

4.13 TRIBAL CULTURAL RESOURCES

4.13.1 INTRODUCTION

This section of the Draft Environmental Impact Report (Draft EIR) evaluates the potential for implementation of the proposed Inglewood Transit Connector Project (proposed Project) to impact tribal cultural resources within the footprint of the proposed Project and in the immediate surrounding area.

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 California Register of Historic Places (CRHR) or included in a local register of historical resources, or a resource determined by the lead California Environmental Quality Act (CEQA) agency, in its discretion and supported by substantial evidence, to be significant and eligible for listing on the CRHR. Such resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements.

Information from the following study of the proposed Project is incorporated into this section:

- *Cultural Resource Investigation*, Roberta Thomas, RPA, and Gena Granger, M.A., RPA, PaleoWest Archaeology, December 12, 2018 (included as **Appendix 4.4.1** of this Draft EIR).

Information regarding the AB 52 process is provided in the following appendices:

- AB 52 Summary of the AB 52 Consultation Process for the Inglewood Transit Connector Project, Meridian Consultants LLC, December 6, 2018 (included as **Appendix 4.13.1**); and
- *AB 52 Meeting Summary*, Meridian Consultants LLC, February 6, 2019 (included as **Appendix 4.13.2**).

Please see **Section 8.0** for a glossary of terms, definitions, and acronyms used in this Draft EIR.

Prior to the preparation of this Draft EIR, an Initial Study (included as **Appendix 2.0.2** of this Draft EIR) was prepared using the CEQA Guidelines Environmental Checklist Form to assess potential environmental impacts resulting from construction and operation of the proposed project associated with tribal cultural resources

According to the requirements of Public Resources Code (PRC) Section 21080.3.1 (Assembly Bill [AB] 52)¹, 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

¹ State of California, Public Resources Code Section 21080.3.1.

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 Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

4.13.2 TRIBAL CONSULTATION

A part of the AB 52 process, the City has been notified by tribes that may have interest in tribal cultural resources in the region. Four tribes had previously 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 Gabrieleno/Tongva San Gabriel Band of Mission Indians. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation was identified as a relevant party.

In accordance with AB 52, the City sent notification letters on July 31, 2018, notifying the four tribes identified above that the City was planning the proposed Project. Additionally, the Gabrieleno Band of Mission Indians–Kizh Nation (Tribe) was mailed a Notice of Preparation of this Draft EIR. 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 of December 6, 2018, the City had received only one response requesting consultation via email from Brandy Salas, Administrative Specialist for the Tribe.² The Tribe indicated that if there were to be any ground disturbance activity associated with the proposed Project, they would like to consult.

Consultation between the Tribe and the City, and the City’s consultant team was initiated via conference call on February 6, 2019.³ As part of the consultation, the City noted that it completed record searches to date to identify existing archaeological records, and that that information would be made available to the Tribe if the requested. A summary of the AB 52 meeting with the Tribe is provided in **Appendix 4.13.2**.

Members of the Tribe provided an overview of the Tribe’s experience with other projects in the Los Angeles Basin, including work that the Tribe has completed for LA Metro and other transit efforts. As part of the other projects, the Tribe noted that artifacts had been unearthed as part of ground disturbing activities. The Tribe also noted that many of these discoveries were the result of many of the transit routes following historic roads and routes in the Los Angeles Basin. They 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.

² See **Appendix 4.13.1**, *AB 52 Tribal Notification and Outreach Summary Memorandum*.

³ *AB 52 AB 52 Consultation Summary*, Meridian Consultants LLC, February 6, 2019. **Appendix 4.13-2**.

As a result of consultation, the Tribe shared information including maps of the area that depict the historic and prehistoric trading routes, and suggested mitigation measures that may be considered to assist in reducing potential impacts from the proposed Project to any cultural resources that could be unearthed during ground disturbing activities.

4.13.3 METHODOLOGY

4.13.3.1 Tribal Cultural Resources

The analysis of impacts to tribal cultural resources is based on the consultation between the City and the Tribe, information provided by the Tribe and a *Cultural Resource Investigation Report* (see **Appendix 4.4.1**). The potential for the proposed Project to contain tribal cultural resources (TCRs). As previously discussed, during the AB 52 consultation (see **Appendix 4.13.2**), information on tribal resources was provided by the Tribe; this was supplemented by the cultural resource records search (i.e., presence and proximity of known resources), the Sacred Lands File (SLF) search, land use history research, subsurface geological conditions, and the proposed excavation parameters for the proposed Project.

4.13.3.2 Archival Research

A records search for the proposed Project 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 and is provided as part of the *Cultural Resource Investigation* (see **Appendix 4.4.1**). The records search included a review of all recorded historic, prehistoric archaeological resources and previous studies within the footprint and a 0.5-mile radius of the proposed Project.

The records search results indicate that 21 previous studies have been conducted within a 0.5-mile radius of the proposed Project; however, none of these studies appear to include the guideway, stations and support facilities (MSF and TPSSs).⁴ The records search results indicate that no archaeological or historical archaeological resources have been previously recorded within the proposed Project or within one half mile.⁵

The California Native American Heritage Commission (NAHC) maintains a confidential SLF which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on June 15, 2018 to request a search of the SLF of the area of the proposed Project. Results of the SLF search indicate that there are no known Native American cultural resources within the immediate area of the proposed Project.

4 See **Appendix 4.4.1** of this Draft EIR.

5 See **Appendix 4.4.1** of this Draft EIR.

4.13.3.3 Human Remains

The analysis of impacts to human remains is based on the consultation between the City and the Tribe and the *Cultural Resource Investigation* (see **Appendix 4.4.1**). The potential for the proposed Project to contain human remains was assessed based on the cultural resource records search (i.e., presence and proximity of known resources), the SLF search, land use history research, subsurface geological conditions, and the proposed excavation parameters.

4.13.3.4 Windshield Survey

A windshield/reconnaissance survey of the proposed Project's guideway, stations and support facility sites was conducted on July 20, 2018.⁶ No prehistoric or historic archaeological resources were identified during the survey. However, ground visibility in the area was very poor due the high degree of urban development disturbance.

4.13.3.5 Additional Sources

Additional sources consulted during the cultural resource 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 historical resources recorded within one half mile of the proposed Project.⁷

4.13.4 REGULATORY FRAMEWORK

Cultural historic resources are regulated at the federal, State, and local levels of government. Federal laws establish broad frameworks for cultural resource identification and protection, while State and local jurisdictions actively identify, document, and protect resources within their boundaries. The National Historic Preservation Act of 1966,⁸ the California Register of Historical Resources, the California Public Resources Code,⁹ and CEQA are the primary federal and State laws regulating the preservation of cultural historic resources of national and State significance.

⁶ See **Appendix 4.4.1** of this Draft EIR.

⁷ See **Appendix 4.4.1** of this Draft EIR.

⁸ National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)

⁹ California Public Resources Code Sections 5020-5029.5, 5079-5079.65, and 5097.9-5097.998

4.13.4.1 Federal Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 (NHPA) authorized formation of the NRHP and coordinates public and private efforts to identify, evaluate, and protect the nation’s historic and archaeological resources.¹⁰ The NRHP includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation.¹¹ Section 106 requires tribal consultation in all steps of the process when a federal agency project or effort may affect historic properties that are either located on tribal lands, or when any Native American tribe or Native Hawaiian organization attaches religious or cultural significance to the historic property, regardless of the property’s location.

The Advisory Council on Historic Preservation, an independent federal agency, administers the review process, with assistance from State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process. A tribe may assume all or any part of the functions of SHPO in accordance with subsections (b)(2) and (b)(3) of Section 101 of the NHPA.¹²

National Register of Historic Places

Section 106 of the NRHP¹³ requires federal agencies to take into account the effects of an undertaking on historic properties, which are defined as cultural resources included in or eligible for listing in the NRHP. Determination of NRHP eligibility for cultural resources prior to making a finding of effect is made according to the following criteria:

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- 10 National Historic Preservation Act of 1966 amend thru 1992, Public Law. Approved October 15, 1966 (Public Law 89-665; 80 STAT.915; 16 U.S.C. 470) as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, Public Law 96-199, Public Law 96-244, Public Law 96-515, Public Law 98-483, Public Law 99-514, Public Law 100-127, and Public Law 102-575)
 - 11 U.S. General Services Administration, “NHPA Section 106 Tribal Consultation,” accessed March 2019, <https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation>
 - 12 U.S. General Services Administration, “NHPA Section 106 Tribal Consultation,” accessed March 2019, <https://www.gsa.gov/resources-for/native-american-tribes/nhpa-section-106-tribal-consultation>
 - 13 U.S. General Services Administration, Section 106, 16 U.S.C. 470f) accessed June 2020, <https://www.nps.gov/history/local-law/nhpa1966.htm>.

The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and,

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

If cultural resources do not meet the above criteria, they are not historic properties and are not further considered in the Section 106 process. In addition to having significance, resources must have integrity for the period of significance. The period of significance is the date or span of time within which significant events transpired or significant individuals made their important contributions.

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) are intended to promote responsible preservation practices that help protect irreplaceable cultural resources.¹⁴ They cannot be used to make essential decisions about which features of the historic building should be saved and which can be changed. Choosing the appropriate treatment Standard, or approach, requires careful decision making and depends on a number of considerations, including level of historical significance, physical condition, proposed use, and code or regulatory requirements. Once the Standard is selected, whether it's preservation, rehabilitation, restoration, or reconstruction, the Standards provide philosophical consistency when treatment work is undertaken.

Rehabilitation, the most common treatment approach, is the process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values. The Standards for Rehabilitation are as follows:

14 U.S. Department of the Interior, National Park Services, Technical Preservation Services, *The Secretary of The Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*, 2017, accessed June 2018 at <https://www.nps.gov/tps/standards/treatment-guidelines-2017.pdf>.

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities and, where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.
7. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

4.13.4.2 State Regulations

Office of Historic Preservation

The Office of Historic Preservation (OHP), an office of the California Department of Parks and Recreation, implements the policies of the NRHP on a Statewide level. The OHP works to preserve California's heritage resources by ensuring that projects and programs carried out or sponsored by federal, State, and local agencies comply with federal and State historic preservation laws.

California Register of Historical Resources

The California Register of Historical Resources (CRHR)¹⁵ is the authoritative guide to the State’s significant archaeological and historical resources. It closely follows the eligibility criteria of the NRHP but deals with State and local-level resources. The CRHR serves to identify, evaluate, register, and protect California’s historical resources. For purposes of CEQA, a historical resource is any building, site, structure, object, or historic district listed in or eligible for listing in the CRHR (Public Resources Code, Section 21084.1). A resource is considered eligible for listing in the CRHR if it meets any of the following criteria:

- a. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- b. Is associated with the lives of persons important in our past.
- c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- d. Has yielded, or may be likely to yield, information important in prehistory or history [Public Resources Code Section 5024.1(c)].¹⁶

Historical resources meeting one or more of the criteria listed above are eligible for listing in the CRHR. In addition to significance, resources must have integrity for a period of significance—the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. “Integrity is the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” Simply put, resources must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.”

California Environmental Quality Act

CEQA also requires the lead agency to consider whether there is a significant effect on unique archaeological resources that are not eligible for listing in the California Register. As defined in CEQA,¹⁷ a unique archaeological resource is:

an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

15 State of California, Office of Historic Preservation, California Historical Resources, <https://ohp.parks.ca.gov/listedresources>

16 Public Resources Code (PRC), *Division 5. Parks and Monuments*[5001 - 5873], “CHAPTER 1. State Parks and Monuments,” Article 2. Historical Resources (5024.1).

17 PRC Section 21083.2(a)

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

If an archaeological resource is found eligible for listing in the CRHR, then it is considered under CEQA to be a historic resource that needs to be protected. This may also apply to unique archaeological resources. If a historic resource may be impacted by activity, under CEQA, avoidance and preservation in place is the preferred alternative. If that is not possible, then a data recovery plan will need to be created and enacted to lessen impacts to the environment to a less than significant level. If the archaeological resource is not eligible for listing in the CRHR, and it is not a unique archaeological resource, then no further action is required to protect or mitigate possible impacts to it.

California Health and Safety Code

The discovery of human remains is regulated per California Health and Safety Code, Section 7050.5,¹⁸ which states the following:

In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation...until the coroner...has determined...that the remains are not subject to...provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible... The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and...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.

California Public Resources Code Section 5097.98

Tribal cultural resources are protected pursuant to a number of State policies and regulations enumerated under PRC Section 5097.98.¹⁹ In addition, tribal cultural resources are recognized as a nonrenewable resource.

¹⁸ California Health and Safety Code, Division 7, Dead Bodies, Section 7050.5

¹⁹ Public Resources Code, *Division 5. Parks and Monuments*, "Chapter 1.75. Native American Historical, Cultural, and Sacred Sites," Section 5097.98.

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

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

Assembly Bill 52

AB 52 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) is filed.²⁰ The primary intent of AB 52 is to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native Americans, known as tribal cultural resources, that require consideration under CEQA. CEQA defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence.²¹ PRC Section 21080.3.1²² requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC section 21073) and who have requested in writing to be informed by the lead agency (PRC section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency’s formal notification

20 AB-52 Native Americans: California Environmental Quality Act., An act to amend Section 5097.94 of, and to add Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to, the Public Resources Code, relating to Native Americans.

21 PRC, Division 13. Environmental Quality Section 21080.3.2, “Chapter 2.4. Definitions.”

22 PRC, Division 13. Environmental Quality Section 21080.3.1, “Chapter 2.6. General, Tribal Consultation.”

and the lead agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC sections 21080.3.1(d) and 21080.3.1(e)).

PRC section 21080.3.2(a)²³ identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to PRC section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) of the statute and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND.²⁴ The statute further states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

Senate Bill 18

Senate Bill 18 (SB 18),²⁵ which went into effect January 1, 2005, requires local governments (city and county) to consult with Native American tribes prior to making certain planning decisions and to provide notice to tribes at certain key points in the planning process. The intent is to "provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

23 PRC, *Division 13. Environmental Quality* Section 21080.3.2, "Chapter 2.6."

24 PRC, *Division 13. Environmental Quality* Section 21080.3.2, "Chapter 2.6."

25 Senate Bill No. 18 (Burton), An act to amend Section 815.3 of the Civil Code, to amend Sections 65040.2, 65092, 65351, 65352, and 65560 of, and to add Sections 65352.3, 65352.4, and 65562.5 to the Government Code, relating to traditional tribal cultural places.

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

According to the *Tribal Consultation Guidelines: Supplement to General Plan Guidelines*,²⁶ the following are the contact and notification responsibilities of local governments:

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

4.13.4.3 Local Regulations

City of Inglewood

The City of Inglewood's (City) General Plan does not identify any goals or policies related specifically to tribal resources or tribal cultural preservation ordinance or program in effect.

4.13.5 EXISTING CONDITIONS

4.13.5.1 Environmental Setting

Geological Setting

The City is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province.²⁷ The Los Angeles Basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18–3

26 State of California, Office of Planning and Research, *Tribal Consultation Guidelines, Supplement to General Plan Guidelines*, November 2005.

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

million years ago (Ma).²⁸ While sediments dating back to the Cretaceous (66 Ma) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Ma).²⁹ Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation. Most of these sediments are marine, as they eroded from surrounding marine formations, until sea level dropped in the Pleistocene Era and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

The Los Angeles Basin is subdivided into four structural blocks, with the proposed Project occurring in the Central Block, where sediments range from 32,000 to 35,000 feet thick.³⁰ The Central Block is wedge-shaped, extending from the Santa Monica Mountains in the northwest, where it is about 10 miles wide, to the San Joaquin Hills to the southeast, where it widens to around 20 miles across. Specifically, however, in the Baldwin and Rosecrans hills are geomorphic features associated with uplift along the Newport–Inglewood structural zone.

The Quaternary rocks consist of shallow marine sandstone and siltstone as well as continental siltstone, mudstone, and gravel.³¹ Older Quaternary units are exposed in these strongly dissected hills, and elevations range from approximately 75 feet to over 400 feet.³² 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 proposed Project, Pleistocene dune sand overlies older alluvial deposits. The main drainage courses within the area are the Dominguez Channel, Compton Creek, and Centinela Creek.³³

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

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

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

31 City of Inglewood, *General Plan Update Technical Background Report*, August 2006.

32 California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.

33 California Department of Conservation, Division of Mines and Geology (now California Geological Survey), *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle*, Los Angeles County, California, 1998.

Prehistoric Setting

According to recent research in the region,³⁴ the following prehistoric chronology has been divided into four general time periods: the Paleoacoastal Period (12,000 to 8,000 Before Present [B.P.]), the Millingstone Period (8,000 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to the time of Spanish contact in A.D. 1542).

While it is not certain when humans first came to California, their presence in Southern California by about 11,000 B.P. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P.³⁵ During the Paleoacoastal period, the climate of Southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources.³⁶

During the Millingstone period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first definitive evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures.^{37,38}

Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals.^{39,40} Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

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

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

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

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

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

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

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

During the Intermediate period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred.^{41,42,43} The native populations of Southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources.⁴⁴ Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants.⁴⁵

This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and nonutilitarian materials, and extensive travel routes. Although the intensity of trade had already been increasing, it now reached its zenith, with asphaltum (tar), seashells, and steatite being traded from Southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl.⁴⁶ Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P.⁴⁷

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente.⁴⁸ This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record.^{49,50} Settlement at this time is believed to have consisted of dispersed family groups

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

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

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

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

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

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

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

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

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

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

that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources.

Ethnographic Setting

The ethnographic history ranges from A.D 1542 to 1771 and is referred to as the Protohistoric period. This period covers the occupation of the area by native American tribes. The City is located in a region traditionally occupied by the Gabrielino Indians.

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 term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence.⁵¹ The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

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.⁵² 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.⁵³

At the time of Spanish contact in A.D. 1542, also the beginning of what is known as the Protohistoric Period (A.D. 1542 to 1771), many Gabrielino practiced a religion that was centered around the mythological figure Chinigchinich.⁵⁴ This religion may have been relatively new when the Spanish arrived, and at that time was spreading to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation

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

52 See **Appendix 4.4.1** of this Draft EIR.

53 See **Appendix 4.4.1** of this Draft EIR.

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

of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased.

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory.⁵⁵ Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

Historic Setting

Spanish Period

Although Spanish explorers made brief visits to the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay.⁵⁶ Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés.⁵⁷

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

A Gabrielino village, or “rancheria” (known as Guaspét, Guasna, or Gaucha), appears to have been located northwest of the City. Based on mission baptism records, the rancheria appears to have been occupied from about 1790 to 1820. At least 193 people are known to have lived at the rancheria and been baptized. Records suggest that recruitment into the mission system did not occur until native populations in closer proximity to Mission San Gabriel had been assimilated, and after grazing expanded into the vicinity of the

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

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

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

proposed Project, bringing native inhabitants of the region into closer contact with Spanish-era ranchers.

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

Mexican Period

After Mexico gained its independence from Spain in 1821, Los Angeles became the capital of the California territory in 1835.⁵⁸ Mexico continued to promote settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the California missions, reclaiming the majority of mission lands, and redistributing them as land grants throughout California. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur.⁵⁹ Because of the disbursement that the Gabrielino populations suffered during the Mission period no land was returned to the Gabrielino Tribes.

During the Mexican Period, many ranchos continued to be used by settlers for cattle grazing. Hides and tallow from cattle became a major export for Mexican settlers in California, known as Californios, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros and Indian laborers.^{60,61}

American Period

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized the right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership.⁶²

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

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

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

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

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

When the discovery of gold in northern California was announced in 1848, an influx of people from other parts of North America flooded into California and the population of Los Angeles tripled between 1850 and 1860. The increased population led to additional demand of the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts.^{63,64}

These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement.^{65,66}

During the rancho period, the City was part of the *Rancho Aguaje de la Centinela* and the *Rancho Sausal Redondo*. A year after Mexico gained independence from Spain and control of California in 1822, Los Angeles resident Antonio Avila received a land grant for *Rancho Sausal Redondo* and grazed cattle there as well. The rancho encompassed the areas that are now the Cities of Redondo Beach, Inglewood, Hawthorne, El Segundo, Lawndale, Manhattan Beach and Hermosa Beach. In 1834, Ygnacio Machado, one of the original leather jacket soldiers that escorted settlers to Los Angeles, built the Centinela Adobe. The Centinela Adobe, located approximately 2.5 miles from the proposed Project was in the center of what became a 2,200-acre ranch on a portion of the *Rancho Sausal Redondo*. Machado had moved onto what he claimed was still public land, which was granted to him as the *Rancho Aguaje de la Centinela*. Soon after, Machado traded the *Rancho Aguaje de la Centinela* for a keg of whiskey and a home in the Pueblo of Los Angeles. The property traded hands many times and was eventually acquired by a Scottish noble man named Robert Burnett who eventually added the much larger *Rancho Sausal Redondo* to his holdings, once again combining the ranchos. Burnette eventually returned to Scotland and leased the ranch to a Canadian immigrant who was considered by many to be the founding father of Inglewood: Daniel Freeman. In spite of drought and other hardship Freeman successfully farmed barley on the ranch, and purchased it from Burnette with gold in 1885. Freeman went on to become a major land developer in Inglewood.⁶⁷

Centinela Springs (California Historical Landmark 363), or *Aguaje de Centinela*, was a valued source of spring water for the *Rancho Aguaje de la Centinela* and the spring is described as continuously existing

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

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

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

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

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

since the Pleistocene Era. The spring is memorialized and is still located at the corner of Centinela Avenue and Florence Boulevard, approximately 2 miles north of the proposed Project.⁶⁸

4.13.5.2 Adjusted Baseline

Section 4.13: Tribal Cultural Resources assumes the Adjusted Baseline Environmental Setting as described in **Section 4.0: Environmental Impact Analysis, 4.0.5: Adjusted Baseline**. Related to tribal cultural resources, the changes associated with the Adjusted Baseline projects include excavation and construction of new uses on the HPSP site.

There is no evidence that development in the HPSP would affect the baseline for analysis of the tribal cultural resources. No tribal resources have been discovered and documented during construction of the Adjusted Baseline projects that would provide additional information on the presence or sensitivity of these resources in the area.

4.13.5.3 Project Setting

The proposed Project is located within the fully urbanized City, and thus includes a high degree of development disturbance. The proposed Project would begin at approximately the Metro Crenshaw/LAX Line just north of the Florence Avenue and Market Street intersection with a pedestrian bridge that would connect to the Market Street/Florence Avenue Station located at the northeast corner of Market Street and Regent Avenue. The guideway would extend from the station and travel south through downtown Inglewood along Market Street, where it be adjacent to existing commercial retail, office, restaurant, parking, residential, and mixed uses. The guideway would turn east onto Manchester Boulevard and be bordered by commercial retail, office, mixed-use, and residential uses on both sides of the Manchester Boulevard segment. After turning south onto Prairie Avenue, the guideway would be bordered by commercial and multifamily residential uses to the west, while uses to the east include commercial/recreational uses associated with the Forum and entertainment, retail, and residential uses under development within the HPSP as part of the Los Angeles Stadium and Entertainment District (LASED). The guideway would terminate at the intersection of Prairie Avenue and Hardy Street and the proposed Prairie Avenue/Hardy Street Station just north of Hardy Street.

There are no known tribal resources within the footprint of the proposed Project. However, as part of the AB 52 tribal consultation process,⁶⁹ it was 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. Significant among these historic and pre-historic trading routes were

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

69 AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019.

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).⁷⁰ Rancho Ajuaje de la Centinela included parts of present-day Westchester and Inglewood; and Rancho Centinela 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.

Further, as part of the AB 52 consultation process,⁷¹ it was noted that the location of the proposed Project is in an area that 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.

4.13.6 THRESHOLDS OF SIGNIFICANCE

Criteria outlined in Appendix G of the State *CEQA Guidelines* were used to determine the level of significance of impacts to tribal cultural resources. A project would have a significant impact if it would:

- Threshold TCR-1** **Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or**
 - ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

⁷⁰ Centinela Springs was registered as Historical Landmark on 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.

⁷¹ AB 52 Consultation Summary, Meridian Consultants LLC, February 6, 2019.

4.13.7 IMPACT ANALYSIS FOR THE PROPOSED PROJECT

- Impact TCR-1:** **Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**
- i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or**
 - ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

For purposes of this impact analysis, a tribal cultural resource (TCR) is considered a site, feature, place, cultural landscape, sacred place, or object which is of cultural value to a California Native American Tribe and is either on or eligible for the California Register or a local historic register.

As previously noted, the Tribe shared with the City that the location of the proposed Project may be surrounded by historic and pre-historic trading routes and village activity. Tribal members described historical landmarks in the region, including Rancho Sausal Redondo (translated as “round clump of willows”) and Rancho Ajuaje de la Centinela (translated as “Sentinel of Waters,” and refers to the artesian water in the area exemplified by Centinela Springs),⁷² which 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 Tribe further added that there are known streams to the east and trading routes to the west of the proposed Project that could contain TCRs.⁷³ The Tribe stated that, due to these trading routes and historical activity centers and the tribal tradition of burying their deceased along the routes and near waterways over thousands of years, these activities could result in the proposed Project having a high sensitivity for TCRs and human remains.

⁷² Centinela Springs was registered as Historical Landmark on 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.

⁷³ See **Appendix 4.13.2** of this Draft EIR.

The Tribe explained that railroads were placed on top of traditional tribal trade routes due to the favorable topographical conditions of the paths, having been flattened by human travel over thousands of years.

Inland and coastal waterways, the Tribe described, create unique habitats and riparian corridors that provide an abundance of food and medicine resources along with aesthetically peaceful areas with running water, shade trees, and shelter. The Tribe stated that areas near watercourses and water bodies housed seasonal or permanent hamlets, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites of their ancestors. Larger water bodies were high attractants for human activity and the banks and shores of these water bodies have a higher-than-average potential for encountering TCRs of artifacts and human remains during ground disturbing activities. The waterway immediately east of the proposed Project is a landscape feature that was heavily used for life sustenance, homesites, ceremonies, and regular daily activities.

Since the Project site was a land area of confluence, it would have been heavily used for human travel, movement of trade items, visiting of family, going to ceremonies, accessing recreation areas, and accessing foraging areas. Further, within and around these routes contained seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and often still contain isolated burials and cremations from Tribal members who died along the trail. These isolated burials are not associated with a village community burial site or ceremonial burial site, rather the location is simply where the person died and was buried where they died. Therefore, isolated burials are more concentrated and likely to occur in proximity to Tribal trade routes, particularly near major trade routes.

Because the proposed Project is located within and around a sacred village site, adjacent to sacred water courses, major traditional trade routes, and within a sacred landscape for ceremonies and homesites, the Tribe indicated that there is a high potential to impact TCRs still present within the soil from the thousands of years of prehistoric activities that occurred within and around these Tribal cultural landscapes.

Construction

Implementation of the proposed Project would include demolition, grubbing, and grading, possible subterranean utility relocation and installation, and excavation and installation of piles for the guideway and stations including structural support columns and excavations for guideway and stations foundations and as part of the construction of support facilities, including the MSF and TPSSs.

Historic maps provided to the City by the Tribe were reviewed as part of the background research for the proposed Project to identify previous geographical features and historic land uses, including the location

of historical Native American trading routes and villages.⁷⁴ Because the Project is located in the vicinity of areas identified during the AB 52 tribal consultation, there may be unanticipated discovery of TCRs as defined in Public Resources Code Section 21074. As such, there is the potential for loss of artifact and TCR and/or the diminishment in value to the Tribe of TCRs to occur during ground disturbing activities. As such, the proposed Project could result in a substantial adverse change in the significance of a TCR pursuant to the criteria in subdivision (c) of PRC Section 5024.1. These potential impacts would be potentially significant.

During the Rancho period, the settlers resided near Centinela Creek north of the proposed Project. The likelihood of unmarked graves associated with the Rancho period is low as the preference would have been to bury family members at the Mission or in the Pueblo near the church. The area was developed around the turn of the century, at which time (i.e., in 1905) the Inglewood Park Cemetery was established. The cemetery is still in operation and located near the proposed Project at the northeast corner of Manchester Boulevard and Prairie Avenue. Because the cemetery is close by, available, and in use, the likelihood of unmarked historic-age graves is low. However, due to the current development and disturbance in the cumulative context area, it is not currently possible to identify any sites or resources that may exist subsurface.

Ground disturbing activities that would be employed during construction of the proposed Project, including demolition, borings, drilling, grading, and excavations would extend into previously undisturbed subsurface areas or other locations where there is the possibility that they may encounter buried human remains. As a result, these activities may disturb human remains, including those interred outside of dedicated cemeteries.

Lands within the footprint of the proposed Project are not known to contain any unmarked graves or human remains. However, the loss of any previously unknown human remains, including native American remains, may be significant, and the proposed Project would have a potentially significant impact.

Operation

While the operations of the proposed Project would introduce different land uses, these uses would not involve activities related to ground disturbance. As such, impacts related to a substantial adverse change in the significance of a TCR would occur from the operation of the proposed Project would be less than significant.

⁷⁴ See Appendix 4.13.2.

Mitigation Measures

As indicated previously, impacts related to TCRs during ground disturbing construction activities would be potentially significant. The following Mitigation Measures (MMs) have been identified and are based on information and suggestions received from Tribes during the AB 52 consultation process with the City.

Construction

MM TCR-1: Retention of a Tribal Cultural Resources Monitor/Consultant.

Prior to the commencement of any ground disturbing activity at the project site, the project applicant shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (US Department of the Interior, 2008) to carry out all mitigation related to cultural resources. In addition, a Native American Monitor shall be designated by the Gabrieleno Band of Mission Indians-Kizh Nation – the tribe that consulted on this project pursuant to Assembly Bill A52 (the "Tribe" or the "Consulting Tribe"). If no Native American Monitor is designated within a reasonable period of time (not to exceed 30 days), the activity can commence without the designated Monitor. A copy of the executed contract shall be submitted to the City of Inglewood Planning and Building Department prior to the issuance of any permit necessary to commence a ground-disturbing activity. The Tribal monitor will only be present on-site during the construction phases that involve ground-disturbing activities. Ground disturbing activities are defined by the Tribe as activities that may include, but are not limited to, pavement removal, potholing or auguring, grubbing, tree removals, boring, grading, excavation, drilling, and trenching, within the project area. The Tribal Monitor 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 all ground-disturbing activities on the Project Site are completed, or when the Tribal Representatives and Tribal Monitor have indicated that all upcoming ground-disturbing activities at the Project Site have little to no potential for impacting Tribal Cultural Resources. Upon discovery of any Tribal Cultural Resources, construction activities shall cease in the immediate vicinity of the find (not less than the surrounding 50 feet) until the find can be assessed. All Tribal Cultural Resources unearthed by project activities shall be evaluated by the qualified archaeologist and Tribal monitor approved by the Consulting Tribe. If the resources are Native American in origin, the Consulting Tribe will retain it/them in the form and/or manner the Tribe deems appropriate, for educational, cultural and/or historic purposes.

If human remains and/or grave goods are discovered or recognized at the Project Site, all ground disturbance shall immediately cease, and the county coroner shall be notified per Public Resources Code Section 5097.98, and Health & Safety Code Section 7050.5. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2). Work may continue on other parts of the Project Site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). If a non-Native American 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 PRC 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, it shall be offered to a local school or historical society in the area for educational purposes.

MM TCR-4 and **MM TCR-5** will supplement **MM TCR-1**.

MM TCR-2: Monitoring and Mitigation Program.

Prepare, design, and implement a monitoring and mitigation program for the Project. The Plan shall define pre-construction coordination, construction monitoring for excavations based on the activities and depth of disturbance planned for each portion of the Project area, data recovery (including halting or diverting construction so that archaeological remains can be evaluated and recovered in a timely manner), artifact and feature treatment, procurement, and reporting. The Plan shall be prepared and approved by a qualified archaeologist prior to the issuance of the first grading permit.

MM TCR-3: Cultural Resources Sensitivity Training.

The qualified archaeologist and Native American Monitor shall conduct construction-worker archaeological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.) and will present the Program as outlined in **MM TCR-2**, for all construction personnel conducting, supervising, or associated with demolition and ground disturbance, including utility work, for the Project. In the event construction crews are phased or rotated, additional training shall be conducted for new construction personnel working on ground-disturbing activities. Construction personnel shall be informed of the types of prehistoric and historic archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Documentation shall be retained by the qualified archaeologist demonstrating that the appropriate construction personnel attended the training.

MM TCR-4: Archaeological and Native American Monitoring

The qualified archaeologist will oversee archaeological and Native American monitors who shall be retained to be present and work in tandem, monitoring during construction excavations such as grading, trenching, or any other excavation activity associated with the Project and as defined in the Monitoring and Mitigation Plan. If, after advanced notice, the Native American representative declines, is unable, or does not respond to the notice, construction can proceed under supervision of the qualified archaeologist. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the quantity and type of archaeological resources encountered. Full-time monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified archaeologist and the Native American monitor.

1. In the event of the discovery of any archaeological materials during implementation of the Project, all work shall immediately cease within 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has made a determination on the significance of the resource(s) and provided recommendations regarding the handling of the find. If the resource is determined to be significant, the qualified archaeologist will confer with the project applicant regarding recommendation for treatment and ultimate disposition of the resource(s).

2. If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource pursuant to CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement.
3. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with the project applicant, and appropriate Native American representatives (if the find is of Native American origin). The Cultural Resources Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource through laboratory processing and analysis of the artifacts. The Treatment Plan will further make recommendations for the ultimate curation of any archaeological materials, which shall be curated at a public, non-profit curation facility, university or museum with a research interest in the materials, if such an institution agrees to accept them. If resources are determined to be Native American in origin, they will first be offered to the Tribe for permanent curation, repatriation, or reburial, as directed by the Tribe. If no institution or Tribe accepts the archaeological material, then the material shall be donated to a local school or historical society in the area for educational purposes.
4. If the resource is identified as a Native American, the qualified archaeologist and the City shall consult with appropriate Native American representatives, as identified through the AB 52 consultation process in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond that which is scientifically important, are considered.
5. Prepare a final monitoring and mitigation report for submittal to the City, and the South Central Coastal Information Center (SCCIC), in order to document the results of the archaeological and Native American monitoring. If there are significant discoveries, artifact and feature analysis and final disposition shall be included with the final report, which will be submitted to the SCCIC and the applicant. The final monitoring report shall be submitted to the applicant within 90 days of completion of excavation and other ground disturbing activities that require monitoring.

MM TCR-5: Inadvertent Discoveries Related to Human Remains.

In the event of the unanticipated discovery of human remains during excavation or other ground disturbance related to the proposed Project, all work shall immediately cease within 150 feet of the discovery and the County Coroner shall be contacted in accordance

with PRC Section 5097.98⁷⁵ and Health and Safety Code Section 7050.5.⁷⁶ Additionally, the contractor shall notify the City, and the tribal cultural resources monitor and archaeological monitor.

The City, as the Project sponsor, and the contractor shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural and tribal standards or practices, and that further ground-disturbing activities take into account the possibility of multiple burials.

No further excavation or disturbance of the discovery or any nearby area reasonably suspected to overlie adjacent remains (as determined by the qualified archaeologist and/or tribal cultural resources monitor) shall occur until the coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected (as determined by the qualified archaeologist and/or cultural resources monitor), and consultation and treatment could occur as prescribed by law. As required by law, the coroner would determine within two working days of being notified if the remains are subject to his or her authority.

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 NAHC. In accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641), the NAHC would make an MLD determination.

If the Tribe is designated MLD, the following standards shall apply and the following requirements and treatment measures shall be implemented.

1. 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

75 NAGPRA, Title 43. Public Lands: Interior, Subtitle A. Office of the Secretary of the Interior, Part 10. Native American Graves Protection and Reparation Regulations, § 5097.98 – Notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.

76 California / Health and Safety Code - HSC / CHAPTER 2. General Provisions [7050.5. - 7055.] / Section 7050.5.

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.

2. 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 shall 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. As stated by the Tribe as part of the Project's AB 52 consultation, "[t]he 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."
3. 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 must 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. Scientific study or the utilization of any invasive diagnostics on human remains of Native American origin.
4. 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 feasible. These items shall be retained and reburied within six months of recovery if feasible. The site of reburial/repatriation shall be on the Project area, 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.

If the Tribe is not designated MLD, each occurrence of human remains and associated funerary objects shall be stored using opaque cloth bags. All human remains, funerary objects, sacred objects, and objects of cultural patrimony shall be preserved in place where feasible and to consult with the tribal cultural resources monitor and/or the MLD about appropriate treatment if removal is required. If remains are removed, they shall be removed to a secure container on site if possible, with consultation with of the qualified archaeologist and/or tribal cultural resources monitor. These items shall be retained and reburied within six months of recovery or as directed by the qualified archaeologist and/or tribal cultural resources monitor. The site of reburial/repatriation shall be within the proposed Project footprint, or at a location agreed upon between the MLD and the landowner at a site to be protected in perpetuity. There shall be no publicity regarding any cultural materials recovered.

Operation

No mitigation is required during operation of the proposed Project.

Level of Significance after Mitigation

Construction

With implementation of **MMs TCR-1, TCR-2, TCR-3, TCR-4, and TCR-5**, potentially significant impacts to TCRs, including related, unanticipated discovery of human remains, would be reduced to a level that is less than significant. These measures would work to prevent the destruction and loss of sensitive TCRs and ensure the proper disposition of human remains.

Operation

There are no significant impacts associated with the operation of the proposed Project; impacts would be less than significant.

4.13.8 CUMULATIVE IMPACTS

In addition to the proposed Project, there are numerous projects within the City of Inglewood and within the corresponding ethnographic territory of the Gabrielino Tribe, 48 of which are in the City of Inglewood, that have been taken into consideration when developing the cumulative context, as described in **Section 4.0, 4.0-6: Cumulative Assumptions**.

The closest active cumulative projects are the SoFi Stadium and associated developments, located adjacent to the proposed Project east of Prairie Avenue, and the proposed Inglewood Basketball and Entertainment Center located south of the proposed Project along Century Boulevard.

Tribal Cultural Resources

The City implements the AB 52 process on all projects as required CEQA Section 21080.3.1.⁷⁷ This requires that prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, the City, as lead agency, shall begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. Further, within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the City, as lead agency provides formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice. Based on the individual consultations with Tribes, the City incorporates into the conditions and mitigation of each project, as applicable, considerations for the protection of TRCs.

The cumulative context for Tribal cultural resources is within the Gabrielino Tribal territory which encompasses land within Los Angeles County north to Thousand Oaks, east to Pomona, west to the coast and south to Long Beach. Their territory also extends into Orange County as far south as Costa Mesa. The City is included within the Gabrielino Tribal territory and has been subject to historic development within the City since the rancho period, with more wide scale development occurring at the turn of the century. The Gabrielino Tribal territory has been subject to wide scale development and redevelopment projects over the past several decades and is currently experiencing a high level of redevelopment projects. Known Tribal village locations, trade routes, and known significant prehistoric archaeological sites that have a higher potential to represent a Tribal cultural resource are mapped and documented between 2 and 5 miles from the proposed Project. As such, development in these areas could have a significant impact to a Tribal cultural resource. Cumulatively, the large amount of development within the Tribal territory, especially development within known village locations, trade routes, and known significant prehistoric archaeological sites could have a cumulatively significant impact to Tribal cultural resources. All related projects would, like the proposed Project, be required to comply with regulatory requirements governing Tribal cultural resources, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified the related projects would be required to comply with PRC section 21084.3, which would require avoidance and preservation or mitigation as defined in PRC section 21084.3(b).

77 CEQA Section 21080.3.1.

As described above, construction of the proposed Project could result in a significant impact on a previously unknown Tribal cultural resource. While there are no Tribal cultural resources identified within the proposed Project, the City has consulted with Tribal representatives and recognizes the potential sensitivity.

Some of the cumulative development projects in the vicinity of the proposed Project are near historical Native American trade routes or villages or waterways and could result in potentially significant due to substantial adverse changes in the significance of TCRs. Prior to mitigation, the proposed Project would result in similar potentially significant impacts. Cumulatively, this large amount of development within the Tribal territory could have a cumulatively significant impact to TCRs.

Based on the above considerations, the proposed Project, in conjunction with cumulative development within the vicinity and in the City, could result in cumulatively significant impacts to Tribal cultural resources. The proposed Project's incremental contribution to this cumulatively significant impact would be less than cumulatively considerable, however, because the proposed Project would include mitigation to prevent or substantially minimize the destruction or loss of TCRs, consistent with the mitigation measures recommended by the Tribe through the Project's AB 52 consultation.

With regulatory adherence and incorporation of required mitigation the proposed Project would not result in a cumulatively considerable impact on TCRs.

Unknown Human Remains

In regard to impacts to previously unknown human remains, including those buried outside a formal cemetery, there are no known burial grounds or unmarked cemeteries within the footprint of the proposed Project or a 0.5-mile radius based on the SLF search and sensitivity analysis for cultural resources. The proposed Project and other cumulative projects would be required to comply with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641) related to the proper disposition of human remains.

The related projects would, like the proposed Project, be required to comply with regulatory requirements governing TCRs, including consultation with California Native American Tribes where required under AB 52. Should an impact be identified, the related projects would be required to comply with PRC Section 21084.3 which would require avoidance and preservation or mitigation as defined in PRC Section 21084.3(b). As such, with regulatory adherence and incorporation of required mitigation, other area projects in combination with the proposed Project would have a less-than-significant cumulative impact on human remains associated with TCRs.

4.13.9 CONSISTENCY WITH CITY OF INGLEWOOD GENERAL PLAN

The City's General Plan does not identify any goals or policies related specifically to TCRs. Accordingly, the proposed Project would not conflict with any goals, objectives, strategies, or policies of the City's General Plan related to this topic area.