tribal Contact list for the area of the project location. This list is provided by the NAHC. The monitor/consultant will only be present on-site during the construction phases that involve ground disturbing activities. Ground disturbing activities are defined by the Gabrieleño Band of Mission Indians-Kizh Nation as activities that may include, but are not limited to, pavement removal, pot-holing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor/consultant will complete daily monitoring logs that will provide descriptions of the day's activities, including construction activities, locations, soil, and any cultural materials identified. The on-site monitoring shall end when the project site grading and excavation activities are completed, or when the Tribal Representatives and monitor/consultant have indicated that the site has a low potential for impacting Tribal Cultural Resources.

Unanticipated Discovery of Tribal Cultural and Archaeological Resources: Upon discovery of any archaeological resources, cease construction activities in the immediate vicinity of the find until the find can be assessed. All archaeological resources unearthed by project construction activities shall be evaluated by the qualified archaeologist and tribal monitor/consultant approved by the Gabrieleño Band of Mission Indians-Kizh Nation. If the resources are Native American in origin, the Gabrieleño Band of Mission Indians-Kizh Nation shall coordinate with the landowner regarding treatment and curation of these resources. Typically, the Tribe will request reburial or preservation for educational purposes. Work may continue on other parts of the project while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5 [f]). If a resource is determined by the qualified archaeologist to constitute a "historical resource" or "unique archaeological resource", time allotment and funding sufficient to allow for implementation of avoidance measures, or appropriate mitigation, must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and

Public Resources Code Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be offered to a local school or historical society in the area for educational purposes.

Unanticipated Discovery of Human Remains and Associated Funerary Objects:

Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated according to this statute. Health and Safety Code 7050.5 dictates that any discoveries of human skeletal material shall be immediately reported to the County Coroner and excavation halted until the coroner has determined the nature of the remains. If the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC) and PRC 5097.98 shall be followed.



Resource Assessment & Continuation of Work Protocol:

Upon discovery, the tribal and/or archaeological monitor/consultant/consultant will immediately divert work at minimum of 150 feet and place an exclusion zone around the burial. The monitor/consultant(s) will then notify the Tribe, the qualified lead archaeologist, and the construction manager who will call the coroner. Work will continue to be diverted while the coroner determines whether the remains are Native American. The discovery is to be kept confidential and secure to prevent any further disturbance. If the finds are determined to be Native American, the coroner will notify the NAHC as mandated by state law who will then appoint a Most Likely Descendent (MLD).

Kizh-Gabrieleno Procedures for burials and funerary remains:

If the Gabrieleno Band of Mission Indians – Kizh Nation is designated MLD, the following treatment measures shall be implemented. To the Tribe, the term “human remains” encompasses more than human bones. In ancient as well as historic times, Tribal Traditions included, but were not limited to, the burial of funerary objects with the deceased, and the ceremonial burning of human remains. These remains are to be treated in the same manner as bone fragments that remain intact. Associated funerary objects are objects that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed with individual human remains either at the time of death or later; other items made exclusively for burial purposes or to contain human remains can also be considered as associated funerary objects.

Treatment Measures:

Prior to the continuation of ground disturbing activities, the land owner shall arrange a designated site location within the footprint of the project for the respectful reburial of the human remains and/or ceremonial objects. In the case where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate that can be moved by heavy equipment placed over the excavation opening to protect the remains. If this type of steel plate is not available, a 24-hour guard should be posted outside of working hours. The Tribe will make every effort to recommend diverting the project and keeping the remains in situ and protected. If the project cannot be diverted, it may be determined that burials will be removed. The Tribe will work closely with the qualified archaeologist to ensure that the excavation is treated carefully, ethically and respectfully. If data recovery is approved by the Tribe, documentation shall be taken which includes at a minimum detailed descriptive notes and sketches. Additional types of documentation shall be approved by the Tribe for data recovery purposes. Cremations will either be removed in bulk or by means as necessary to ensure completely recovery of all material. If the discovery of human remains includes four or more burials, the location is considered a cemetery and a separate treatment plan shall be created. Once complete, a final report of all activities is to be submitted to the Tribe and the NAHC. The Tribe does NOT authorize any scientific study or the utilization of any invasive diagnostics on human remains.

Each occurrence of human remains and associated funerary objects will be stored using opaque cloth bags. All human remains, funerary objects, sacred objects and objects of cultural patrimony will be removed to a secure container on site if possible. These items should be retained and reburied within six months of recovery. The site of reburial/repatriation shall be on the project site but at a location agreed upon between the Tribe and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.



Professional Standards: Archaeological and Native American monitoring and excavation during construction projects will be consistent with current professional standards. All feasible care to avoid any unnecessary disturbance, physical modification, or separation of human remains and associated funerary objects shall be taken. Principal personnel must meet the Secretary of Interior standards for archaeology and have a minimum of 10 years of experience as a principal investigator working with Native American archaeological sites in southern California. The Qualified Archaeologist shall ensure that all other personnel are appropriately trained and qualified.

Acceptance of Tribal Government Recommended Mitigation Measures:

By _____
Lead Agency Representative Signature

Date: _____

Revised: August 2018



Attachment A

Kizh Nation Ancestral Tribal Territory extended along the coast from Malibu Creek in Los Angeles County down to Aliso Creek in Orange County and encompassed the Channel Islands of Catalina (Pimugna), San Nicolas (Haraasnga), and San Clemente (Kiinkenga). Our inland border was the San Gabriel Mountains (Hidakupa) and eastwardly our territory extended to parts of San Bernardino (Waatsngna), Orange, and Riverside counties.

