I.1 Cultural Resource Investigation
Cultural Resource Investigation in Support of the Inglewood Transit Connector Project, Los Angeles County, California

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

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MANAGEMENT SUMMARY

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

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

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

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

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

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

1.1 PROJECT LOCATION AND DESCRIPTION

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

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

The design and construction of the APM system elevated guideway structures, stations, and support facilities will be designed to avoid existing utility and other infrastructure to the greatest degree possible. In addition to surface improvements, some utility infrastructure that cannot be avoided may need to be relocated to accommodate the guideway columns and foundations. The proposed maximum depth of
excavation for the vertical supports of the APM guideway structures outside of the stations is approximately 100 feet below ground surface and the proposed maximum depth excavation for the vertical supports of the APM guideway structures at the stations is approximately 80 feet below ground surface.

1.2 REPORT ORGANIZATION

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

USGS 7.5' Quadrangle:
Inglewood, CA (1982)
T2S R14W Secs 26, 27 & 35, T3S R14W Secs 2 & 3, Sausal Redondo Land Grant and Aguaje de la Centinella Land Grant
NAD 83 UTM Zone 11

Service Layer Credits: © 2013 National Geographic Society, i-cubed

Figure 1-2 Project Location Map
2.0 REGULATORY CONTEXT

2.1 CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

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

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

2.2 CALIFORNIA ASSEMBLY BILL 52

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

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

3.1 ENVIRONMENTAL SETTING

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

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

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

3.2 PREHISTORIC SETTING

The most widely used chronological sequence in the Project vicinity distinguishes Early, Middle, and Late periods. It was initially outlined by King (1981) and later revised to include additional radiocarbon dates (King 1990) and to incorporate refinements in our understanding of cultural developments (Arnold 1992).
3.2.1 Early Holocene (9600-5600 cal B.C.)

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

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

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

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

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

Coastal and inland sites of this time period exhibit shallow midden accumulations, suggesting seasonal camping. Based on the distribution of sites assigned to this period, larger groups likely occupied a base camp during a portion of the year, while smaller groups of people used satellite camps to exploit seasonally available floral resources such as grass seeds, berries, tubers, and nuts (cf. Binford 1980; Warren 1968). Site assemblages in coastal Southern California dating to this time contain numerous manos and metates, charmstones, coggd stones, discoidals, and some stone balls. A significant
technological change in ground stone is seen at this time with the appearance of mortars and pestles which suggests the adoption of acorn, nut, and seed processing by coastal groups (Sutton and Gardner 2010). The quantity of projectile points also increases during this time, indicating a subsistence shift toward greater reliance on large game. Burial practices also suggest that society was primarily egalitarian (Glassow 1996). Secondary burials among coastal communities continue to be the dominant mortuary regime with a smaller number of flexed inhumations during the Middle Holocene.

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

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

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

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

3.3 ETHNOGRAPHIC SETTING

The prehistory of California’s coast spans the entire Holocene and may extend back to late Pleistocene times. At the time of contact however, the ethnographic record indicates that the Gabrielino populations inhabited what is now known as the Los Angeles Basin and the Project region. Traditionally, the Gabrielino occupied a large territory, including the entire Los Angeles Basin, the coast from Malibu to Aliso Creek, parts of the Santa Monica Mountains, the San Fernando Valley, the San Gabriel Valley, the San Bernardino Valley, the northern part of the Santa Ana Mountains, and much of the middle and lower Santa Ana River reaches. In addition, the Gabrielino also inhabited the islands of Santa Catalina, San Clemente, and San Nicolas. The Gabrielino language was a Cupan language which is part of the Takic language family and part of a larger language group called Uto-Aztecan (Harrington 1981, Kroeber 1925).
It is believed that more than 50 communities with populations that ranged from 50-150 individuals inhabited the traditional territory of the Gabrielino pre-contact. Each autonomous community or village consisted of one or more patrilineages that maintained permanent placement and the maintenance of surrounding hunting and gathering areas, and ceremonial sites as well. The chief, his family, and elite members were typically the epicenter of the village sites. The village members would encompass and surround the homes of the chief and elite with smaller houses/structures. Other common structures found in Gabrielino villages included sweat houses, clearings for ceremonies and playing fields, as well as cemeteries or burial grounds (McCawley 1996:32-33). Management of food and resources was implemented by the chief and food stores were also kept for each family when supply was low.

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

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

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

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

Mission San Gabriel was founded on September 8, 1771, but moved to its present location around 1774, due to the second location consisting of more suitable land for agriculture. A second mission, San Fernando, was established within Gabrielino territory in 1797. The assimilation of the Gabrielino people
in to the mission system had gross negative affect on the traditional Gabrielino communities as they were depopulated, had become estranged from many of their traditional cultural practices, their lands, political autonomy, and had even become enslaved and even killed, and suffered from epidemics caused by the introduction of European diseases further reduced the indigenous population. Between 1832 and 1834, as the primary result of secularization of the former mission lands, which was theoretically designed to turn over ownership of some of the lands back to the Native peoples of California, consequently increased the displacement of the Gabrielino (McCawley 1996:208). The establishment of California as a state in 1850 brought further hardships to the Gabrielino, forcing many to eventually settle into smaller groups of Native American and Mexican settlements in places like the Eagle Rock and Highland Park districts of Los Angeles as well as in Pauma, Pala, Temecula, Pechanga, and San Jacinto.

3.4 HISTORICAL SETTING

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

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

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

With the signing of the Treaty of Guadalupe-Hidalgo on February 2, 1848, California formally became an American territory, and two years later, on September 9, 1850, California became the thirty-first state in the Union. Prior to becoming a state, California was divided into 27 counties, and Los Angeles was one of
them. In addition to California being granted statehood, the City of Los Angeles also became incorporated in 1850. In those two years (1848–1850) there was an influx of Americans to California seeking their fortunes, triggered by James Marshall’s 1848 discovery of gold at Sutter’s Mill. However, statehood and an extensive drought in the 1860s eventually ended the prosperity of the ranchos (Beedle et al, 2008).

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

Although much of the lands changed ownership, the economy of the time remained largely based on agriculture with an emphasis on raising livestock and crops.

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

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

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

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

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

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

4.1 PREVIOUS CULTURAL RESOURCE INVESTIGATIONS

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

<table>
<thead>
<tr>
<th>Report No.</th>
<th>Date</th>
<th>Author(s)</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>LA-02904</td>
<td>1993</td>
<td>Stickel, Gary E.</td>
<td>Draft Report a Phase I Cultural Resources Literature Search for the West Basin Water Reclamation Project</td>
</tr>
<tr>
<td>LA-03289</td>
<td>1990</td>
<td>Davis, Gene</td>
<td>Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation</td>
</tr>
<tr>
<td>LA-04836</td>
<td>2000</td>
<td>Science Applications International Corporation</td>
<td>Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project</td>
</tr>
<tr>
<td>LA-06012</td>
<td>2001</td>
<td>Love, Bruce, Bai &quot;Tom&quot; Tang, and Mariam Dahdul</td>
<td>The Grevillea Mall Park City of Inglewood Los Angeles County, California</td>
</tr>
<tr>
<td>LA-06035</td>
<td>2002</td>
<td>Duke, Curt</td>
<td>Cultural Resource Assessment at &amp; T Wireless Services Facility No. 04111 Los Angeles County, California</td>
</tr>
<tr>
<td>LA-07402</td>
<td>2004</td>
<td>Bonner, Wayne H.</td>
<td>Records Search and Site Visit for Sprint Telecommunications Facility Candidate La60bx408d (Florence Locust RI) 405 East Florence Avenue, Inglewood, Los Angeles County, California</td>
</tr>
<tr>
<td>LA-07697</td>
<td>2005</td>
<td>Wlodarski, Robert J.</td>
<td>Records Search Results for Cingular Telecommunications Wireless Site E10118-01 (car Wash) Located at 10200 Hawthorne Boulevard, City of Inglewood, County of Los Angeles, California 90303</td>
</tr>
<tr>
<td>LA-07869</td>
<td>2006</td>
<td>Bonner, Wayne H.</td>
<td>Cultural Resources Records Search Results and Site Visit for Sprint Nextel Candidate Ca 7731d (la Colima), 405 East Florence Avenue, Inglewood, Los Angeles County, California</td>
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<tr>
<td>LA-09513</td>
<td>2008</td>
<td>Bonner, Wayne H. and Kathleen Crawford</td>
<td>Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA23650D (Inglewood Electric), 923 South Prairie Avenue, Inglewood, Los Angeles County, California</td>
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<tr>
<td>LA-09516</td>
<td>2008</td>
<td>Bonner, Wayne H.</td>
<td>Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA03329E (Walgreens La Brea), 230 North La Brea Avenue, Inglewood, Los Angeles County, California</td>
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</table>
### Table 4-1
#### Previous Cultural Studies within the Study Area

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

### 4.2 CULTURAL RESOURCES REPORTED WITHIN THE STUDY AREA

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

### 4.3 ADDITIONAL SOURCES

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

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

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

5.1 FIELD METHODS

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

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

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

5.2 FIELD RESULTS

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

No historical or prehistoric archaeological resources were observed within the Project area during the windshield/reconnaissance survey. However, six previously recorded built-environment cultural resources were identified within a half-mile radius of the Project during the records search. These resources may be directly or indirectly impacted by the Project; however, are not discussed in this study.
Figure 5-1 Market and Regent Street intersection, view to the south

Figure 5-2 Kelso and Prairie Avenue intersection, view to the south
Figure 5-3 Overview of proposed Hollywood Park stop, view to the north

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

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

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

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Basgall, Mark E.  

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Binford, L. R.  

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Erlandson, Jon M. (continued)

1997  The Middle Holocene along the California Coast. In Archaeology of the California Coast during the Middle Holocene, edited by Jon M. Erlandson and Michael A. Glassow, pp. 1–10. Perspectives in California Archaeology, vol. 4. Institute of Archaeology, University of California, Los Angeles.

Erlandson, Jon M., Douglas J. Kennett, B. Lynn Ingram, Daniel A. Guthrie, Don P. Morris, Mark A. Tveskov, G. James West, and Phillip L. Walker

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Glassow, Michael, and Larry Wilcoxon

Glassow, Michael A., Larry R. Wilcoxon, and Jon Erlandson

Greenwood, Roberta

Harrington, John Peabody

Johnson, John R., Thomas W. Stafford, Jr., Henry O. Ajie, and Don P. Morris

Jones, Terry L., Nathan E. Stevens, Deborah A. Jones, Richard T. Fitzgerald, and Mark G. Hylkema
Lanham, Maryland.

King, Chester D.


Kroeber, Albert L.

McCawley, W.

Merriam, J. C.

Moratto, Michael J.

Priestley, H. J.

Reid, Hugo, and Robert F. Heizer

Robinson, W. W.

Starr, Kevin

Stickel, E. Gary
2010 Ice Age Man in Malibu: The Clovis Culture Discovery at the Farpoint Site. Presentation to the Pacific Coast Archaeological Society, March 11, Irvine, California.

Sutton, Mark Q.

Appendix A.
Native American Coordination
June 19, 2018

Robbie Thomas
PaleoWest Archaeology

Sent by E-mail: rthomas@paleowest.com

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

Dear Ms. Thomas:

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

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

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

Sincerely,

Gayle Totton, M.A., PhD.
Associate Governmental Program Analyst
(916) 373-3714
Gabrieleno Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA, 91723
Phone: (626) 926 - 4131
admin@gabrielenoindians.org

Gabrieleno/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA, 91778
Phone: (626) 483 - 3564
Fax: (626) 286-1262
GTTribalcouncil@aol.com

Gabrielino/Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231
Los Angeles, CA, 90012
Phone: (951) 807 - 0479
sgoad@gabrielino-tongva.com

Gabrielino Tongva Indians of California Tribal Council
Robert Dorame, Chairperson
P.O. Box 490
Bellflower, CA, 90707
Phone: (562) 761 - 6417
Fax: (562) 761-6417
gtongva@gmail.com

Gabrielino-Tongva Tribe
Charles Alvarez,
23454 Vanowen Street
West Hills, CA, 91307
Phone: (310) 403 - 6048
roadkingcharles@aol.com

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Inglewood Transit Interconnect Project, Los Angeles County.
July 27, 2018

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

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

Dear Mr. Salas,

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

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

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

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

Respectfully yours,

Roberta Thomas, M.A., RPA
Senior Archaeologist
PaleoWest Archaeology
<table>
<thead>
<tr>
<th>Recommended Contacts (Name and Tribal Affiliation)</th>
<th>Initial Contact</th>
<th>Follow up Attempts</th>
<th>Comments/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Andrew Salas, Chairperson, Gabrieleno Band of Mission Indians – Kizh Nation</td>
<td>Letter/email dated July 27, 2018</td>
<td>Phone call, August 29, 2018</td>
<td>Mr. Salas requested the lead agency's contact information so that he send his comments regarding the Project directly to the lead agency. Mr. Salas was informed that the lead agency would be conducting formal AB 52 consultation at a later date and would reach out to him directly for his comments.</td>
</tr>
<tr>
<td>Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians</td>
<td>Letter/email dated July 27, 2018</td>
<td>Phone call, August 29, 2018</td>
<td>Mr. Morales stated that the Project lies within a highly culturally sensitive area and that any trenching or excavation for structures such as support columns may require archaeological and Native American monitoring. He stated that he recommends monitoring and requests consultation.</td>
</tr>
<tr>
<td>Sandonne Goad, Chairperson, Gabrielino/Tongva Nation</td>
<td>Letter/email dated July 27, 2018</td>
<td>Phone call, August 29, 2018</td>
<td>Left a message for Ms. Goad.</td>
</tr>
<tr>
<td>Robert Dorame, Chairperson, Gabrielino-Tongva Indians of California Tribal</td>
<td>Letter/email dated July 27, 2018</td>
<td>Phone call, August 29, 2018</td>
<td>Mr. Dorame requested that the original email be resent. Email resent on August 29, 2018. Mr. Dorame stated that he would like to consult with other Tribal Members before offering official comments and recommendations.</td>
</tr>
<tr>
<td>Charles Alvarez, Chairperson, Gabrielino-Tongva Tribe</td>
<td>Letter/email dated July 27, 2018</td>
<td>Phone call, August 29, 2018</td>
<td>Left a message for Mr. Alvarez.</td>
</tr>
</tbody>
</table>
1.2

Historical Resources Technical Report
HISTORICAL RESOURCES TECHNICAL REPORT

Inglewood Transit Connector
(Revised Project)

HISTORIC RESOURCES GROUP

PREPARED FOR

Trifiletti Consulting
1545 Wilshire Blvd., Suite 700,
Los Angeles, CA 90017

COVER PHOTO: Market Street, looking south from Regent Street, 1960. (Inglewood Public Library,
Online Archive of California)
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Appendix A: Field Photographs
Appendix B: List of Parcels in the Project Area and Expanded Study Area
Appendix C: Market Street Historic District Analysis
Appendix D: Conceptual Project Design
1.0 SUMMARY OF FINDINGS

Historic Resources Group has completed this historical resources technical report to inform environmental review of the revised Inglewood Transit Connector Project (the Project) under the California Environmental Quality Act (CEQA). The purpose of this report is to determine if historical resources as defined by CEQA are present within the Inglewood Transit Connector project area or immediate vicinity, and to identify potential impacts of the revised Project to those historical resources and how those impacts might be mitigated.

This report identifies a total of ten (10) historical resources in the Project Area or Expanded Study Area for the revised Project. Of these, two (2) are listed in the National Register of Historic Places (National Register) and are therefore automatically listed in the California Register of Historical Resources (California Register); and eight (8) have been evaluated as appearing eligible for listing in the California Register and/or National Register. All of these properties are considered herein as historical resources for the purposes of CEQA. Therefore, potential impacts of the Project to these properties are analyzed.

As detailed in this report, the revised Project will not result in significant impacts to historical resources under CEQA. Of the ten (10) historical resources identified in the Project Area and/or Expanded Study Area, the Project will have no impact on two (2) resources and a less-than-significant impact on eight (8) resources. Based upon this analysis, this report finds that the Project will not have a significant effect on historical resources as defined by CEQA.

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¹ For certain property types—such as religious properties and cemeteries—the National Park Service provides special criteria considerations and additional guidance for evaluating their eligibility for the National Register. This guidance was used to evaluate two properties located in the Expanded Study Area. Because these properties were found to satisfy the special considerations, they were also evaluated as appearing eligible for listing in the National Register.
2.0 PROPOSED PROJECT

2.1 Overview

The proposed Automated Transit System (ATS) would include an approximately 1.6-mile long, elevated, guideway primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. Three stations are proposed adjacent to the guideway on privately owned land that would be acquired as part of the Project. The elevated guideway will contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand.

As part of the City’s collaboration and partnership with Metro, the Project is proposed as an extension of the Metro regional rail system to the City’s activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.

The ATS technology may be a self-propelled technology, including, rubber-tire ATS systems, monorails, large steel-wheel ATS systems, also known as automated light rail transit (ALRT) or a cable propelled ATS system. The system will be fully automated (i.e., driverless) to operate at the headways to meet the projected peak ridership needs. The vehicles are smaller than traditional heavy rail technology and can maneuver the tight curves required for the site-specific conditions. This type of technology is often times also referred to as automated guideway transit, automated transit system (ATS), automated people mover or simply monorail; regardless of the terminology used in the industry, it is a form of a light rail technology without an overhead catenary.

The ATS trains will operate in a pinched loop mode on dual tracks along the alignment, wherein trains follow each other and switch back at the end-of-line stations to make the return journey on the other track. As planned, the trains can be operated in multiple different configurations, ranging from a one-car train to multiple-car length trains with a maximum train length of approximately 200 feet. Depending on the ridership demands, which will be time of day and event day dependent, multiple trains of up to the maximum train length can be operated at varying headways, as close as 1.5 minutes, to provide the necessary peak and reserve capacity.

Three stations are proposed on private property that will be acquired as part of the Project. These stations are:

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\(^2\) Description of the Project as provided by the Project proponent.
• The Market Street/Florence Avenue station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood;

• The Prairie Avenue/Manchester Boulevard station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard parcel providing service to the Forum and the LASED at Hollywood Park including SoFi Stadium and existing and future local businesses and residences.

• The Prairie Avenue/Hardy Street station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the LASED at Hollywood Park, including SoFi Stadium, the IBEC, and other existing and future local businesses and residences.

These station locations were chosen to be near major employment, housing and retail centers, including the Forum, the LASED, including SoFi Stadium, and other employment, housing and retail commercial uses in the Hollywood Park Specific Plan, the IBEC, and employment, housing and retail commercial uses in Downtown Inglewood, which the City is seeking to enhance and activate.

The proposed stations are configured as center-station platforms. This configuration minimizes the total footprint of the station and guideways and provides easy way-finding for passengers by directing all passengers to the same platform where they board their train. This configuration also provides greater flexibility in maintaining operations in the event of equipment failures.

Each station includes ground, mezzanine, and platform levels. From the ground level, each station includes vertical circulation elements, consisting of stairs, escalators, and elevators from grade at existing sidewalks and passenger areas adjacent to the stations to the mezzanine and platform levels of the station. Pedestrian bridges at each station provide passenger walkways to travel over streets to avoid at-grade passenger crossings. The stations will be sized to support the projected ridership demands, including the peak projected boarding and deboarding demands at the station for non-event days and major event days, as well as in worst-case scenarios in the unexpected event of emergency conditions and/or system failure.

Existing roadways and infrastructure along the transit alignment will require reconfiguration to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the proposed Project.
The proposed Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center. The MSF will be located on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station are proposed as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The MSF will be designed in accordance with the Inglewood Transit Connector (ITC) Design Standards and Guidelines (Design Guidelines) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF will engage with the pedestrian and vehicular circulation around it, and sustainability features.

The proposed Project also includes two power distribution system (PDS) substations. These PDS substations will provide the necessary power for the proposed Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations will be located on the MSF site. The Southern California Edison service connection for the system would be provided to the PDS substation on the MSF site. The second PDS substation will be located on the Prairie Avenue/Hardy Street station site.

Additional public parking would be provided as part of the Project at three locations that are proposed for acquisition for use as construction staging areas. After construction, these sites will be improved as public parking lots:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 100 parking spaces would be provided at the Prairie Avenue/Hardy Street Station site along with a pick-up and drop-off area.

Revisions to the design of the Project were made in response to comments on the Draft EIR and consultation with key stakeholders in the community. These changes are identified below for the Market Street, Manchester Boulevard and Prairie Avenue segments of the proposed ATS system.
Figure 1. PROJECT LOCATION MAP
2.2 Market Street Segment

- Station
  - Market Street Station - The connection to the Metro K Line Downtown Inglewood station and the orientation of the station on site have been revised based on coordination with Metro to locate the connection more optimally on the north side of Florence Avenue. The pedestrian bridge location was moved based on coordination with Metro. Surface parking with a multi-modal pick-up and drop-off area will also be provided on this site as originally proposed.

- Guideway
  - Height – The height of the guideway has been raised approximately 10 feet on Market Street between Queen Street and Regent Street to maintain existing views of the façade of the Fox Theater Building, a historic resource.
  - Columns – The number of columns has been reduced and the proposed locations of the columns will be required to maintain existing views of the Fox Theater Building.
  - Alignment – As the alignment approaches Manchester Avenue the guideway has been narrowed.

2.3 Manchester Boulevard Segment

- Maintenance & Storage Facility (MSF)
  - The MSF Facility has been reduced in size from approximately 120,000 to 84,400 square feet in size and relocated from the western half of the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street and Spruce Avenue to the eastern half of this site to allow the Vons grocery store currently located on this site to remain on the site in a new building. The existing Vons store currently occupies approximately 58,000 square feet of a larger building on the southern portion of this block. A new Vons store, approximately 46,400 square feet in size, will be built on the northwest corner of this block on the corner of Manchester Boulevard and Hillcrest Boulevard. The new Vons store will have approximately 205 parking spaces, appropriate loading and access areas, and greater visibility along Manchester Boulevard.
• Guideway

  o Columns – The design of the guideway on Manchester Boulevard has been refined to reduce the need for columns on both sides of the street. The Draft EIR conservatively evaluated the ATS design to include the possibility of columns on both sides of Manchester Boulevard which would be connected by beams straddling the street (“straddle bents”) to support the guideway. The City has further investigated potential utility conflicts and refined the design to create a smaller ATS footprint. Accordingly, many of these straddle bents can be eliminated and replaced with single columns located in the center of the street. Additional straddle bents can be changed to half straddle bents, consisting of a column on one side of the street and a second column in the center of the street.

  o Street Improvements - The relocation of the columns for the guideway to the center of the street will require the construction of a raised roadway median replacing the existing dual left center turn lane. Turning movements at all street intersections will be maintained.

2.4 Prairie Avenue Segment

• Stations

  o Prairie/Pincay Station – This station at the Prairie/Pincay intersection has been removed from the Project and relocated to the intersection of Prairie Avenue and Manchester Boulevard. The Prairie/Pincay Station straddled Prairie Avenue, was supported by straddle bents that spanned Prairie Avenue and was also adjacent to Kelso Elementary School.

  o Prairie/Manchester Station – To accommodate a single column design for the guideway along Manchester Boulevard and Prairie Avenue this station has been added on the southwest corner of Prairie Avenue and Manchester Boulevard on a vacant site. This site is currently under private ownership and would be acquired as part of the Project. This station is proposed west of Prairie Avenue and would be supported by columns located under the station on the station site. A pedestrian bridge over Prairie Avenue is proposed to provide access to the Forum. A pedestrian plaza will also be provided on this site surrounding the station.

  o Prairie/Hardy Station – This station has been relocated from the center of Prairie Avenue to the western side of Prairie Avenue and would be supported by columns located under the station on the station site. A
pedestrian plaza and surface parking with a multi-modal pick-up and drop-off area will also be provided on this site. A pedestrian bridge over Prairie Avenue is proposed to provide access to the LASED. A third ITC Power Distribution Substation (PDS) site option has been identified at this station site. This station is proposed on private property proposed for acquisition as part of the Project. This site is currently developed with a retail commercial center. Acquisition of additional parcels located immediately north of the station site is also proposed to accommodate the track switch zone for this station. These parcels include vacant parcels and parcels developed with commercial buildings.

- **Guideway**

  - Alignment—The alignment in the Draft EIR was located over Prairie Avenue from Manchester Boulevard south through the southern end of the Pincay Station and was supported by straddle bents across Prairie Avenue. The alignment from Victory Street south through the Hardy Station was also supported by straddle bents across Prairie Avenue. From south of Pincay Street to Victory Street, the alignment was located along the west side of Prairie Avenue by single columns. With the revised design, the guideway is now located on the west side of Prairie Avenue and will be supported by single columns, allowing the road to be open to the sky. Straddle bent columns will be located near the Prairie/Hardy and Prairie/Manchester Stations to support switch zones. The straddle bent columns north of the Hardy Street station will be located west of Prairie Avenue. Three straddle bent columns that span Prairie Avenue will be located immediately south of the station and Nutwood Street.

- **Street Improvements**—The street improvements described in the Draft EIR included shifting Prairie Avenue east into the setback area in the Hollywood Park Specific Plan Area and on the Forum property from south of Hardy Street to Manchester Avenue.

  - With the revised design, the existing number of travel lanes on Prairie Avenue is maintained and sidewalk widths will also be maintained. Prairie Avenue is still shifted east into the setback area from north of Hardy Street to Manchester Avenue and the roadway will continue be relocated in the setback along the Hollywood Park Specific Plan and in the Forum property. Now, the only ITC infrastructure located in the setback area will be the pedestrian bridge landings from the Prairie Avenue/Hardy Street and Prairie Avenue/Manchester Boulevard stations, and potentially up to three straddle bent columns on the east
The proposed Project includes an extensive set of Design Guidelines. These guidelines include a number of performance-based standards with the specific goal of minimizing the Project’s effects on adjacent properties, including historical resources. These performance-based standards are incorporated into the Project as Project Design Features (PDFs). The purpose of these PDFs is to ensure that the final Project design achieves unobstructed—or in some cases, minimally obstructed—views of the street-facing façade(s) of each identified historical resource such that the resource will not be impaired. The identified resources would retain sufficient integrity to convey their significance. This includes minimizing or eliminating visual obstructions from the guideway support columns as well as from the guideway itself.

The extent and manner of achieving these views is a function of multiple variables related both to final Project design, as well as to the nature of the particular historical resource. Design variables include the elevation of the guideway (as measured from grade to the bottom of the guideway); the width of the guideway; the distance of the guideway from the resource (as measured from the guideway edge); as well as the dimensions, placement, and spacing of the support columns. Resource variables include the building’s height; scale; number of street-facing façades; width of its primary façade; front setback (if any); projecting elements overhanging the sidewalk (if any); and viewpoints from which the historical resource can best be discerned in its entirety (optimal viewpoints). For the historical resources on Market Street and Manchester Boulevard, which have no front setback, optimal viewpoints are from the sidewalk across the street from the resource. For all other resources, optimal viewpoints are from the sidewalk in front of the resource.

The final Project design must consider design variables (elevation of guideway, width of guideway, distance of the guideway from the resources, and the dimensions, placement, and spacing of support columns) and resource variables (building’s height, scale, number of street-facing facades, width of primary façade, front setback, project elements overhanding the sidewalk, and viewpoints from which the resource can best be discerned in its entirety). The final Project design shall minimize impacts to historical resources and cause minimal visual obstruction of the resource’s character-defining features.

In order to meet these performance-based standards, the following PDFs will be incorporated into the final Project design:

- The guideway’s elevation and distance from the façade of the historical resource will be sufficient for the guideway to visually clear the top of the historical
resources’ street-facing façade(s) when viewed from the optimal viewpoints. The final Project design is expected to achieve no visual obstruction of any of the identified historical resources from the guideway.

- At the Fox Theater (115 N. Market Street), and for 100 feet on either side of the resource, the guideway elevation will be a minimum of 52 feet from grade in order to achieve unobstructed views of this resource, including its monumental sign pylon.

- The dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of the historical resources’ street-facing façade(s) when viewed from the optimal viewpoints will be minimized. For five of the identified historical resources—Holy Faith Episcopal Church (260 N. Locust Street), former United Bank of California (now Broadway Federal Bank, 158-170 N. Market Street), former Fox Theater (115 N. Market Street), Professional Building (149-155 S. Market Street/231-239 Manchester Boulevard), and Inglewood Park Cemetery (720 E. Florence Avenue)—the final Project design is expected to completely avoid visual obstructions from support columns.

- For five of the historical resources—the former Bank of Inglewood (100 N. Market Street/307 E. Queen Street), former J.C. Penney (129-139 S. Market Street), Bank of America (320-330 E. Manchester Boulevard), the Forum (3900 W. Manchester Boulevard), and Lighthouse McCormick Mortuary (619-635 S. Prairie Avenue)—views that are completely unobstructed by support columns are not necessary for the resource to convey its significance. For the former Bank of Inglewood building and former J.C. Penney building, visual obstruction will be limited to one (1) support column. For the Lighthouse McCormick Mortuary, visual obstruction will be limited to two (2) support columns. Visual obstruction of the Bank of America building will be limited to three (3) support columns. With these limitations, only a small portion of the resources’ primary façades will be intermittently obscured depending on the position of the viewer. However, due to the scale and/or setback of these resources, their primary façades will remain readily discernable.
3.0 METHODOLOGY

This report analyzes potential project impacts to historical resources resulting from the Project. To identify historical resources that could be impacted, this report examines the site of the proposed Project (Project Area) and the immediately surrounding area (Expanded Study Area) to determine if historical resources are present.

The “Project Area” comprises all areas and parcels where new construction will occur. This includes the public rights-of-way along Market Street, Manchester Boulevard, and Prairie Avenue where the elevated ATS guideway will be constructed; the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street where the Market Street Station will be constructed; parcels north of Florence Avenue where a pedestrian bridge from the Market Street Station to the existing Metro station will land; the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue where the Maintenance & Storage Facility (MSF) and a Power Distribution System (PDS) substation will be built; the parcel at the corner of southwest corner of Manchester Boulevard and Prairie Avenue where a station will be located; parcels at the northwest corner of Prairie Avenue and Hardy Street were a station will be located; and parcels east of Prairie Avenue between Manchester and Hardy where the travel lanes will be relocated.

The “Expanded Study Area” has been defined to encompass what is expected to be the maximum extent within which Project impacts will occur. The Expanded Study Area includes all parcels fronting the alignment right-of-way on both sides. In addition, where there will be substantial new construction outside of the alignment right-of-way, parcels immediately adjacent to or across from the new construction have been included in the Expanded Study Area. This includes parcels adjacent to or across from the block where the Market Street, Manchester Boulevard/Prairie Avenue, and Prairie Avenue/Hardy stations will be constructed; parcels adjacent to or across from the MSF site; and sites where the pedestrian bridges will land.

Where historical resources exist within the Project Area or Expanded Study Area, this report analyzes project impacts for any adverse change in the significance of these resources. In doing so, this report provides a comprehensive review of historical resources that could be impacted, directly or indirectly, by the proposed Project. To this end, this report contains:

3 The parcel at the northeast corner of Manchester Boulevard and Prairie Avenue is included in the Expanded Study Area because it fronts the alignment right-of-way. While this parcel extends several blocks north of the Project Area to Florence Avenue, the potential for project impacts would only be expected in the southernmost portion of the parcel.

HISTORICAL RESOURCES TECHNICAL REPORT

Inglewood Transit Connector (Revised Project)

HISTORIC RESOURCES GROUP
• Field survey of the existing buildings, structures, objects, and landscape areas located within the Project Area and Expanded Study Area.

• Review of previous evaluations within the Project Area and Expanded Study Area through historic survey, environmental review, or other official actions.

• Identification and evaluation of historical resources within the Project Area and Expanded Study Area, including the potential for a historic district.

• Analysis of potential impacts to historical resources within the Project Area and Expanded Study Area.

For the purpose of this report, properties within the Project Area or Expanded Study Area have been evaluated (both individually and, where relevant, collectively as a potential historic district) for their eligibility for listing in the California Register of Historical Resources (California Register) per CEQA definition of a historical resource.

This report was prepared using primary and secondary sources related to the history and development of the City of Inglewood generally, with an emphasis on the early-20th century central business district that comprises much of the Project Area and Expanded Study Area. Documents that were consulted include:

• Previous historical resources surveys and assessments

• Previous environmental reviews

• City of Inglewood historical building permits

• Los Angeles County Tax Assessor records

• Sanborn Fire Insurance maps

• Historical photographs and aerial images

• Historical newspapers and other periodicals

• Local histories and historic context statements

• Built Environment Resources Directory for Los Angeles County

Research, field inspection, and analysis were performed by Paul Travis, AICP, Managing Principal; and Kari Fowler, Senior Preservation Planner, both of whom are qualified professionals who meet or exceed the Secretary of the Interior’s Professional Qualification Standards. Additional assistance was provided by Robby Aranguren, Planning Associate/GIS Specialist.

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4 Analysis in this report is based upon available building permits as provided by the City of Inglewood.

5 For a complete listing of all parcels examined as part of the Project Area and Expanded Study Area for the Project, see Appendix B.
Inglewood Transit Connector
(Revised Project)

HISTORIC RESOURCES GROUP
4.0 REGULATORY SETTING

4.1 Historical Resources under CEQA

The California Environmental Quality Act (CEQA) requires that environmental protection be given significant consideration in the decision-making process. Historical resources are included under environmental protection. Thus, any project or action which constitutes a substantial adverse change in the significance of a historical resource also has a significant effect on the environment and shall comply with the State CEQA Guidelines.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which cultural resources are significant, as well as which project impacts are considered to be significantly adverse. A “substantial adverse change” means “demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired.”

CEQA defines a historical resource as a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The courts have interpreted CEQA to create three categories of historical resources:

- **Mandatory historical resources** are resources “listed in, or determined to be eligible for listing in, the California Register of Historical Resources.”

- **Presumptive historical resources** are resources “included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1” of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

- **Discretionary historical resources** are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.6

To simplify the first three definitions provided in the CEQA statute, a historical resource is a resource that is:

- Listed in the California Register of Historical Resources;

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• Determined eligible for the California Register by the State Historical Resources Commission; or

• Included in a local register of historical resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. A historical resource is a resource that is:

• Identified as significant in a historical resource survey meeting the requirements of Public Resources Code 5024.1(g);

• Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code 55024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historical resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an “historical resource” for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historical resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

4.2 Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria. The property must also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places is an authoritative guide to be used by Federal, State, and local governments, private groups, and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection
from destruction or impairment. The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for Federal or Federally assisted projects; eligibility for Federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be listed in or eligible for listing in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of a historical resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

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. 

In addition to meeting any or all of the criteria listed above, properties nominated must also possess historic integrity. According to National Park Service guidance for applying National Register criteria, a property that is more than 50 years of age can be considered for listing in the National Register. Fifty years is a general estimate of time needed to develop historical perspective and therefore to evaluate historic significance.

7 36CFR60, Section 60.2.
8 36CFR60, Section 60.3.
California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State’s historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change to their significance.¹⁰

The criteria for listing in the California Register are based upon National Register criteria. A property may be listed in the California Register if it:

1. Is associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States.
2. Is associated with the lives of persons important to local, California or national history.
3. Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values.
4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.¹¹

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

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.
- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).
- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.¹²

Other resources which may be nominated for listing in the California Register include:

- Individual historical resources.

¹⁰ California PRC, Section 5023.1(a).
¹¹ 14 CCR 4852 (b).
¹² California PRC, Section 5023.1(d).
• Historical resources contributing to the significance of a historic district.

• Historical resources identified as significant in historical resources surveys, if the survey meets the criteria listed in subdivision (g).

• Historical resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.

• Local landmarks or historic properties designated under any municipal or county ordinance.¹³

Guidance for applying the California Register criteria does not provide a specific age threshold for eligibility. However, it does state that “sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource.”¹⁴

Local Designation

The City of Inglewood does not have a historic preservation ordinance and does not maintain a local designation program.

4.3 Historic Significance

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register. Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation.¹⁵ It is achieved in several ways:

• Association with important events, activities or patterns

• Association with important persons

• Distinctive physical characteristics of design, construction, or form

• Potential to yield important information

¹³ California PRC, Section 5023.1(e).
¹⁴ California Office of Historic Preservation, Technical Assistance Series #6, California Register and National Register: A Comparison (for purposes of determining eligibility for the California Register), (Sacramento, CA: California Department of Parks and Recreation), 3.
A property may be significant individually or as part of a grouping of properties.

### 4.4 Historic Integrity

*Historic integrity* is the ability of a property to convey its significance. It is defined as the “authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period.”

The National Park Service defines seven aspects of integrity: *location, design, setting, materials, workmanship, feeling, and association*. These qualities are defined as follows:

- **Location** is the place where the historic property was constructed or the place where the historic event occurred.
- **Design** is the combination of elements that create the form, plan, space, structure, and style of a property.
- **Setting** is the physical environment of a historic property.
- **Materials** are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
- **Workmanship** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling** is a property’s expression of the aesthetic or historic sense of a particular period of time.
- **Association** is the direct link between an important historic event or person and a historic property.

### 4.5 Period of Significance

The National Park Service defines the *period of significance* as “the length of time when a property was associated with important events, activities or persons, or attained the characteristics which qualify it for… listing” in National, State or local registers. A period of significance can be “as brief as a single year… [or] span many years.” It is based on “specific events directly related to the significance of the property,” for example the date of construction, years of ownership, or length of operation as a particular entity.

### 4.6 Historic Districts

Standard preservation practice evaluates collections of buildings from similar time periods and historic contexts as historic *districts*. The National Park Service defines a

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17 National Register Bulletin 15, 44-45.
18 National Register Bulletin 16A, 42.
A historic district derives its significance as a single unified entity.

According to the National Park Service, “a district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.” Some examples of districts include business districts, college campuses, large estates, farms, industrial complexes, residential areas and rural villages.

Properties that have been found to contribute to the historic significance of a district are referred to as district contributors. Properties located within the district boundaries that do not contribute to its significance are identified as non-contributors.

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19 National Register Bulletin 15, 5.
20 National Register Bulletin 15, 5.
5.0 HISTORIC CONTEXT

5.1 Development History

The following narrative describes the evolution of the Project Area and vicinity over time, with an emphasis on the early development of Inglewood and its downtown business district. The purpose of this narrative is to provide guidance for evaluating the historic significance of properties within the Project Area and Expanded Study Area, and for determining their eligibility for listing or designation according to established criteria and integrity thresholds.

Pre-History

In the pre-historical period, the coastal plain between present-day Los Angeles and Long Beach was immensely fertile, enriched by the periodic flooding of the Los Angeles River over millennia. It was home to the Tongva people, also referred as the Gabrieleño, Fernandeño, or Nicoleño, the names given to the region’s indigenous people by California’s Spanish missionaries. The Tongva occupied the area now encompassed by the Los Angeles basin, San Fernando Valley, San Gabriel Valley, San Bernardino Valley, and the local California coastline. The South Bay region was home to a number of small Tongva (Gabrieleño) villages, with notable settlements at Suangna near the present-day city of Carson, near Point Fermin in San Pedro, and near Malaga Cove in Palos Verdes.21

Spanish Colonial and Mexican Periods

In 1542, Spanish explorer Juan Rodriguez Cabrillo led the first European expedition to explore what is now the west coast of North America. Explorers with Cabrillo’s expedition encountered native people on land and sea voyages, making what is thought to be the first known contact with Alta California’s indigenous tribes, including the Tongva of the Suangna area.22 While Cabrillo claimed California for the Spanish Crown at this time, Spanish settlement would not reach this territory for another two hundred years.

On July 14th, 1769, Don Gaspar de Portolá, governor and military leader of Baja California, led the first expedition to colonize Alta California. Accompanied by Franciscan friars Junípero Serra and Juan Crespi, Portolá took a group of 64 men northward from San Diego toward Monterey. On August 2nd, the expedition camped along the east bank of the Los Angeles River just south of where it is joined by the Arroyo Seco. Fr. Crespi named the spot “El Pueblo de Nuestra Señora la Reina de los Ángeles del Río Porciúncula (translating as “town of Our Lady the Queen of Angels of

22 Ibid.
the River Porciúncula”). As the expedition crossed the river and continued to the south and west approximately one mile, they encountered the Tongva village of Yang-na, believed to be near the current site of El Pueblo de Los Angeles.

On September 8th, 1771, Spanish colonists established Mission San Gabriel, the fourth of an eventual 21 Spanish missions in California, and the first in this area. Much of the area’s native population would be recruited to work the San Gabriel Mission lands. Seven years later, in 1778, Governor Felipe de Neve received approval for the creation of a civil pueblo along the Río la Porciúncula. Persuaded by Crespi’s earlier descriptions of a well-watered valley with good soils for growing crops and an ample native population to work the land, the Spanish colonial government ordered Governor Neve to establish a settlement at this location and name the new pueblo La Reina de los Angeles (“Queen of the Angels”).

In 1821, Mexico won its independence from Spain and Alta California became a territory of the new Mexican Republic, marking an end to Spanish colonial rule in the region. The political and social control of the military and religious leadership began to shift toward the secular and private sector, and to native-born Californios. The new Mexican government sought to diminish the influence of Spain in the region, as the Spanish missions largely remained loyal to the Roman Catholic Church in Spain. At the same time, there was a need for more grazing lands to increase commerce in the hide and tallow trade. Thus, beginning in 1834, the Mexican government began to secularize the missions, confiscating mission lands to be distributed in large land grants called ranchos. Pío Pico, the last governor of Alta California, subdivided the former mission lands into large tracts, granting them to various prominent Californios.

American Period

United States troops began occupying Alta California in 1846, at the advent of the Mexican-American War, and soon gained possession of Los Angeles itself. However, Alta California would not officially come under American rule until February 2nd, 1848, with the signing of the Treaty of Guadalupe Hidalgo, which ceded the California territory to the United States and ended the war. Importantly, the treaty also provided that the existing land grants would be honored.

The origin of today’s City of Inglewood dates back to the mid-1800s and a dispute between two prominent Californio families: the Ávilas and the Machados. José Manuel Orchado Machado was a Spanish soldier and mule tender who was sent west of Los Angeles in 1781 to graze his livestock. He found the area around the Centinela Springs to be excellent grazing lands and settled there with a group of ranchers. In 1834, the term Californio refers to Spanish-speaking natives of Alta California. The Californios were elite families that received large land grants from Spain and Mexico.

The site of Centinela Springs is today’s Edward Vincent Junior Park, just northeast of the Project Area.
Machado’s son Ygnacio built the Centinela Adobe. During this same period, Francisco Ávila and his family had established grazing lands near the Centinela. As the claims of the two families clashed, they took their dispute to the local council in 1837, which gave official title of the area around Centinela Springs to the Machado family as the 2,219-acre Rancho Aguaje de la Centinela. The Ávila family was granted the much larger Rancho Sausal Redondo. At 22,458 acres, this land encompassed much of what is now the South Bay region of Los Angeles County. In 1845, Bruno Ygnacio Ávila arranged a trade with the Machados: a small tract in the Pueblo de Los Angeles for Rancho Aguaje de la Centinela. The grant for Rancho Sausal Redondo was officially patented to Antonio Ygnacio Ávila in 1855; Rancho Aguaje de la Centinela was officially granted to Bruno Ávila in 1872.

Ultimately the Ávila family would lose both of the ranchos. Bruno Ávila lost Rancho Aguaje de la Centinela through foreclosure in 1857; the property was subsequently acquired by Scotsman Sir Robert Burnett in 1860. In 1868, the heirs of Antonio Ávila were forced to sell Rancho Sausal Redondo to pay probate costs, and it was also acquired by Burnett. By 1872, Burnett combined the total area of some 25,000 acres into the Centinela Ranch, thus reuniting the extent of the original land grant. This ranch included what would ultimately become the coastal communities of Playa del Rey, El Segundo, Manhattan Beach, Hermosa Beach, and Redondo Beach; as well as the inland communities of Westchester, Inglewood, Hawthorne, and Lawndale.

In 1873, Burnett returned to his native Scotland, leasing the combined rancho lands to Canadian attorney Daniel Freeman and his wife, Catherine, with an agreement that they could eventually purchase the property outright. The Freeman family moved to the ranch, which Burnett had been using to graze sheep and cattle. Daniel Freeman continued to graze the stock, while also planting more than 10,000 fruit and nut trees. Following a drought that led to the death of some 22,000 of his sheep, Freeman turned to dry farming, eventually producing a million barrels of barley annually. Ultimately Freeman would amass a fortune farming barley, olives, citrus fruits, and almonds. He named his ranch “Inglewood,” after his birthplace in Ontario.

Following Catherine’s death, Daniel Freeman began to pursue the commercial development of his expansive holdings. He first established the Centinela Land Company, which proved unsuccessful. Then in 1887, as the California Central Railway laid tracks to Redondo Beach, Freeman sold some 11,000 acres of his ranch to the Centinela-Inglewood Land Company, which would subdivide the extent into small

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25 The Centinela Adobe is located in the Los Angeles community of Westchester and is the oldest building in the area. Considered the “birthplace of Inglewood,” it is operated as a house museum by the Historical Society of Centinela Valley.  
26 The Freeman family officially acquired this land from Burnett in 1885.
parcels for the settlement of the new town of Inglewood. As local historian Gladys Waddingham tells it:

*Much fanfare went into selling the first lots. Excursion trains from Los Angeles brought prospective customers as well as several dignitaries. All came to the Land Office that stood near the little depot. We can imagine the excitement! By the end of the day 300 lots had been sold.*

In 1888, Freeman began work on a large mansion for himself and his family, with bricks provided by his own newly-established Continuous Brick Kiln Company of Inglewood, and lumber from the recently-acquired local planning mill. In 1889, he built the Land Company office next to the train depot, moving it to the grounds of his estate in 1895 where it served as his office until his death in 1918. Ultimately, all 25,000 acres of the Centinela Ranch would be subdivided and developed, with the only remaining portion of the ranch being the one-acre site on which the Centinela Adobe is situated.

**Inglewood Townsite**

The townsite of Inglewood was platted by the Centinela-Inglewood Land Company in 1888, by which time the town already had a population of 300. The plan divided the town into northern and southern sections on either side of the newly completed Inglewood Division of the California Central Railroad line, a subsidiary of the Atchison Topeka & Santa Fe Railway, which ran along Florence Boulevard as it made its way from Los Angeles to Redondo Beach. The major north-south street leading into Inglewood was Grevillea Avenue. Development during this period was sparse, and most buildings were of impermanent wood-frame construction. The first few business buildings clustered on narrow uniform lots along Grevillea Avenue and Commercial Street (now La Brea Avenue) between Regent and Queen streets.

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28 Waddingham, 8.
29 Waddingham, 11. Daniel Freeman is considered the founder of the City of Inglewood. Among his various pursuits, he is said to have been the first farmer to engage extensively in wheat cultivation in Southern California. Upon discovering a deposit of brick clay on his property, he established the Continuous Brick Kiln Company of Inglewood in 1888, manufacturing the building materials for many of the business blocks on Spring Street and Broadway in downtown Los Angeles, including his own building, the Freeman Block at 6th and Spring streets. He was the first president of the California Club of Los Angeles, president of the Los Angeles Chamber of Commerce in 1893-1894, and director of the Southern California Railway Co. Freeman lived in the Centinela Adobe before erecting his own residence in beginning in 1891, which was demolished 1972 to make way for the Daniel Freeman Memorial Hospital (now closed). In 1975, the Land Company office was moved from his estate to the grounds of the Centinela Adobe, where it now stands.
30 Waddingham, 6.
By 1892, the town of Inglewood was home to several small businesses, including a grocery, post office, a barber, a restaurant, and a large two-story hotel on Queen Street between Commercial and Market. At this time, Inglewood also had a post office, a railroad depot, and a large grain storage building situated along the Redondo Branch of the AT&SF railroad, as well as a handful of single-family residences. Market Street was predominantly residential during this period, before the opening of a streetcar line along its length in 1904, which would lead to its gradual transition to a commercial corridor.

By 1907, downtown Inglewood had several dozen dwellings. Commercial establishments included a drug store, general merchandise store, grocery, meat market, tailor, print shop, and various lodging buildings and offices. Institutional properties included a public school and a Presbyterian church. Industrial uses were clustered along the rail lines and included a greenhouse, planning mill, lumber yard, cement storage, gain mills and storage, and several warehouses. The City of Inglewood was officially incorporated on February 14, 1908.

![Market Street at the time of incorporation, 1908. ("History of Inglewood," Waddingham.)](image)

31 Sanborn Fire Insurance Maps, Inglewood CA, 1892. The Inglewood Hotel is labeled on this map as “not open” and occupied by four families as a dwelling.
Also, by this time, Inglewood was home to an expansive cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association, acquiring a large plot of land just east of what would become downtown Inglewood. A total of 32 internments took place in the cemetery’s first year of operation, with funerals often arriving by rail from Los Angeles in a private funeral car. In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. Within a decade, the cemetery would erect the Neoclassical-style Inglewood Mausoleum, the first community mausoleum in the State of California.

Many of the South Bay region’s earliest settlers have been laid to rest at Inglewood Park Cemetery, including a number of Civil War veterans. Other notable residents include former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams.

By 1912, Inglewood’s commercial core was beginning to take shape along Commercial Street between Los Angeles Street/Inglewood Avenue (now Florence Avenue) and Queen Street. Deep, narrow lots were being developed with various commercial uses, from restaurants and boarding houses, to plumbers and hardware stores. Market Street remained primarily residential during this period, with a few commercial buildings, including a jeweler, a milliner, a confectioner, an undertaker, a bank, and a Methodist church.

By 1920, the South Bay’s local economy was booming due to the region’s fertile agricultural lands, productive oil fields, and emerging aviation industry. The City of Inglewood was growing exponentially, as hundreds of new homes were being built. At the same time, the city’s commercial development was coalescing into a downtown

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33 Portions of the original railroad waiting station have been incorporated into the main entrance.
34 The Inglewood Mausoleum was erected over the course of three years, from 1913 to 1915.
business district. Commercial Street between Regent and Queen streets was now solidly commercial, boasting many of the business enterprises needed by any growing town, from banks and automobile showrooms, to furniture stores and a movie theater. South of Queen, Commercial Street was still largely undeveloped but for a few single-family residences and an apartment house. At this point, Market Street was more sparsely developed overall and displayed a combination of commercial and residential uses.38

The commercial structures erected in downtown Inglewood at this time were typical of those being built in downtowns throughout Southern California. These were what have since been termed “taxpayer blocks,” speculative investments to generate tax benefit until more valuable development could be carried out. Early examples were multi-unit two-story buildings, frequently with retail units on the ground floor and offices or apartments above. These buildings were typically unreinforced brick in construction, with applied ornament of cast stone or terra cotta at the entrance or along the parapet. Depending on the size of the building, it may contain one or more retail storefronts, with flexible interiors to accommodate the ever-changing needs of individual tenants. While many of these buildings were vernacular in design, in Southern California they were often overlaid with details of the Spanish Colonial Revival style, including tile roofs or parapet edges, arched doors and window openings, and decorative wall tile and cast-stone detailing. With the advent of the personal automobile, a single-story version of the form became popular, with surface parking behind.39

Inglewood also had a number of churches by this time, including the First Methodist Episcopal Church, St. John’s Catholic Church, Church of the Brethren, and Christian Church.40 The only church that survives from this period is Holy Faith Episcopal Church, located at the southeast corner of Locust Street and Grace Avenue.41 The

40 Bricker, 9.
41 Holy Faith Episcopal Church is located at 260 N. Locust Street.

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church was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, Grace Freeman Howland and her husband Charles donated the funds to erect a religious complex consisting of a church, a rectory (the dwelling to the south), and parish hall (now a school at the rear). They hired a young architect, Philip Frohman, to design what would be hailed as “the most perfect example of true Gothic architecture in the West.” Frohman would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church was officially consecrated on November 8th, 1914, and dedicated to Catherine Freeman and Mathilda Howland, the mothers of Grace and Charles. The church lost its original bell tower in the 1933 Long Beach Earthquake, but soon thereafter gained the Stations of the Cross, imported from Italy; the pulpit, lectern and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by Judson Studios in the Highland Park neighborhood of Los Angeles.

On the evening of June 21, 1920, the Los Angeles Basin was rattled by an estimated 5.0 earthquake centered near Inglewood. While tremors were felt as far away as Ventura and Riverside, almost all of the damage took place in Inglewood, and specifically to the unreinforced brick buildings along Commercial Street (now La Brea Avenue), where exterior walls fell into the street and plate glass windows shattered. The Inglewood Hotel was also badly damaged and subsequently demolished. Despite the widespread damage, however, the earthquake did not seriously hamper the city’s growth. In fact, according to local historian Gladys Waddingham, the quake appears to have been a boon to development, as “many of the people who flocked to see the damage were seeing Inglewood for the first time and were so impressed that they came back to live.” This hypothesis is borne out by population figures: the 1920 census

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42 Grace Freeman was the daughter of Daniel Freeman, considered the founder of the City of Inglewood.
credited Inglewood with a population of 3,286. In just two years the figure would double, making Inglewood the fastest growing city in the nation.\textsuperscript{45} 

The 1920s was a boom period for the City of Inglewood, both in terms of population and development. While Commercial Street continued to be the primary artery of the downtown business district, many more businesses were being established on Market Street and its cross-streets during this period. At least seven new buildings were constructed in the 100 block of North Market Street alone. The local financial institution the People’s Federal Building & Loan Association was established at this time, first in a unit of the building at 314 S. Market Street, before constructed their own building at the northeast corner of Market Street and Pimiento Street (now Manchester Boulevard) in 1927.\textsuperscript{46} That same year, the Bank of Inglewood erected a two-story mixed-use building at the northeast corner of Market and Queen streets, at a cost of $140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was touted as the “first steel frame business block in this city” and as “practically fire and earthquake proof.”\textsuperscript{47} 

\begin{figure}
\centering
\includegraphics[width=\textwidth]{Market_Street_1925.jpg}
\caption{Market Street, looking north, 1925. (Security Pacific National Bank Collection, LAPL)}
\end{figure}

On May 18\textsuperscript{th}, 1927, some 15,000 locals came out to celebrate the “Festival of Light” which marked the opening of a new ornamental lighting system installed along Market Street. In addition to providing much needed illumination, the standards also supported

\textsuperscript{45} Waddingham, 26.  
\textsuperscript{46} The former People’s Federal Building & Loan Association building is located at 150 S. Market Street. It is currently occupied by the World Hat & Boot Mart.  
the trolley wires of the Los Angeles Railway, allowing for the removal of the wooden poles from the middle of the street and the sidewalk. In 1928, a two-story mixed-use structure called the Professional Building was constructed at Market Street and Manchester Boulevard’s northwest corner. The building was designed in the Spanish Colonial Revival style with Churrigueresque details. Also constructed in downtown Inglewood during this period were a new City Hall building (1923, demolished), the Granada Theater (1923, demolished), an S.H. Kress Variety Store (1927), and a United Artists Theater (1931, demolished), as well as a number of auto-related businesses such as gas stations and repair garages.

Toward the end of the 1930s, Inglewood’s economic base began to expand outside the downtown core. Appropriately, in 1937 Commercial Street was officially changed to La Brea Avenue, connecting it with the street in Los Angeles. Also that year, Mines Field, which had been established just southwest of the city, was purchased by the City of Los Angeles to serve as its municipal airport, bringing many new jobs to the region. In 1938, the Hollywood Park, an “ultra-modern” thoroughbred racetrack, opened on 314 acres just southeast of downtown, effectively making Inglewood a destination for the first time. In addition to attracting the typical racing fan, Hollywood Park brought in celebrated personalities associated with the entertainment industry—from studio executives Jack Warner, Walt Disney and Samuel Goldwyn, to A-list actors like Al Jolson and Bing Crosby—many of whom were also investors in the operation.

Wartime and Postwar Growth
As war clouds gathered in the early 1940s, a number of aviation-related and other wartime manufacturing facilities set up shop around the Los Angeles Airport. North American Aviation, Inc. and the Northrup Company both established airplane manufacturing plants in the vicinity. Due to the emergence of these new facilities, this area would not only be critical to the defense industry during

49 The Professional Building is located at 149-155 S. Market Street/231-239 E. Manchester Boulevard.
50 Waddingham, 43.
51 Bricker, 13.
World War II, but in the postwar years would evolve into one of the most important centers of the nation’s aerospace industry.

The presence of wartime and postwar manufacturing jobs added sharply to the local population and financially supported a growing middle class throughout the South Bay region, including in Inglewood. In 1938, the city had a population of 26,000; by 1956, that number had grown to 64,000.\(^5\) Housing construction naturally responded to the increased demand, and commercial development followed, leading to a pattern of postwar decentralization. By the mid-1950s, the city had three retail business areas—in North Inglewood, Morningside Park, and Crenshaw—in addition to the downtown.

Despite this tremendous growth overall, new development in downtown Inglewood was very limited during this period. In 1941 a J.C. Penney department store opened on Market Street between Queen Street and Manchester Boulevard. Originally constructed as a one-story building, in 1954 it was expanded with a second story and remodeled in its exiting Mid-Century Modern style, with a deep front canopy and glazed terra cotta tile columns.\(^5\)

The Fox Theater opened on March 31\(^\text{st}\), 1949, on Market Street between Regent and Queen. Erected on the site of the Granada Theater, which burned down in 1945, it was the last theater constructed by the Fox West Coast Theater chain. Designed by prolific theater architect S. Charles Lee in the Late Moderne style, it was the first theater in Inglewood to have air conditioning. Other features included automatic lobby doors, CinemaScope widescreen projections, assistance for the hearing impaired, and a soundproof “crying room.” The Fox Inglewood was often used for Fox Pictures’ premiers and sneak previews.\(^5\)

During this same period, two substantial institutions opened just outside of downtown

\(^{52}\) Ibid.

\(^{53}\) The former J.C. Penney building is located at 129-139 S. Market Street.

In 1948, Bank of America erected a sprawling 22,000-square-foot branch at the southwest corner of Manchester Boulevard and Locust Street.\textsuperscript{55} That same year, funeral director John Flanagan opened Hardin & Flanagan Colonial Chapel & Mortuary on Prairie Avenue at La Palma Drive, across the street from Hollywood Park. Flanagan built a number of mortuaries around the Los Angeles area using the same American Colonial Revival design. In 1959, the business was purchased by the McCormick family and renamed McCormick Mortuary.\textsuperscript{56} The following year, the building was expanded with a two-story north wing, adding a new lobby with offices above. Today, the business is operated as Lighthouse McCormick Mortuary.\textsuperscript{57} The other area for new development during the postwar period was La Brea Avenue, a wide auto corridor which previously served as the western border of downtown Inglewood.\textsuperscript{58}

Despite these examples of new construction in and around downtown during this period, the primacy of the city’s downtown as a commercial district was substantially diminished by increased competition from outlying commercial areas. The removal of the Market Street trolley line in 1957 added further stress to already struggling downtown.\textsuperscript{59}

\textsuperscript{55} The Bank of America building is located at 320-330 E. Manchester Boulevard.
\textsuperscript{56} The McCormick family operated various locations throughout the South Bay, including Westchester, Hawthorne, Redondo Beach, Manhattan Beach, Gardena, and Whittier.
\textsuperscript{57} The Lighthouse McCormick Mortuary is located at 619-635 S. Prairie Avenue.
\textsuperscript{58} Also built during this period was a Sears department store at Manchester and Hillcrest boulevards. Opened in 1947, this was an early indicator that the future of retail in Inglewood would not be downtown. Sears was demolished in 1993 and replaced by a Vons supermarket.

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businesses. The city responded by adding municipally-owned off-street parking lots located throughout the district to draw car-dependent shoppers. The Chamber of Commerce and Downtown Inglewood Retail Merchants Association coordinated to organize various promotional activities, as well as physical improvements like tree planting in the center strip and along sidewalks, which were in place by the early 1960s. However, these effects of these efforts were soon eclipsed by the continued loss of customers to new shopping malls in communities throughout Los Angeles. Inglewood considered, but ultimately rejected plants to build a mall of its own on a large parcel at Prairie and Manchester, a proposal largely defeated by the Market Street merchants. The site would instead become the home of the Forum.

By the late 1960s, downtown Inglewood was in need of reinvention. To this end, the city contemplated a wholesale redevelopment scheme for the Market Street corridor that would expand and remodel existing stores, construct two high-rise office and apartment towers, introduce a landscaped arcade, and build a four-square block parking deck above shops to quadruple parking capacity. However, this plan would go unrealized. The United Bank of California at the southeast corner of Market and Regent streets would be the first new structure to be added to the Market Street corridor in

nearly two decades, replacing several early 20th-century commercial buildings.\textsuperscript{62} Constructed in 1967 in the Late Modern style, it was joined nine years later by a stand-alone drive-thru automated teller building situated across Regent from the bank. Both buildings are believed to have been designed by Los Angeles modernist Richard Dorman.\textsuperscript{63}

**Beyond Downtown**

In the late 1960s, nationally prominent businessman Jack Kent Cooke selected the site of a former golf course at the southeast corner of Prairie Avenue and Manchester Boulevard to erect a new venue for his three professional sports franchises: the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. The Forum, a multi-purpose indoor arena, was designed by the prominent Los Angeles architectural firm Charles Luckman & Associates and completed in 1967.\textsuperscript{64} Designed in the New Formalist architectural style, it was intended as a modern and highly-stylized version of the Coliseum of ancient Rome. Nicknamed “the Fabulous Forum,” it would host tennis matches, boxing matches, ice shows, rodeos, the circus, award shows, and political events. In 1972, the Forum was the site of the Lakers’ first NBA championship since moving to Los Angeles; five additional titles would follow in the 1980s. From the mid-1970s through the 1990s, the Forum would serve as the premier large-scale concert venue for the Los Angeles area, and would be influential in the birth of “arena rock.” During the 1984 Olympics, the Forum was the venue for men’s and women’s basketball.\textsuperscript{65}

By the early 1970s, Market Street had turned into a virtual ghost town as shoppers abandoned the downtown business center for suburban malls, and key tenants like J.C. Penney closed their doors. In an effort to revitalize the core of the city, from 1971 to

\textsuperscript{62} The former United Bank of California is located at 158-170 N. Market Street.

\textsuperscript{63} Although an original building permit for the 1967 bank building is not available from the City of Inglewood, the permit for the similarly-styled drive-thru automated teller building lists Richard Dorman as its architect.

\textsuperscript{64} The Forum is located at 3900 W. Manchester Boulevard.

1976 Inglewood spent about $50 million in local, county, and federal funds to erect a new civic center complex along La Brea Avenue, just one block west of downtown. This new complex combined City Hall, a courthouse, library, fire and police facilities, public health complex, and a major new parking garage onto a single super-block, surrounded by expanses of lawn and public art. As hoped, this new construction sparked a flurry of new commercial development in the larger In-Town Redevelopment Area—bounded by Florence, Locust, Manchester and Fir—the vast majority of which was office space and not retail. Several residential projects were built at this time as well, most notably the 200-unit Inglewood Meadows housing complex on Locust Street, just east of downtown.

While these projects brought large numbers of people into the vicinity of Market Street, their presence did not raise the corridor’s fortunes, and the vitality of the downtown business district continued to wain into the 1980s. In October 1986, Market Street merchants brought downtown business activity to halt as they closed their shops and picketed in a city-owned parking lot in a last-ditch effort to save it from redevelopment. The parking lot at La Brea Avenue and Queen Street provided 80 metered parking spaces which local shopkeepers saw as critical to continued viability of the downtown business district, which was already suffering from a severe parking shortage. Ultimately, however, the protests were unsuccessful, and the parking lot was soon replaced by a five-story office building. Yet another sign of downtown’s economic decline, the Fox Theater, then owned by the Mann theater chain, closed its doors in 1988.

Since the late-1970s, at least four City-sponsored revitalization programs have focused on improving Market Street’s commercial viability, introducing street landscaping and furniture as well as façade improvements to the existing buildings. Efforts have included a façade improvement program designed by architectural firm Kahn, Kappe, Lotery, Boccato (1979); a $250,000 façade improvement program, including signs and awnings (1984); a California Main Street Community Project (1990s); and the Market Street Renaissance program (2000). However, despite these efforts, Market Street has largely remained an underutilized asset.

Inglewood Today & Tomorrow

In 1994, Hollywood Park underwent a $100 million expansion into Hollywood Park Casino, which extended the facility’s economic viability. However, in May of 2013, it was announced that the Hollywood Park racetrack would be closing at the end of the fall racing season. In 2015, the Inglewood City Council approved a plan to build a

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66 The In-Town Redevelopment Area was one of six redevelopment project areas adopted by the Inglewood Redevelopment Agency between 1970 and 1973.


70,000-seat football stadium on the site in anticipation of the St. Louis Rams moving back to Los Angeles. The Inglewood mayor was on-hand to witness the demolition by explosives of the massive grandstand.

The Forum remained the home of the Lakers and Kings until 1999, when both teams relocated to the newly-constructed Staples Center in downtown Los Angeles. Beginning in 2012, the Forum underwent a substantial renovation, reopening in 2014. Later that year, the Forum was listed in the National Register of Historic Places. The venue is inextricably tied to the identity of the City of Inglewood, which adopted the moniker “City of Champions.” The Forum is slated to host the gymnastics events for the 2028 Summer Olympics.

Over the past decade, the City of Inglewood has been acquiring select parcels throughout the city for redevelopment, including along Market Street. Various planning studies have been conducted to develop standards for transit-oriented development, mixed-use development, and parking, with the goal of revitalizing downtown Inglewood. Local advocacy organization the Inglewood Historic Preservation Alliance (IHPA, formerly the Inglewood Historic Site Preservation Committee) continues to work toward the protection of the city’s historic structures and places of interest, including the Fox Theatre, which was successfully listed in the National Register of Historic Places in 2013. Currently, the City of Inglewood is utilizing *The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines*, adopted November 1st, 2016, as the controlling document for future activity along Market Street.

On January 12th, 2016, the NFL voted to move the St. Louis Rams back to Los Angeles, with the San Diego Chargers to follow. In October 2016, the last part of the former racetrack, the Casino, was demolished and a new Hollywood Park Casino was opened next door. The new *Los Angeles Stadium at Hollywood Park* is currently under construction. When completed in 2020, it will be the new home of the NFL’s Los Angeles Rams and Los Angeles Chargers. The Los Angeles Stadium is slated to host Super Bowl LVI in 2022, the College Football National Championship in 2023, and the opening and closing ceremonies and soccer events for the 2028 Summer Olympics.

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5.2 Selected Chronology

Pre-History

3,500 BP The Tongva occupy the area now encompassed by the Los Angeles basin, San Fernando Valley, San Gabriel Valley, San Bernardino Valley, and the local California coastline.

Spanish Colonial Period

1542 Spanish explorer Juan Rodriguez Cabrillo makes the first documented European contact with the native Tongva people.

1769 The Portolá expedition passes through present-day downtown Los Angeles, encountering the native people from the village of Yang-na.

1771 On September 8th, Spanish colonists establish Mission San Gabriel, the fourth of California’s Spanish missions.

1778 *El Pueblo de Los Angeles* is officially founded under the Spanish Laws of the Indies on September 4th.

Mexican Period

1821 Mexico wins its independence from Spain and Alta California becomes a territory of the new Mexican Republic.

1834 The California Missions are secularized by the Mexican government, and mission lands are confiscated for distribution in large land grants called *ranchos*.

Ygnacio Machado builds the Centinela Adobe, now considered the “birthplace of Inglewood.”

1837 The Machado family is granted official title of the area around Centinela Springs as the 2,219-acre *Rancho Aguaje de la Centinela*.

The Ávila family is granted the 22,458-acre *Rancho Sausal Redondo*, encompassing much of what is now the South Bay region of Los Angeles County.

1845 Bruno Ygnacio Ávila acquires *Rancho Aguaje de la Centinela* from the Machados in exchange for a small tract in the *Pueblo de Los Angeles* for.

American Period

1846 United States troops begin occupying Alta California.

1848 The signing of the Treaty of Guadalupe Hidalgo on February 2nd cedes the California territory to the United States and ends the Mexican-American War.

1850 Los Angeles incorporates as an American city on April 4th.
California is admitted to the Union as its 31st state.

1857 Bruno Ávila loses Rancho Aguaje de la Centinela through foreclosure.

1860 Rancho Aguaje de la Centinela is acquired by Scotsman Sir Robert Burnett.

1868 The heirs of Antonio Ávila are forced to sell Rancho Sausal Redondo to pay probate costs.

1872 Burnett combines his total land holdings into the Centinela Ranch, encompassing the present-day communities of Playa del Rey, El Segundo, Manhattan Beach, Hermosa Beach, Redondo Beach, Westchester, Inglewood, Hawthorne, and Lawndale.

1873 Burnett leases his property to Daniel and Catherine Freeman.

1885 Daniel Freeman officially acquires Burnett’s property and names it Inglewood.

1887 Freeman sells some 11,000 acres of his ranch to the Centinela-Ingelwood Land Company for development.

**Inglewood Townsite**

1888 The townsite of Inglewood is platted by the Centinela-Ingelwood Land Company.

The California Central Railway completes a line to Redondo Beach.

Freeman erects a large mansion in Inglewood.

1889 Freeman builds a land office on the grounds of the Centinela Adobe.

1905 A group of local businessmen forms the Inglewood Park Cemetery Association.

1907 The Romanesque-style Grace Chapel is erected at Inglewood Park Cemetery.

**City of Inglewood**

1908 The City of Inglewood is incorporated on February 14th.

1914 Holy Faith Episcopal Church, designed by nationally renowned architect Philip Frohman, is officially consecrated.

1915 The Neoclassical-style Inglewood Mausoleum at the Inglewood Park Cemetery is completed.

1920 On the evening of June 21st, the Los Angeles Basin is rattled by an estimated 5.0 earthquake centered near Inglewood.

1927 The People’s Federal Building & Loan Association erects a building at the northeast corner of Market Street and Manchester Boulevard.
The Bank of Inglewood building is erected at the northeast corner of Market and Queen streets.

A new ornamental lighting system is installed along Market Street.

1928 The Professional Building is constructed at Market Street and Manchester Boulevard’s northwest corner.

1929 The stock market crashes in late October, ultimately leading to the Great Depression.

1933 On the evening of March 10th, a magnitude 6.4 earthquake strikes off the coast of Long Beach.

1937 Mines Field, west of Inglewood, is purchased by the City of Los Angeles to serve as its municipal airport.

1938 Hollywood Park thoroughbred racetrack opens southeast of downtown Inglewood.

Wartime & Postwar Growth

1941 On December 7th, the U.S. naval base at Pearl Harbor is attacked by the Imperial Japanese Navy, leading to the United States’ entry into World War II.

A J.C. Penney department store opens in downtown Inglewood.

1945 The Granada Theater on Market Street burns down.

1947 Sears department store opens at Manchester and Hillcrest boulevards.

1948 Bank of America opens a large branch on Manchester Boulevard, just east of downtown Inglewood.

The Hardin & Flanagan Colonial Chapel and Mortuary (now Lighthouse McCormick Mortuary) opens on Prairie Avenue, across from Hollywood Park.

1949 On March 31st, the Fox Theater opens on Market Street on the site of the Granada Theater.

Los Angeles Airport is renamed Los Angeles International Airport.

Beyond Downtown

1957 The Market Street trolley line is removed.

1967 The United Bank of California becomes the first contemporary structure to be added to the Market Street corridor.

The Forum is built by prominent businessman Jack Kent Cooke as a venue for his three professional sports franchises in Los Angeles: the Lakers (basketball), Kings (hockey), and Wolves (soccer).
1972  The Forum is the site of the Lakers’ first NBA championship since moving to Los Angeles.

1973  A new Inglewood Civic Center complex is constructed just west of downtown.

1984  The Forum is the venue for men’s and women’s basketball during the Summer Olympics.

1986  Market Street merchants picket to stop the loss of a parking lot at La Brea Avenue and Queen Street for new construction; the protest is unsuccessful.

1988  The Fox Theater, then owned by the Mann theater chain, closes its doors.

Ingledwood Today & Tomorrow

1993  Sears is demolished and replaced by a Vons supermarket.


1999  The Lakers and Kings leave the Forum for the newly-constructed Staples Center in downtown Los Angeles.

2013  It is announced that Hollywood Park racetrack will close at the end of the fall racing season.

The Fox Theatre is listed in the National Register of Historic Places.

2014  The Forum reopens after a $50 million renovation.

The Forum is listed in the National Register of Historic Places.

2015  The Inglewood City Council approves a plan to build an 70,000-seat football stadium on the Hollywood Park site.

2016  On January 12\textsuperscript{b}, the NFL votes to move the St. Louis Rams back to Los Angeles, with the San Diego Chargers to follow.

The Hollywood Park casino is demolished, and a new casino opened next door.

2020  The \textit{Los Angeles Stadium at Hollywood Park} (SoFi Stadium) opens as the new home of the NFL’s Los Angeles Rams and Los Angeles Chargers.

2022  SoFi Stadium is scheduled to host Super Bowl LVI.

2023  SoFi will be the venue for the College Football National Championship.

2028  SoFi Stadium will host the opening and closing ceremonies for the Summer Olympics, as well as soccer events.

The Forum is slated to host the gymnastics events for the Summer Olympics.
6.0 IDENTIFICATION OF HISTORICAL RESOURCES

6.1 Listed Historical Resources

There are two (2) properties within the Project Area and/or Expanded Study Area that are listed in the National Register and are therefore automatically listed in the California Register. As such, these properties are considered historical resources as defined by CEQA.

115 N. Market Street (former Fox Theater)

This property, located on the west side of Market Street between Regent and Queen streets, contains a 1,008-seat neighborhood movie theater building. Originally constructed in 1949 for Fox West Coast Theaters, it was designed by prolific theater architect S. Charles Lee in the Late Moderne style. The theater closed in 1988. The building is currently unoccupied and its storefront is boarded up.

On January 14th, 2013, the Fox Theater was listed in the National Register and is therefore automatically listed in the California Register. As such, this property is a historical resource under CEQA.

3900 W. Manchester Boulevard (The Forum)

This property, located at the southeast corner of Manchester Boulevard and Prairie Avenue, contains the Forum, a multi-purpose indoor arena, surrounded by an expansive surface parking lot. It was built by nationally prominent businessman Jack Kent Cooke as a venue for his three professional sports franchises: the Los Angeles Lakers NBA basketball team, the Los Angeles Kings NHL hockey team, and the short-lived Los Angeles Wolves professional soccer team. Completed in 1967, it was designed by prominent Los Angeles architectural firm Charles Luckman & Associates in the New Formalist style. From 2012 to 2014, it underwent an extensive rehabilitation.

The Forum was listed in the National Register on September 24th, 2014 under Criterion C as an excellent example of a 1960s New Formalist-style arena building and is therefore automatically listed in the California Register. As such, this property is a historical resource under CEQA.


71 In 2000, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a very good example of a 1940s Late Moderne-style movie theater building in Inglewood.

6.2 Previous Historic Resources Study
A previous effort to identify historical resources within the Project Area was done as part of an investigation to inform the “Inglewood Downtown District, Main Street Project Area, Historic Design Guidelines,” which were prepared for the City of Inglewood, on May 15, 2000. The 2000 Historic Design Guidelines document included investigation of potential historical resources located in the Inglewood Downtown District/Main Street project area, which was bounded by La Brea Avenue to the west, Locust Street to the east, Florence Avenue to the north, and Hillcrest Boulevard to the south. The upper portion of the Downtown District/Main Street area includes the Market Street portion of the current Project Area/Expanded Study Area.

The 2000 Historic Design Guidelines investigation does not meet the requirements in Public Resources Code 5024.1(g) for historic resource surveys. It did not include an intensive-level historic resources survey. Instead, preparation of the Historic Design Guidelines was limited to a reconnaissance-level survey only; properties were not fully evaluated or documented on inventory forms. Several properties were identified as eligible for local listing only, but the City of Inglewood did not then, and does not currently, have a local landmark designation program with codified eligibility standards and criteria for local listing. For these reasons, as well as the fact that it is now over 20 years old, the 2000 Historic Design Guidelines investigation is not considered an authoritative or definitive source for this report. It was, however, utilized for research and informational purposes.

There are ten (10) properties within the Project Area and/or Expanded Study Area that were previously identified as eligible for historic listing or designation in the 2000 Historic Design Guidelines investigation. Each of these properties has been re-examined and re-evaluated herein for its eligibility for listing in the California Register and/or National Register.

6.3 Individual Properties Evaluated as Eligible for Historic Listing
Detailed field surveys of the Project Area and Expanded Study Area were conducted on June 4th, 2018, February 21st, 2019, and August 1, 2021. These field surveys were supplemented by property-specific and contextual research to identify additional properties that are eligible for listing or designation and therefore may be considered historical resources under CEQA. Through this process, eight (8) properties were

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73 Lauren Weiss Bricker, et al., Inglewood Downtown District, Main Street Project Area, Historic Design Guidelines, prepared for the City of Inglewood, May 15, 2000.
74 The New Downtown and Fairview Heights Transit Oriented Development Plan and Design Guidelines, adopted November 1, 2016, identifies Downtown Inglewood as “Historic Downtown.” However, this appears to refer to the area’s history as Inglewood’s original business district, and is not an evaluation of historic eligibility.
evaluated as appearing eligible for listing in the California Register and are therefore considered herein as historical resources for the purposes of CEQA.

260 N. Locust Street (Holy Faith Episcopal Church)

This property, located at the southeast corner of Locust Street and Grace Avenue, contains the Holy Faith Episcopal Church complex. The congregation was first established in 1911, with services held in the Inglewood Masonic Hall. In 1912, funds were donated to erect a complex consisting of a church, a rectory (the dwelling to the south), and a parish hall (now a school at the rear). The complex of buildings was designed by architect Philip Frohman, who would go on to become nationally renowned, particularly for his work on the National Cathedral in Washington, D.C. The church building was officially consecrated on November 8th, 1914. It lost its original bell tower in the 1933 Long Beach Earthquake, but continued to be improved throughout the 1930s, with the Stations of the Cross, imported from Italy; the pulpit, lectern and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by Judson Studios in the Highland Park neighborhood of Los Angeles. Due to its growing congregation, in the late 1950s Frohman returned to design an addition to the church building. The church was extended to the west and an interior balcony added, doubling its capacity from 200 to 400. The newly expanded church building was dedicated in 1959. The parish hall, which now serves as a school, has been expanded multiple times from the 1950s to the 1980s, now extending nearly the full width of the lot. The rectory appears largely intact, with some windows replaced. In the 2000 Historic Guidelines Study, the property was assigned a status code of 4S1 (may become eligible for the National Register when it becomes old enough). Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property for the purpose of this report, and finds that it appears substantially intact, including the main church building, the rectory, and the school. Character-defining features of the church building include its double-cruciform plan; gabled roofs with capped parapets and decorative crosses; copper steeple; stucco exterior walls with cast-stone stepped buttresses; base with cast-stone molding; pointed-arch openings with decorative cast-stone surrounds; leaded stained-glass windows; cast-stone Gothic tracery and quoining; wood plank doors with exposed iron hardware; metal scuppers and downspouts; and decorative wrought-iron wall sconces. The church expansion was designed by the original architect to respect and complement the original church—with features such as wood entry doors and stained-glass windows retained and incorporated into the expanded design—and thus is

75 Bricker, 8 (Database Master Report, appendix to the Inglewood Downtown District/Main Street Project Area Historic Design Guidelines).
considered to have acquired significance in its own right. Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident. Therefore, the property appears eligible for listing in the California Register under Criterion 1 as a good example of early institutional development in Inglewood, and Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

The National Park Service provides additional guidance for the evaluation of religious properties for listing in the National Register (Criterion Consideration A). This guidance was used to evaluate the Holy Faith Episcopal Church for the California Register. Because this property was found to satisfy Criterion Consideration A for religious properties, Holy Faith Episcopal Church was also evaluated as appearing eligible for listing in the National Register.

Criterion Consideration A states that a religious property must “[derive] primary significance from architectural or artistic distinction or historical importance.” Indeed, the Holy Faith Episcopal Church complex appears eligible for both of these reasons, thus meeting the Criterion Consideration. According to National Park Service guidance on Criterion Consideration A as applied to eligibility under National Register Criterion A, a religious property can meet this criterion if it is significant under a historical theme not related to religion, such as patterns of settlement. Because the complex originated with the main church building constructed in 1914, the property meets Criterion Consideration A and appears eligible under National Register Criterion A as an excellent, intact example of early institutional development in Inglewood.

According to NPS guidance on Criterion Consideration A as applied to eligibility under National Register Criterion C, a religious property can meet this criterion for its architectural or artistic values. This property represents the work of nationally-renowned architect Philip Frohman, who would become best known for his work on the National Cathedral in Washington, D.C. As noted above, Frohman was not only responsible for the church’s original design but also for its mid-20th century expansion. In addition to its architecture, the church incorporated the work of various artisans, including the Stations of the Cross, imported from Italy; the pulpit, lectern and choir stalls from England; and the reredos carved and imported from Bavaria. The stained-glass windows were crafted by the world-renowned Judson Studios. Thus, the property meets Criterion Consideration A and appears eligible under National Register Criterion A.

C as an outstanding example of Late Gothic Revival architecture, and as representing the work of master designers and artisans, including a nationally significant architect.

This property appears substantially intact, including the main church building, the rectory, and the school. The church expansion was designed by the original architect to respect and complement the original church and thus is considered to have acquired significance in its own right. Similarly, additions to the school building are compatible with yet differentiated from the original extent, which remains evident. As such, the property as a whole retains sufficient integrity to convey its significance. Therefore, the Holy Faith Episcopal Church complex meets Criterion Consideration A for Religious Properties and thus appears eligible for listing in the National Register.

158-170 N. Market Street (former United Bank of California)

This property, located at the southeast corner of Market and Regent streets, contains a 9,000 square-foot branch bank building and rear surface parking lot. Originally constructed in 1967 for United Bank of California, it was designed by noted Los Angeles architect Richard Dorman in the Late Modern style. Richard Dorman was a prolific modernist architect and designer who worked throughout the Los Angeles region from the 1950s through the 1970s. Over the course of his career he designed dozens of high-end residences, as well as various commercial and institutional buildings such as offices, churches, and banks. In 1976, the bank added a similarly-designed drive-thru automated teller building across Regent Street to the north, also designed by Dorman. The building is currently occupied by Broadway Federal Bank. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 6Z (appears ineligible for the National Register). Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property for the purpose of this report and finds that it appears substantially unaltered since its original construction. Character-defining features include its cruciform roof plan; projecting trapezoidal volumes; battered walls; heavy wood beams; smooth exterior surfaces of brick and stucco; and large expanses of tinted glass. Alterations—such as contemporary signage, and the addition of an in-wall ATM with an access ramp and projecting canopy—are minor in relation to the building's overall appearance, and do not substantially diminish its integrity. At the time of its previous evaluation, the bank building was well below the

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79 Although an original building permit for the 1967 bank building is not available from the City of Inglewood, the permit for the similarly-styled drive-thru automated teller building across the street lists Richard Dorman as its architect.
80 Because the drive-thru automated teller building is situated across the street and was added nine years later, it is not considered part of the bank building.
81 Bricker.
50-year age threshold used in standard preservation practice for evaluating eligibility for historic designation. Additionally, since the 2000 survey there has been substantial new scholarship on the built environment of the mid-20th century, with new historic contexts developed to provide guidance for evaluating such properties. In light of this new scholarship, this property appears to be significant as a 1960s Late Modern-style bank building in Inglewood, representing the work of a noted architect. It remains highly intact and thus retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore, the property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, it is considered a historical resource herein for the purposes of CEQA.

100 N. Market Street/307 E. Queen Street (former Bank of Inglewood)

This property, located at the northeast corner of Market and Queen streets, contains a two-story, 9,258 square-foot mixed-use commercial building constructed in 1927. The building was originally constructed for the Bank of Inglewood at a cost of $140,000. Designed by local architect William L. Campbell in the Mediterranean Revival style, the reinforced concrete building was the first steel frame business block in the city. The building was sold to Bank of America National Trust & Savings Association in 1936; in 1950 it became Southwest Bank. It now serves as a retail space occupied by Vajra Books & Gifts. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as an excellent example of a 1920s Mediterranean Revival-style bank building in Inglewood. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property for the purpose of this report, and finds that it appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, roof material, exterior wall cladding, fenestration patterns, elaborate arched main entrance and ground-story windows, upper-story windows, and various decorative elements. Alterations—such as replaced front doors and the addition of tile cladding on the ground story—are minor in relation to the building’s overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mediterranean Revival bank building from the 1920s. It retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore, the property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, it is considered a historical resource herein for the purposes of CEQA.

According to National Park Service guidance, 50 years is a general estimate of time needed to develop sufficient historical perspective to evaluate historic significance.

Bricker.
Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

**129-139 S. Market Street (former J.C. Penney)**

This property, located on the west side of Market Street between Queen Street and Manchester Boulevard, contains a two-story, 62,583 square-foot commercial retail building which originally housed a J.C. Penney department store. The building was initially constructed as one story in 1941. In 1954, it was expanded with a second story and remodeled in the Mid-Century Modern style. It is currently occupied by Inglewood Marketplace. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1950s Mid-Century Modern-style department store building. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it appears substantially unaltered since its 1950s remodel. The building retains the majority of its exterior features from this period, including its form and massing, exterior wall cladding, angled storefronts, recessed entry with terrazzo flooring, entry doors, canopy, upper-story ribbon windows, and applied decoration. Alterations—such as contemporary signage and the distinctive paint job—are minor in relation to the building’s overall appearance, and do not substantially diminish its integrity. The building remains highly intact and continues to display the characteristic features of a Mid-Century Modern department store building from the 1950s. This building retains sufficient integrity to convey its significance as a good example of its building type and its architectural style. Therefore, this property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

**149-155 S. Market Street/231-239 E. Manchester Boulevard (Professional Building)**

This property, located at the northwest corner of Market Street and Manchester Boulevard, contains a two-story, 6,000 square foot mixed-use commercial building. Constructed in 1928 as the Professional Building, it was designed in the Spanish Colonial Revival style with cast-stone Churriguereque details. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 4S7 (may become eligible for the National Register when integrity is restored). Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

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*Bricker.*

*Bricker.*
Historic Resources Group has re-examined this property and finds that despite alterations on the ground story, the upper story appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its red clay tile shed roofs with exposed rafter tails; smooth stucco exterior cladding; wood tripartite upper-story windows; decorative cast-stone details at the roofline; and a canopy with decorative wrought-iron supports at the secondary entrance. Alterations—including replacement of ground-story storefronts and entry doors—do somewhat diminish the building’s integrity. However, overall the building remains largely intact and continues to display the characteristic features of a Spanish Colonial Revival commercial building from the 1920s. It retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore, this property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

320-330 E. Manchester Boulevard (Bank of America)

This property, located at the southwest corner of Manchester Boulevard and Locust Street, contains a 21,976 square-foot bank building and a rear surface parking lot. Originally constructed in 1948, the building was erected for Bank of America and designed in the Late Moderne style. Bank of America continues as its current tenant. The smaller adjacent building at 320 E. Manchester Boulevard was originally constructed in 1920 and remodeled as part of the Bank of America in 1954. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a good example of a 1940s Late Moderne-style bank building in Inglewood. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it appears substantially unaltered since its original construction. The building retains the majority of its original exterior features, including its form and massing, exterior wall cladding, fenestration patterns, and decorative elements. The framing of the windows and doors may have been updated. However, the replacement material appears to be in keeping with what would have been in place historically, such that this change does not substantially diminish the building’s integrity. Other changes—including lighting, signage, and the addition (and subsequent removal) of an in-wall ATM—are minor in relation to the building’s overall appearance. The building remains largely intact and continues to display the characteristic features of a Late Moderne bank building from the 1940s. This

86 The main bank building uses the address 330 E. Manchester Bl.; the smaller adjacent building is at 320.
87 Bricker.
building retains sufficient integrity to convey its significance as a good example of its architectural style. Therefore, this property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

720 E. Florence Avenue (Inglewood Park Cemetery)

This property, located at the northeast corner of Manchester Boulevard and Prairie Avenue, contains an approximately 200-acre cemetery. In 1905, a group of local businessmen formed the Inglewood Park Cemetery Association and acquired a large plot of land just east of what would become downtown Inglewood. In 1907, the cemetery erected the Romanesque-style Grace Chapel, a three-quarters replica of a church in Edinburgh, Scotland. In these early days, funeral ceremony participants often arrived by rail from Los Angeles in a private funeral car; portions of the original railroad waiting station have been incorporated into the main entrance. The Neoclassical-style Inglewood Mausoleum was completed in 1915 and was the first community mausoleum in the State of California. The Mausoleum of the Golden West was built over several decades from the 1930s to the 1960s and features stained-glass representations of early California by Judson Studios. Various notable persons have been laid to rest at Inglewood Park Cemetery, including some of the South Bay region’s earliest settlers, a number of Civil War veterans, and famous figures such as former Los Angeles Mayor Tom Bradley, Chet Baker, Ray Charles, Ella Fitzgerald, Etta James, boxer Sugar Ray Robinson, and architect Paul Williams. At the time of this report, both Grace Chapel and the Inglewood Mausoleum were undergoing renovation.

Historic Resources Group has examined this property for the purpose of this report, and finds that it has evolved over time but that it remains substantially intact. The property appears to retain the majority of its original features, such as its overall form and configuration, landscape design, and main entrance, as well as multiple excellent examples of cemetery architecture, including Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West. Alterations—such as the addition of more recent buildings—do not substantially diminish the integrity of the property overall.

88 The parcel at the northeast corner of Manchester Boulevard and Prairie Avenue is included in the Expanded Study Area because it fronts the alignment right-of-way. This parcel has no address and contains only a small portion of the Inglewood Park Cemetery property. The vast majority of the cemetery occupies the adjacent parcel at 720 E. Florence Avenue (APN 4012031027). In the interest of being inclusive, the Inglewood Park Cemetery has been included in the Expanded Study Area for the purpose of this Project. While the cemetery extends several blocks north of the Project Area to Florence Avenue, project impacts would only be expected in the southwesternmost portion of the property.

89 Due to the size and complexity of this property, identification of contributing and non-contributing features was outside the scope of this report.
Thus, the property as a whole retains sufficient integrity to convey its significance as an excellent and rare early 20th-century cemetery in Inglewood. Additionally, Grace Chapel, Inglewood Mausoleum, and Mausoleum of the Golden West appear to be excellent examples of their architectural style. Therefore, the property appears eligible for the California Register under Criterion 1 as early institutional development in Inglewood, and Criterion 3 and for the quality of its architectural and landscape design.90

The National Park Service provides additional guidance for the evaluation of cemeteries for listing in the National Register (Criterion Consideration D). This guidance was used to evaluate the Inglewood Park Cemetery for the California Register. Because this property was found to satisfy Criterion Consideration D for cemeteries, the Inglewood Park Cemetery was also evaluated as appearing eligible for listing in the National Register.

Criterion Consideration D states that a cemetery property must “[derive] its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events.” National Park Service guidance on the application of Criterion Consideration D explains that a cemetery property can meet this criterion and be eligible under National Register Criterion A on the basis of age if it has “achieved historic significance for [its] relative great age in a particular geographic or cultural context.”92 Inglewood Park Cemetery was originally established in 1905, three years prior to the City of Inglewood’s incorporation in 1908. Grace Chapel, built in 1907, is one of the oldest—if not the oldest—remaining religious buildings in Inglewood. As noted above, the Inglewood Mausoleum was the first community mausoleum in the State of California when it was erected in 1915. For these reasons, the property meets Criterion Consideration D and appears eligible under National Register Criterion A as an excellent example of early institutional development in Inglewood.

According to NPS guidance, a cemetery property can also meet Criterion Consideration D and be eligible under National Register Criterion A as the burial place of persons of transcendent importance, defined as persons “of great eminence in their fields of endeavor or [who] had a great impact upon the history of their community, State, or nation.”93 Inglewood Park Cemetery contains the graves of numerous notable persons, including some of the South Bay region’s earliest settlers, and a number of Civil War veterans. Additionally, the cemetery serves as the final resting place for a number of the

90 Based upon its age, this property appears to meet National Register Criterion Consideration D for cemeteries.
91 National Register Bulletin 15, 25.
92 National Register Bulletin 15, 35.
93 National Register Bulletin 15, 34.
region’s most prominent African American residents, including singers Ray Charles, Ella Fitzgerald and Etta James; boxer Sugar Ray Robinson; architect Paul R. Williams; and former Los Angeles Mayor Tom Bradley. For these reasons, the property meets Criterion Consideration D and appears eligible under National Register Criterion A as the burial place of persons of transcendent importance.

Per NPS guidance, a cemetery property can meet Criterion Consideration D and be eligible under National Register Criterion C on the basis of distinctive design values, including "aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture." As noted above, the cemetery contains several excellent examples of architecture styles, most notably the Romanesque-style Grace Chapel and the Neoclassical-style Inglewood Mausoleum. Additionally, the Mausoleum of the Golden West features scenes of early California rendered in stained-glass by the world-renowned Judson Studios in the Highland Park neighborhood of Los Angeles. For these reasons, the property meets Criterion Consideration D and appears eligible under National Register Criterion C for the quality of its architecture and design.

Although this property has evolved over time, it remains substantially intact. The property appears to retain the majority of its original features, and the addition of more recent buildings do not substantially diminish the integrity of the property overall. Thus, the property as a whole retains sufficient integrity to convey its significance. Therefore, the Inglewood Park Cemetery meets Criterion Consideration D for Cemetery Properties and thus appears eligible for listing in the National Register.

619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary)

This property, located at the northwest corner of Prairie Avenue and La Palma Drive, contains a two-story, 9,352 square-foot chapel and mortuary building. Designed in the American Colonial Revival style, the building was initially constructed in 1948 as the Hardin & Flanagan Colonial Chapel & Mortuary. In 1959, the business was acquired by the McCormick family and renamed McCormick Mortuary. Around 1960, the building was expanded with a new two-story wing to the north. It is currently operated as Lighthouse McCormick Mortuary.

Historic Resources Group has examined this property for the purpose of this report, and finds that it appears substantially unaltered since its 1960s expansion. The building retains the majority of its exterior features from this period, including its form and massing: hipped and gable roofs with boxed eaves; decorative cornice with return; two-story porticos with slender full-height columns; stucco and wood clapboard exterior cladding; fluted pilasters; divided-light double-hung wood windows with louvred wood

94 National Register Bulletin 15, 35.
shutters; wood paneled doors; round and rounded-arch openings; elaborated entrances including fanlights, sidelights, and decorative wood surrounds; and hanging lanterns. Alterations—such as replacement of an original window with a vinyl slider—are minor in relation to the building’s overall appearance, and do not substantially diminish its integrity. The mortuary’s expansion was designed to respect and complement that of the original chapel and office, and thus is considered to have acquired significance in its own right. The building remains highly intact and continues to display the characteristic features of a mid-20th century American Colonial Revival mortuary building. It retains sufficient integrity to convey its significance as an excellent example of its building type and architectural style. Therefore, this property appears eligible for listing in the California Register under Criterion 3 for its architectural merit. As such, this property is considered a historical resource herein for the purposes of CEQA.

6.4 Individual Properties Evaluated as Ineligible for Historic Listing

No additional individual properties were identified as eligible for historic listing other than those noted above in Section 6.3. There are, however, six (6) properties within the Project Area and/or Expanded Study Area that had been previously identified as potentially eligible for historic listing in the 2000 Historic Design Guidelines investigation and were found to appear ineligible for historic listing due to substantial alteration. Each of these properties has been evaluated for its eligibility for listing in the California Register below.

124-126 N. Market Street

This property, located on the east side of Market Street between Regent and Queen streets, contains a two-story, 2,750 square-foot mixed-use commercial building constructed in 1920. In the 2000 Historic Design Guidelines study the property was assigned a status code of 5S1 (eligible for local listing); no reason for significance was provided. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it appears to have been substantially altered over time. The building’s original retail storefronts have been replaced with floor-to-ceiling aluminum storefronts, thereby completely altering the ground story on the building’s only publicly visible façade. On the upper story, original fenestration has been replaced with metal sliders. The building does not display the characteristic features of a particular architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify

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95 Bricker. Note that Inglewood’s downtown survey was completed prior to the revision of the California Historical Resources Status Codes. These codes were updated and their definitions revised in August 2003.
it for historic listing or designation. Therefore, the building does not appear eligible for listing in the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

125 S. Market Street
This property, located on the west side of Market Street between Queen Street and Manchester Boulevard, contains a one-story commercial building constructed in 1938. The building is currently occupied by Basket Beauty Supply. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as an intact example of a mid-century remodeled façade.96 Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it has been substantially altered over time, including since its previous evaluation. The 2000 survey referred to this building as “among the more visually interesting” mid-century façade remodels along Market Street, noting a “metal pylon sign [that] juts above the building’s parapet at a sufficient height and angle to be seen by the pedestrian” and “framed [display] cases that cantilever beyond their built-in bases.”97 None of these features remain extant. Alterations include the replacement of the exterior wall cladding on both stories, the replacement of all retail storefronts and entry doors, the addition of applied decorative features above the canopy, added light fixtures, and contemporary signage. Taken together, these alterations have completely transformed the building’s only publicly visible façade, such that it no longer displays any elements of its original 1930s design, nor does it represent a comprehensive mid-century façade remodel. Thus, this building does not retain sufficient integrity to convey its significance as a good example of its architectural style, and therefore does not appear eligible for listing in the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

132 S. Market Street
This property, located on the east side of Market Street between Queen Street and Manchester Boulevard, contains a two-story mixed-use commercial building constructed in 1925. The building is currently occupied by Smoove Fashion World. In the 2000 Historic Design Guidelines study the property was assigned a status code of 5S1 (eligible for local listing); no reason for significance was provided.98 Due to the age and

96 Bricker.
97 Bricker, 16.
98 Bricker.
limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property for the purpose of this report and finds that it appears to have been substantially altered over time. The building’s original retail storefront has been replaced with a floor-to-ceiling aluminum storefront, and brick veneer wall cladding and an awning have been added, thereby completely altering the building’s ground story. On the upper story, original fenestration has been replaced with metal or vinyl sliders. Some original decorative features remain on the upper story. However, overall the building does not display the characteristic features of a particular architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify it for historic listing or designation. Therefore, the building does not appear eligible for listing in the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

150 S. Market Street (former People’s Federal Building & Loan Association)

This property, located at the northeast corner of Market Street and Manchester Boulevard, contains a two-story, mixed-use commercial building originally constructed in 1927 as the People’s Federal Building & Loan Association. It was remodeled in the Late Modern style, likely sometime in the 1960s, and is currently occupied by World Hat & Boot Mart. In the 2000 Historic Design Guidelines study the property was assigned a status code of 5S1 (eligible for local listing) under Criterion C as a good example of a 1960s Late Modern-style commercial building. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it is not architecturally significant. As noted above, the building was originally constructed in 1927 and later acquired its Late Modern-style appearance in the mid-1960s. Visible elements of the underlying original 1920s building include its overall form and massing, pedestrian orientation set at the sidewalk, clipped corner entrance, and the overall fenestration pattern including primary and secondary door openings and upper-story window openings. In the 1960s, design elements were applied to the building’s primary facades. These include stucco and stone panel cladding; metal-framed doors, windows, and storefronts, a flat, curved canopy over the ground story; and stylized piers on the upper story which support a flat, curved canopy suspended above the roofline. No architect was identified with this remodel. The end result is a 1920s-era building in mass and form with 1960s-era design elements applied to its facades. As such, 150 S. Market Street is not a fully realized and cohesive example of Late Modern architecture from the 1960s.
As discussed above, re-evaluation of 150 S. Market Street reveals that the building is not a significant example of Late Modern architecture and is, therefore, not eligible for listing in the California Register under Criterion 3. It is not listed in a local register of historical resources and is not identified as significant in a historical resources survey which meets state criteria. Based upon this re-evaluation, the former People’s Federal Building & Loan Association at 150 S. Market Street is not a historical resource for purposes of CEQA.

302 E. Manchester Boulevard/200-204 S. Market Street (Cox Menswear)
This property, located at the southeast corner of Manchester Boulevard and Market Street, contains a two-story commercial retail building. Originally constructed in 1941, the building was designed in the Streamline Moderne style and was historically occupied by Scotty’s Men’s Shop. The building’s current tenant is Cox Menswear. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 3S (appears eligible for the National Register as an individual property through survey evaluation) under Criterion C as a good example of the Streamline Moderne style in Inglewood. Due to the age and limitations of the 2000 Historic Design Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it appears to have been substantially altered over time. On the ground story, the existing stone veneer and projecting aluminum-frame display windows appear to be the result of a mid-century remodel, replacing all of the original retail storefronts and wall cladding along both street-facing façades. On the upper story, original fenestration has been replaced with vinyl sliders. Also, the neon sign that originally adorned the corner tower has been removed. Due to these alterations, the building no longer displays the characteristic features of the Streamline Moderne style, nor does it represent a comprehensive or wholesale stylistic remodel from a particular historic period. Thus, this building does not retain sufficient integrity to convey its significance as a good example of its architectural style, and therefore does not appear eligible for listing in the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

333 E. Nutwood Street
This property, located at the northwest corner of Locust and Nutwood streets, contains a one-story commercial office building constructed in 1940. The building is currently occupied by Anphon Medical Center. In the 2000 Historic Design Guidelines study, the property was assigned a status code of 5S1 (eligible for local listing); no reason for significance was provided. Due to the age and limitations of the 2000 Historic Design

99 Bricker.
100 Ibid.
Guidelines study discussed above, the property was re-evaluated for the purposes of this report.

Historic Resources Group has re-examined this property and finds that it appears to have been substantially altered over time. The building’s exterior wall cladding has been replaced with rough-textured stucco, and exaggerated stucco-clad window surrounds have been added throughout. These changes are incompatible with the building’s American Colonial Revival style, and thereby substantially alter the building’s overall appearance. The building is no longer a good example of its architectural style and is not known to be the work of a master; it does not appear to be a notable example of its building type from a particular period; and it has no known important historic associations that would qualify it for historic listing or designation. Therefore, the building does not appear eligible for listing in the California Register. As such, it is not considered a historical resource herein for the purposes of CEQA.

**6.5 Potential Historic District Evaluated as Ineligible for Historic Listing**

As outlined in the Section 5 of this report, Market Street has played a central role in the commercial development of Inglewood, serving as the spine of the city’s primary business and retail center from the early-20th century and into the postwar period. For this reason, the first approach to the identification of historical resources in this area was to determine the potential for a historic district along Market Street. In order to make this determination, two different extents were analyzed. The first extent included the portion of Market Street located within the Project Area and Expanded Study Area for the proposed Project, between Florence Avenue and Manchester Boulevard. The second extent included the full length of the Market Street corridor in downtown Inglewood, extending an additional two-and-a-half blocks south of the Project Area and Expanded Study Area to Hillcrest Boulevard. These analyses were undertaken because commercial corridors such as Market Street are often composed of buildings that lack individual distinction but are collectively significant as a whole within a historic context such as commercial development.

**Framework for Analysis**

The National Register recognizes five significant property types: buildings, structures, objects, sites and districts. According to National Park Service guidance, collections of properties from similar time periods and historic contexts are evaluated as historic districts. A historic district is defined as “a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.” Its importance is derived from being a unified entity, even though it may be composed of a variety of resources. Rather, the identity of a historic

district results from the interrelationship among its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. Properties that were present during the historic period, are located within the district boundaries, and that relate to the historic significance of the district are identified as district contributors. Properties that post-date the historic period, fall outside the district boundaries, or are unrelated to the district’s significance are non-contributors.

In addition to being significant, an eligible historic district must be an identifiable entity and retain sufficient integrity to convey its significance. Integrity is defined as the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic period. As noted by the National Park Service, all properties change over time, and it is not necessary for a property to retain all of its original physical features or characteristics to be considered historic. However, the property must retain “the essential physical features that enable it to convey its historic identity.” The essential physical features are those features that define both why a property is significant and when it was significant. Regarding the integrity of a historic district, the NPS continues:

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

Utilizing these standard preservation concepts, a framework was developed to assess the relative integrity of Market Street in downtown Inglewood, and thus its eligibility for historic listing or designation as a historic district. This framework was intentionally designed to be as inclusive as possible, in order to allow for modifications to retail storefronts which are typical of many downtowns. For this reason, a broad period of significance was defined for a potential historic district, extending from the 1920s through the 1960s, to accommodate intact façade modernizations from the postwar period. Additionally, in cases where an earlier building was wholly updated or remodeled at a specific point in time, an “evaluation date” was identified and the property’s historic significance and integrity was evaluated based upon this later date, rather than the property’s original date of construction.
It is well understood that “Main Street” commercial buildings are often updated and modernized over time. Therefore, in evaluating the integrity of a potential historic district along Market Street in downtown Inglewood, alterations to the original design that occurred during the period of significance and have since achieved significance in their own right were not considered to diminish the building’s overall integrity. However, in order for alterations to an individual property to be considered significant in their own right, they must result in a comprehensive or wholesale remodel or redesign of the property such that it conveys a sense of time and place from the period when it was altered. As noted by the National Park Service, integrity of design “results from conscious decisions made during the original conception and planning of a property (or its significant alteration).”\textsuperscript{106} That is, for an individual property to have integrity, it must reflect a particular historic period, whether that is the period of the property’s original construction or the period of its comprehensive remodel.

Even with this consideration for the modernization of commercial storefronts over time, the fact remains that the vast majority of individual buildings along the Market Street corridor in downtown Inglewood have undergone some degree of alteration—during and/or after the district’s period of significance—which diminish their overall integrity. Ultimately, the question of integrity is answered by whether or not the property retains the identity for which it is significant.\textsuperscript{107} An individual building that has been altered incrementally over time no longer conveys a sense of time and place from a particular historic period. For example, a 1920s commercial storefront that was modernized in the 1950s, with additional alterations in the 1980s and the 2000s, does not convey a sense of time and place from any one period, but instead is a collection of features, styles and materials from various periods. As such, it does not have a definable historic identity which associates it with the larger historic district. This trend is particularly apparent in retail buildings that have multiple storefronts which date from different periods.

Retention of a property’s original scale and massing is not sufficient to qualify a property as a contributor to a historic district.

While some alterations may not seem to have a considerable impact on one building or another, it is the prevalence of these alterations over many years and to multiple buildings across several blocks that compounds the overall effect, resulting in a substantial loss of integrity for the area as a whole. Additionally, as many of these buildings are rather simple and vernacular in their design, modification or replacement of retail storefronts—which typically comprise the majority of a building’s primary (and often only publicly-visible) façade—can be a substantial alteration. Other common alterations include the modification or removal of distinctive signage elements indicative

\textsuperscript{106} National Register Bulletin 15, 44.
\textsuperscript{107} National Register Bulletin 15, 45.
of a particular era of commercial development, and the addition or removal of awnings
and canopies.

Analysis of Market Street in Project Area & Expanded Study Area

The extent of Market Street within the Project Area and Expanded Study Area appears
significant as a historic district for its association with early- and mid-20th century
commercial development in the City of Inglewood. This extent comprises a significant
concentration of historically related properties from a specific historic period, and thus is
an identifiable entity that is distinguishable from the surrounding area. However, due to
substantial changes to individual properties over time, this extent does not convey a
visual sense of the overall historic environment.

A total of 42 parcels were examined and researched in detail, including parcels along
both sides of Market Street, between Florence Avenue on the north and Manchester
Boulevard on the south, and including all four corner parcels at the intersection of
Market and Manchester. While downtown Inglewood originated in the 1920s, the
period of significance for a potential historic district was extended through the 1960s to
include postwar development and façade improvements that remain evident in the
downtown area today.

Of the 42 parcels that were examined, twelve were evaluated as potential district
contributors (DC) if a historic district was identified, while the remaining 30 parcels
were evaluated as non-contributors (NC). Most of the non-contributing parcels were so
evaluated due to extensive alterations over time. Some parcels contain more recent infill
development, while others are vacant lots or parking lots. With twelve of 42 parcels
evaluated as potential district contributors, this results in a contribution rate of just 29
percent, well below what would typically be required for an eligible historic district.

Due to this low ratio of district contributors, it was determined that this extent of
Market Street does not retain sufficient integrity to convey its historic significance, and
therefore does not meet the criteria to qualify as a historic district. (For documentation
of this analysis, see the Property Data Table and District Analysis Map in Appendix C.)

Analysis of Market Street Corridor

A second examination was conducted, this time of the full extent of the Market Street
corridor in downtown Inglewood—extending an additional two-and-a-half blocks south
of the Project Area and Expanded Study Area to Hillcrest Boulevard—to determine if
this larger area retained sufficient integrity to qualify as a potential historic district. As

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108 Five of these twelve were also evaluated as individually eligible for historic listing and comprise the five
identified CEQA resources.

109 For a geographical area to be considered eligible for listing as a historic district, standard preservation
practice requires that the majority of properties be contributors to the district.
with the smaller area as described above, this larger extent of the Market Street corridor appears significant for its association with early- and mid-20th century commercial development in the City of Inglewood and comprises a significant concentration of historically related properties from a specific historic period. However, this extent does not convey a visual sense of the overall historic environment due to substantial changes to individual properties over time.

A reconnaissance-level review of these southern blocks found a somewhat higher concentration of buildings with sufficient integrity to qualify as district contributors, but not enough to offset the lower concentration in the northern blocks. Of the 64 parcels that were examined along the full extent of the Market Street corridor, 23 were evaluated as potential district contributors (DC) if a historic district was identified, while the remaining 41 parcels were evaluated as non-contributors (NC). This results in a contribution rate of just 36 percent, still well below what would typically be required for an eligible historic district. Due to this low ratio of district contributors, it was similarly determined that this larger extent of Market Street does not retain sufficient integrity to convey its historic significance, and therefore does not meet the criteria to qualify as a historic district. (For documentation of this analysis, see the Property Data Table in Appendix C.)

Thus, while Market Street largely retains its overall scale, massing and pedestrian orientation, incremental changes over time have substantially compromised the cohesion of the area as a whole. As such, Market Street does not retain the ability to convey a sense of time and place from its historic period. Despite its historic significance, Market Street in downtown Inglewood—whether the smaller or larger extent—does not retain sufficient integrity to convey its significance and does thus not meet the criteria to qualify as a historic district. As such, Market Street is not a historical resource under CEQA.

Previous Analysis of Market Street Corridor

It should also be noted that this finding confirms a previous evaluation of the Market Street corridor completed some two decades ago, as detailed in the 2000 Historic Design Guidelines. As noted previously, historic resources investigation to inform the Design Guidelines was limited to a reconnaissance-level survey, wherein properties were not fully evaluated or documented on inventory forms. A total of 112 buildings were, however, reviewed as part of this project; “no historic district was identified for the project area.”

Bricker, 4. Assigned Status Codes from the 2000 “Inglewood Downtown District” survey are listed in the Property Data Table in Appendix C, in the “Previous Evaluations” column. Note that the “Inglewood Downtown District” survey took place prior to the revision of the California Historical Resources Status Codes in 2003.
Conclusion

Thus, while it is true that the proposed Project would result in a substantial change in the overall look and feel of downtown Inglewood, this change cannot be considered an impact to historical resources as defined by CEQA. Because no historic district was identified, Market Street is not a historical resource under CEQA. As such, there can be no impacts to this area as a whole from the proposed Project.

6.6 Summary of Historical Resources

To summarize, ten (10) historical resources have been identified in the Project Area and/or Expanded Study Area. Of these, two (2) are listed in the National Register and the California Register; and eight (8) were evaluated as appearing eligible for listing in the California Register and/or National Register. All of these properties are considered herein as historical resources for the purposes of CEQA. Therefore, potential impacts of the Project to these properties are analyzed in this report.

[For field photographs of these historical resources and their immediate surroundings, taken June 4th, 2018 and February 21st, 2019, see Appendix A.]

Table 1. SUMMARY LIST OF HISTORICAL RESOURCES (listed north to south)

<table>
<thead>
<tr>
<th>ADDRESS</th>
<th>APN</th>
<th>DATE</th>
<th>NAME</th>
<th>DESCRIPTION</th>
<th>CURRENT EVALUATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>260 N Locust St</td>
<td>4015026039</td>
<td>1914</td>
<td>Holy Faith Episcopal Church</td>
<td>Religious complex (church, rectory and school)</td>
<td>Appears eligible for listing in CR and NR</td>
</tr>
<tr>
<td>158-170 N Market St</td>
<td>4021007012</td>
<td>1967</td>
<td>Former United Bank of California (now Broadway Federal Bank)</td>
<td>Branch bank, rear parking lot</td>
<td>Appears eligible for listing in CR</td>
</tr>
<tr>
<td>115 N Market St</td>
<td>4021008006</td>
<td>1949</td>
<td>Former Fox Theater</td>
<td>Neighborhood movie theater</td>
<td>Listed in NR and CR</td>
</tr>
<tr>
<td>100 N Market St/307 E Queen St</td>
<td>4021007024</td>
<td>1927</td>
<td>Former Bank of Inglewood (now Vajra Books &amp; Gifts)</td>
<td>Two-story mixed-use commercial building</td>
<td>Appears eligible for listing in CR</td>
</tr>
<tr>
<td>129-139 S Market St</td>
<td>4021009031</td>
<td>1941, addition and remodel 1954</td>
<td>Former J.C. Penney (now Inglewood Marketplace)</td>
<td>Two-story retail commercial building</td>
<td>Appears eligible for listing in CR</td>
</tr>
<tr>
<td>149-155 S Market St/231-239 E Manchester Bl</td>
<td>4021009017</td>
<td>1928</td>
<td>Professional Building</td>
<td>Two-story mixed-use commercial building</td>
<td>Appears eligible for listing in CR</td>
</tr>
<tr>
<td>ADDRESS</td>
<td>APN</td>
<td>DATE</td>
<td>NAME</td>
<td>DESCRIPTION</td>
<td>CURRENT EVALUATION</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>----------------</td>
<td>------</td>
<td>-----------------------------</td>
<td>--------------------------------------------------</td>
<td>------------------------</td>
</tr>
<tr>
<td>320-330 E Manchester Bl</td>
<td>4021013018</td>
<td>1948</td>
<td>Bank of America</td>
<td>Branch bank, rear parking lot</td>
<td>Appears eligible for listing in CR</td>
</tr>
<tr>
<td>720 E Florence Ave¹¹¹</td>
<td>4012031930</td>
<td>1905</td>
<td>Inglewood Park Cemetery</td>
<td>Cemetery</td>
<td>Appears eligible for listing in CR and NR</td>
</tr>
<tr>
<td>3900 W Manchester Bl</td>
<td>4025001002</td>
<td>1967</td>
<td>The Forum</td>
<td>Multi-purpose indoor arena, surrounding parking lot</td>
<td>Listed in NR and CR</td>
</tr>
</tbody>
</table>

¹¹¹ The parcel situated within the Expanded Study Area (APN 4012031930) has no address and contains only a small portion of the Inglewood Park Cemetery property. The vast majority of the cemetery occupies the adjacent parcel at 720 E Florence Avenue (APN 4012031027).
7.0 POTENTIAL IMPACTS

7.1 Conceptual Project Design

This section analyzes a conceptual project design to demonstrate how the revised Project might be realized (“Conceptual Project Design”). The Conceptual Project Design conforms to the Project Design Features stipulated as part of the Project. The Conceptual Project Design is presented here to demonstrate one possible design outcome of the Project.

The Conceptual Project Design includes the following:

- ATS guideway heights that vary 27 feet to a maximum to approximately 53 feet from grade to the bottom of the guideway.
- ATS guideway heights along Market Street that range from approximately 42 feet above grade at Regent Street to approximately 53 feet above grade at the Fox Theater.
- ATS guideway widths ranging from approximately 32 feet wide at closed spaces, approximately 42 feet wide at crossovers (not at stations), and approximately 74 feet at crossovers adjacent to stations.
- ATS guideway situated on one side of the right-of-way in between stations and generally supported by single columns, then gradually transitioning to opposite sides of the right-of-way on approach to center-platform stations supported by straddle bents with columns on both sides of the street.
- Guideway supports measuring between 6 feet and 8 feet in diameter for round columns.
- Eccentric columns (along Prairie) supporting a dual guideway that are oblong in diameter, measuring approximately 7 feet by 12 feet (with the longer dimension perpendicular to the guideway).
- Most center median supports on Market Street and Manchester Boulevard will be round columns measuring 8 feet in diameter.
- Other columns placed in the center median are oblong and measure no larger than 6 feet by 9 feet in diameter

[For plan and section drawings of the Conceptual Project Design, see Appendix D.]
7.2 Framework for Analysis

*Guidelines for Implementation of CEQA* are codified at Title 14 California Code of Regulations section 15000 et seq. The *CEQA Guidelines* state that “a project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.” A “substantial adverse change in the significance of a historical resource” means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The CEQA Guidelines go on to state that “[t]he significance of a historical resource is materially impaired when a project...”[d]emolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local register of historical resources... or its identification in a historical resources survey.”

Thus, an evaluation of project impacts under CEQA requires a two-part inquiry: (1) a determination of whether the project site contains or is adjacent to a historical resource, and if so, (2) a determination of whether the proposed project will result in a substantial adverse change in the significance of the historical resource.

7.3 Analysis of Direct Impacts

The significance of a historical resource may be materially impaired through project impacts both direct and indirect. Thus, the potential for this Project to impact a historical resource, either directly or indirectly, is analyzed. This section analyzes the potential for the Project to have a direct impact on any historical resources under CEQA. A direct impact is distinguished herein as a physical change to a historical resource which is caused by and immediately related to the project. An example would be demolition, alteration or damage to a historical resource caused by the project.

As described above, much of the Project will be constructed within the public right-of-way, including the elevated ATS guideway set on single or dual support columns. Other Project components will be constructed on parcels immediately adjacent to the public right-of-way. These include the three stations; the pedestrian bridges over Florence Avenue and Prairie Avenue; vertical circulation elements for stations; the MSF (the Vons marketplace currently located on the proposed MSF site would be relocated to the northwest corner of the parcel); and the relocation of traffic lanes on Prairie Avenue.

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112 *CEQA Guidelines*, Section 15064.5(b).
113 Ibid., Section 15064.5(b)(1).
114 Ibid., Section 15064.5(b)(2).
This report has identified one (1) historical resource within the Project Area that could be directly impacted by the Project. Potential impacts to this resource is described below.

3900 W. Manchester Boulevard (The Forum)
The Forum property is located within the Project Area, situated along the east side of the ATS alignment as it travels north/south along Prairie Avenue. The Project will construct an elevated ATS guideway largely supported by columns located on the west side of Prairie Avenue within the public right-of-way. A few straddle bent columns may be necessary long this section of the alignment near the corner of Manchester Boulevard and Prairie Avenue. Traffic lanes on Prairie Avenue will be relocated to the east to accommodate the anticipated ATS columns on the west side of the street and maintain a sufficient sidewalk width. This lane relocation along Prairie Avenue will result in an encroachment into the Forum property along its western boundary. Straddle bent support columns may land on the east side of the ATS guideway in what is now the Forum parking lot. A pedestrian bridge will be constructed from the Manchester Boulevard/Prairie Avenue Station, with vertical circulation elements (stairs, escalators, elevators) landing on the east side of Prairie in the current Forum parking lot.

The Project will not physically alter the Forum building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will alter a portion of the Forum’s surface parking lot, which is defined in the National Register nomination as one of the Forum’s character-defining features. The Project will encroach into the Forum parking lot along its western edge between Manchester Boulevard and Pincay Drive no more than 30 feet to accommodate the relocation of traffic lanes along Prairie Avenue. This encroachment will alter the original dimensions of the property. Despite this alteration, the parking lot will retain its overall character as an expansive, on-grade, asphalt-paved parking area surrounding the Forum building on all sides.

Additionally, the Project vertical circulation elements for the station pedestrian bridge, will land on what is currently the Forum property. These elements would be constructed within the public right-of-way of the newly relocated sidewalk on the east side of Prairie Avenue. They would be situated along the property’s western edge, and thus there will remain a substantial physical distance between the new construction and the Forum building itself (more than 300 feet). Thus, the Project will not alter the relationship between the Forum building and its immediate surroundings in any meaningful way.

The motorist’s view of the Forum building from Prairie Avenue looking east and pedestrian views from the west sidewalk will be intermittently obstructed by straddle-bent support columns supporting the ATS guideway and the vertical circulation elements of the pedestrian bridge. However, pedestrian views from the new sidewalk on
the east side of Prairie Avenue will remain largely unobstructed with only minimal impairment. Views of the Forum building looking south from Manchester Boulevard and north from Pincay Drive will also remain unobstructed. Overall, the new construction will not block or obscure important views of the Forum building, as there will remain multiple vantage points from which the building can be observed without obstruction. The Forum property will retain its essential character as a large circular building set at the center of a sprawling, generally open site with largely unobstructed views from all sides. Important features of the Forum’s setting are limited mainly to the property itself, the most important of which is the expansive surface parking area surrounding the building on all sides. Although the Project will encroach on the Forum property along the eastern edge of the parking lot, the important aspects of the Forum’s historical setting will remain intact.

Because the Project will not physically alter the Forum building; will not block or obscure important views of the Forum building; and will only alter a small portion of the Forum parking lot; the revised Project will not result in a substantial adverse change in the significance of the historical resource. After construction of the Project, the Forum will continue to convey its historic significance as a 1960s New Formalist-style arena in Inglewood. Therefore, direct and indirect impacts to the Forum as a result of the revised Project will be less than significant.

7.4 Analysis of Indirect Impacts

This section analyzes the potential for the Project to have an indirect impact on any historical resources under CEQA. As discussed above, the significance of a historical resource is materially impaired, and constitutes a substantial adverse change in the significance of that historical resource, if the project would materially alter in an adverse manner those physical characteristics of the resource or its immediate surroundings that convey its historical significance and justify its inclusion in the California Register, local register, or historical resource survey. The significance of a historical resource may be materially impaired through project impacts both direct and indirect. Thus, the potential for this Project to impact a historical resource, either directly or indirectly, is analyzed.

An indirect impact is distinguished herein as is a physical change which is not immediately related to the project, but which is caused indirectly by the project. An example would be new construction that diminishes the ability of a historical resource to convey its significance by blocking or obscuring character-defining features after the project has been completed.

An Expanded Study Area has been defined to encompass what is expected to be the maximum extent within which Project impacts will occur. The Expanded Study Area includes all parcels fronting the alignment right-of-way on both sides. In addition, where there will be substantial new construction outside of the right-of-way, parcels
immediately adjacent to or across from the new construction have been included in the Expanded Study Area. This includes parcels adjacent to or across from the block where the Market Street Station would be constructed; parcels adjacent to the Manchester Boulevard/Prairie Avenue station and the Prairie Avenue/Hardy Street station; parcels adjacent to or across from the MSF site; and sites where the pedestrian bridges will land. The Project has the potential to indirectly impact historical resources within the Expanded Study Area.

This report has identified seven (7) historical resources within the Expanded Study Area that could be indirectly impacted by the Project. Potential impacts to each of these resources are described below.

158-170 N. Market Street (former United Bank of California)

The former United Bank of California building is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The former United Bank of California building is located on the east side of Market Street, immediately adjacent to where the new ATS guideway will be located.115

The Project will not physically alter the former United Bank of California building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the building along Market Street, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. Because the United Bank of California building is slightly set back from the property line, important setting features are limited to the building parcel and the configuration of the street and sidewalk fronting the building’s east-facing façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary façade when viewed from the west side of Market Street—an important vantage point from which to understand the building’s overall scale, massing composition, and design. The building’s secondary façade along Regent Street will not be obscured by the Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the United Bank of California building. As shown in the updated conceptual Project plans, the edge of the guideway will be approximately 38 feet from the building’s façade and approximately 24 feet from the projecting canopy. The bottom of

115 The drive-thru automated teller building across the street is not considered part of the bank building.
the guideway will be elevated a minimum of 40 feet above the roadway. Additionally, the guideway will be carried by single columns positioned in the center of Market Street, one of which will be located in front of or immediately adjacent to the United Bank of California. The support columns will be a round shape approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing façade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized.

These elements will allow for a substantial distance between the ATS guideway and the United Bank of California building, maintaining a substantial portion of the existing open sidewalk and street area that partly defines the building’s setting. The United Bank of California building measures approximately 23 feet in height; thus, the guideway will clear the top of the building by approximately 17 feet. Because the guideway will be a substantial distance away from the United Bank of California building’s façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the west side of Market Street.

Because two columns will sit in front of or immediately adjacent to the United Bank of California building, a portion of the building’s primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the United Bank of California building’s primary façade will be obstructed when viewed from the west side of Market Street. The north façade facing Regent Street will remain unobstructed. Those portions of the building’s façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the ATS guideway would be located approximately 17 feet above the top of the United Bank of California building and the center support columns carrying the guideway will only obscure a small portion of the building’s primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the United Bank of California building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Features of the Project -- including the height of the...
guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns—have been designed in a manner that maintains important aspects of the resource’s existing setting and ensures that it’s overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the United Bank of California building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. Thus, the United Bank of California building will continue to convey its historic significance after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

115 N. Market Street (former Fox Theater)

The former Fox Theater building is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The former Fox Theater building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the Fox Theater building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the Fox Theater, altering its setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the Fox Theater building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building’s west and south façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary east-facing façade when viewed from the west side of Market Street—an important vantage point from which to understand the building’s overall scale, massing, composition, and design.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Fox Theater building. The main volume of the Fox Theater building measures approximately 38 feet tall, with its vertical sign pylon—an important component of the building’s design—rising to a height of approximately 70 feet.

As shown in the conceptual Project plans, the horizontal distance from the edge of the guideway to the marquee will be approximately 17 feet; the horizontal distance from
the edge of the guideway to the building façade will be approximately 28 feet (assuming a maximum guideway width of 42 feet). Additionally, the guideway will be carried by single columns positioned in the center of Market Street, although no column will be located directly in front of or immediately adjacent to the Fox Theater. This will allow for a greater distance between the ATS guideway and the Fox Theater building, maintaining much of the existing open sidewalk and street that define the building's setting, compared to conceptual plans analyzed in the Draft EIR. The height of the guideway in front of the Fox Theater building, the stipulation that no support columns will be located in front of or adjacent to the Fox Theater, and the horizontal separation between the Fox Theater and the guideway, will ensure that the Project will not obscure important physical features of the primary façade — including the sign pylon — when viewed from the east side of Market Street.

The Project will alter the historic setting of the Fox Theater building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. The Project Design Feature includes minimum visual clearances -- including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns. The Project will be designed in a manner that maintains important aspects of the resource’s existing setting and ensures that its overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Fox Theater building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity — including location, design, materials, workmanship, feeling and association — will remain, and therefore the historical resource will retain integrity overall. Thus, the Fox Theater building will continue to convey its historic significance as a 1940s Late Moderne-style movie theater building after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

100 N. Market St/307 E Queen Street (former Bank of Inglewood)

The former Bank of Inglewood building is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The former Bank of Inglewood building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the former Bank of Inglewood building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical
structure in front of and within close proximity of the buildings along Market Street, altering their setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the Bank of Inglewood building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building's west and south façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building's setting. New construction also has the potential to limit the building's ability to convey its historic significance by substantially obscuring its primary façade when viewed from the west side of Market Street—an important vantage point from which to understand the building's overall scale, massing composition, and design. The building's façade along Queen Street will not be obscured by the Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Bank of Inglewood building. According to the conceptual Project plans, the edge of the guideway will be approximately 29 feet from the façade of the Bank of Inglewood building (assuming a maximum guideway width of 42 feet). Additionally, the guideway will be carried by single columns positioned in the center of Market Street, one of which will likely be located in front of or immediately adjacent to the Bank of Inglewood building. The support columns will be a round shape approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center. This will allow for a substantial distance between the ATS guideway and the Bank of Inglewood building, maintaining much of the existing open sidewalk and street that define the building's setting. The Bank of Inglewood building measures approximately 33 feet in height; thus, the guideway will clear the top of the building by approximately 7 feet. Because the guideway will be a substantial distance away from the Bank of Inglewood building's façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the west side of Market Street.

With a single column located adjacent to the Bank of Inglewood building, a portion of the building's primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the Bank of Inglewood building's primary façade will be obstructed when viewed from the west side of Market Street. The larger south façade facing Queen Street will remain unobstructed. Additionally, columns will be placed so that the important corner view of the building— which takes in the entirety of both publicly visible façades—will be maintained. Those portions of the building's façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the guideway would be located at least 7 feet above the top of the Bank of Inglewood building and the center support columns carrying the guideway will only obscure a small portion of the building's primary façade, the Project...
will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the facade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing facade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the Bank of Inglewood building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. The Project -- including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns -- will be been designed in a manner that maintains important aspects of the resource’s existing setting and ensures that it’s overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Bank of Inglewood building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. Thus, the Bank of Inglewood building will continue to convey its historic significance after implementation of the revised Project and as such, the impact of the Project to the historic resource will be less than significant.

129-139 S. Market Street (former J.C. Penney)

The former J.C. Penney building is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The former J.C. Penney building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the former J.C. Penney building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the buildings along Market Street, altering their setting and potentially interfering with the visual and spatial relationships between the buildings and their immediate surroundings. Because the J.C. Penney building is built to the property line, important setting features are limited to the scale of the surrounding
development and configuration of the street and sidewalk fronting the building’s east façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary façade when viewed from the east side of Market Street—an important vantage point from which to understand the building’s overall scale, massing composition, and design.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the J.C. Penney building. The edge of the guideway will be approximately 21 feet to the building’s projecting canopy and approximately 28 feet to the building façade at its closest point, after which the guideway pulls further away from the building as it turns the corner onto Manchester Boulevard. The bottom of the guideway will be approximately of 40 feet above the roadway. Additionally, the guideway will be carried by single columns positioned in the center of Market Street, one of which will be located in front of or immediately adjacent to the J.C. Penney building. The support columns will be a round shape approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center.

This will allow for distance between the ATS guideway and the J.C. Penney building, maintaining a substantial portion of the existing open sidewalk and street that define the building’s setting. The J.C. Penney building measures approximately 30 feet in height; thus, the guideway will clear the top of the building by approximately 10 feet. Because the guideway will be a substantial distance away from the J.C. Penney building’s façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the east side of Market Street. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing façade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized.

With a single column located in front of or adjacent to the J.C. Penney building, a portion of the building’s primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the J.C. Penney building’s primary façade will be obstructed when viewed from the east side of Market Street. The portion of the building’s façade that will be obscured will be minor in comparison to the overall size of the building, the majority of which will remain visible. Because the ATS guideway would be located approximately 10 feet above the top of the J.C. Penney building and the support columns carrying the guideway will only obscure a small portion of the
building’s primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the J.C. Penney building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Features of the Project—including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns—have been designed in a manner that maintains important aspects of the resource’s existing setting and ensures that its overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the J.C. Penney building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. Thus, the J.C. Penney building will continue to convey its historic significance as a 1950s Mid-Century Modern-style department store building after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

149-155 S. Market Street/231-239 E Manchester Boulevard (Professional Building)

The Professional Building is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The Professional Building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the Professional Building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of and within close proximity of the building along Market Street, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. Because the Professional Building is built to the property line, important setting features are limited to the building parcel and the configuration of the street and sidewalk fronting the building’s east- and south-facing façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary façade when viewed from the east side of Market Street—an important vantage point from which to understand the building’s overall
scale, massing composition, and design. The building’s secondary façade along Manchester Boulevard will not be obscured by the Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Professional Building. The edge of the guideway will be approximately 47 feet from the building’s façade at its closest point, after which the guideway pulls further away as it turns the corner onto Manchester Boulevard. The bottom of the guideway will be elevated approximately 40 feet above the roadway.

Additionally, as the guideway makes its turn at Market Street and Manchester Boulevard, the columns will be placed on the opposite (east) side of the Market Street and on Manchester Boulevard. Because no columns will sit in front of or immediately adjacent to the Professional Building, the building’s primary facade will not be obscured when viewed from the east side of Market Street. The south façade facing Manchester will also remain unobstructed.

This allows for a substantial distance between the ATS guideway and the Professional Building, maintaining more of the existing open sidewalk and street area that partly defines the building’s setting. The Professional Building measures approximately 32 feet in height; thus, the guideway will clear the top of the building by approximately eight feet. Because the guideway will be a substantial distance away from the Professional Building’s façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from the east side of Market Street. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing façade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized.

The Project will alter the historic setting of the Professional Building by placing new construction along Market Street. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Features of the Project—including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns—have been designed in a manner that maintains important aspects of the resource’s existing setting and ensures that it’s overall scale, massing, composition, and design will remain readily discernable.

Although integrity of setting will be altered along Market Street, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—
will remain, and therefore the historical resource will retain integrity overall. Thus, the Professional Building will continue to convey its historic significance as a 1920s Spanish Colonial Revival-style commercial building after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

320-330 E. Manchester Boulevard (Bank of America)
The Bank of America building is located within the Expanded Study Area for the revised Project. As described above, the revised Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Manchester Boulevard, between Market Street and Prairie Avenue. The Bank of America building is located on the south side of Manchester Boulevard, immediately adjacent to where the new ATS guideway will be located.

The revised Project will not physically alter the Bank of America building in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the revised Project will erect a substantial new physical structure in front of this resource, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings. The setting of a historical resource includes features within its boundaries as well as its immediate surroundings. Because the Bank of America building is built to the property line, important setting features are limited to the scale of the surrounding development and configuration of the street and sidewalk fronting the building’s north and east façades. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary façade when viewed from the north side of Manchester—a critical vantage point from which to understand the building’s overall scale, massing, composition, and design.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Bank of America building. According to the conceptual Project plans, the edge of the guideway will be approximately 30 feet from the façade of the Bank of America building (assuming a maximum guideway width of 42 feet). The bottom of the guideway would be elevated a minimum of 40 feet above the roadway.

The guideway along Manchester Boulevard would be supported by single columns in a new center median. Each column will be approximately 8 feet in diameter and spaced a minimum of 120 feet apart on center. Thus, support columns will be located away from the Bank of America building façade with substantial space between columns, maintaining much of the existing open sidewalk and street that define the building’s setting. The Bank of America building measures approximately 28 feet in height; the guideway will clear the top of the building by approximately 12 feet. Because the guideway will be a substantial distance away from the Bank of America building’s
façade, and positioned a substantial distance higher than the building, it will not obscure important physical features of the primary façade when viewed from directly across the street on the north side of Manchester.

With single columns located within the center of Manchester Boulevard in the vicinity of the Bank of America building, portions of the building’s primary façade will be intermittently obscured depending on the position of the viewer. However, due to the anticipated dimensions and spacing of the columns, only very limited portions of the Bank of America building’s primary façade will be obstructed when viewed from the north side of Manchester Boulevard. Those portions of the building’s façade that will be obscured will be minor in comparison to the façade’s total size, the majority of which will remain unobstructed. Because the ATS guideway would be located approximately 12 feet above the top of the Bank of America Building and the center support columns carrying the guideway will only obscure small portions of the building’s primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of some views.

The revised Project will alter the historic setting of the Bank of America building by placing new construction along Manchester Boulevard. However, this alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing façade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized. This Project Design Feature ensures that the Bank of America building’s overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Bank of America building, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Manchester Boulevard, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. Thus, the Bank of America building will continue to convey its historic significance after implementation of the revised Project and as such, the impact of the revised Project to the historical resource will be less than significant.

619-635 S. Prairie Avenue (Lighthouse McCormick Mortuary)

The Lighthouse McCormick Mortuary property is located within the Expanded Study Area. As described above, the Project will construct an elevated ATS guideway set on
support columns within the public right-of-way of Prairie Avenue between Manchester Boulevard and Hardy Street. The Lighthouse McCormick Mortuary property is located on the west side of Prairie Avenue, immediately adjacent to where the new ATS guideway will be located.

The Project will not physically alter the Lighthouse McCormick Mortuary property in any way. The building will remain in its original location and will retain all of its significant character-defining features. However, the Project will erect a substantial new physical structure in front of the mortuary property, altering its setting and potentially interfering with the visual and spatial relationships between the building and its immediate surroundings to the east. The Lighthouse McCormick Mortuary property is set back from the property line behind a front lawn. Important setting features are limited to the property itself and the configuration of the street and sidewalk fronting the building’s east-facing façade. New construction has the potential to encroach upon and reduce the generally open area of public street and sidewalk that partly defines the building’s setting. New construction also has the potential to limit the building’s ability to convey its historic significance by substantially obscuring its primary façade when viewed from Prairie Avenue. The building’s secondary façade along La Palma Drive will not be obscured by the revised Project.

The ATS guideway will be elevated above the roadway and sidewalks, passing directly in front of the Lighthouse McCormick Mortuary property. The bottom of the guideway will be elevated approximately 40 feet above the roadway, meaning the ATS guideway will clear the top of the mortuary building by approximately 10 feet. Additionally, the guideway will be carried by three support columns positioned on the Prairie Avenue sidewalk in front of the mortuary building.

The Project will alter the immediate surroundings of the Lighthouse McCormick Mortuary by encroaching on the existing open sidewalk and street area that partly defines the building’s setting. ATS support columns will also partially obscure the mortuary building’s primary façade from some vantage points on the east side of Prairie Avenue. Because three columns will sit in front of the Lighthouse McCormick Mortuary property, a portion of the building’s primary façade will be intermittently obscured depending on the position of the viewer. However, due to the dimensions and spacing of the columns, only a very limited portion of the Lighthouse McCormick Mortuary property’s primary façade will be obstructed when viewed from the west side of Prairie Avenue. More importantly, the mortuary’s primary façade is set back from the sidewalk behind a front lawn, physically separating between the mortuary building and the new construction. Due to this separation, the mortuary building’s primary façade will not be obscured from vantage points on the east side of Prairie Avenue. The south façade facing La Palma Drive will remain unobstructed. Those portions of the building’s façade that will be obscured will be minor in comparison to the overall size of the building, the
majority of which will remain visible. Because the ATS guideway would be located approximately 10 feet above the top of the Lighthouse McCormick Mortuary property and the center support columns carrying the guideway will only obscure a small portion of the building’s primary façade, the Project will not obscure its primary facade such that its physical form and architectural style cannot be discerned. Moreover, a Project Design Feature has been incorporated into the Project that requires the guideway’s elevation and distance from the façade of the historical resource to be sufficient for the guideway to visually clear the top of the historic resources’ street facing façade. The Project Design Feature also requires the dimensions, placement, and spacing of the guideway support columns will be such that the obstruction of views of historical resources’ street facing facades will be minimized. Ultimately, the building’s overall scale, massing, composition, and design will remain readily discernable despite some intermittent obscuring of physical features from some views.

The Project will alter the historic setting of the Lighthouse McCormick Mortuary property by placing new construction along Prairie Avenue including the placement of three support columns within the Prairie Avenue sidewalk in front of the Mortuary building. This alteration to setting will not substantially interfere with the visual and spatial relationships between the building and its immediate surroundings. Features of the Project -- including the height of the guideway, the distance of the guideway from the edge of the building, and the size and spacing of the vertical supporting columns -- have been designed in a manner that maintains important aspects of the resource’s existing setting and ensures that it’s overall scale, massing, composition, and design will remain readily discernable.

For architecturally significant historical resources like the Lighthouse McCormick Mortuary property, the most important aspects of integrity are design, workmanship, and materials. Although integrity of setting will be altered along Market Street, all of the other aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. Thus, the Lighthouse McCormick Mortuary property will continue to convey its historic significance after implementation of the Project and as such, the impact of the Project to the historic resource will be less than significant.

7.5 Analysis of No Impact

This report has identified two (2) historical resources within the Expanded Study Area that will not be impacted by the Project, either directly or indirectly. Potential impacts to each of these resources, or lack thereof, are described below.

260 N. Locust Street (Holy Faith Episcopal Church)

The Project will construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard.
North of Regent, the ATS guideway will bear northeast off of the public right-of-way and onto the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street. This block will be acquired, and the existing one-story shopping center and restaurant buildings demolished to accommodate new construction of the elevated ATS guideway and Market Street/Florence Avenue Station. The Holy Faith Episcopal Church property is situated across Locust Street from this block.

The Project will not physically alter the Holy Faith Episcopal Church property in any way. The buildings will remain in their original locations and will retain all of their significant character-defining features. The Project will erect substantial new physical structures across the street from the Holy Faith Episcopal Church property, thereby changing its physical surroundings to the west. The setting of a historical resource includes features within its boundaries as well as its immediate surroundings. Setting features import to the Holy Faith Church property are largely located within the boundaries of the church property. These include the lawns, planted areas and pedestrian paths located within the interstitial spaces between and in front of the buildings. The immediate surroundings outside Church property boundaries – a densely developed urban area containing a wide range of building types and uses dating from various periods of development -- are less important. This is particularly true of the existing commercial block to be redeveloped by the Project which was developed over 50 years after the Church was constructed. The church property and the commercial block are not spatially related with the majority of the shopping center buildings oriented to a surface parking lot to the west.

The new construction will be separated from the Holy Faith Episcopal Church property by the width of a residential street (Locust Street). The closest support column will be more than 200 feet from the Church. With over 200 feet of separation, the new construction will not alter important setting features located on the Church property or interfere with any important visual or spatial relationships between the property and its immediate surroundings. For these reasons, the addition of new construction a substantial distance from the Church property will not substantially alter its setting. The important setting features located within the boundaries of the church property will remain unchanged by the revised Project; the areas to be redeveloped by the Project have already been substantially altered and have no important spatial or visual relationships with the church property.

Because the Project will not physically alter the Holy Faith Episcopal Church property and will not alter its surroundings in any meaningful way, the Project will not result in a substantial adverse change in the significance of the historical resource. All of the aspects of integrity—including location, design, materials, workmanship, feeling and association—will remain, and therefore the historical resource will retain integrity overall. After construction of the Project, the Holy Faith Episcopal Church property will continue to
convey its historic significance as an early 20th-century Late Gothic Revival-style religious complex in Inglewood. Therefore, there will be no impact to the Holy Faith Episcopal Church property as a result of the Project.

720 E. Florence Avenue (Inglewood Park Cemetery)
The Inglewood Park Cemetery property is located within the Expanded Study Area. The cemetery is situated along the ATS alignment at the northeast corner of Manchester Boulevard and Prairie Avenue. As described above, the Project will construct an elevated ATS guideway set on support columns within the public rights-of-way of Manchester Boulevard and Prairie Avenue. Traveling southbound, the ATS guideway will run along Manchester Boulevard east to Prairie Avenue, where it will make a right-hand turn to continue south on Prairie. The Project will also construct a station at the southeast corner of Manchester and Prairie.

The Project will not physically alter the Inglewood Park Cemetery property in any way. The cemetery will remain in its original location and will retain all of its significant character-defining features. The Project will erect a new physical structure immediately adjacent to the cemetery property, thereby changing its physical surroundings to the southwest. The ATS will run along Manchester Boulevard west of the cemetery, and along Prairie Avenue south of the cemetery. Thus, the ATS will not run along the perimeter of the cemetery property at any point. At the intersection of Manchester and Prairie, the ATS will make a turn, touching the parcel at the southwest corner; the cemetery property is situated at the northeast corner. At this location, where the ATS guideway will be closest to the cemetery property, the edge of the ATS guideway will be approximately 190 feet from the cemetery wall. Thus, there will be substantial physical separation between the cemetery property and the new construction. At the intersection, support columns for the guideway will be placed on the sidewalk at the northwest, southwest, and southeast corners; no support columns will be placed at the northeast corner.

The setting of a historical resource includes features within its boundaries as well as its immediate surroundings. The cemetery property’s immediate surroundings have evolved over time, as this is a densely developed urban area comprising a wide range of building types and uses dating from various periods of development. The addition of the ATS will not interfere with existing visual and/or spatial relationships between the property and its surroundings in any meaningful way. Furthermore, the most significant features of the Inglewood Park Cemetery—including the Grace Chapel (1907), Inglewood Mausoleum (1915), Mausoleum of the Golden West (1930s), and main entrance walls and gates—are clustered in the northernmost portion of the cemetery grounds or situated along Florence Avenue, whereas the Project’s new construction will

116 Traveling northbound, the ATS guideway will run along Prairie Avenue north to Manchester Boulevard, where it will make a left-hand turn to continue west on Manchester.
be southwest of the cemetery property. Setting features important to the cemetery are within the boundaries of the property which is surrounded by a high wall, and these will not be altered or effected by the Project. Therefore, the addition of new construction a substantial distance from the cemetery property will not substantially alter its setting and all aspects of integrity including location, design, materials, setting, workmanship, feeling, and association will remain unchanged.

Because the Project will not physically alter the Inglewood Park Cemetery property and will not alter its surroundings in any meaningful way, the Project will not result in a substantial adverse change in the significance of the historical resource. After construction of the Project, the Inglewood Park Cemetery will continue to convey its historic significance as the burial ground of persons of transcendent importance and architectural significance for the high quality of the buildings within. Therefore, there will be no impact to the Inglewood Park Cemetery property as a result of the Project.

7.6 Summary of Impacts

To summarize, the Project will result in both direct and indirect impacts to historical resources under CEQA. Of the ten (10) historical resources identified in the Project Area and/or Expanded Study Area, the revised Project will have a less than significant impact on eight (8) resources, and no impact on two (2) resources. Thus, there will be no significant impacts to historical resources as a result of the revised Project.

Figure 5. SUMMARY LIST OF IMPACTS

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<td>720 E Florence Ave</td>
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<td>Lighthouse McCormick Mortuary (former Hardin &amp; Flanagan Colonial Chapel and Mortuary)</td>
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</table>
BIBLIOGRAPHY


California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387.


California Public Resources Code, Sections 21000-21177.


City of Inglewood. Building Permit Records.

Code of Federal Regulations, Title 36, Part 60.


Historic Resources Inventory. California State Office of Historic Preservation, August 2011.


APPENDIX A: FIELD PHOTOGRAPHS

Holy Faith Episcopal Church, 260 N. Locust Street (Northeast view).

Holy Faith Episcopal Church, 260 N. Locust Street (Southeast view).
Holy Faith Episcopal Church and School, 260 N. Locust Street (Southwest view).

Holy Faith Episcopal Church and Rectory, 260 N. Locust Street (East view).
Former United Bank of California, 158-170 N. Market Street (East view).

Former United Bank of California, 158-170 N. Market Street (Southeast view).
Former Fox Theater, 115 N. Market Street (Northwest view).

Former Fox Theater, 115 N. Market Street (West view).
Former Fox Theater, 115 N. Market Street (Southwest view, detail).

Former Fox Theater, 115 N. Market Street (Southwest view).
Former Bank of Inglewood, 100 N. Market Street/307 E. Queen Street (Northeast view).

Former Bank of Inglewood, 100 N. Market Street/307 E. Queen Street (East view, detail).
Former J.C. Penney, 129-139 S. Market Street, (Southwest view).

Former J.C. Penney, 129-139 S. Market Street (Northwest view).
Professional Building, 149-155 S. Market Street/231-239 E. Manchester Boulevard (Northwest view).

Professional Building, 149-155 S. Market Street/231-239 E. Manchester Boulevard (Southwest view, detail).

Bank of America, 320-330 E. Manchester Boulevard (Southwest view).
Bank of America, 320-330 E. Manchester Boulevard (South view).

Bank of America, 320-330 E. Manchester Boulevard (Southeast view).
Inglewood Park Cemetery, 720 E. Florence Avenue, main entrance (Southwest view).

Inglewood Park Cemetery, 720 E. Florence Avenue, Grace Chapel (Southeast view).
Inglewood Park Cemetery, 720 E. Florence Avenue, Inglewood Mausoleum (Northeast view).

Inglewood Park Cemetery, 720 E. Florence Avenue, Mausoleum of the Golden West (North view).
Inglewood Park Cemetery, 720 E. Florence Avenue (West view).

The Forum, 3900 W. Manchester Boulevard (East view).
The Forum, 3900 W. Manchester Boulevard (East view, detail).

The Forum, 3900 W. Manchester Boulevard, with SoFi Stadium (Southeast view).
The Forum, 3900 W. Manchester Boulevard (East view).

Lighthouse McCormick Mortuary, 619-635 S. Prairie Avenue (Northwest view).
Lighthouse McCormick Mortuary, 619-635 S. Prairie Avenue (West view).

Lighthouse McCormick Mortuary, 619-635 S. Prairie Avenue (Northwest view).
Market Street, looking south toward Queen Street.

Market Street, looking north from Queen Street.
Market Street, looking north from Manchester Boulevard.

Manchester Boulevard, looking east toward Market Street.
Manchester Boulevard, looking west toward Market Street.

Manchester Boulevard, looking west from Locust Street.
Prairie Avenue, looking north from Kelso Street.

The Forum and SoFi Stadium from Inglewood Park Cemetery (Southwest view).
APPENDIX B: LIST OF PARCELS IN THE PROJECT AREA AND EXPANDED STUDY AREA

The following is a complete listing of all parcels examined as part of the Project Area and Expanded Study Area for the revised Project. This includes all parcels fronting the alignment right-of-way on both sides, and all parcels where new construction is proposed. Where there will be substantial new construction outside of the alignment right-of-way, parcels immediately adjacent to or across from the new construction are also included.

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<td>Vajra Books &amp; Gifts, 2-story mixed-use commercial (former Bank of Inglewood)</td>
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<tr>
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<td>I Sports Two, storefronts</td>
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<td>1938</td>
<td>Basket Beauty Supply, 1-story commercial storefront</td>
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<tr>
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<td>1923</td>
<td>Handwritten LA, 2-story mixed-use commercial building</td>
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<td>Smoove Fashion World, 2-story mixed-use commercial building</td>
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<td>1941, 1954</td>
<td>2-story commercial retail building (former J.C. Penney)</td>
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<td>149-155 S Market St/231-239 E Manchester Bl</td>
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<tr>
<td>150 S Market St</td>
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<td>1927, 1965</td>
<td>World Hat &amp; Boot Mart, 2-story mixed-use commercial building (former People’s Federal Building &amp; Loan Association)</td>
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<td>201-207 S Market St</td>
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<td>Fashion Express, commercial storefront</td>
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<tr>
<td>333 E Nutwood St</td>
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<td>1940</td>
<td>Anphon Medical Center, 1-story commercial professional building</td>
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<td>338 E Nutwood St, 320 E Nutwood St, 325 E Hillcrest Bl</td>
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<td>2-story single-family residence converted to commercial office, 1- and 2-story commercial building at rear</td>
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<tr>
<td>813 E Nutwood St</td>
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<td>817 E Nutwood St</td>
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<td>924 S Osage Ave</td>
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<td>Osage Senior Villas, 3-story apartment building</td>
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<tr>
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<td>1958</td>
<td>Osage Gardens, 2-story apartment building (northern of two associated buildings)</td>
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<td>1006 S Osage Ave</td>
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<td>1958</td>
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<td>1014 S Osage Ave</td>
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<td>1973</td>
<td>Osage Gardens, 2-story apartment building</td>
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<td>1018 S Osage Ave</td>
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<td>1965</td>
<td>2-story apartment building</td>
</tr>
<tr>
<td>1024 S Osage Ave</td>
<td>4024009032</td>
<td>1961</td>
<td>La Riviera, 2-story apartment building</td>
</tr>
<tr>
<td>1030 S Osage Ave</td>
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<td>1953</td>
<td>2-story apartment building (northern of two associated buildings)</td>
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<td>1949</td>
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<td>517 S Prairie Ave</td>
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<td>c. 1950</td>
<td>William H. Kelso Elementary School, elementary school campus (expansion area)</td>
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<td>4025011064</td>
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<td>4021038025</td>
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<td>Bourbon Street Fish, converted service station</td>
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<tr>
<td>619-635 S Prairie Ave</td>
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<td>1948, addition c. 1960</td>
<td>Lighthouse McCormick Mortuary (former Hardin &amp; Flanagan Colonial Chapel and Mortuary)</td>
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<tr>
<td>703 S Prairie Ave</td>
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<td>c. 1925</td>
<td>2 1½-story single-family residences</td>
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<td>Single-family residence</td>
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<td>713 S Prairie Ave</td>
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<td>715 S Prairie Ave</td>
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<td>1947</td>
<td>1- and 2-story apartment building</td>
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<td>813 S Prairie Ave</td>
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<td>1945</td>
<td>JP Termite, 1-story commercial storefront</td>
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<tr>
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<td>Iglesia Cristiana Hispana, 1-story commercial/industrial building</td>
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<td>823-825 S Prairie Ave</td>
<td>4024007008</td>
<td>1948</td>
<td>Hollywood Park Motel</td>
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<td>Strip mall</td>
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<td>Inglewood Electric Supply, 2-story commercial building, 1-story commercial building, rear garage, parking lot</td>
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<td>Pride Plaza, 2-story commercial retail/office building</td>
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<td>Tender Care, Inc., two single-family residences converted to a school</td>
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<td>Wilder's Preparatory Academy, 1-story single-family residence converted to a school</td>
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APPENDIX C: MARKET STREET HISTORIC DISTRICT ANALYSIS

The following is documentation of the analysis of Market Street as a potential historic district, including a Property Data Table and a Historic District Analysis Map.
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# Property Data Table

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<th>STYLE</th>
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<td>Market</td>
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<td>1937 Survey</td>
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<td>242-244</td>
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<td>1937 Survey</td>
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<td>1937 Survey</td>
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APPENDIX D: CONCEPTUAL PROJECT DESIGN

The following plan and sections drawings illustrate the Conceptual Project Design in relation to each of the identified historical resources.
E QUEEN STREET

EXHIBIT 103

SECTION VIEW
SCALE: N.T.S

CITY OF INGLEWOOD
TRANSIT CONNECTOR
FORMER BANK OF INGLEWOOD
I.3
Historical Preservation Memo
MEMORANDUM

Date: October 7, 2021

To: Louis Atwell, City of Inglewood, Assistant City Manager/Public Works Director

Subject: Proposed Inglewood Transit Connector Project – Peer Review

From: Teresa Grimes | Historic Preservation

INTRODUCTION

To perform a technical peer review at the request of the City of Inglewood, I have reviewed and analyzed the Historical Resource Technical Report (Report) prepared by Historic Resources Group (HRG) for the Inglewood Transit Connector (ITC) Project (Project). The HRG Report is dated October 4, 2021 and was prepared in compliance with the California Environmental Quality Act (CEQA). I previously reviewed an earlier version of the HRG Report dated November 19, 2020, which was attached to the Draft Environmental Impact Report (DEIR) for the originally proposed Project. The Los Angeles Conservancy (LAC) submitted a letter on February 8, 2021 in response to the DEIR, raising questions about the identification of historical resources and analysis of project impacts. Subsequent to the release of the DEIR, the City revised the original Project to minimize the potential for impacts on historical resources and to address feedback received from a myriad of stakeholders. Thus, HRG prepared a new Report to address certain comments from LAC as well as new analysis in response to the revised Project. The purpose of this peer review is to assess the 2021 Report for methodology, accuracy, and consistency with industry standards as well as the CEQA Guidelines and to determine whether or not I concur with HRG’s conclusions. My qualifications are attached as Exhibit A.

ITC OVERVIEW

The proposed ITC Project would involve the development of an Automated Transit System (ATS) within the City of Inglewood. Approximately 1.6-mile long, the elevated guideway would be primarily located within the public right-of-way along Market Street, Manchester Boulevard, and Prairie Avenue. The elevated guideway would contain dual lanes to allow trains to travel continuously in each direction. Several trains would likely be operating at the same time, depending on ridership demand (see Figure 1 below). As part of the City’s partnership with Metro, the Project is proposed as an extension of the Metro regional rail system to the City’s activity centers, closing the critical first/last mile transit gap in Inglewood, increasing passenger service along the Metro system by facilitating a seamless transfer of passengers between the ITC and the Metro K Line.
Three stations are proposed adjacent to the guideway on privately owned land that would be acquired as part of the Project. These stations are:

- The Market Street/Florence Avenue station generally located between Market Street and Locust Street providing connections to the Metro K Line and Downtown Inglewood.
- The Prairie Avenue/Manchester Boulevard station located on the southwest corner of the intersection of Prairie Avenue and Manchester Boulevard parcel providing service to the Forum and the LASED at Hollywood Park including SoFi Stadium and existing and future local businesses and residences.
- The Prairie Avenue/Hardy Street station located on the northwest corner of the intersection of Prairie Avenue and Hardy Street providing service to the LASED at Hollywood Park, including SoFi Stadium, the IBEC, and other existing and future local businesses and residences.

The proposed stations are configured as center-station platforms. This configuration minimizes the total footprint of the station and guideways and provides easy way-finding for passengers by directing all passengers to the same platform where they board their train. This configuration also provides greater flexibility in maintaining operations in the event of equipment failures.

Each station includes ground, mezzanine, and platform levels. From the ground level, each station includes vertical circulation elements, consisting of stairs, escalators, and elevators from grade at existing sidewalks and passenger areas adjacent to the stations to the mezzanine and platform levels of the station. Pedestrian bridges at each station provide passenger walkways to travel over streets to avoid at-grade passenger crossings. The stations would be sized to support the projected ridership demands, including the peak projected boarding and deboarding demands at the station for non-event days and major event days, as well as in worst-case scenarios in the unexpected event of emergency conditions and/or system failure.

Existing roadways and infrastructure along the transit alignment would require reconfiguration to accommodate new elevated transit guideway structures and stations. In addition to surface improvements, utility infrastructure located under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations proposed along Market Street, Manchester Boulevard, and Prairie Avenue are necessary to assure that the existing roadway travel capacity is not reduced to accommodate the Project.

The Project includes a Maintenance and Storage Facility (MSF) to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center. The MSF would be located on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue. An existing commercial building containing a Vons grocery store, a fitness center and a bank branch, is located on the southern portion of this site. A gas station operated by Vons is located on the northeast portion of this site. Demolition of the existing commercial building and gas station are
proposed as part of the Project. A new Vons replacement store is proposed on the corner of Manchester Boulevard and Hillcrest Boulevard.

The MSF would be designed in accordance with the ITC Design Standards and Guidelines (Design Guidelines) which address the massing, façade, materials, colors, roof, and lighting for this facility, how the MSF would engage with the pedestrian and vehicular circulation around it, and sustainability features.

The Project also includes two power distribution system (PDS) substations. These PDS substations would provide the necessary power for the Project including traction power, auxiliary power, and housekeeping power for the stations and related infrastructure. One of the PDS substations would be located on the MSF site. The Southern California Edison service connection for the system would be provided to the PDS substation on the MSF site. The second PDS substation would be located on the Prairie Avenue/Hardy Street station site.

Additional public parking would be provided as part of the Project at three locations that are proposed for acquisition for use as construction staging areas. After construction, these sites would be improved as public parking lots:

- Approximately 650 parking spaces would be provided in a surface parking lot at the Market Street/Florence Avenue Station along with pick-up and drop-off areas on Locust Avenue and Regent Street.
- Approximately 50 parking spaces would be provided in a surface parking lot at 150 S. Market Street.
- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area are proposed at the Prairie Avenue/Hardy Street Station site.

**PROJECT AREA AND EXPANDED STUDY AREA**

The first step in the preparation of a Historical Resource Technical Report is defining the geographic area within which a project may directly or indirectly cause alterations to the character of historical resources. The CEQA Guidelines do not provide direction for determining a study area; however, the Advisory Council on Historic Preservation (ACHP)\(^1\) provides guidance for determining an Area of Potential Effect (APE) for federal undertakings subject to Section 106 of the National Historic Preservation Act. In determining an APE three factors are considered: the existing setting of the project; the scale and nature of the project; and the impacts the project could have on historical resources, if such resources exist.

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\(^1\) The Advisory Council on Historic Preservation is an independent federal agency charged with promoting the preservation of the nation’s historical resources.
Figure 2: Map of Project Area and Expanded Study Area prepared by HRG
HRG included the Project Area as well as an Expanded Study Area in the scope of their Report (see Figure 2 above). The existing setting of the Project is an urban landscape. The alignment right-of-way is mostly flanked by commercial and institutional land uses with buildings constructed in various periods and styles, generally ranging from one (15 feet) to six (75 feet) stories in height. Additionally, the existing setting includes large-scale athletic and entertainment arenas. Thus, the existing setting is not one of consistency but rather diversity.

The scale and nature of the Project is reflected in the Conceptual Project Design. The Conceptual Project Design conforms to the Project Design Features stipulated as part of the Project. The Conceptual Project Design includes the following:

- ATS guideway heights that vary 27 feet to a maximum to approximately 53 feet from grade to the bottom of the guideway.
- ATS guideway heights along Market Street that range from approximately 42 feet above grade at Regent Street to approximately 53 feet above grade at the Fox Theater.
- ATS guideway widths ranging from approximately 32 feet wide at closed spaces, approximately 42 feet wide at crossovers (not at stations), and approximately 74 feet at crossovers adjacent to stations.
- ATS guideway situated on one side of the right-of-way in between stations and generally supported by single columns, then gradually transitioning to opposite sides of the right-of-way on approach to center-platform stations supported by straddle bents with columns on both sides of the street.
- Guideway supports measuring between 6 feet and 8 feet in diameter for round columns.
- Eccentric columns (along Prairie) supporting a dual guideway that are oblong in diameter, measuring approximately 7 feet by 12 feet (with the longer dimension perpendicular to the guideway).
- Most center median supports on Market Street and Manchester Boulevard will be round columns measuring 8 feet in diameter.
- Other columns placed in the center median are oblong and measure no larger than 6 feet by 9 feet in diameter.

The Project Area is defined as all areas and parcels where new construction would occur and may involve the demolition of existing buildings or alteration of existing structures and sites. The Expanded Study Area is defined as the maximum extent within which Project impacts could occur. It includes all parcels fronting the ATS alignment right-of-way on both sides as well as parcels adjacent to new construction outside the alignment right-of-way. Although the ITC Project is not yet federal undertaking at this time, the delineation of the Expanded Study Area uses the guidance from the ACHP, which is consistent with industry standards. I concur with the delineation of the Expanded Study Area, which is clearly articulated, reasoned, and illustrated in the HRG Report.
REGULATORY FRAMEWORK

CEQA Definition of Historical Resources

CEQA defines a historical resource as a property listed or determined to be eligible for listing in the California Register of Historical Resources (California Register). Historical resources may include buildings, structures, objects, sites, and historic districts. The California Register automatically includes properties listed in and formally determined eligible for listing in the National Register of Historic Places (National Register) as well as some California State Landmarks and Points of Historical Interest. A property designated under a local preservation ordinance or identified as eligible in a historic resource survey is presumed to be a historical resource unless a preponderance of evidence demonstrates that the property is not architecturally, historically, or culturally significant. A lead agency has the discretion to treat a property as a historical resource if it meets statutory requirements and substantial evidence supports the conclusion. The City of Inglewood does not have a historic preservation ordinance and does not maintain a local designation program. The National and California Register programs are discussed below.

National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment."4

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:

A. Associated with events that have made a significant contribution to the broad patterns of our history; or
B. Associated with the lives of persons significant in our past; or
C. 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

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2 Public Resources Code § 21084.1
3 Public Resources Code § 5024.1 and Title 14 California Code of Regulations § 4850 & § 15064.5 (a) (2).
4 Title 36 Code of Federal Regulations Part 60.2.
D. Have yielded, or may be likely to yield, information important in prehistory or history.\(^5\)

**Context**

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns or trends in history by which a specific...property or site is understood and its meaning...is made clear.”\(^6\) A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

**Integrity**

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as "the ability of a property to convey its significance.”\(^7\) Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

**Historic Districts**

The National Register includes significant properties, which are classified as buildings, sites, districts, structures, or objects. A historic district “derives its importance from being a unified entity, even though it is often composed of a variety of resources. The identity of a district results from the interrelationship of its resources, which can be an arrangement of historically or functionally related properties.”\(^8\)

A district is defined as a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development.\(^9\) A district’s significance and historic integrity should help determine the boundaries. Other factors include:

- Visual barriers that mark a change in the historic character of the area or that break the continuity of the district, such as new construction, highways, or development of a different character;

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\(^5\) Title 36 Code of Federal Regulations Part 60.4.
\(^7\) *National Register Bulletin #15*, 44.
\(^8\) Ibid, 46.
\(^9\) Title 36 Code of Federal Regulations Part 60.3 (d).
• Visual changes in the character of the area due to different architectural styles, types, or periods, or to a decline in the concentration of contributing resources;
• Boundaries at a specific time in history, such as the original city limits or the legally recorded boundaries of a housing subdivision, estate, or ranch; and
• Clearly differentiated patterns of historical development, such as commercial versus residential or industrial.10

Within historic districts, properties are identified as contributing and noncontributing. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a district is significant because:

• It was present during the period of significance, relates to the significance of the district, and retains its physical integrity; or
• It independently meets the criterion for listing in the National Register.11

Criteria Considerations

Certain types of properties are not usually eligible for listing in the National Register. These include religious properties and cemeteries, which were evaluated as potential historical resources in the HRG Report. In addition to being significant under one of the four criteria listed above, these properties must meet a special requirement called a criteria consideration in order to be eligible for listing in the National Register. There are seven criteria considerations. Criteria Consideration A states “A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.”12 Criteria Consideration D states “A cemetery is eligible if it derives its primary significance from graves or persons of transcendent importance, from age, from distinctive design features, or from association with events.”13 These criteria considerations guard against the listing of properties based upon religious values or personal beliefs.

California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.14

The California Register consists of properties that are listed automatically as well as those that

13 Ibid., 34
14 Public Resources Code § 5024.1 (a).
must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 770 onward; and
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Resources Commission for inclusion on the California Register.\textsuperscript{15}

\textit{Criteria and Integrity}

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.\textsuperscript{16}

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.\textsuperscript{17}

\textit{SOHP Survey Methodology}

The evaluation instructions and classification system prescribed by the SOHP for recording historical resources provide a Status Code for use in classifying potential historical resources. In 2003, the Status Codes were revised to address the California Register. These Status Codes are used statewide in the preparation of historical resource surveys and evaluation reports. The first code is a number that indicates the general category of evaluation. The second code is a

\textsuperscript{15} Public Resources Code § 5024.1 (d).
\textsuperscript{16} Public Resources Code § 5024.1 (c).
\textsuperscript{17} Title 14 California Code of Regulations § 4852 (c).
letter that indicates whether the property is separately eligible (S), eligible as part of a district (D), or both (B). There is sometimes a third code that describes some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

The specific Status Codes referred to in this memorandum are as follows:

1S Individual property listed in the National Register by the Keeper. Listed in the California Register.
3S Appears eligible for the National Register as an individual property through survey evaluation.
3CS Appears eligible for the California Register as an individual property through survey evaluation.
5S3 Appears eligible for local listing as an Individual property through survey evaluation.
6Y Determined ineligible for National Register through Section 106 process, not evaluated for California Register or local listing.
6Z Found ineligible for the National Register, California Register, or local designation through a survey evaluation.

IDENTIFICATION OF HISTORICAL RESOURCES

In identifying historical resources in the Project Area and Expanded Study Area, HRG first reviewed records managed by the SOHP and studies prepared by the City of Inglewood to identify properties already listed or formally determined eligible for listing under national and state designation programs and properties previously evaluated as potential historical resources. HRG then conducted field work to identify properties that required evaluation as potential historical resources for the first time. This sequencing of tasks is consistent with industry standards. The listed and evaluated properties in the Project Area and Expanded Study Area are included at the end of this memorandum in Table 1.

Listed and Previously Evaluated Historical Resources

The Built Environment Resources Directory (BERD) was consulted by HRG to determine if the Project Area and/or Expanded Study Area includes properties currently designated under national or state landmark or historic district programs or previously evaluated as potential
historical resources. The BERD is managed by the SOHP and includes properties listed and determined eligible for listing in the National Register, listed and determined eligible for listing in the California Register, designated California Registered Historical Landmarks, and designated Points of Historical Interest. The BERD also includes information on properties evaluated in historic resource surveys and properties subject to federal and state environmental laws processed through the SOHP.

I consulted the BERD to confirm the findings in the HRG Report. There are two properties in the Expanded Study Area listed in the National Register:

- 3900 W. Manchester Boulevard
- 115 N. Market Street

As previously stated, properties listed in the National Register are listed in the California Register by statute. As such, these properties are historical resources as defined by CEQA and did not require re-evaluation by HRG.

The following properties were previously evaluated as ineligible for listing in the National Register through the Section 106 process, but not evaluated for listing in the California Register:

- 206 S. Locust Street
- 401 E. Manchester Boulevard
- 605 E. Manchester Boulevard
- 128 N. Market Street
- 129 N. Market Street
- 134 N. Market Street
- 125 S. Market Street
- 128 S. Market Street
- 932 S. Prairie Avenue

Some of these properties were subsequently demolished or altered as they were determined ineligible for listing in the National Register in association with a federal undertaking. Therefore, they were not re-evaluated as potential historical resources by HRG, which is consistent with industry standards.

**Inglewood Downtown District/Main Street Project Area Historic Design Guidelines**

The *Inglewood Downtown District/Main Street Project Area Historic Design Guidelines* were prepared in 2000. In preparing the Design Guidelines, the authors conducted a reconnaissance-level survey of the project area to ascertain the potential for a historic district and to identify buildings, structures, sites, and objects potentially eligible as individual resources. The project area for the Design Guidelines overlaps with a portion of the Project...
Area and Expanded Study Area for the ITC Project. It is bounded on the north by E. Florence Avenue, on the south by E. Hillcrest Boulevard, on the east by the east side of N. and S. Locust Street, and on the west by N. and S. La Brea Avenue (see Figure 3).

No historic district was identified in the project area for the Design Guidelines. Ten properties overlapping with the boundary of the Project Area and Expanded Study Area were identified as potential historical resources. The following four properties were evaluated as appearing eligible for listing in the National Register:

- 302 E. Manchester Boulevard/200-204 S. Market Street
- 320-330 E. Manchester Boulevard
- 100 N. Market Street/307 E. Queen Street
- 115 N. Market Street

Figure 3: Map of Main Street Project Area from Design Guidelines
The California Register criteria for eligibility mirror those of the National Register. Therefore, these buildings were presumably considered eligible for listing in the California Register for the same reasons outlined in the Design Guidelines.

Although the City of Inglewood does not have an ordinance for the designation of local landmarks, the authors of the Design Guidelines nonetheless identified the following six properties as appearing eligible for local listing:

- 124-126 N. Market Street
- 125 S. Market Street
- 129-139 S. Market Street
- 132 S. Market Street
- 150 S. Market Street
- 333 E. Nutwood Street

Public Resources Code Section 21084.1 states that a property identified as eligible in a historic resource survey is presumed to be a historical resource defined by CEQA unless a preponderance of evidence demonstrates that the property is not architecturally, historically, or culturally significant. However, the survey must meet the criteria set forth in subdivision (g) of Section 5024.1 of the Public Resources Code:

1. The survey has been or will be included in the State Historic Resources Inventory.
2. The survey and the survey documentation were prepared in accordance with office procedures and requirements.
3. The resource is evaluated and determined by the office to have a significance rating of Category 1 to 5 on Department of Parks and Recreation 523 Forms.
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

The HRG Report correctly explains that the survey conducted for the Design Guidelines does not meet these criteria. The survey data was not submitted to the SOHP for inclusion in the California Historic Resources Inventory System. The properties were not fully evaluated against the four National or California Register criteria for significance or seven aspects of integrity, and DPR 523 Forms were not prepared. Completed in 2000, the survey is obviously over five years of age. Therefore, the properties identified as eligible in the survey for the Design Guidelines do not qualify as presumptive historical resources. Consistent with industry standards, HRG reevaluated the properties identified in the 2000 Design Guidelines as potential historical resources. The property at 115 N. Market Street was constructed as the Fox Theater. It was not reevaluated because it was subsequently listed in the National Register.
Properties Evaluated as Eligible Historical Resources

HRG prepared a historic context statement and conducted field work to identify properties that required evaluation as potential historical resources for the first time. The HRG Report includes a list of every parcel within the Project Area and Expanded Study Area including a date of construction and brief description. Although not explicitly stated, HRG apparently screened vacant lots, parking lots, properties less than 45 years of age, and properties substantially altered from their original construction as potential historical resources. The City of Inglewood provided building permit records to confirm the dates of construction and subsequent alterations. In my experience working on other large-scale transportation projects, this is an acceptable level of effort and consistent with industry standards. Properties with no apparent potential to meet National and/or California Register criteria for significance do not require further investigation or documentation, especially when the project does not involve their demolition or alteration. A summary of the HRG evaluations as well as my comments and recommendations are provided below.

720 E. Florence Avenue

The Inglewood Park Cemetery was established in 1905 and has evolved over time. Approximately 200 acres in size, the cemetery property includes Grace Chapel constructed in 1907 and Inglewood Mausoleum constructed in 1915 among other buildings, structures, and funerary objects. The property is evaluated in the HRG Report as eligible for listing in the National and California Registers under Criterion A/1 for its association with the early institutional development of Inglewood as well as Criterion C/3 for the quality of its architecture. The HRG Report addresses Criteria Consideration D for cemeteries, which are not usually eligible for listing in the National Register. I agree with the evaluation of eligibility under Criterion A/1 for the site and Criterion C/3 for individual buildings. The site meets Criteria Consideration D because it derives its primary significance from graves of persons of transcendent importance and individual buildings are excellent examples of architectural styles. Further investigation or evaluation are not required.

260 N. Locust Street

The Holy Family Episcopal Church was established in 1911 and the buildings on the campus were designed between 1914 and 1959 by the architect Philip Frohman. The property is evaluated in the HRG Report as appearing eligible for listing in the National and California Registers under Criterion A/1 for its association with the early institutional development of Inglewood as well as Criterion C/3 as an outstanding example of Late Gothic Revival architecture representing the work of a master architect. The HRG Report also addresses Criteria Consideration A for religious properties, which are not usually eligible for listing in the National Register. I agree with the evaluation of eligibility under Criterion C/3 and that the main church building meets Criteria Consideration A because it derives its primary significance from its architectural and artistic distinction. Further investigation or evaluation are not required.
320-330 E. Manchester Boulevard

This property is occupied by a two-story bank building constructed in 1948 for Bank of America. It was evaluated as appearing eligible for listing in the National Register in 2000. I concur with the HRG evaluation of this property as appearing eligible for listing in the California Register under Criterion 3 as a good example of the PWA Moderne style. No further investigation or evaluation is recommended.

100 N. Market Street/307 E. Queen Street

This property is occupied by a two-story mixed-use building constructed in 1927 for the Bank of Inglewood. It was evaluated as appearing eligible for listing in the National Register in 2000. I concur with the HRG evaluation of this property as appearing eligible for listing in the California Register under Criterion C/3 as a good example of the Mediterranean Revival style. No further investigation or evaluation is recommended.

158-170 N. Market Street

This property is occupied by a one-story bank building constructed in 1967 for United California Bank. It was evaluated as ineligible for listing in the National Register in 2000, principally because it was only 33 years of age at the time. I concur with the HRG evaluation of this property as appearing eligible for listing in the California Register under Criterion 3 as a good example of the Late Modern style. No further investigation or evaluation is recommended.

129-139 S. Market Street

This property is occupied by a department store building constructed as one story in 1941 and expanded to two stories and remodeled in 1954. It was evaluated as ineligible for listing in the National Register but appearing eligible for local listing in 2000. HRG evaluated the building as appearing eligible for listing in the California Register under Criterion 3 as a good example of the Mid-Century Modern style. I do not think the analysis supports the conclusion of architectural significance; however, I do not recommend further investigation or evaluation at this time. The DEIR conservatively treats the property as a historical resource. Furthermore, it is not proposed for demolition or alteration.

149-155 S. Market Street/231-239 E. Manchester Boulevard

This property is occupied by a two-story mixed-use building constructed in 1928 as the Professional Building. It was evaluated as ineligible for listing in the National Register in 2000 for lack of integrity. HRG evaluated the building as eligible for listing in the California Register under Criterion 3 as a good example of the Spanish Colonial Revival style despite the alterations. It is possible that properties may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. An altered property may still have sufficient integrity for the California Register if it
maintains the potential to yield significant scientific or historical information or specific data. This means a property ineligible under Criteria 1, 2, or 3 for lack of integrity could still be eligible under Criterion 4, which does not seem likely in this case. Since I agree this property should be treated as a historical resource in the DEIR, I do not recommend further investigation or evaluation at this time.

619-635 S. Prairie Avenue

This property is occupied by a two-story mortuary building constructed in 1948 for the Hardin & Flanagan Colonial Chapel & Mortuary. In 1960 the building was expanded by a two-story wing on the north. I concur with the HRG evaluation of this property as appearing eligible for listing in the California Register under Criterion 3 as a good example of the American Colonial Revival style. No further investigation or evaluation is recommended.

Properties Evaluated as Ineligible Historical Resources

The following properties were identified as potential historical resources in the 2000 Design Guidelines, but reevaluated by HRG as ineligible for listing in the National or California Registers. Therefore, they are not historical resources as defined by CEQA.

302 E. Manchester Boulevard/200-204 S. Market Street

This property is occupied by a two-story commercial building constructed in 1941. It was evaluated as appearing eligible for listing in the National Register in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register due to a lack of integrity, regardless of any significance it may or may not possess. No further investigation or evaluation is recommended.

124-126 N. Market Street

This property is occupied by a two-story mixed-use building constructed in 1920. It was evaluated as ineligible for listing in the National Register but appearing eligible for local listing in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register due to a lack of integrity, regardless of any significance it may or may not possess. No further investigation or evaluation is recommended.

125 S. Market Street

This property is occupied by a one-story commercial building constructed in 1938. It was evaluated as ineligible for listing in the National Register but appearing eligible for local listing in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register due to a lack of integrity, regardless of any significance it may or may not possess. No further investigation or evaluation is recommended.
132 S. Market Street

This property is occupied by a two-story mixed-use building constructed in 1925. It was evaluated as ineligible for listing in the National and California Registers but appearing eligible for local listing in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register due to a lack of integrity, regardless of any significance it may or may not possess. No further investigation or evaluation is recommended.

150 S. Market Street

This property is occupied by a two-story mixed-use building constructed in 1927 as People’s Federal Building & Loan Association and remodeled in the 1960s. It was evaluated as ineligible for listing in the National Register but appearing eligible for local listing in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register. As a result of the 1960s remodel, the building is ineligible for lack of integrity, regardless of any significance it may or may not possess from its original construction or prewar history. The 1960 remodel has not achieved significance in its own right. Late Modern elements were applied to the street-facing facades; however, the design lacks the cohesion to be considered a true representative of an architectural type from the 1960s. Although this building is proposed for demolition, no further investigation or evaluation is recommended.

333 E. Nutwood Street

This property is occupied by a one-story commercial building constructed in 1940. It was evaluated as ineligible for listing in the National Register but appearing eligible for local listing in 2000. I concur with the HRG evaluation of ineligibility for listing in the California Register due to a lack of integrity, regardless of any significance it may or may not possess. No further investigation or evaluation is recommended.

Historic District

Commercial corridors within the Project Area and Expanded Study Area such as Market Street are often composed of buildings that lack individual distinction but are collectively significant as a whole within a historic context such as commercial development. Thus, HRG considered whether any groups of buildings within the Project Area and/or Expanded Study Area qualified as a historic district. According to the National Register, a district is a geographically definable area of land containing a significant concentration of buildings, sites, structures, or objects united by past events or aesthetically by plan or physical development. ¹⁸

In their February 8, 2021 comment letter on the DEIR, LAC suggested an evaluation of Market Street as a potential historic district. In fact, HRG had performed such an evaluation but did not include the information in the 2020 Report. The 2020 Report stated without elaboration

¹⁸ Title 36 Code of Federal Regulations Part 60.3 (d).
that no historic districts were identified in the Project Area and/or Expanded Study Area. The 2021 Report includes their evaluation of Market Street as a potential historic district and conclusion that it is ineligible for lack of integrity regardless of any significance it may have played as the commercial center of Inglewood from the early twentieth century through the postwar period.

I reviewed HRG’s evaluation and conducted my own field inspection of Market Street between Florence Avenue and Hillcrest Boulevard. I concur with the HRG evaluation of ineligibility for listing in the National and California Registers as a historic district. Within historic districts, properties are identified as contributing and noncontributing. A contributing building was present during the period of significance, relates to the significance of the district, and retains its physical integrity.  

In my estimation, HRG was very generous in their methodology for extending the period of significance to the 1960s and identifying potential contributing buildings to account for storefront alterations, which are common in commercial architecture. Yet, HRG only identified 23 potential contributing buildings of the 64 properties in the area, or 36 percent contributing and 64 percent noncontributing. While the National and California Registers do not prescribe a minimum ratio for eligibility, I’m not aware of any listed historic districts with such a low ratio of contributing to noncontributing buildings. Although the area is visually united by the use, height, and scale of the existing buildings, it is lacking in a strong sense of time and place required for historic district designation. Some properties are developed with recently constructed buildings, while others are vacant lots or parking lots that create breaks in the street wall. Due to extensive alterations over time, many of the one-story buildings are unrecognizable from their original construction. As the area does not contain a sufficient concentration of potential contributing buildings to qualify as a historic district, HRG proceeded to identify individual properties for evaluation as potential historical resources.

Summary of Identified Historical Resources

I concur with HRG in that the Project Area and/or Expanded Study Area does not include any groups of buildings that qualify as historic districts. I also concur with HRG in the evaluations of individual properties as ineligible as historical resources. I did not identify any errors or omissions in HRG’s identification of listed historical resources and did not identify any other properties that should have been evaluated as potential historical resources.

HRG identified ten properties as listed or eligible for listing in the National and/or California Registers. Therefore, these properties were treated as historical resources as defined by CEQA. In some cases, I agree with the evaluations of eligibility in part but not in whole. Since the evaluations of eligibility are for CEQA purposes and I agree the properties should be treated as historical resources, I do not recommend further investigation or evaluation.

Two of the ten properties (129-139 S. Market Street and 149-155 S. Market Street/231-239 E. Manchester Boulevard) were evaluated by HRG as eligible for listing in the California Register.

19 National Register Bulletin #16, 16.
don’t think the analysis supports this conclusion but do not recommend further investigation or evaluation. These buildings would not be demolished or altered as a result of the Project and are conservatively treated as historical resources in the DEIR. As discuss below, the indirect impacts on these properties would be less than significant.

ANALYSIS OF PROJECT IMPACTS

Thresholds for Impacts on Historical Resources

The CEQA Guidelines set forth the standard for determining the significance of impacts to historical resources in Title 14 California Code of Regulations Section 15064.5 (b), which states:

A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

Title 14 California Code of Regulations Section 15064.5 (b) (1) further clarifies “substantial adverse change” as follows:

Substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.

Title 14 California Code of Regulations Section 15064.5(b)(2)(C) in turn explains that a historical resource is “materially impaired” when a project:

Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

As a property conveys its significance as a historical resource through its physical characteristics, the test for determining whether or not a proposed project will have a significant impact on an identified historical resource is whether or not the project will alter in an adverse manner the integrity of the historical resource such that it would no longer be eligible for listing in the National and/or California Registers.

Analysis of Direct Impacts

Direct or primary impacts are caused by a project and occur at the same time and place. The Project has the potential to directly impact one historical resource which is located within the Project Area, the Forum at 3900 W. Manchester Boulevard. This property is

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20 Title 14 California Code of Regulations § 15358 (a) (1).
discussed below because it was analyzed by HRG for direct and indirect impacts.

**Analysis of Indirect Impacts**

CEQA also requires the analysis of indirect impacts. Indirect impacts, or secondary effects, are reasonably foreseeable and caused by a project but occur at a different time or place. Indirect impacts, or secondary effects, are reasonably foreseeable and caused by a project but occur at a different time or place. Examples of indirect impacts may include visual, auditory, and atmospheric changes to the setting of historical resources. In analyzing the potential for indirect impacts from the construction and operation of the Project on the historical resources in the Project Area and Expanded Study Area, the central question is whether the Project would cause a “material impairment” to the significance of the nearby historical resources. Material impairment occurs where a project alters the physical characteristics that convey the significance of a historical resource and that justify its inclusion in or eligibility for inclusion in national, state, or local landmark or historic district programs pursuant to the requirements of CEQA. Such an effect would only occur if the historical resources in the Project Area and Expanded Study Area no longer retained sufficient integrity to convey their significance as a result of the Project.

According to National Register Bulletin #15, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not alter the physical characteristics of the historical resources in the Expanded Study Area, the only relevant aspect of integrity with respect to the impact of the Project on these historical resources is setting. Setting refers to the character of the place in which the historical resource is situated within the boundaries of the property as well as the resource’s broader surroundings. Setting is typically considered a more important aspect of integrity for conveying historic associations than for conveying architectural significance.

As described above, there are ten historical resources in the Project Area and Expanded Study Area. As discussed above, only one historical resource, the Forum, is located within the Project Area. Because the Project Area is located outside the parcel boundaries of the other historical resources in the Expanded Study Area, the Project would not impact their integrity of immediate setting. The analysis below considers the following:

- Why is the historical resource significant?
- What are the physical characteristics of the historical resource that conveys its significance?
- Specifically, is the broad setting a character-defining feature of the historical resource?
- If so, is the broad setting intact from the historical resource’s period of significance or is the broad setting already disrupted?
- What is the view shed from the historical resource?

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21 Title 14 California Code of Regulations § 15358 (a) (2).
22 Public Resource Code § 21084.1; Title 14 California Code of Regulation §15064.5(b).
• How and to what degree is the broad setting diminished by the visibility of the Project from the historical resource?

A summary of the indirect impacts analysis as well as my comments are provided below.

720 E. Florence Avenue

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 720 E. Florence Avenue. However, The Project would construct an elevated ATS guideway set on support columns within the public rights-of-way of Manchester Boulevard and Prairie Avenue. Traveling southbound, the ATS guideway would run along Manchester Boulevard east to Prairie Avenue, where it would make a right-hand turn to continue south on Prairie Avenue. The property is situated along the ATS alignment at the northeast corner of Manchester Boulevard and Prairie Avenue.

I concur with HRG in that the Project would have no indirect impact on the property at 720 E. Florence Avenue. The property is a cemetery that was evaluated as a historical resource for its historic associations and architectural significance. There are features within the boundary of this historical resource that contribute to its setting; however, the broad setting is not a physical characteristic that conveys the significance of the cemetery. Indeed, the cemetery is surrounded by a wall, which is intended to create a visual barrier; preserving the tranquility of the property from the broad setting. Furthermore, the ATS guideway would be approximately 190 feet away from the wall at the southwest corner of the cemetery, which is approximately 200 acres in size. Thus, there would be substantial physical separation between the historical resource and the new construction.

The Project would not affect the property’s integrity of setting, location, design, materials, workmanship, feeling, and association. The cemetery would not be materially impaired by the Project because it would retain all of its significant character-defining features, continue to convey its historic associations and architectural significance, and remain eligible for listing in the National and California Registers. Therefore, I concur the Project would have no impact on the historical resource.

320-330 E. Manchester Boulevard

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 320-330 E. Manchester Boulevard. However, the Project would involve the construction of an elevated ATS guideway set on support columns within the public right-of-way of Manchester Boulevard, between Market Street and Prairie Avenue. The building is located on the south side of Manchester Boulevard, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 320-330 E. Manchester Boulevard would be less than significant. The property was evaluated as a historical resource as a good example of a PWA Moderne style bank building. There are no features within the
boundary of the historical resource that contribute to its setting. The building occupies all of
the property on which it was constructed except for the parking lot to the rear, which is not a
character-defining feature because it is not a distinctive component of the design. The
important view sheds from the building are north and east from its street-facing elevations.
The features of the broad setting are limited to the scale of the surrounding development
and the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Manchester
Boulevard due to its size, design, and location elevated over the street. Views from the
building looking east would not be affected by the Project. Views from the building looking
north would not be significantly obstructed, but the ATS guideway would be a significant
change to the surroundings of the historical resource. The broad setting, however, is not a
physical characteristic that conveys the architectural significance of the building.

Project Design Features have been incorporated into the Project to minimize indirect impacts
on the historical resource. They pertain to the distance between the north facade and the
ATS guideway, the height of the guideway relative to the height of the building, and the
location and shape of support columns so the visual relationship between the property and
its surroundings would be maintained. Furthermore, the Project would not affect the
building’s integrity of location, design, materials, workmanship, feeling, and association. At
the conclusion of the Project, the building would continue to convey its architectural
significance that justifies its eligibility for inclusion in the California Register. Therefore, I
concur the indirect impact would be less than significant.

3900 W. Manchester Boulevard

The Project would not involve any physical change to the Forum building, which is situated in
the approximate center of the 29 ½-acre property at 3900 W. Manchester Boulevard.
However, the Project would encroach into the Forum parking lot along its western edge
between Manchester Boulevard and Pincay Drive no more than 30 feet to accommodate the
relocation of traffic lanes along Prairie Avenue. The Project would also involve the
construction of an elevated ATS guideway largely supported by columns located on the west
side of Prairie Avenue within the public right-of-way. Straddle bent support columns may
land on the east side of the ATS guideway in what is now the Forum parking lot. Additionally,
a pedestrian bridge would be constructed from the Manchester Boulevard/Prairie Avenue
Station, with vertical circulation elements (stairs, escalators, elevators) landing on the east
side of Prairie Avenue in the current Forum parking lot.

I concur with HRG in that the direct and indirect impacts on the property at 3900 W.
Manchester Boulevard would be less than significant. The property was listed in the National
Register and included in the California Register as an excellent example of a postwar sports
arena designed by Charles Luckman and Associates in the New Formalist style. Features
within the boundary of the historical resource that contribute to its setting include the
relationship between the Forum building and the on-site landscape features and parking lot.
The round building was deliberately designed as a freestanding object so it would be visible and accessible from the surrounding streets. Thus, the view shed from the building is in all directions.

The encroachment into the parking lot would alter the original dimensions of the property, but only marginally given its 29 ½ acre size. The vast majority of the parking lot would remain intact and the character would not be altered. Furthermore, the Project would not alter the visual and spatial relationship between the Forum building and the landscape features and parking lot within the boundary of the historical resource. Therefore, the direct impact on the property would be less than significant because the Forum would not be materially impaired by the Project. The building would continue to convey its significance as an excellent example of New Formalism surrounded by a sprawling parking lot, which would remain a character-defining feature.

The ATS guideway, station, and vertical circulation elements would become a dominant visual feature of this portion of Prairie Avenue due to their size, design, and location elevated over the street. However, these elements would be more than 300 feet from the Forum building. Therefore, views to and from the Forum building would not be significantly obstructed. Furthermore, the broad setting is not a physical characteristic that conveys the architectural significance of the property. The building was intentionally isolated from its surroundings. Therefore, the introduction of a new visual feature in the vicinity of the Forum would not diminish its significance. The Project would not affect the property’s integrity of location, design, materials, workmanship, feeling, and association. The property would not be materially impaired by the Project because it would retain all of its significant character-defining features, continue to convey its architectural significance, and remain listed in the National and California Registers. Therefore, I concur the indirect impact would be less than significance.

100 N. Market Street/307 E. Queen Street

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 100 N. Market Street/307 E. Queen Street. However, the Project would construct an elevated ATS guideway set on center support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The building is located on the east side of Market Street, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 100 N. Market Street/307 E. Queen Street would be less than significant. The property was evaluated as a historical resource as a good example of a Mediterranean Revival style bank building. There are no features within the boundary of the historical resource that contribute to its setting. The building occupies all of the property on which it was constructed. The important view sheds from the building are west and south from its street-facing elevations. The features of the broad setting include the visual relationships between the historical resource and the other
buildings at the intersection, the scale of the surrounding development, and the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Market Street due to its size, design, and location elevated over the street. Views from the building looking south would not be affected by the Project. Views from the building looking west would not be significantly obstructed, but the ATS guideway would be a significant change to the surroundings of the historical resource. The broad setting, however, is not a physical characteristic that conveys the architectural significance of the building.

Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the west facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Furthermore, the Project would not affect the building’s integrity of location, design, materials, workmanship, feeling, and association. At the conclusion of the Project, the property would continue to convey its architectural significance that justifies its eligibility for inclusion in the California Registers. Therefore, I concur the indirect impact would be less than significant.

115 N. Market Street

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 115 N. Market Street. However, the Project would construct an elevated ATS guideway set on center support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 115 N. Market Street would be less than significant. The property was listed in the National Register and included in the California Register as a good example of an Art Deco style theater building. Setting is typically considered a more important aspect of integrity for conveying historic associations than for conveying architectural significance. There are no features within the boundary of the historical resource that contribute to its setting. The building occupies all of the property on which it was constructed. Typical of theater architecture, the building was designed to stand out from its surroundings and includes a vertical sign pylon that can be seen from across the street. The important view shed from the building is east from its street-facing elevation. The features of the broad setting include the visual relationships between the historical resource and the other buildings on the block, the scale of the surrounding development, and the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Market Street due to its size, design, and location elevated over the street. Views from the building looking east would not be significantly obstructed, but the ATS guideway would be a significant
Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the east facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Although the Project may diminish the property’s integrity of setting, the integrity of location, design, materials, workmanship, feeling, and association would remain unaltered. At the conclusion of the Project, the property would continue to convey its architectural significance that justifies its listing in the National and California Registers. Therefore, I concur the indirect impact would be less than significant.

158-170 N. Market Street

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 158-170 N. Market Street. However, the Project would construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The building is located on the east side of Market Street, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 158-170 Market Street would be less than significant. The property was evaluated as a historical resource as a good example of a Late Modern style bank building. Features within the boundary of the historical resource that contribute to its setting include a brick retaining wall along the south property line, the narrow landscaped setbacks on the west and north, and the parking lot on the east. The important view sheds from the building are north and west from its street-facing elevations. The features of the broad setting are limited to the scale of the surrounding development and the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Market Street due to its size, design, and location elevated over the street. Views from the building looking north would not be affected by the Project. Views from the building looking west would not be significantly obstructed, but the ATS guideway would be a significant change to the surroundings of the historical resource. The broad setting, however, is not a physical characteristic that conveys the architectural significance of the building.

Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the west facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Furthermore, the Project would not affect the building’s integrity of location, design, materials, workmanship, feeling, and association. At the conclusion of the Project, the property would continue to convey its architectural
significance that justifies its eligibility for inclusion in the California Register. Therefore, I concur the indirect impact would be less than significant.

129-139 S. Market Street

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 129-139 S. Market Street. However, the Project would construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 129-139 S. Market Street would be less than significant. The property was evaluated as a historical resource as a good example of a Mid-Century Modern department store building. There are no features within the boundary of the historical resource that contribute to its setting. The building occupies all of the property on which it was constructed. The important view shed from the building is looking east from its street-facing elevation. The features of the broad setting include the visual relationships between the historical resource and the other buildings on the block, the scale of the surrounding development, and the configuration of the street and sidewalk.

Views from the building looking east would not be significantly obstructed, but the ATS guideway would be a significant change to the surroundings of the historical resource. Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the east facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Furthermore, the Project would not affect the building’s integrity of location, design, materials, workmanship, feeling, and association. At the conclusion of the Project, the property would continue to convey its architectural significance that justifies its eligibility for inclusion in the California Register. Therefore, I concur the indirect impact would be less than significant.

149-155 S. Market Street/231-239 E. Manchester Boulevard

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 149-155 S. Market Street/231-239 E. Manchester Boulevard. However, the Project would construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. The building is located on the west side of Market Street, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 149-155 S. Market Street/231-239 E. Manchester Boulevard would be less than significant. The property was
evaluated as a historical resource as a good example of a Spanish Colonial Revival style mixed-use building. There are no features within the boundary of the historical resource that contribute to its setting. The building occupies all of the property on which it was constructed. The important view sheds from the building are east and south from the street-facing elevations. The features of the broad setting include the visual relationships between the historical resource and the other buildings at the intersection, the scale of the surrounding development, and the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Market Street due to its size, design, and location elevated over the street. Views from the building looking south would not be affected by the Project. Views from the building looking east would not be significantly obstructed, but the ATS guideway would be a significant change to the surroundings of the historical resource. The broad setting, however, is not a physical characteristic that conveys the architectural significance of the building.

Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the east facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Furthermore, the Project would not affect the building’s integrity of location, design, materials, workmanship, feeling, and association. At the conclusion of the Project, the building would continue to convey its architectural significance that justifies its eligibility for inclusion in the California Register. Therefore, I concur the indirect impact would be less than significant.

260 N. Locust Street

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 260 N. Locust Street. However, the Project would construct an elevated ATS guideway set on support columns within the public right-of-way of Market Street between Regent Street and Manchester Boulevard. North of Regent Street, the ATS guideway would bear northeast off of the public right-of-way and onto the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street. This block would be acquired, and the existing one-story shopping center and restaurant buildings demolished to accommodate new construction of the elevated ATS guideway and Market Street Station. The property is situated across Locust Street from this block.

I concur with HRG in that the Project would have no indirect impact on the property at 260 N. Locust Street. The property is a complex of religious buildings that was evaluated as a historical resource for its historic associations and architectural significance. There are features within the boundary of this historical resource that contribute to its setting; however, the larger setting is changed and is not a physical characteristic that conveys the significance of the complex. The surroundings have evolved over time and consist of various building types from various period of time. Furthermore, the components of the Project
would be separated from the historical resource by a street as well as a new surface parking lot for the Market Street Station. The closest support column would be more than 200 feet from the church building. Thus, there would be substantial physical separation between the historical resource and the new construction.

The Project would not affect the property’s integrity of setting, location, design, materials, workmanship, feeling, and association. The church complex would not be materially impaired by the Project because it would retain all of its significant character-defining features, continue to convey its historic associations and architectural significance, and remain eligible for listing in the National and California Registers. Therefore, I concur the Project would have no impact on the historical resource.

619-635 S. Prairie Avenue

The Project would not involve the physical demolition, destruction, relocation, or alteration of the property at 619-635 S. Prairie Avenue. However, The Project would construct an elevated ATS guideway set on support columns within the public right-of-way of Prairie Avenue between Manchester Boulevard and Hardy Street. The building is located on the west side of Prairie Avenue, immediately adjacent to where the new ATS guideway would be located.

I concur with HRG in that the indirect impact on the property at 619-635 S. Prairie Avenue would be less than significant. The property was evaluated as a historical resource as a good example of an American Colonial Revival style mortuary building. Features within the boundary of the historical resource that contribute to its setting include the landscaped setbacks on the east and south. The important view sheds from the building are east and south from its street-facing elevations. The features of the broad setting are limited to the configuration of the street and sidewalk.

The ATS guideway would become a dominant visual feature of this portion of Prairie Avenue due to its size, design, and location elevated over the street. Views from the building looking south would not be affected by the Project. Views from the building looking east would not be significantly obstructed, but the ATS guideway would be a significant change to the surroundings of the historical resource. The broad setting, however, is not a physical characteristic that conveys the architectural significance of the building.

Project Design Features have been incorporated into the Project to minimize indirect impacts on the historical resource. They pertain to the distance between the east facade and the ATS guideway, the height of the guideway relative to the height of the building, and the location and shape of support columns so the visual relationship between the property and its surroundings would be maintained. Furthermore, the Project would not affect the building’s integrity of location, design, materials, workmanship, feeling, and association. At the conclusion of the Project, the property would continue to convey its architectural significance that justifies its eligibility for inclusion in the California Register. Therefore, I
concur the indirect impact would be less than significant.

Summary

The indirect impacts analysis in the HRG Report is well organized and detailed but often conflates the thresholds for aesthetic impacts with historic impacts. Aesthetic impacts consider the experiences of people who view the landscape, which may include historical resources. Historic impacts consider whether a project will adversely affect the integrity of a historical resource. The experiences of people are not the threshold for significant impacts on historical resources according to the CEQA Guidelines. The historical resource - rather than people and their aesthetic experiences - is the impact receptor. Otherwise, HRG applies the proper thresholds from the CEQA Guidelines and discusses impacts in terms of the affect the Project will have on the integrity of the identified historical resource.

Conclusions

I concur with HRG in that the Project would result in direct and indirect impacts on historical resources. The Project would directly and indirectly impact one historical resource within the Project Area; however, the impact would be less than significant. The Project would have a less than significant impact on seven historical resources in the Expanded Study Area. Two historical resources in the Expanded Study Area would not be impacted by the Project. As the Project would not result in any significant impacts on historical resources, mitigation is not required. Project Design Features have been incorporated into the Project to minimize impacts on the identified historical resources. The Project would not result in a substantial adverse change to the integrity of the identified historical resources to the degree that they would no longer be eligible for listing as historical resources defined by CEQA.

Thank you for your consideration of this memorandum. I am happy to answer any questions you may have. You can reach me by e-mail at Teresa.grimes@icloud.com.
TERESA GRIMES | Historic Preservation

Teresa Grimes has 30 years of experience in the field of historic preservation. She is widely recognized as an expert in the identification and evaluation of historical resources having successfully prepared dozens of landmark and historic district applications for a wide variety of property types. Teresa graduated from the University of California with a Master of Art degree in Architecture and has worked in the private, public, and non-profit sectors. Teresa has extensive experience in the preparation of environmental compliance documents in accordance with the California Environmental Quality Act including the identification of historical resources, analysis of direct, indirect, and cumulative impacts, and development of mitigation measures. Her many projects throughout Southern California include the Art Center College of Design Master Plan, Baldwin Hills Crenshaw Plaza, Cinerama Dome Entertainment Center, City of Hope Master Plan, Claremont Graduate University Master Plan, Claremont McKenna College Master Plan, John Anson Ford Theatres, Oakwood School Master Plan, Los Angeles County Museum of Art, Times Mirror Square, Sunset Las Palms Studios, and Sunset Bronson Studios.

Educational Background

- M.A., Architecture, University of California, Los Angeles, 1992
- B.A., Political Science, University of California, Los Angeles, 1986

Qualifications

- Meets the Secretary of the Interior’s Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Professional Experience

- Teresa Grimes | Historic Preservation, Principal, 2020 - Present
- GPA Consulting, Principal Architectural Historian, 2009-2020
- Getty Conservation Institute, Research Associate, 1992-1993
- Los Angeles Conservancy, Preservation Officer, 1988-1991

Professional Activities

- Pasadena Heritage Board Member, 2008-2012
- Highland Park Heritage Trust, Board Member, 1996-1998
- West Hollywood Cultural Heritage Advisory Board, 1990-1994
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