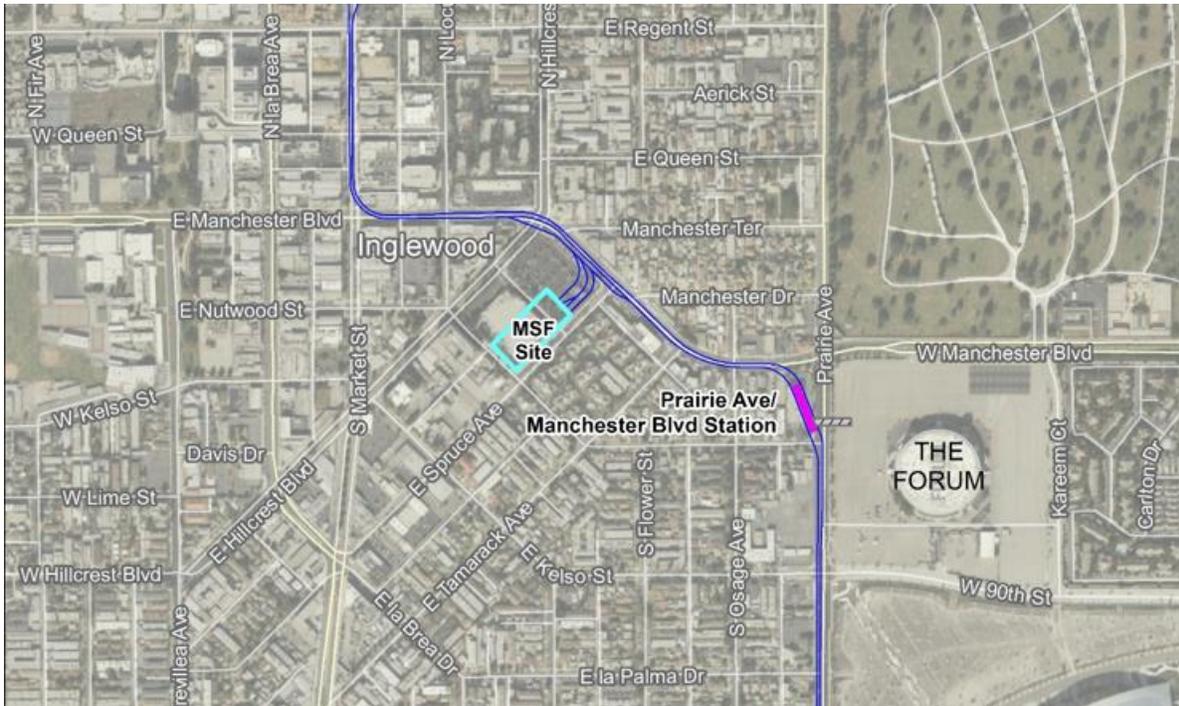


**ATTACHMENT E**  
**Cultural Resources Monitoring and Discovery Plan**



# Inglewood Transit Connector Project

## Cultural Resources Monitoring and Discovery Plan

*prepared for*

**City of Inglewood**

One Manchester Boulevard  
Inglewood, California 90301

Contact: Mr. Louis Atwell, Assistant City Manager and Public Works Director

*prepared by*

**Rincon Consultants, Inc.**

250 East 1st Street, Suite 1400  
Los Angeles, California 90012

**February 17, 2023**



**RINCON CONSULTANTS, INC.**

Environmental Scientists | Planners | Engineers  
rinconconsultants.com

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Fuerstenberg T., and Chris Duran

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# Acronyms and Abbreviations

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AASHTO	American Association of State Highway and Transportation Officials
AB	(California) Assembly Bill
ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effects
ATS	Automated Transit System
BP	Represents dates before 1950
cal B.C.	calibrated radiocarbon dates corresponding to years Before the Common Era
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CRM DP	Cultural Resources Monitoring and Discovery Plan
FTA	U.S. Department of Transportation Federal Transit Administration
HAZWOPER	Hazardous Waste Operations and Emergency Response
ITC	Inglewood Transit Connector Project
LACMTA	Los Angeles County Metropolitan Transit Authority
LASED	Los Angeles Stadium and Entertainment District
MSF	Maintenance and Storage Facility
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OHP	Oral History Project/Program
OSHA	Occupational Safety and Health Administration
PDS	Power Distribution Systems
PI	Principal Investigator
PMOC	Project Management Oversight Contractor
SCE	Southern California Edison
SHPO	State Historic Preservation Office
TPSS	Traction Power Substation
USC	United States Code

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# 1 Introduction

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This Cultural Resources Monitoring and Discovery Plan (CRMDP) has been developed in consultation with the California State Historic Preservation Office (SHPO) as a condition to the Federal Transit Administration's findings of no adverse effect for the Inglewood Transit Connector Project. This CRMDP has been prepared to guide the protocol for cultural resource monitoring and cultural resources treatment during construction activities when conducted in the archaeologically sensitive areas identified for monitoring which are located in the Area of Potential Effects (APE) for the Inglewood Transit Connector Project (ITC or Project) located in the City of Inglewood (City), Los Angeles County, California. The City is seeking financial assistance from the U.S. Department of Transportation Federal Transit Administration (FTA) for this project. As such, the Project is a federal undertaking pursuant to 36 Code of Federal Regulations Part 800.16(y). The FTA is the Lead Agency under the National Environmental Policy Act (NEPA). It is FTA's responsibility to ensure that the City fulfills the actions of the CRMDP. This Plan is part of the FTA and City actions undertaken to assure compliance with Section 106 of the National Historic Preservation Act (NHPA) and other federal and local regulations.

Section 106 consultation efforts have included the Gabrieleño Band of Mission Indians-Kizh Nation and the Gabrielino Tongva Indians of California as consulting parties to the project and monitoring efforts. As a result of ongoing consultation, this plan provides a framework for cultural resources monitoring, post-review discovery, identification and evaluation and data recovery protocol for cultural resources found in the Project's APE.

The purpose of this CRMDP is to guide monitoring and discovery procedures for any cultural resources encountered during implementation of the Project. Background research identified that the Project is located in Holocene areas that have medium level for the possibility of discoveries. Tribal consultation pursuant to Section 106 of the NHPA further supported the background research. While no archaeological resources were identified in portions of the APE subject to Project-related ground disturbance, the majority of the APE is a highly urbanized environment with much of the natural ground surface being covered by development, paving, hardscape, and ornamental landscaping. Beneath this development, the majority of the APE is underlain by Pleistocene alluvium with low potential for buried prehistoric archaeological deposits. A small portion of the Project APE is underlain by Holocene alluvium, which has moderate potential for buried prehistoric archaeological deposits. The depth of the Pleistocene and Holocene alluvium is expected to extend throughout the vertical APE (up to 100 feet in depth). The potential for historic period archaeological resources is low where construction related ground disturbance will occur along city streets, and moderate where construction of stations and Traction Power Substation (TPSS) facilities will occur. The depth where these deposits may occur is expected to extend no more than 25 feet below ground surface. Considering the amount of development in the APE, there is a low potential for unanticipated discoveries of intact archaeological resources during Project construction within approximately two feet below ground surface. This Plan details the methods to be employed during monitoring and describes the protocols and procedures to be followed in case of a post-review discovery of a cultural resource.

## 2 Project Description

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### 2.1 Overview

The proposed Project is an Automated Transit System (ATS) that would include an approximately 1.6-mile (2.57-kilometer) long, elevated, guideway primarily located within the public right-of-way along Market Street, Manchester Boulevard and Prairie Avenue in the City of Inglewood, Los Angeles County (Figure 1 and Figure 2). The Project would provide a transit extension from the LACMTA regional rail system, providing access to the City's activity centers. 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. The proposed Project is designed to provide automated transit service to serve the largest typical event, which is a National Football League (NFL) game at SoFi Stadium. A fleet of six, 4-car trains (assuming the equivalent of generic self-propelled technologies) operating at two-minute headways would be required to serve the demand.

One of the six trains would be used for "hot" standby or maintenance for the ATS system. The proposed Project will provide additional capacity through the introduction of additional trains stored at the Maintenance and Storage Facility (MSF), should this be necessary in the future to accommodate changes in demand levels, event sizes, or event schedules. The stations are sized to accommodate the maximum length trains and, for this reason, no modifications to the station configurations are required if the reserve capacity is utilized.

**Automated Transit System** The Project will consist of an Automated Transit System (ATS) operating on an elevated guideway with dual tracks for train travel in both directions. The elevated guideway will be supported by single or double column/bents (depending on the train track separations, site constraints, and the guideway location relative to potential column placements). The guideway structure would have a clearance height of approximately 16 feet 6 inches above all roadways. A continuous walkway would be provided along the entire length of the guideway to provide emergency egress for evacuating and safe access for operations and maintenance personnel to access guideway and wayside equipment.

The guideway would vary in height from a minimum of approximately 35 feet to a maximum of approximately 60 feet, measured from existing grade to top of guideway deck. Generally, support columns for the guideway would be single columns, ranging from 6 feet to 9 feet in diameter, when centered under the supported guideway to approximately 6-feet-by-12-feet, oblong columns, when located off-center from the guideway. Column foundations would require be deep shafts with depths ranging from approximately 60 to 100 feet.

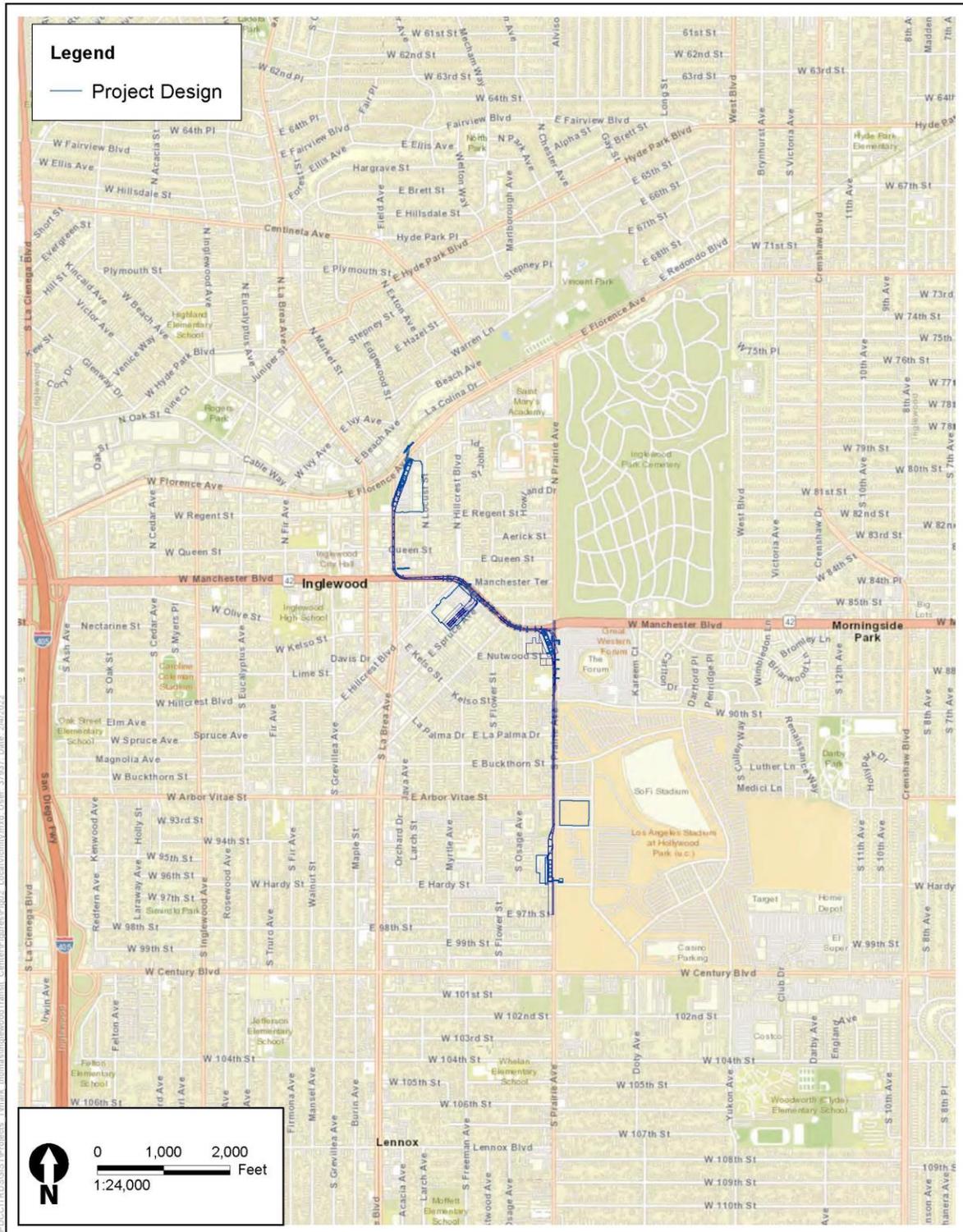
Refer to Section 5.2, *Area of Potential Effects*, which describes how the ATS and other Project components informed the delineation of the APE.

Figure 1 Project Vicinity



City of Inglewood  
Inglewood Transit Connector Project

Figure 2 Project Design



## 2.1.1 Stations

The Project includes three center-platform stations located at Market Street/Florence Avenue, Prairie Avenue/Manchester Boulevard, and Prairie Avenue/Hardy Street. The Market Street/Florence Avenue Station would provide connections to the LACMTA K Line and Downtown Inglewood. The Prairie Avenue/Manchester Boulevard Station would provide a connection to The Forum, existing and future local businesses and residences, SoFi Stadium, and the surrounding mixed-use development at Hollywood Park/Los Angeles Stadium and Entertainment District (LASED). The Prairie Avenue/Hardy Street Station would provide connections to existing and future local businesses and residences, SoFi Stadium and the surrounding mixed-use development at Hollywood Park/LASED, and the Inglewood Basketball and Entertainment Center including the Intuit Dome. Each station would be up to approximately 80 feet in height, measured from existing grade to top of station canopy. The maximum depth of excavation for the vertical supports of the ATS guideway structures at the stations is approximately 80 feet below the surface.

The Market Street/Florence Avenue Station would include an elevated pedestrian bridge connecting to the LACMTA K Line Downtown Inglewood Station. The Prairie Avenue/Manchester Boulevard Station would include an elevated pedestrian bridge connecting to The Forum property, and the Prairie Avenue/Hardy Street Station would include an elevated pedestrian bridge connecting to the LASED properties on the east side of Prairie Avenue. Each pedestrian bridge would be up to approximately 55 feet in height, measured from existing grade to top of the structure.

## 2.1.2 Roadways and Infrastructure

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 under roadways may need to be relocated to accommodate the guideway columns, footings, and other components. The roadway reconfigurations along Market Street, Manchester Boulevard, and Prairie Avenue would be necessary to ensure that the existing roadway travel capacity is not reduced to accommodate the Project. The maximum depth of disturbance is anticipated to be 10 feet below the surface.

There are several major utility lines identified within the Market Street segment of the proposed Project including water, sewer, stormwater, and electrical lines. Utility lines identified within the Manchester Boulevard segment include water, sewer, wastewater, stormwater, and gas lines. Utility lines within the Prairie Avenue segment include water, sewer, wastewater, stormwater, electrical, telecommunications and gas lines. Based upon a Utility Report prepared for the Project, it appears that several utility lines within these segments would conflict with proposed Project columns. The location of utilities is based on a review of existing documentation and the exact locations have not been field verified. Several storm drains have also been identified along these segments that may require relocation due to column placement. In addition, Southern California Electric has determined that the proposed Project would likely utilize a new 16 kilovolt circuit constructed in an underground duct bank from the Inglewood substation near Florence Avenue and Fir Avenue to the proposed MSF site. The maximum depth of disturbance is anticipated to be 10 feet below the surface.

### 2.1.3 MSF

The Project includes an MSF to provide regular and preventive maintenance for the ATS trains, vehicle storage, and an operations control center. The MSF is on the eastern half of the block bound by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue. The maximum depth of excavation for the vertical supports of the ATS guideway structures outside of the stations is approximately 100 feet below the surface.

### 2.1.4 Power Distribution Systems Substations

Propulsion power, which includes the power to run the train on the guideway and power for auxiliary and housekeeping needs, would be provided by two Power Distribution Systems (PDS) substations located along the alignment. Regardless of the transit technology, the two PDS substations would include one located at the MSF and the second located at either the Prairie Avenue/Manchester Boulevard Station site or Prairie Avenue/Hardy Street Station site. Each PDS substation is approximately 3,000 square feet (approximately 30 feet by 100 feet) with 20 feet of clearance above the finished floor. The maximum depth of disturbance is anticipated to be 10 feet below the surface.

### 2.1.5 Public Parking

Additional public parking would be provided as part of the Project at three locations 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 South Market Street.
- Approximately 80 parking spaces and a shuttle bus pick-up and drop-off area at the Prairie Avenue/Hardy Street Station. This lot would be used for public parking, transportation network companies, and shuttle bus pick-up and drop-off operations during events.

## 3 Regulatory Context

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### 3.1 Federal

#### 3.1.1 National Environment Policy Act

NEPA of 1969, as amended (42 United States Code [USC] 4321 et seq.), establishes the federal policy of protecting important historic, cultural, and natural aspects of our national heritage during federal project planning. NEPA also obligates federal agencies to consider the environmental consequences and costs of their projects and programs as part of the planning process. All federal or federally assisted projects requiring action pursuant to Section 102 of NEPA must take into account the effects on cultural resources.

According to the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR Parts 1500–1508), in considering whether an action may “significantly” affect the quality of the human environment, an agency must consider, among other things, the intensity or severity of the impact, including: “unique characteristics of the geographic area, such as proximity to historic or cultural resources (40 CFR §1508.27(b)(3))” and “the degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the NRHP (40 CFR §1508.27(b)(8)).” Section 1502.25(a) of the Council on Environmental Quality Regulations for Implementing NEPA also requires the following:

To the fullest extent possible, agencies shall prepare draft environmental impact statements concurrently with and integrated with environmental impact analyses and related surveys and studies required by...the National Historic Preservation Act of 1966 (16 USC 661 et seq.), and other environmental review laws and executive orders.

#### 3.1.2 National Historic Preservation Act of 1966 (NHPA)

This Report was prepared in compliance with Section 106 of the NHPA and its implementing regulations (36 CFR 800, as amended through 2004). The NHPA sets federal policy for historic preservation such as the establishment of SHPO, the Advisory Council on Historic Preservation (ACHP), and the programs through which this policy is implemented, including the NRHP. Section 106 of the NHPA requires federal agencies to consider effects of projects carried out, funded, permitted, licensed, or assisted by said federal agencies, and provides ACHP, interested parties, and the public an opportunity to review and comment on these matters before a final decision is made. If a federal, or federally assisted, project has the potential to affect historic properties, a Section 106 review is undertaken.

#### 3.1.3 Section 106 of the NHPA

Commonly called the Section 106 process, Section 106 of the NHPA of 1966 (16 USC 470) requires projects that include federal participation to take into account the effects on any properties listed, or eligible for listing, in the NRHP. In addition, Section 106 requires that ACHP must be provided with an opportunity to comment on the project. Historic properties may include districts, sites, buildings, structures, or objects. Federal regulations for implementing Section 106 are contained in 36 CFR 800, Protection of Historic and Cultural Properties.

The Section 106 review process consists of four steps:

- Initiate the Section 106 process by establishing the undertaking, developing a plan for public involvement, and identifying the appropriate consulting parties.
- Identify historic properties (i.e., resources that are eligible for inclusion in the NRHP) by determining the scope of efforts, identifying historic properties in the area potentially affected by the project, and evaluating resources' eligibility for NRHP inclusion.
- Assess adverse effects by applying the Section 106 criteria of adverse effect to identified historic properties.
- Resolve adverse effects by consulting with SHPO and other consulting agencies, including ACHP, if necessary, to develop an agreement that addresses the treatment of historic properties.

### 3.1.4 National Register of Historic Places (NRHP)

The NHPA established the NRHP as “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 NRHP recognizes properties that are significant at the national, state, and local levels. The framers of the NRHP established a 50-year age threshold for significance in order to ensure that substantial time had passed to objectively reflect on the property’s historical significance. Ordinarily, properties that have achieved significance within the past 50 years are not considered eligible for the NRHP, unless they demonstrate exceptional significance. In addition, birthplaces, cemeteries, or graves of historical figures; properties owned by religious institutions or used for religious purposes; structures that have been moved from their original locations; reconstructed historic buildings; and properties that are primarily commemorative in nature are also typically not considered eligible for the NRHP, unless they are integral parts of historic districts or meet special requirements, or criteria considerations, described in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation.

Applying the National Register Criteria for Evaluation to a property requires that property to demonstrate significance in American history, architecture, archaeology, engineering, and culture that may be present in districts, sites, buildings, structures, and objects that possess and meet any of the following criteria:

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

In addition to meeting one or more of the NRHP criteria for evaluation, a historic property must also retain a sufficient level of historic integrity. The seven aspects of integrity include design, materials, workmanship, setting, location, feeling, and association.

### 3.1.5 Section 4(f) of the U.S. Department of Transportation Act

Section 4(f) (23 CFR 774) of the U.S. Department of Transportation Act of 1966, as amended (49 USC 1653(f)), defines effects or impacts of U.S. Department of Transportation agency projects to be the “use” of certain types of resources, including “historical sites.” It stipulates that the Federal Highway Administration and other U.S. Department of Transportation agencies, including FTA, cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and historical sites (defined as listed in or determined eligible for listing in the NRHP) unless there is no feasible and prudent alternative to the use of land, and the action includes all possible planning to minimize harm to the property resulting from use. Section 4(f), as specifically related to cultural resources, applies when there is an actual taking of land from, or constructive use of, a historic property. Section 4(f) evaluation requires documentation of completion of the Section 106 process. Section 4(f) regulations are found at 23 CFR 774.

### 3.1.6 American Antiquities Act

The American Antiquities Act of 1906 (16 USC 431–433) was enacted with the primary goal of protecting cultural resources in the United States. As such, it prohibits the appropriation, excavation, injury, or destruction of “any historic or prehistoric ruin or monument, or any object or antiquity” located on public land under federal jurisdiction. It also establishes criminal penalties, including fines or imprisonment, for these acts, and sets forth a permit requirement for the collection of antiquities on federally owned lands.

### 3.1.7 Archaeological Resources Protection Act

The Archaeological Resources Protection Act was enacted in 1979 and amended in 1988. The act states that archaeological resources on public or Indian lands are an accessible and irreplaceable part of the nation’s heritage.

### 3.1.8 Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (104 Statutes 3048–3058) pertains to human remains of Native American origin discovered on federal land. NAGPRA defines “cultural items,” “sacred objects,” and “objects of cultural patrimony”; establishes an ownership hierarchy; provides for review by the Reviewing Committee; allows excavation of human remains but stipulates return of the remains according to ownership; sets penalties; calls for inventories; and provides for return of specified cultural items. NAGPRA requires federal agencies and federally assisted museums to return “Native American cultural items” to the federally recognized Indian tribes or Native Hawaiian groups with which they are associated.

### 3.1.9 Executive Order 11593: Protection of the Cultural Environment

In accordance with 36 CFR 8921, dated May 13, 1971, Executive Order 11593 orders the protection and enhancement of the cultural environment by providing leadership, establishing state offices of historic preservation, and developing criteria for assessing resources values.

### 3.1.10 The American Indian Religious Freedom Act

The American Indian Religious Freedom Act (42 USC 1996) proclaims that the U.S. Government will respect and protect the rights of Indian tribes to the free exercise of their traditional religions; the courts have interpreted this as requiring agencies to consider the effects of their actions on traditional religious practices.

## 4 Natural and Cultural Setting

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### 4.1 Natural Setting

Information on the natural setting of the Project vicinity is adapted from a previous archaeological resources technical study for the Project (Thomas and Granger 2018) and the *Inglewood Transit Connector Project Draft Environmental Impact Report* (City of Inglewood 2021).

The Project area is in the Los Angeles basin in Los Angeles County, California. The Los Angeles basin, as it exists today, measures roughly 50 miles in length by 20 miles in width and is described as a low-lying, northwest-trending alluvial plain. The Project area lies at the convergence of the southern foothills of the Santa Monica Mountains and the coastal plain that underlies west Los Angeles. The ground surface generally slopes to the south as it transitions from underlying foothills to alluvial plain.

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

Geomorphic features associated with uplift along the Newport-Inglewood structural zone are in the Baldwin and Rosecrans Hills. Older Quaternary units exposed in these strongly dissected hills range from approximately 75 feet to over 400 feet in elevation. 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 (City of Inglewood 2021).

The local drainage basin, which contains Holocene sediments, narrows to the south into the Dominguez Channel. 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 consisted of coastal sage scrub, freshwater and salt marshes, and riparian woodlands (City of Inglewood 2021).

### 4.2 Cultural Setting

#### 4.2.1 Ethnographic Overview – Gabrieleño

The Project study area is entirely within the ethnographic territory of the Gabrieleño, the Native American population that has long inhabited the area in the Los Angeles Basin. Following the Spanish custom of naming local tribes after nearby missions, missionaries dubbed the native peoples the Gabrieleño, Gabrieliño, or San Gabrieleño in reference to Mission San Gabriel Arcángel northeast of the Project study area. The Gabrieleño consist of a number of smaller bands. Present-

day Gabrieleño tribal groups refer to themselves as Gabrieleno, Gabrielino, Tongva, Gabrieleño/Tongva, or Kizh, depending on the tribe.

The Gabrieleño spoke a language that falls within the Cupan group of the Takic subfamily of the Uto-Aztecan language family. This language family is extremely large and includes the Shoshonean groups of the Great Basin. Given the geographic proximity of Gabrieleño and Serrano bands living in the area and their linguistic similarities, ethnographers have suggested that the bands shared the same ethnic origins (Kroeber 1925).

The Gabrieleño are considered one of the most distinctive tribes in all of California. They occupied a large area bordered on the west by the community of Topanga and the city of Malibu, the San Fernando Valley, the greater Los Angeles Basin, and the coastal strip south of Aliso Creek, south of San Juan Capistrano. Gabrieleño territory extended from the San Bernardino Mountains to the islands of Catalina, San Clemente, and San Nicolas and occupied most of modern-day Los Angeles and Orange Counties (Bean and Smith 1978:538–549). By 1500 before present (B.P), permanent villages were built in the lowlands along rivers and streams. Over 50 villages may have been occupied simultaneously with populations of between 50 and 200 people per village (Bean and Smith 1978).

Very little has been written about early Gabrieleño social organization because the tribe was not studied until the 1920s and had already been greatly influenced by missionaries and settlers by that time (Kroeber 1925). Kroeber's (1925) work indicates that the Gabrieleño were a hierarchically ordered society with a chief who oversaw social and political interactions both within the Gabrieleño culture and with other groups. The Gabrieleño had multiple villages ranging from seasonal satellite villages to larger, more permanent settlements. Resource exploitation was focused on village-centered territories and hunting ranged from deer, rabbits, birds, and other small game to sea mammals. Fishing for freshwater fish, saltwater mollusks, and crustaceans and gathering acorns and various grass seeds were also important (Bean 1978:538–549). Fishing technology included basket fish traps, nets, bonefish hooks, harpoons, and vegetable poisons, and ocean fishing was conducted from wooden plank canoes lashed and asphalted together. Gabrieleño houses were large, circular, thatched, and domed structures of tule, fern, or carrizo that were large enough to house several families. Smaller ceremonial structures were also present in the villages and used in a variety of ways. These structures were earth covered and used as sweathouses, meeting places for adult males, menstrual huts, and ceremonial enclosures (*yuva'r*) (Heizer 1962:289–293).

The coastal Gabrieleño are among the few indigenous peoples who regularly navigated the ocean. They built seaworthy canoes, called *tí'at*, with wood planks that were sewn together, edge to edge, and then caulked and coated with either pine pitch or, more commonly, the tar available from the La Brea Tar Pits or asphaltum washed ashore from offshore oil seeps. The *tí'at* could hold as many as 12 people, all of their gear, and all of the goods carried to trade with other people, either along the coast or on one of the Channel Islands. The Gabrieleño paddled out to greet Spanish explorer Juan Cabrillo when he arrived off the shores of San Pedro in 1542. Modern place names with Gabrieleño origins include Pacoima, Tujunga, Topanga, Rancho Cucamonga, Azusa, and Cahuenga Pass.

Recorded ethnographic and archaeological sites associated with Gabrieleño settlements are not common. This is directly attributable to the extensive and prolonged urban development of the Los Angeles region over the last one and a half centuries (California Department of Parks and Recreation 2005:16). In the 1990s, Kuruvungna Springs, a natural spring on the site of a former Gabrieleño village on the campus of University High School in west Los Angeles, was revitalized due to the efforts of the Gabrieleño Tongva Springs Foundation. The spring, which produces 22,000 gallons

(83,279 liters) of water each day, is considered by the Gabrieleño to be one of their last remaining sacred sites and is regularly used for ceremonial events. Centinela Spring at Edward Vincent Jr. Park, more than a half-mile from the Project study area, is California State Landmark No. 363. This spring flowed continuously from its source in a deep-water basin since the Pleistocene era. Animals, Native Americans, and early Inglewood settlers were attracted here by the pure artesian water. The springs and valley were named after sentinels guarding cattle in the area (OHP n.d).

### **Gabrieleño Band of Mission Indians – Kizh Nation**

Chairman Andrew Salas of the Gabrieleño Band of Mission Indians—Kizh Nation provided information on the history of the tribe’s ancestors and their relationship to the project vicinity, passed down in the tribe through written and oral history. This section summarizes information provided by Chairman Salas.

The project vicinity is within the Sa’angna/Guasonga area, which was a large tribal community, as well as Rancho Sausal Redondo, a Mexican land grant granted to Antonio Avila. The Avila family was a prominent Spanish family in the Inglewood area. There were salt ponds in this area that were essential to native inhabitants, the Avilas, and travelers. The native inhabitants and the travelers mined the salt ponds for salt to preserve meat, fish, and other foods for transport and trade. The Avila family acquired Rancho Sausal Redondo to access the salt ponds for the same reason—to mine salt for food preservation. The people of the Kizh Nation are lineal descendants of the peoples who lived in the project vicinity and they consider the landscape within that area a tribal cultural resource. Nearby projects have unearthed items with tribal meaning such as chert, quartz, shell beads, cords, bowls, obsidian, and fragments of bowls. Some artifacts (cogstones or *Tamet* stones) associated with their religion of the sun god have been found in the Los Angeles area.

#### **4.2.1 Ethnographic Overview – Tongva**

The APE lies in the traditional territory of the Tongva/Gabrieleño. The name “Gabrieleño” denotes those people, who were administered by the Spanish from the San Gabriel Mission. It includes people from the Gabrieleño area proper, as well as other social groups nearby (Kroeber 1925, Plate 57, Bean and Smith 1978: 538). The term Gabrieleño was imposed upon the Tribe by Spanish Missionaries. Thus, some descendants have chosen to use their original name, Tongva (Welch 2006). This term is used in the remainder of this section to refer to the pre-contact inhabitants of the Los Angeles Basin and their descendants, some of whom include the Gabrielino Tongva Indians of California. Archaeological evidence points to the Tongva arriving in the Los Angeles Basin sometime around 500 BCE, and the Tongva note their presence in the area going back thousands of years (Villa 2017). Today, the Tongva people are active in protecting their Tribal cultural resources in the greater Los Angeles Basin and three Channel Islands: present-day San Clemente, San Nicolas, and Santa Catalina.

The Tongva language belongs to the Takic branch of the Uto-Aztecan language family, which can be traced to the Great Basin region (Mithun 2001). This language family includes dialects spoken by the nearby Juaneño and Luiseño to the southeast, the Serrano and Cahuilla to the northeast, and the Tataviam to the northwest. Yet, it is considerably different from the Chumash people living to the northwest and the Diegueño people (including the Ipai, Tipai, and Kumeyaay) to the south.

The Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast. A total tribal population is estimated to have been at least

5,000 in 1770 (Bean and Smith 1978: 540), but recent ethnohistoric work suggests a number closer to 10,000 (O'Neil 2002). Political organization followed a patrilocal and patrilineal pattern. Typically, the oldest son would lead a family. Chieftainship was also passed down patrilineally. A *Chari*, or chief of a village or political grouping, was separate from religious leadership (King 2011).

At the time of Spanish contact, the basis of Tongva religious life was the Chinigchinich cult, centered on the last of a series of heroic mythological figures. Chinigchinich gave instruction on laws and institutions, and taught people how to dance, the primary religious act for this society. He later withdrew into heaven, where he rewarded the faithful and punished those who disobeyed his laws (Kroeber 1925: 637–638). The Chinigchinich religion seems to have been relatively new when the Spanish arrived. It was spreading south into the Southern Takic groups as Christian missions were being built. Elements of Chinigchinich beliefs suggest it was a syncretic mixture of Christianity and native religious practices (McCawley 1996: 143–144).

Houses constructed by the Tongva were large, circular, domed structures made of willow poles, thatched with tule and sheltered up to 50 people (Bean and Smith 1978). Other structures served as sweathouses, menstrual huts, ceremonial enclosures, and probable communal granaries. Cleared fields for races and games, such as lacrosse and pole throwing, were created adjacent to Tongva villages (McCawley 1996: 27).

The Tongva subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the Tribe exploited the mountains, foothills, valleys, deserts, including riparian and estuarine areas, as well as open and rocky coastal ecological niches. Like most Native Californians, acorns were the staple food. By the time of the early Intermediate Period, acorn processing was an established industry. Acorns were supplemented by the roots, leaves, seeds, and fruits of a wide variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, insects, and large and small mammals were also consumed (Kroeber 1925: 631–632, Bean and Smith 1978: 546, McCawley 1996: 119–123, 128–131).

The Tongva used a wide variety of tools and implements to gather food resources. These included the bow and arrow, traps, digging sticks, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. The Tongva made oceangoing plank canoes (known as a *ti'at*) capable of holding six to 14 people and used for fishing, travel, and trade between the mainland and the Channel Islands. Tule reed canoes were employed for near-shore fishing (McCawley 1996: 117–127). Tongva people processed food with a variety of tools, including hammerstones and anvils, mortars and pestles, *manos* and *metates*, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make *ollas* and cooking vessels (Kroeber 1925: 629, McCawley 1996: 129–138).

Deceased Tongva were either buried or cremated. Inhumation was more common on the Channel Islands and the neighboring mainland coast, and cremation was more predominate on the remainder of the coast and in the interior (Harrington 1942, McCawley 1996: 157). At the behest of the Spanish missionaries, cremation essentially ceased during the Post-Contact Period (McCawley 1996: 157).

## 4.2.2 Prehistoric Overview

This following prehistoric overview is adapted from a previous archaeological resources technical study prepared for the Project (Thomas and Granger 2018).

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). Dates presented as “cal B.C.” indicate calibrated radiocarbon dates corresponding to years Before the Common Era. Dates presented as “B.P.” correspond to dates before the year 1950, when radiocarbon dating was first established.

### **Early Holocene (9600–5600 cal B.C.)**

Archaeological data compiled over the last two decades indicate that initial settlement along coastal Southern California began at least 12,000 B.P. Some of the earliest evidence of human occupation specifically derives from radiocarbon samples from Daisy Cave (CA-SMI-261) on San Miguel Island, where the oldest cultural layer at the site produces dates between 9600 and 9000 cal B.C. (Erlandson et al. 1996). Additionally, the discovery of fluted projectile points in coastal Southern California indicates humans were in the region possibly as early as 13,000 years ago (Erlandson et al. 1996).

There are few known sites that date to this earliest period (i.e., pre-10,000 years B.P.) and very few sites have been identified 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 female human remains that were discovered in association with a handstone in the tar pits of Rancho La Brea in 1914 (Merriam 1914). The scarcity of sites dating to the early Holocene in the region may be due to possible low population densities. However, the few known sites suggest that they tend to be on elevated landforms, and sites on the Northern Channel Islands indicate knowledge and use of marine resources. Diagnostic artifacts from coastal California associated with this time period 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).

### **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. 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, coggled 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.

### **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 *tomal* (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 Gabrieleño groups (Sutton 2009).

Due to the archaeological evidence gathered, it is suggested that Hokan-speaking groups were largely replaced or subsumed by the Gabrieleño and Chumash by 2000 B.P. (Sutton and Gardner 2010). Several new types of material appear in the archaeological record during 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. Furthermore, 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.

### **4.2.3 Historic Overview**

This following abbreviated historic overview is adapted from a previous built environment technical report prepared for the Project (HRG 2021).

During the Mexican period, the Ávila family was granted the Rancho Sausal Redondo in 1855, which at 22,458 acres encompassed much of what is now the South Bay region of Los Angeles County. Scotsman Sir Robert Burnett in 1860 acquired Rancho Aguaje de la Centinela and Rancho Sausal Redondo in 1868. 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. Freeman named his ranch “Inglewood,” after his birthplace in Ontario. 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 parcels for the settlement of the new town of Inglewood. By 1892, the town of Inglewood was home to several small businesses, including a grocery, post office, barber, restaurant, and large two-story hotel on Queen Street between Commercial Street and Market Street.

By 1907, downtown Inglewood had several dozen dwellings. On February 14, 1908, the City of Inglewood was officially incorporated. By 1912, Inglewood’s commercial core was beginning to take shape along Commercial Street. 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 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 business district. Market Street remained more sparsely developed overall and displayed a combination of commercial and residential uses.

On the evening of June 21, 1920, a 5.0-magnitude earthquake rattled Inglewood. Damage took place to the unreinforced brick buildings along Commercial Street (now La Brea Avenue), where exterior walls fell into the street and plate glass windows shattered. Despite the widespread damage, the earthquake did not seriously hamper the City’s growth. 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.

On May 18, 1927, some 15,000 locals celebrated 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 system also supported 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.

Toward the end of the 1930s, Inglewood’s economic base began to expand outside the downtown core. In 1937, 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.

As war clouds gathered in the early 1940s, a number of aviation-related and other wartime manufacturing facilities set up shop around the former Mines Field, now 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 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. 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.

Despite some new construction in and around downtown during the post-World War II 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 businesses. The Chamber of Commerce and Downtown Inglewood Retail Merchants Association coordinated physical improvements like tree planting in the center strip and along sidewalks, which were in place by the early 1960s. 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 reinvigorate the core of the City, from 1971 to 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. As hoped, this new construction sparked a flurry of new commercial development.

While new developments 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 wane into the 1980s. Over the past decade, the City 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.

## 5 Cultural Background

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### 5.1 Project Research and Consultation History

An Archaeological Resources Assessment Report was prepared for the Project (ICF 2022) to comply with current federal environmental review policies, namely Section 106 of the NHPA and NEPA. The assessment consisted of a records search of the California Historical Resources Information System's South Central Coastal Information Center for the APE and 0.5-mile radius, a literature review, and a pedestrian field survey of the APE. FTA reached out to six representatives from six local Native American tribal organizations and entered into consultation with two tribes, the Gabrieleño Band of Mission Indians—Kizh Nation and Gabrielino Tongva Indians of California Tribal Council.

Although no archaeological resources were documented within the APE as a result of the records search, background research, or field survey (ICF 2022), there was an area of moderate archaeological sensitivity identified based on soils data alone, and consultation with the Kizh Nation resulted in an agreement to complete archaeological and Native American monitoring during ground-disturbing activities associated with the Project in of the areas identified as having moderate archaeological sensitivity. The Gabrielino Tongva Indians of California also responded to a consultation request and stated that the Gabrielino Tongva Indians of California will be a part of the said ground disturbances on rotation with any other interested tribes, and stated that consultation could be closed.

### 5.2 APE

FTA established the APE in accordance with 36 Code of Federal Regulations (CFR) 800.16(d), which defines an APE as:

the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

The APE considers and encompasses all areas potentially affected by the Project. The boundaries of the APE for the Project have been delineated on aerial photographs showing the Project-related features and parcel boundaries (see Attachment A). The APE is specific to the types of resources potentially affected. The focus of this report is archaeological resources. For details on the APE relative to architectural resources, see the *Historic Property Survey and Eligibility Determination Report for the Inglewood Transit Connector Project* (ICF and Rincon Consultants 2022).

The archaeological resource area is defined as areas that could be affected by the maximum extent of Project-related ground disturbance. This includes the public rights-of-way along Market Street, Manchester Boulevard, and Prairie Avenue, where the elevated ATS guideway would be constructed, the block bounded by Market Street, Florence Avenue, Locust Street, and Regent Street, where the Market Street Station would be constructed, parcels north of Florence Avenue, where a pedestrian bridge from the Market Street Station to the existing LACMTA station would land, the block bounded by Manchester Boulevard, Hillcrest Boulevard, Nutwood Street, and Spruce Avenue, where the MSF and a PDS substation would be built, the parcel at the southwest corner of

Manchester Boulevard and Prairie Avenue, where a station would be located, parcels at the northwest corner of Prairie Avenue and Hardy Street, where a station would be located, and parcels east of Prairie Avenue between Manchester and Hardy, where the travel lanes would be relocated to the east. The types of ground-disturbance activities include the following:

- Construction of new elevated tracks using vertical support columns, new stations, and new PDS
- Modification of existing public and private facilities such as roadway and sidewalk reconfiguration
- Use of temporary construction easements and construction staging areas
- Grading
- Trenching for utilities

The APE extends to the limits of the aboveground Project improvements and/or direct impacts for the stations, service areas, construction staging and laydown areas, and aboveground facilities. The maximum depth of excavation for the vertical supports of the ATS guideway structures outside of the stations is approximately 100 feet belowground surface and the maximum depth of excavation for the vertical supports of the ATS guideway structures at the stations is approximately 80 feet belowground surface. In addition to the guideway, ground disturbance would be required for Project components listed above (e.g., stations, roadway/infrastructure, PDS and surface lots) that would generally be limited to 10 feet below the surface.

## 5.3 Construction Scenario

Construction activities are planned for each element of the Project. Much of the construction includes subsurface excavation. The main elements of the Project that will include ground-disturbing construction are as follows:

- **ATS.** The guideway for the ATS will vary in height from approximately 35 feet to approximately 60 feet, with single-support columns ranging from 6 feet to 9 feet in diameter, when centered under the supported guideway, to approximately 6-foot-by-12-foot oblong columns, when located off-center from the guideway. Column foundations will likely be deep shafts with depths ranging from approximately 60 to 100 feet.
- **Stations.** Three stations are planned, each approximately 80 feet in height with three levels including the ground, mezzanine, and platform. Each station will include vertical transportation elements to be constructed meeting Americans with Disabilities Act requirements. The maximum depth of excavation for the vertical supports of the ATS guideway structures at the stations is approximately 80 feet belowground surface.
- **Roadways and Infrastructure.** Roadway reconfigurations for the Project may conflict with existing underground utilities. Construction will entail investigating these subsurface conflicts and inform the plan to reconfigure the roadways. The maximum depth of disturbance is anticipated to be 10 feet below the surface.
- **MSF.** This phase involves demolition of existing buildings and construction of new facilities. The maximum depth of excavation for the vertical supports of the ATS guideway structures outside of the stations is approximately 100 feet the surface.
- **PDS.** A new feed into an existing SCE facility will provide power for the Project. The SCE feed will be supplied via a new underground duct bank from the SCE Inglewood substation to the ITC

MSF site, where SCE transfer equipment is planned to be located. The maximum depth of disturbance is anticipated to be 10 feet below the surface.

The APE map in Appendix A depicts the location of these various project components and the Project Description in Section 2.1 provides a more detailed synopsis of the construction planned for the Project.

## 5.4 Archaeological Sensitivity

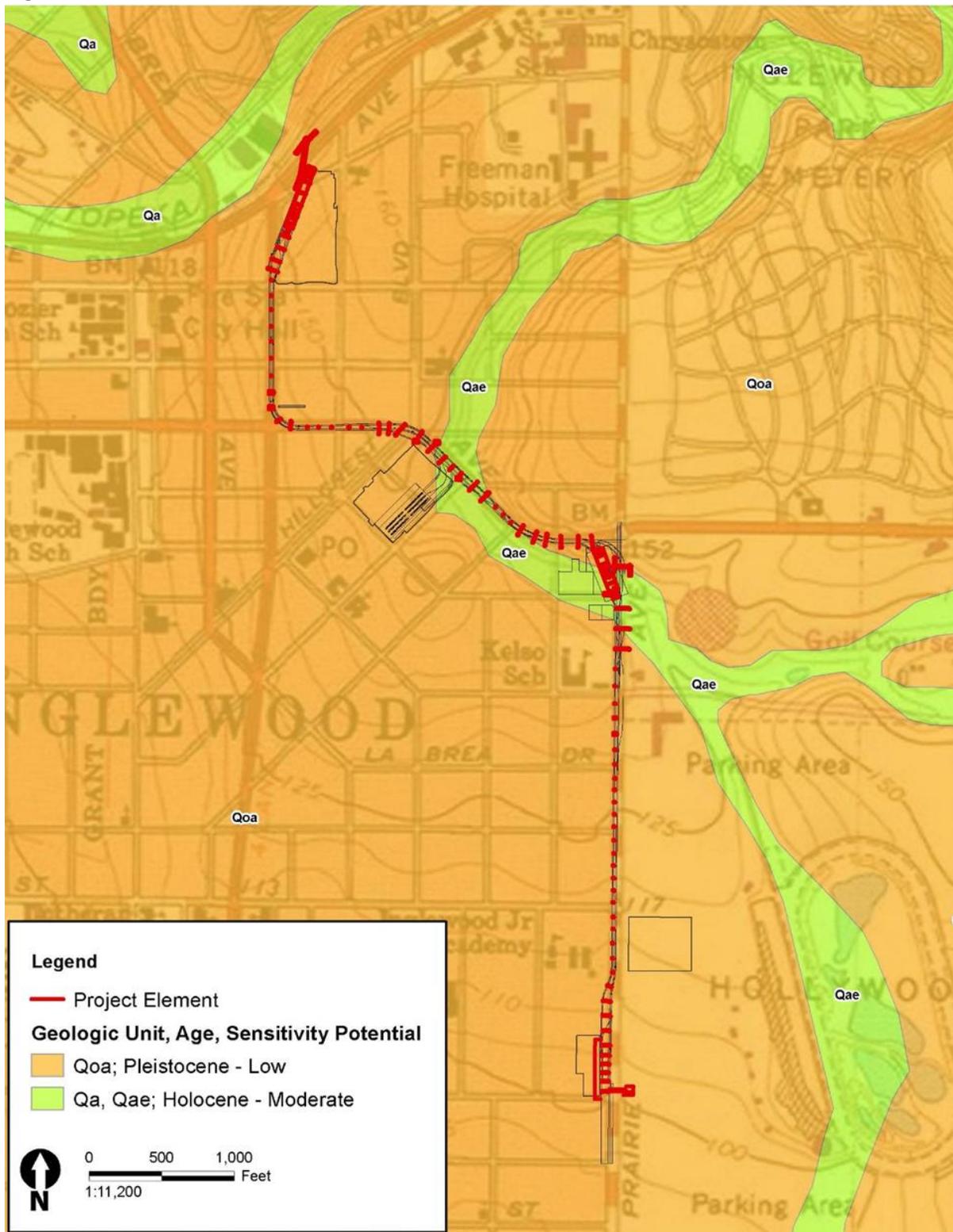
ICF (2022) conducted an archaeological site potential analysis based on a review of geologic mapping and geologic reports conducted near the Project. This analysis considered whether portions of the Project have the potential to contain buried pre-contact-era archaeological sites. A review of historical topographic maps, aerial photos and Sanborn Fire Insurance maps were reviewed to assess the potential for buried historic-era archaeological resources.

ICF's (2022) analysis concluded that most of the APE is underlain by older late Pleistocene alluvium (Qoa) with small areas of late Pleistocene alluvial fan deposits (QA) and artificial fill (af). These deposits consist of sediments eroded primarily from the Santa Monica Mountains to the north. The older alluvial deposits consist of slightly consolidated deposits of silts, clays, sands, and sandy gravel, and/or mixtures of those materials. The thickness of the older alluvium likely varies but is expected to be deep and extend below the maximum vertical APE of 100 feet in depth. No reliable evidence suggests human occupation in the Los Angeles Basin prior to the formation of Holocene sediments. For this reason, Pleistocene-alluvial sediments, deposited prior to the Holocene epoch, are considered to have little to no potential to contain buried archaeological deposits.

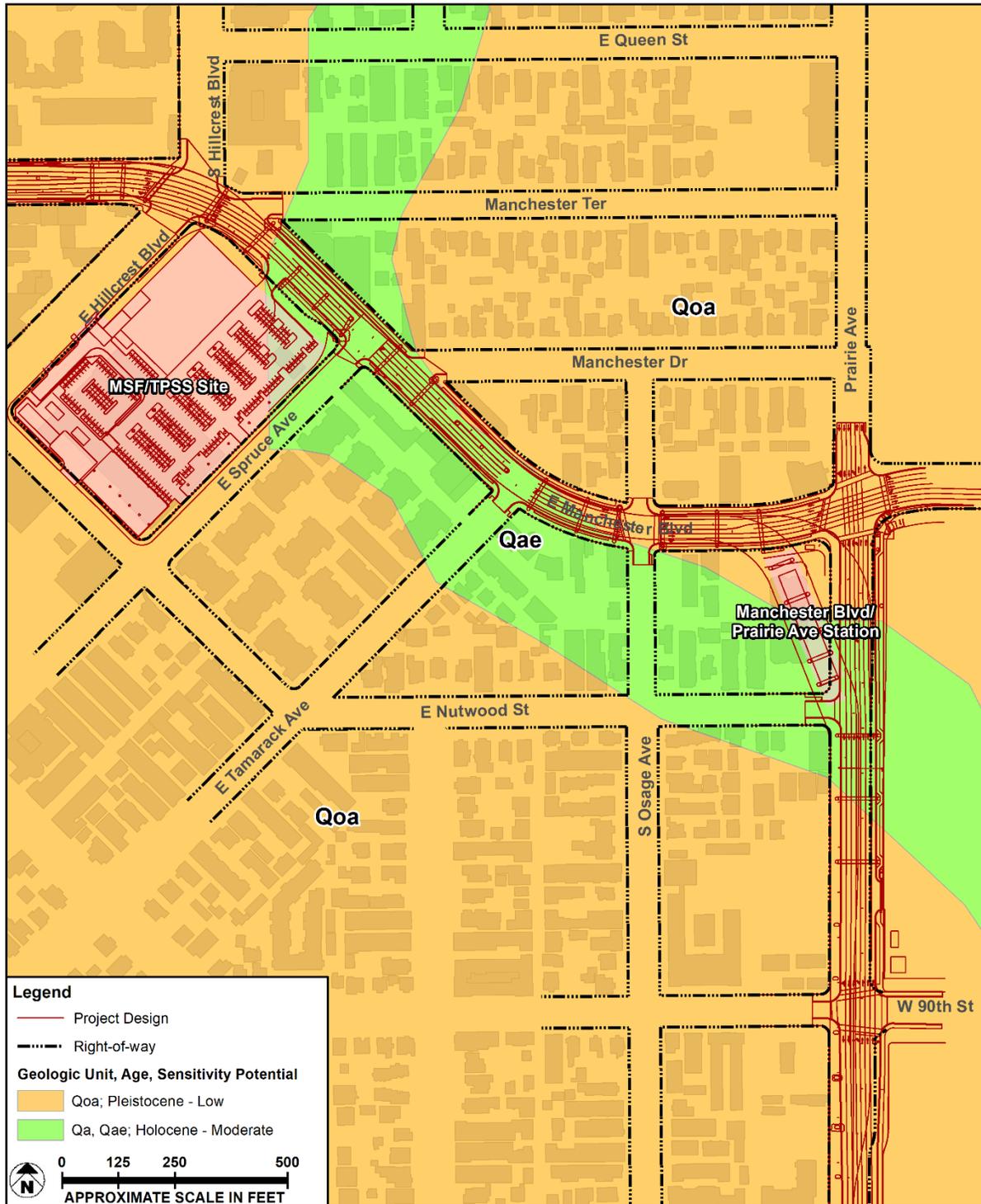
Small areas of the APE are mapped as Holocene alluvium, which includes valley and floodplain alluvium (Qa) and alluvium similar to Qa but slightly elevated and dissected (Qae). These deposits consist of unconsolidated to weakly consolidated sands, silts, clays, and/or mixtures thereof (sandy silts, silty sands, etc.). Like Qoa deposits, Qa and Qae deposits are generally derived from the Santa Monica Mountains. Holocene-alluvium deposits are located just north of Florence Avenue at the location of the pedestrian bridge, adjacent to the northern end of the APE and along East Manchester Boulevard, between East Hillcrest Boulevard and Prairie Avenue, near the MSF/PDS site and the Manchester Boulevard/Prairie Avenue Station. The thickness of Qa and Qae deposits in these locations is likely variable along the Project alignment. The basal depths of the Holocene-aged alluvial deposits have not been identified in the geologic data or in the geotechnical report, so it is assumed that, where present in the APE, the Holocene-aged sediments extend to the maximum depths of Project activities (100-feet-below surface). The types of archaeological sites that may be buried in Holocene alluvium include Native American pre-contact era sites or isolated artifacts.

The analysis concluded that precontact-era buried site potential is low in areas of Pleistocene alluvium and moderate in areas of Holocene alluvium. Areas of artificial fill have no potential to contain intact archaeological resources. Therefore, the project includes areas of low and moderate subsurface archaeological sensitivity, as depicted on Figure 3. The project components located in the Holocene alluvium include the eastern edge of the planned MSF/TPSS Site, continue along the tracks planned on the diagonal portion of E Manchester Boulevard, include the planned Manchester Boulevard/Prairie Avenue Station and continue along the tracks until East Kelso Street (Figure 4).

Figure 3 Buried Precontact -era Site Potential



**Figure 4 Project Components in Archaeologically Sensitive Area Based on Geologic Units**



Because the street grid was well established prior to the twentieth century, and development in the APE appears to have followed that street grid, the potential for buried historic period archaeological resources is low beneath city streets. Any buried historic period archaeological deposits are likely to

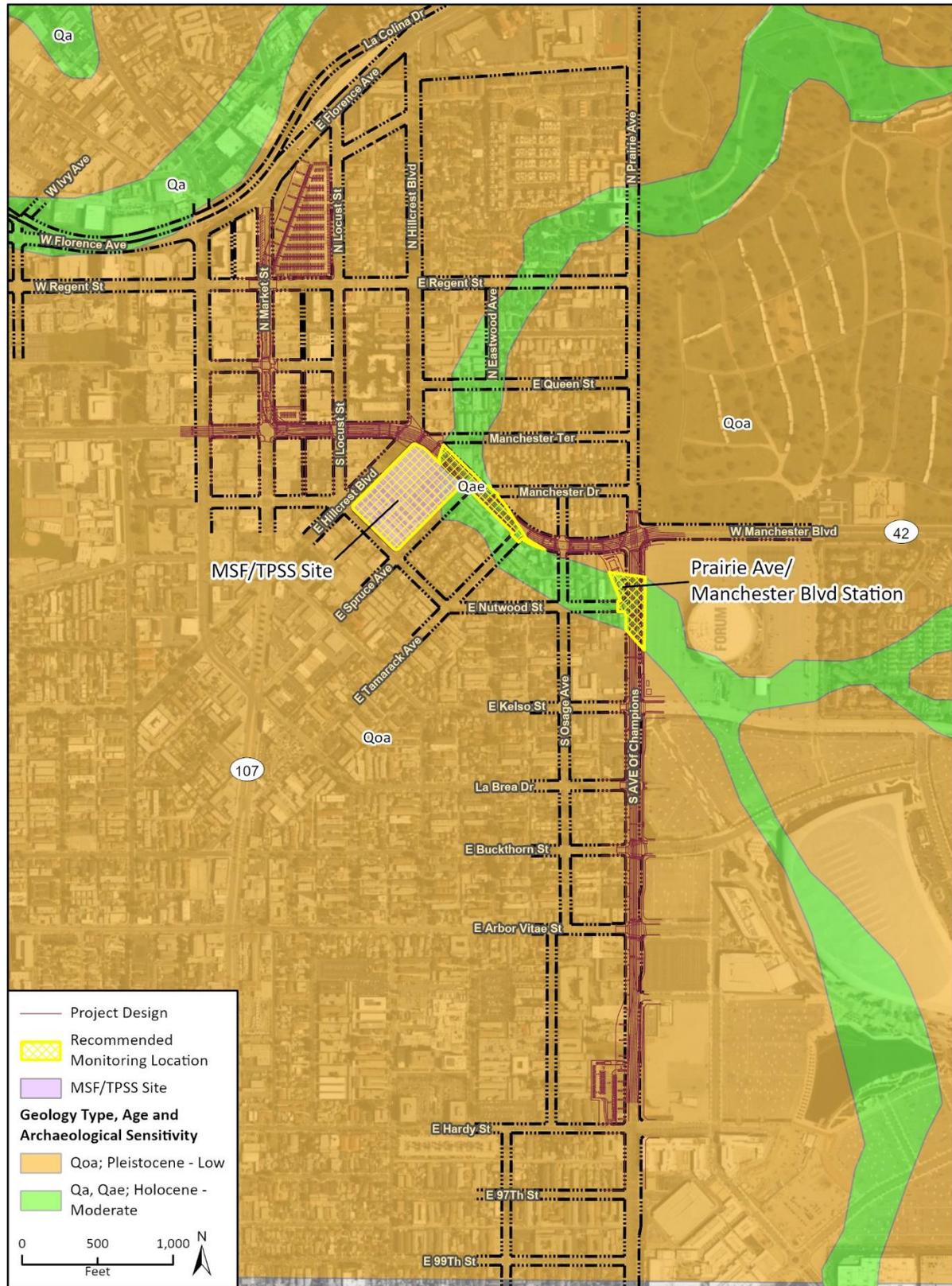
be associated with residential dwellings and commercial buildings. Historical archaeological deposits such as trash pits, privies, cisterns, building foundations, or basements associated with the pre-war development of the APE are possible where TPSS sites are planned, as depicted on the map overlays above. These types of archaeological features, if present, can extend up to approximately 25 feet deep below the current ground surface. Rincon is currently conducting archaeological monitoring and testing for the Inglewood Basketball and Entertainment Center (IBEC) Project located 800 feet south of the southern end of the ITC APE. The IBEC Project is located within the general vicinity of the undertaking and within Rincon's background research study area and results of the excavations taking place at the IBEC Project support the assertion that historical features are unlikely to be encountered below 25 feet.

Overall, the analysis indicates that the majority of the APE is located within areas of Pleistocene alluvium, which has a low potential to contain buried prehistoric archaeological sites, while those portions of the APE located in areas of Holocene alluvium have a moderate potential to contain prehistoric buried archaeological deposits. There is low potential for historic-period archaeological deposits to be present beneath City streets in the APE. However, there is a moderate potential for historical archaeological deposits associated with residential and commercial buildings to be located where station and PDS sites are located, up to a depth of 25 feet below ground surface (ICF 2022). Considering the amount of development in the APE, there is a low potential for unanticipated discoveries of intact archaeological resources during Project construction within approximately 2 feet belowground surface. However, there is always the possibility that intact archaeological resources are present immediately beneath the ground surface. Figure 5 depicts the location of monitoring areas for the project based on the sensitivity information provided above.

## 5.5 Previous Disturbances

The known development history and geotechnical bore data from projects in the Project vicinity indicate that the Project study area has been disturbed through previous construction grading, trenching, and excavations related to residential and commercial development and utility and infrastructure installation. These activities have resulted in the disturbance of the native sediments in the Project study area, and imported fill deposits from previous projects are also included in the Project area. The imported fill deposits are not considered sensitive for containing intact archaeological deposits (ICF 2022).

Figure 5 Recommended Monitoring Locations Based on Sensitivity Analysis



## 6 Site Types and Research Design for Post-Review Discoveries

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The following sections outline the types of archaeological resources that may be encountered in the APE during ground-disturbing activities associated with the Project. The expected prehistoric and historic-era site types are based on previous research in the vicinity of the Project and inform the research design. Unless otherwise stated, the following resources and sites can be found eligible for inclusion in the NRHP when they retain integrity and can convey the reasons for their significance.

### 6.1 Prehistoric Site Types

Paleoindian groups occupied coastal California as marine resource exploitation dominated early prehistoric periods. As groups along the coast adopted new subsistence strategies, settlement patterns also changed with groups becoming more sedentary. The Gabrieleño-Tongva Native American Tribe date their Tribe's arrival in the area to the Millingstone Horizon (~5,000 BC).

#### 6.1.1 Artifact Scatter

This type of site contains a light surface scatter of artifacts such as cores, bifaces, ground stone or milling tools, pottery, charms, and flaked stone debitage. Artifact scatters may represent short-term resting areas along trails, or special purpose sites. Ecofacts such as bone and shell can also present at sites of this type.

#### 6.1.2 Prehistoric Habitation Site

This type of resource is characterized by a variety of ecofacts and artifacts and may contain bedrock milling features suggesting that many different activities occurred and perhaps people in the past were living at this location. Occupation may have been for a short period of time seasonally over hundreds of years or may represent a village site occupied throughout most of the year. When occupied for short periods of time, habitation sites are referred to as "short-term habitation sites" or "temporary camps." When occupied by large numbers of individuals over a long period of time, habitation sites are referred as "long-term habitation sites" or "villages." In addition to well-defined often deep cultural deposits (midden), indications of habitation sites can include fire hearths and burned bone, indicating that food was being prepared and cooking occurred, as well as posthole remains in the soil.

#### 6.1.3 Prehistoric Isolate

An isolate is defined as the presence of a single object, two objects from the same or different artifact classes, or three artifacts from different classes. An isolate can also be three artifacts from the same class that are separated by a distance of at least 30-50 meters (Williams 2016). Prehistoric isolates are items such as, but not limited to, cores, bifaces, ground stone or milling tools, pottery, charms, and flaked stone debitage. An isolate does not constitute a site, nor is it eligible for listing in the NRHP.

### 6.1.4 Lithic Reduction Sites

These types of sites would contain a scatter of only flaked stone tools such as cores, stone debitage, or bifaces that may have been created from one or more distinct lithic reduction episodes. Lithic reduction sites often lack the presence of features or a midden, and often represent a single reduction event. If no subsurface distribution is evident, a lithic scatter is often referred to as a “sparse lithic scatter.” Given the presence of quarries in the area, lithic scatters of varying densities are expected.

### 6.1.5 Native American Heritage Value

It is possible that sites, features, or objects from sites may possess sacred or ceremonial value to local Native Americans. Research into each site and its constituent cultural remains will provide part of the basis for analysis of its potential heritage value, in addition to traditional Tribal knowledge. Interested Tribes will be consulted regarding prehistoric resources located within the Project area.

## 6.2 Historic Period Site Types

Historic-period site types that could be identified in the study area largely relate to transportation, the railroad, and postwar urban development. Ephemeral evidence of historic use, such as refuse scatters left by travelers and railroad workers, may be found in the Project area.

### 6.2.1 Refuse Deposits

Refuse deposits are the result of dumping of historic-era debris, often in the form of cans, glass, bottles, and miscellaneous items such as milled wood, hardware, metal fragments, and household implements. Refuse deposits may display evidence of a single event or may represent continuous dumping activities from nearby settlements.

### 6.2.2 Historic-Period Isolate

An isolate is defined as the presence of a single object, two objects from the same or different artifact classes, or three artifacts from different classes. An isolate can also be three artifacts from the same class that are separated by a distance of at least 30-50 meters (Williams 2016).

### 6.2.3 Built Environment Artifacts

Material culture that is associated with the built environment may include nails, bricks, milled wood, metal fragments, cement fragments, and window glass. These artifacts may be found as an isolate or in groups of two or more fragments. This type of material culture may be associated with refuse deposits within the greater theme of transportation. As a single entity, material culture from the built environment is not eligible. Yet, when assessed in conjunction with the built environment, these artifact classes can be found eligible for inclusion in the NRHP when they retain integrity and can convey the reasons for their significance.

## 6.2.4 Historical Linear Resources

Historic linear resources include a lineal construction, either depressed, elevated, or on ground level, designed to facilitate the transportation of people or vehicles such as a railroad grade, trail, wagon road, or highway, or any device constructed to transport water over a distance, such as flumes, pipes, ditches, canals, and tunnels. These types of resources are man-made manipulation of the earth and often are without any associated material culture.

The potential for a post-review discovery to be able to address significant research questions will help establish whether those sites may be significant pursuant to the NRHP. The following research design has been included in the event a post-review discovery is made.

## 6.3 Research Questions for Prehistoric Resources

Certain research issues and questions are fundamental for understanding the timing and nature of prehistoric uses of the APE. Research topics applicable to prehistoric archaeological sites in the Los Angeles Basin region include chronology, ethnicity, trade and travel, subsistence and settlement, and lithic procurement and technology.

### 6.3.1 Chronology

Establishing a cultural chronology for the Los Angeles Basin is critical to posing and answering other questions related to the coast. Of particular interest is establishing when the coast was used, by whom, and if it was used continuously or sporadically. In order to determine whether the site had been used by pre-Numic or Numic people, the site constituents must be dated to either before ca. 1000 BCE or after ca. 1000 B.P. (Late Prehistoric Period). Research questions related to chronology are commonly resolved through analysis of diagnostic material types reflective of certain activities. For example, charcoal and animal bone for radiocarbon dating, diagnostic attributes of ceramics, and obsidian for obsidian hydration studies.

### 6.3.2 Ethnicity

Questions about ethnicity seek to provide information about the occupation of the region by different groups of people. The following questions are subsequently posed to answer questions related to this topic:

- By whom was the Los Angeles Basin used during various periods of prehistory?
- Was the basin used simultaneously by multiple ethnic groups?
- Is there evidence of population incursion from elsewhere?
- Is there evidence of population replacement? Are there archaeological signatures (e.g., artifact types, residential patterns, resource use) that would identify the ethnicity of basin users or occupants?

Data necessary to answer these questions comes from a wide variety of sources (e.g., human biological remains, diagnostic attributes of ceramics, or rock art).

### 6.3.3 Trade and Travel

Evidence from the Los Angeles Basin shows that travel along established trails and the coast was a common occurrence. Many questions related to trade and travel may help elucidate how the coast was used prehistorically, such as:

- Was the coast used primarily as a transportation corridor?
- Was this area a destination point for procurement of specific resources?
- Were such resources used in barter to obtain other resources that were not locally available?

To address research questions related to trade and travel, nonlocal items must be present in a site. Such items can include obsidian and other lithic material, freshwater shell beads and ornaments, and ceramics with nonlocal paste and temper.

### 6.3.4 Settlement and Subsistence

Questions as to the timing, extent, and duration of prehistoric settlements along coastal southern California are numerous. Specific questions that may be posed relating to patterns of settlement and subsistence in the area include the following:

- Was the Los Angeles Basin occupied permanently?
- If residential site locations were used for extended periods, were their locations dictated by presence of fresh water sources?
- What plant and animal resources were extracted, during what seasons, and during what time periods? Were there periods during the Holocene when climatic conditions created greater availability of water and food resources?
- To what extent were marine resources exploited? Were marine resources of the Channel Islands brought to the mainland?
- Is there evidence of non-local shells or locally sourced shells? What is the function of the shells?

Data required to address the research questions posed above are likewise numerous and require regional and temporal comparisons. Such data include, but are not limited to: fire-altered rock, indicating the presence of habitation sites; chronometric data; ethnic data; artifacts classified functionally; projectile points, knives, and certain kinds of scrapers that indicate animal procurement and processing; ground stone tools that indicate plant food processing; ceramic vessels used to transport, store, and prepare plant foods (especially seeds); mollusk shells and other shells for trade; the presence of animal bone to indicate animal procurement, with classification at least into large (deer, seal) versus small animals (rabbits, rodents, tortoises); and indications of plant food resources, such as the presence of charred seeds and other plant parts in hearths.

## 6.4 Research Questions for Historic-Period Resources

Historic-period sites within the project area requiring evaluations fall into four general research topics or domains: transportation-related built environment resources and historic railroads, and historical refuse deposits and sites. The following research themes are focused on topics pertinent to evaluation of these resource types.

## 6.4.1 Transportation

Roads are seldom found eligible for listing in the NRHP due to their often-complicated histories of reuse or location within and across areas that have experienced exponential growth since the road was constructed and/or use that can interfere with resource significance and integrity. However, large-scale transportation structures or historic section of railroad can retain the integrity required to be eligible for listing in the NRHP. Linear built environment and archaeological resources can be found eligible for inclusion in the NRHP when they retain integrity and can convey the reasons for their significance. In developing this CRM DP, Rincon referred to experience of the California Department of Transportation (Caltrans), who identifies three themes where trails, roads, or highways might be eligible for the NRHP if they: (1) reflect on culture, (2) are symbols of commerce and trade, or (3) are symbols of engineering achievement (Caltrans 2016:162–164). Caltrans proposes that transportation routes determined to be significant should have high to medium values of integrity and provide a rating system within which to evaluate the level of integrity (Caltrans 2016:163, Table 5). In these instances, the following research questions might be applicable:

- If archaeological deposits are present, are they associated with the construction or use of the road during its period of significance?
- What information might these deposits provide pertaining to transportation development in the region?
- Can such features be associated with individuals, events, or institutions of importance to regional history?
- Are there transportation features in the project area that can provide information regarding the earliest recreation use of the area?
- Do these features contain contemporary consumer goods that would yield information about consumer preference, specialized activities, age, ethnicity, or gender of the users?

## 6.4.2 Historic-Period Refuse Deposits

Historic-period refuse scatters or deposits that contain material from a specific household, community, or identifiable and datable activity may provide information on such questions as consumer practices, economic behavior, socio-economic status, ethnicity, and household composition. For the APE, refuse scatter data may additionally be able to provide insight on the primary thematic site associations of homesteading, transportation, and historic-era railroads. Along with sufficient quantity, diversity, and integrity, refuse scatters and deposits must have context, association, and focus in order to evince thematic significance and/or provide useful data. To be eligible for inclusion to the NRHP, the origin of the refuse must be identifiable, the age of the deposit must be bounded, and deposits of different types, ages, or origins must clearly represent their association with events, persons, or themes. To provide important information that cannot be found in published sources, oral histories, or archival research, historical refuse scatters typically must be associated with a known homestead, farm, community, commercial enterprise, or significant persons, and historical event, patterns, or themes. Relevant research questions might be:

- Do features, deposits, or artifacts reflect consumer practices and disposal behavior of a household, industry, or business?
- Are dateable artifacts present?

- What do they tell us about social, occupational, economic, ethnic, gender, or behavior of the site occupants?
- What do features, deposits, or artifacts add to our knowledge of the availability of various classes of consumer goods at a specific place and point in time?
- How does this reflect changes in consumer preferences and how do manufacturers respond to those preferences?
- How do features, deposits, or artifacts reflect acquisition and consumption of foodstuffs or other commodities?
- How do features, deposits, or artifacts contribute to an understanding of landscape alteration, water and waste management, occupation, industry, or other activities over time?
- Are there artifacts in the deposit from the built environment? Do they belong to standing buildings or are they from buildings no longer present?

## 7 Monitoring Procedures

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### 7.1 Personnel and Organization

The archaeological monitoring section of this document presents the purpose, methods and protocol for the construction monitoring, post-review discovery, identification and evaluation and treatment procedures for the area of moderate archaeological sensitivity in the Holocene alluvium depicted on Figure 3. The FTA has determined that the undertaking would result in a finding of no adverse effect on the four historic properties located within the APE (The Inglewood Park Cemetery, The Holy Faith Episcopal Church, the Inglewood Forum, and the Fox Theatre).

No archaeological resources were identified through the cultural resources records search, research, field surveys, or tribal consultation. Based on the work completed, no archaeological resources were identified in the ground-disturbance portions of the APE; therefore, there are no effects on known archaeological resources within portions of the Project APE subject to construction-related ground disturbance. To account for the possibility of post-review discoveries, the CRMDP outlines procedures to address post-review discoveries accordingly.

FTA is the lead federal agency responsible for the implementation of this plan pursuant to Section 106 of the NHPA and is responsible for ensuring the actions of this CRMDP are fulfilled. The CRMDP has been developed in consultation with SHPO who has reviewed the project and will remain a reviewer on project related post-review discoveries and reporting. The City is the lead agency for compliance with the California Environmental Quality Act (CEQA) and is responsible for compliance with any environmental conditions or mitigation measures associated with the project. The City shall provide information to the FTA for ongoing Section 106 oversight and consultation obligations.

Per 36 CFR Part 61, a qualified archaeologist who meets the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR 61) in both prehistory and history and demonstrates a familiarity with the archaeology of the area, will provide cultural resources services during the construction phase of the Project to provide cultural resources monitoring for all ground-disturbing activities in areas containing a moderate potential for buried resources, as depicted in Figure 3 of this Plan, and monitoring to a depth of 25 feet in non-street portions of the APE for historic-era resources. No monitoring for historic-era resources would be required for areas located outside of the non-street portion unless the area has been identified as having a moderate potential for buried cultural resources. No more than seven days prior to the start of construction, the Chief Executive Office at the City and Environmental Protection Specialist at the FTA shall be notified that a cultural resources consultant has been contracted to provide cultural services for the Project. The names and contact information for the archaeological Principal Investigator and all persons authorized to provide cultural resources monitoring during project implementation shall be provided to the Environmental Protection Specialist at the FTA by the Chief Executive Office at the City in a letter verifying that the cultural resources personnel meet the standards outlined herein.

The Principal Investigator (PI) shall meet the Secretary of the Interior's *Professional Qualifications Standards* (36 CFR 61) and be responsible for all actions of the cultural resources monitors approved for the Project. All archaeological monitors shall have at least a Bachelor's degree in Anthropology, Archaeology, or a related field, and have completed an archaeological field school run by an accredited academic institution. All archaeological monitors shall work under the direct supervision

of a qualified archaeologist and will have experience in the identification of both prehistoric and historical archaeology.

A Native American monitor from the Gabrieleño Band of Mission Indians—Kizh Nation, Gabrielino Tongva Indians of California, or another locally-affiliated Tribe, shall be retained within 30 days of the project kick-off date to conduct construction monitoring for all ground-disturbing activities in areas containing a moderate potential for buried resources as depicted on Figure 3 of this Plan. The City of Inglewood shall be responsible for retaining and bearing the cost for a Native American monitor(s) for the project. The FTA will be responsible for all consultation as required under Section 106 with federally recognized Indian tribes or any additional consulting parties (non-federally recognized Native American tribes, groups and individuals).

No more than seven days prior to the start of construction, the FTA shall be notified that a Native American monitor has been contracted to provide monitoring services for the Project. The names and contact information for any Native American monitors shall be provided to FTA by a representative of the City in a verification letter. This can be the same letter in which the archaeological monitors are listed and transmitted to FTA for approval.

At least one Native American monitor and one archaeological monitor shall be approved prior to the start of construction; however, if ground disturbing activity requiring monitoring is occurring at multiple locations within the monitoring areas, additional monitors may be required to cover monitoring of all ground-disturbing activities. Construction activities may proceed with only one monitor in designated monitoring areas provided the following conditions are met: 1) both the archaeologist and Native American monitor were contacted with more than 24 hours' notice to be onsite; 2) if, after 24 hours' notice the Native American monitor determines their presence is not necessary; 3) if, after 24 hours' notice one of the monitors is unable to be present based on extenuating circumstances (e.g., emergency, illness, unforeseen obstacles). However, construction may not proceed if no monitor is onsite in designated monitoring areas. All monitors must be verified and approved by FTA through the City.

The City shall assure that the construction schedule including a three-week forecast is transmitted to the archaeological PI and Native American monitor within five (5) calendar days before the start of construction. The City of Inglewood shall be copied on all communications regarding schedule between the City and the monitors. Updates on the three week schedule will be transmitted to the archaeological PI and Native American monitor on a weekly basis, and any abrupt changes in schedule will be communicated to the archaeological PI and Native American monitor by the City. This does not preclude construction contractors from updating the archaeological and Native American monitors daily on the ground once the initial three-week schedule is communicated through the City. Direct communication between the construction personnel and the archaeological and Native American monitors is encouraged to occur on a daily basis to keep everyone informed of schedule changes. If a change in schedule results in the need for a monitor where no monitoring need was originally anticipated, the archaeological and Native American monitor will be given 48 hours' notice to assure monitors are available.

The PI for archaeology and the Native American monitor should attend any grading/excavation-related pre-construction meetings to make comments and/or suggestions concerning the archaeological monitoring program with the Project Management Oversight Contractor (PMOC), who shall assure construction personnel are briefed on monitoring activities and areas and instruct construction personnel that no ground disturbances shall take place in areas that require monitoring unless both an archaeological and Native American monitors are present. However, if a Tribe has been notified in advance of scheduled construction work (five days prior to the initial

construction and 48 prior to a change in schedule as outlined above) and does not respond, or if a Native American monitor is not available, work may continue without the Native American monitor. The archaeological monitor shall continue the actions of the Native American Monitor to the best extent possible. Costs associated with Native American monitoring shall be borne by the City of Inglewood.

## 7.2 Monitoring Field Methods

An archaeological monitor and Native American monitor shall be present during ground-disturbing activities in areas depicted on Figure 3 of this Plan that have a moderate sensitivity for buried pre-contact-era resources, an archaeological monitor shall be present for all ground-disturbing activities to a depth of 25 feet in non-street portions of the APE. Ground-disturbing construction activities include, but are not limited to, trenching, hand excavation, support pillar installation, and utilities relocation or installation. The archaeologist and Native American monitor shall monitor construction crews as closely as conditions permit, making all reasonable efforts for safety with the construction effort.

Procedures for archaeological and Native American monitoring are as follows:

- The archaeological monitor shall work under the direction of a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's *Professional Qualifications Standards* for archaeology and who is familiar with site types and artifacts likely to be discovered during monitoring.
- Prior to the start of ground-disturbing activities, supervisory contractors, newly assigned contractors, and all construction personnel involved in soil-disturbing activities or working near soil-disturbing activities (including heavy-equipment operators) shall attend an archaeological and tribal cultural resources sensitivity training. This training shall coincide with the pre-construction kickoff meeting. Training shall include an overview of the cultural resources and tribal cultural resources that are known to occur in the area and shall provide a review of the applicable laws and regulations that protect any archaeological or tribal resources that may be encountered during monitoring. The training shall also inform all onsite workers of the procedures to follow in the event of a discovery, and procedures to follow if the discovery includes human remains. A brochure summarizing the presented information shall be provided to training attendees. Construction personnel shall sign a sign-in sheet acknowledging that they received the training and brochure. The cultural resources contractor providing the sensitivity training shall provide the City and FTA with a copy of the sign-in sheet following the completion of the training session. This training shall be held for all new contractors coming on to the project and be held monthly as a refresher for all participants.
- The archaeological monitor and Native American monitor shall visually examine the work areas for the presence of Native American artifacts (e.g., chipped stone tools and production debris, stone milling tools, ceramics), historical debris (e.g., metal, glass, ceramics), and/or soil discoloration that might indicate an archaeological deposit or feature at every opportunity during daily monitoring.
- In the event a visually inspected area requires further inspection occasional screening of soils through a 1/8" mesh screen may occur
- The archaeological monitor and Native American monitor shall record all monitoring activities daily on a Daily Monitoring Form (see Appendix B). The monitoring forms shall be submitted to

FTA and City once per week by the qualified archaeologist, and copies of all forms will be included as an attachment to the monitoring report, outlined in Section 6.4.

## 7.2.1 Halt of Construction

The archaeological monitor and Native American monitor shall have the authority to halt and redirect any Project-related activities adversely impacting potentially significant resources (see Section 6.2.2 for discussion of procedures for inadvertent discoveries). The size of the Project area stopped shall vary depending upon specific circumstances but should generally be between 50 feet and 100 feet.

## 7.2.2 Post-Review Discovery of Archaeological Resources

For the discovery of previously unknown archaeological resources, a Cultural Monitoring Log Discovery Form (Attachment B) shall be completed by the on-site archaeological monitor and the following procedures shall be followed:

- The archaeological and Native American monitors shall divert construction activity in the immediate vicinity of the find by signaling to construction staff and notifying the designated construction foreman. The monitor shall report the discovery to the supervising PI, who shall in turn report the find to the PMOC and the construction manager. The “immediate vicinity” shall vary depending upon specific circumstances but shall fall in a general range of 50 to 100 feet. This is for temporary work stoppage prior to completing the steps below.
- For discoveries of intact or potentially intact cultural deposits or individual artifacts, the archaeological monitor shall immediately notify the PI of the discovery, and the PI shall immediately notify the City of Inglewood. The City shall then notify the FTA within 12 hours of the discovery. FTA will notify the SHPO and the Advisory Council on Historic Preservation (ACHP) within 48 hours of the discovery. Within 24 hours or less of the discovery, the PI shall provide an email with photos of the discovery in context (if possible) and a map of the feature indicating its location within the APE to City of Inglewood. In the case of Native American resource discoveries (i.e., discoveries dating to the pre-contact era as identified by the archaeologist and/or Native American monitor), the FTA will also notify Consulting Tribe(s) within 48 hours of the discovery.
- Upon completion of the initial notification to the PI, the archaeological monitor shall work with the Native American monitor to determine the nature and extent of the cultural remains and make a preliminary assessment of their integrity and potential importance. If the archaeological monitor determines that the discovery is not cultural, or is an isolated artifact (a single or several artifacts removed from their original depositional context), and the Native American monitor has no objections, the monitor shall immediately notify the PI and construction manager that activities may resume as soon as the archaeological item(s) has been properly photographed and recorded. Recording shall be noted on the Daily Monitoring Log and Cultural Discovery Form presented in Appendix B, to which additional notes shall be appended. All artifacts deemed isolated or non-significant by the qualified archaeological PI can be reburied in place after being recorded and photographed.

Resource types that will be excluded/exempt from further notification and consultation include:

- Prehistoric isolated items (less than three items, where any artifact broken into pieces is counted as a single item, within a 100 square-meter area), redeposited material without human remains, and artifact scatters without temporally diagnostic items/materials that can be dated through radiometric techniques.

- Excluded historic-era resources include ubiquitous infrastructure elements such as utilities (cistern, electric, gas, sewer, and water supply lines), transportation infrastructure (bridge piers, buried roadways, and rail segments), sidewalks, and concrete rubble, fill, or waste. Isolated refuse dumps and scatters over 50 years old that lack specific associations. Isolated refuse dumps and scatters over 50 years that include secondary deposits or are in fill.
- If potentially significant cultural features, artifact concentrations, or intact deposits are discovered, the archaeological and Native American monitors shall divert construction activity in the immediate vicinity as outlined below and report the discovery to the qualified archaeologist and the City’s construction inspector, so that appropriate notifications to the FTA can be issued as outlined above. A temporary Construction Exclusion Zone (CEZ), consisting of lath and flagging tape, shall be erected around the discovery. The size of the CEZ may be reduced or enlarged as the significance and extent of the find is determined and treatment measures are implemented. For the purposes of the current effort, a minimum 100-foot radius shall be established for any remains that are suspected of being human (see Section 6.7 for further direction related to the discovery of human remains). Isolated artifacts shall be marked by an orange cone or flagging with no additional radius. In the case of the discovery of an intact archaeological site, a minimum radius of 100 feet may be established, so that the resource may be evaluated. The CEZ shall not be removed until the potentially significant cultural resource has been evaluated to assess whether it is classified as a “historic property,” or “traditional cultural property” pursuant to Section 106 of the NHPA.
- **Evaluation and Assessment of Post-Review Discoveries:** In the case of potential NRHP-eligible historic properties, the FTA may assume eligibility of the resource for the purpose of this undertaking only or will consult with the SHPO and ACHP on NRHP eligibility, assessment of effects, and appropriate treatment. In the case of a Native American potential NRHP-eligible historic property, the FTA will also consult with Consulting Tribe(s) on the proposed treatment measures.
  - The archaeologist shall record the find on Department of Parks and Recreation (DPR) 523-series forms and evaluate the find against the National Register of Historic Places eligibility criteria (36 CFR part 60) to determine whether the find(s) are a historic property according to Section 106, and shall consider input from the Native American monitor and consulting tribes in their evaluation. If the evaluation requires further excavation, the PI shall transmit a limited excavation plan that is specific to the nature of the resource discovered to the City to transmit to the FTA for final approval. The PI shall relay the results of their evaluation to FTA to make the final determination on whether the find constitutes a historic property.
  - If the find is evaluated as eligible by the FTA and determined to be a historic property in consultation with SHPO, the FTA will first consider avoidance of the historic property by all project activities. If avoidance is not feasible, The FTA and City of Inglewood shall consult with the PI and Native American monitor to minimize any adverse effects, and the PI will develop a plan for further treatment that is commensurate with the affects that the Project is anticipated to have to the resource. The FTA shall consult the consulting parties, ACHP, and SHPO on the treatment plan, and the FTA shall be required to sign off on the final plan before it is instituted.
  - If a Treatment Plan were implemented, the methods and results of all archaeological efforts and treatment measures undertaken as part of the Treatment Plan should be documented in a stand alone data recovery (Phase III) report. The data recovery report should be prepared in accordance with the Secretary of the Interior’s Standards for Archaeological

Documentation (National Park Service 1983) and consistent with the Reporting standards outlined in Section 6.3 below. The monitoring report should be submitted to the City, SHPO, consulting parties and FTA for review within 60 days following the completion of monitoring. A final version of the Monitoring Report should be provided to the City, the FTA, consulting parties, the SCCIC, and the ACHP for their permanent records.

These procedures are outlined in Table 1 below.

### 7.2.3 General Approach to Subsurface Testing and Treatment of Post-Review Discoveries

Should a post-review discovery be encountered and avoidance not feasible an Extended Phase I and/or Phase II testing program may be needed to provide data to delineate the resource and inform eligibility recommendations. Avoidance and protection of the site is the first strategy and if avoidance is not possible, evaluation will be necessary.

If test excavation is required to evaluate a discovery, the PI in coordination with the SHPO, FTA, consulting parties and the City will formulate a testing program for implementation. In general, any evaluation effort will be focused on the area of discovery within the area of impact including a reasonable buffer (not more than 10 m from the maximum extent of the find). The focus will be to determine the nature of the archaeological resource and to assess the quantity, quality, and variety of preserved archaeological items that are or may be present. Evaluation will include Shovel Test Pits (STPs) of a sufficient number to characterize the extent of subsurface archaeological deposits. The STPs will be 30 cm in diameter and will be excavated up to 60 centimeters below ground surface or until two sterile levels (20 cm) have been encountered. The STPs will not extend beyond 1 meter in depth. A 1 meter by 1 meter test unit may also be excavated to evaluate the condition of the discovery and acquire a controlled sample of the preserved cultural materials. Soils will be screened onsite and a 1/8" mesh will be used.

After the site evaluation, the PI will have five business days in which to prepare a summary letter report assessing the site's eligibility and recommending appropriate treatment measures, such as the need for archaeological data recovery, if the site is recommended eligible. The letter report will be submitted to the SHPO, FTA, consulting parties and the City, as appropriate, via email, who will have ten business days to review the report and evaluate the proposed treatment measures, if deemed necessary. Determinations concerning NRHP eligibility will be completed using all four National Register criteria and guided by the research design included herein which includes research issues relevant to resources that could be identified.

If a discovered site is determined to be eligible for the NRHP, further treatment measures will be required. In consultation with SHPO, FTA, consulting parties and the City, the PI will prepare a data recovery plan for review and approval by SHPO, FTA, consulting parties and the City. After review and concurrence, the BLM archaeologist will notify the PI that the proposed data recovery can proceed. Data recovery efforts will be focused only on that portion of the site within the area of impact with a reasonable buffer. To the degree possible, the construction and engineering teams will be included in discussions to avoid or minimize potential damage to the discovered resource.

The level of effort will be dictated by the nature and extent of the discovery and on the results of the initial evaluation effort. The focus will be on recovering a sufficient sample to characterize the discovery and to address regional research questions, as appropriate. Upon completion of any

required fieldwork the PI will prepare a brief interim letter report summarizing the results. SHPO, FTA, consulting parties and the City will have five business days to review the report and determine whether or not construction work at the discovery can resume or if additional sampling is required. The FTA will notify the PI when work can resume. The results will be reported in a standalone report and will follow the review protocol outlined in the Treatment Plan protocol.

**Table 1 Notification of Post-Review Discovery**

Action	Project Archaeologist	Construction Contractor	Archaeological Principal Investigator (PI)	City/FTA	SHPO/ACHP
Initial Response/ Notification of Discovery	Temporarily halts ground disturbing activities near find. Consults with Native American monitor. Notifies PI of find and construction contractor of potential work disruption. Establishes temporary work stoppage; if find is potentially significant implements temporary CEZ.	If potential find is discovered by construction contractor when no monitor is present, work is redirected away from find; the archaeological and Native American monitor are alerted to come assess the find.	Inspects new discovery and immediately notifies the City of Inglewood. Records resource and includes the find in the final report. Makes preliminary recommendation on its NRHP eligibility after consultation with Tribe(s).	The City notifies the FTA of discovery within 12 hours. The FTA notifies Tribe(s). The FTA notified the ACHP, SHPO, and consulting tribes within 48 hours of the discovery.	N/A
Human Remains Discovered	Immediately notifies construction contractor and PI of the discovery. Construction activities halted and area secured with a temporary CEZ.	Gives instruction to construction crew. Enforces CEZ buffer.	Immediately notifies the PMOC will notify the City of Inglewood. After consulting with the City of Inglewood either in person or via telephone, the PI shall notify the Los Angeles County Coroner’s Office by telephone, pursuant to Health and Safety Code 7050.5. Ensures protocols are being followed.	The City shall notify the FTA on the same day of the discovery. If remains are determined by Coroner to be Native American, the FTA consults with Most Likely Descendant (MLD), as identified by the NAHC.	N/A
Suspend Work Order	Monitors maintenance of CEZ.	Gives instruction to construction crew; maintains CEZ	Ensures adequate CEZ is established and maintained.	Stop Work Order is issued through the City PM after being approved by FTA.	N/A
Evaluate Significance and Assess Effects	Assists PI with evaluation of find, as needed.	Maintains CEZ.	Completes resource evaluation and assessment of effects in consultation with Tribe(s) and provides documentation and treatment recommendations to the City. Prepares treatment plan if needed.	City PM makes recommendations to the FTA. The FTA consults with the Tribe(s) and the SHPO on NRHP eligibility, assessment of effects, and appropriate treatment. The City and the FTA review and approve treatment plan.	Reviews submitted documentation and provides formal determination on NRHP eligibility, assessment of effects, and treatment plan.
Mitigate Effect	Assists PI as needed.	Maintains CEZ.	If discovered resource is NRHP eligible and effects cannot be	The City PM	Reviews and provides

Action	Project Archaeologist	Construction Contractor	Archaeological Principal Investigator (PI)	City/FTA	SHPO/ACHP
			avoided, implements treatment plan. Mitigation report is prepared and submitted to the City.	submits mitigation report to the FTA on mitigation results. The FTA reviews report and submits to the Tribe(s) and the SHPO and continues consultation.	comments on submitted documentation.
Resume Work	Removes CEZ upon authorization from PI.	The PMOC will issue NTP to construction contractor and PI when work may resume at site.	Upon notification from the City, authorizes removal of ESA.	The FTA informs the City PM when it may issue NTP to construction contractor.	N/A

## 7.3 Disputes

Should any disputes or disagreements regarding the disposition or characterization of any discoveries arise during monitoring, or if any personnel subject to this Plan objects to any actions proposed, or the manner in which the measures to resolve adverse effects are implemented, the FTA shall consult with such party to resolve the objection. This section does not account for a dispute with the ACHP or SHPO. If the FTA determines that such objection cannot be resolved, the FTA shall:

- Document the dispute or objection and notify all parties involved in the dispute and all consulting parties (Tribal Governments, SHPO, and ACHP) that the FTA is consulting to resolve the dispute or objection within 15 calendar days from when the dispute or disagreement arises. The FTA shall request comments on the dispute or objection be provided within 30-calendar days following receipt of notification and proceed to consult with the objecting party for no more than 30-calendar days after receipt of any objection to resolve the objection. The FTA shall take any comments provided by all parties into account. If the objection is resolved during the 30-day consultation period, the FTA may proceed with the disputed action in accordance with the terms of that resolution.
- If, after initiating and consulting for the 30-day period, the FTA determines that the objection cannot be resolved through consultation, it shall move forward with the course of action it finds least objectionable to all parties involved in the dispute, and to all consulting parties (Tribal Governments, SHPO, and ACHP). The FTA shall forward all information relevant to the dispute, including its proposed resolution, to all consulting parties. Any consulting party may provide comments on the resolution within 45 days. All documentation shall be retained by the FTA
- Any affected Tribes can also follow the processes outlined in 36 CFR Section 800, Appendix A to Part 800: Criteria for Council Involvement in Reviewing Individual Section 106 cases.

## 7.4 Reporting of Monitoring Results

At the conclusion of construction requiring archaeological and Native American monitoring, an archaeological monitoring report shall be prepared under the direction of the qualified archaeologist. The monitoring report shall outline the methods of archaeological monitoring at the Project site, describe the construction activity and duration, and present the results of the monitoring. The level of effort to complete a monitoring report is dependent on the number of resources recovered during monitoring activities. Should the monitoring effort be negative for the identification of cultural resources, a negative letter report shall be prepared. The letter report shall include, at a minimum, the dates of monitoring, activities conducted, personnel, and field logs.

If archaeological materials are recovered, a comprehensive technical report shall also be required to describe and interpret findings and data. The technical report shall be prepared in accordance with the *Archaeological Resources Management Reports (ARMR): Recommended Contents and Format*. If required, the ARMR-format report shall include a complete description of resources identified during monitoring, treatment of those resources, National Register of Historic Places eligibility recommendations, site records, and site maps.

A draft of the report prepared for the construction monitoring shall be completed no later than 12 months after the completion of construction and submitted to the City of Inglewood, consulting parties, SHPO and the FTA for review. Each reviewing party shall return the report with comments

within 30 days of receipt. A final technical report will be completed based on the received comments within 30 days of receiving comments.

The final version of the monitoring report shall be submitted to FTA, SHPO, consulting parties, the City, and the South Central Coast Information Center of the California Historical Resources Information Center.

## 7.5 Curation of Project Finds

Recovered archaeological finds not associated with burials and that are not the subject of a treatment plan as outlined in Section 6.2.2 shall be recovered from the field by the qualified archaeologist (PI) or an archaeological monitor working under the PI's direct supervision. Artifacts shall be placed in paper bags and labeled with provenience information; the paper bags shall be placed into banker's boxes to transport them to a temporary storage facility. Features and soil samples shall be collected in double plastic bags and labeled with flagging tape both inside and outside of the bags. These artifacts, samples, and features shall be temporarily stored by Rincon until either an appropriate on-site reburial location or repository is agreed upon by FTA the City of Inglewood other interested Native American groups, and/or the most likely descendant (MLD). If necessary, curation preparation shall include creating acid-free labels and tags, placing artifacts in archival quality bags and boxes, and submitting a hard copy of the report on acid-free paper with and the artifacts to a selected permanent curation facility.

Permanent treatment of human remains and associated funerary items shall be determined by the MLD in coordination with FTA and the City. Unless otherwise specified in a treatment agreement between the City, the FTA, and the Consulting Tribe(s), artifacts or other cultural material associated with Native American resources should be permanently curated with an appropriate institution. The preparation and curation of the collection should be completed according to standards set forth in "Curation of Federally-Owned and Administered Archaeological Collections" (36 CFR Part 79).

## 7.6 Safety

Prior to any monitoring activities, the Project Health and Safety Plan shall be reviewed by all monitoring personnel. Archaeological and Native American monitors on-site shall follow all policies and procedures for safety during project implementation. Safety equipment must be worn by archaeological and Native American monitors at all times while on the project site. This includes high visibility vests with reflective material, hard toe shoes, hard hats, and protective eyewear. The monitors shall maintain Occupational Safety and Health Administration (OSHA) standards of protective safety. The monitors shall not access any deep trenches unless the trench walls have been prepared using OSHA standards of safety, including shoring or excavation techniques of sloping or benching the sidewalls. Work near heavy equipment shall be conducted as close to the excavations as can be accomplished while ensuring the safety of the monitors. As necessary, the grading equipment shall be diverted to allow inspection by the monitors.

If applicable, individuals involved in the monitoring program must have completed the 40-hour HAZWOPER training with certification documentation (Hazardous Waste Operations and Emergency Response; 29 CFR 1910.120).

## 7.7 Discovery of Human Remains

There is a possibility that the Project's construction-related activities may encounter human burials or cremations. Therefore, if the Project's construction-related activities find potential human remains, ground-disturbing activities in the area of the discovery shall **immediately** be halted or redirected, while a temporary CEZ surrounding the site of discovery is established to allow for further examination and treatment of the find. The archaeological monitor shall immediately notify the PI, who shall then notify the PMOC. The PMOC will notify the City of Inglewood. After consulting with the City of Inglewood either in person or via telephone, the PI shall notify the Los Angeles County Coroner's Office by telephone, pursuant to Health and Safety Code 7050.5. The City shall notify the FTA on the same day of the discovery. The FTA shall in turn notify the SHPO, ACHP, and Consulting Tribe(s) within 48 hours of discovery to provide notification of potential human remains being observed during the implementation of the undertaking.

The Coroner, in consultation with the PI, the City, and FTA, would determine the need for a field examination to determine the provenience. The information provided should also indicate whether, and if so, how it was determined that the human remains were an isolated find or constituents of a larger archaeological context.

By law, the Coroner will determine within 48 hours of being notified if the remains are subject to his or her authority. If the human remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission, which will determine and notify a MLD. The MLD shall complete the inspection of the site within 48 hours of being granted access and provide recommendations to the property owner and FTA for the treatment of any human remains and associated artifacts associated with Native American burials.

## 7.8 List of Contacts

Approximately 6-8 months prior to the start of construction and prior to the award of the bid for construction of the Project, the City shall identify the individuals to fill the key roles outlined in this Plan during review of the project bids. The qualifications of the individuals from the selected firm shall be provided prior to award for construction. Once the individuals have been selected, their contact information shall be distributed to FTA, the City of Inglewood, and all construction supervisors as outlined in Table 2 below.

**Table 2 Individual Contact Information**

Agency/Company	Agency/ Company Contact	Title/Role	Email	Phone Number
FTA	Mervin Acebo	Transportation Program Specialist	Mervin.acebo@dot.gov	(213) 202-3957
FTA	Charlene Lee Lorenzo	Director of the Los Angeles Office	Charlene.leelorenzo@dot.gov	(213) 202-3952
FTA	Candice Hughes	Environmental Protection Specialist	candice.hughes@dot.gov	(213) 629-8613
LACMTA	Paul Whang	Advisor	whangp@metro.net	(213) 922-4705
City of Inglewood	Louis Atwell	Chief Executive Officer	latwell@cityofinglewood.org	(310) 412-5333
Gannet Fleming – PMOC/Construction Manager	Chris Metzger	PMOC/Construction Manager	cmetzger@gfnet.com	925.998.1550
Principal Investigator/ Company TBD	TBD	TBD/Archaeological Oversight	TBD	TBD
Archaeological Monitor	TBD	TBD/Archaeological Monitoring		
Los Angeles County Coroner	Los Angeles County Department of Medical Examiner- Coroner	Medical Examiner- Coroner	n/a	(323) 343-0512 (323) 343-0714
Andrew Salas, Kizh Nation Chairman	Gabrieleño Band Of Mission Indians Kizh Nation	Chairman/Consulting Tribe	admin@gabrielenoindians.org	(844) 390- 0787
Christina Conley	Gabrielino Tongva Indians of California	Native American Heritage Commission Contact/Consulting Tribe	<a href="mailto:christina.marsden@alumni.usc.edu">christina.marsden@alumni.usc.edu</a>	
Robert Dorame, Chairperson	Gabrielino Tongva Indians of California	Chairman/Consulting Tribe	<a href="mailto:gtongva@gmail.com">gtongva@gmail.com</a>	(562) 761- 6417
Matt Tuetimez, Kizh Nation	TBD	TBD/Tribal Monitor	TBD	TBD

## 8 References

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Harrington, John P. 1942 "Cultural Element Distributions: XIX Central California Coast." *University of California Anthropological Records* 7(1): 1–46.

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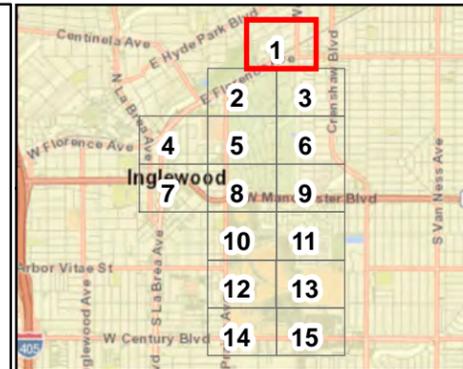
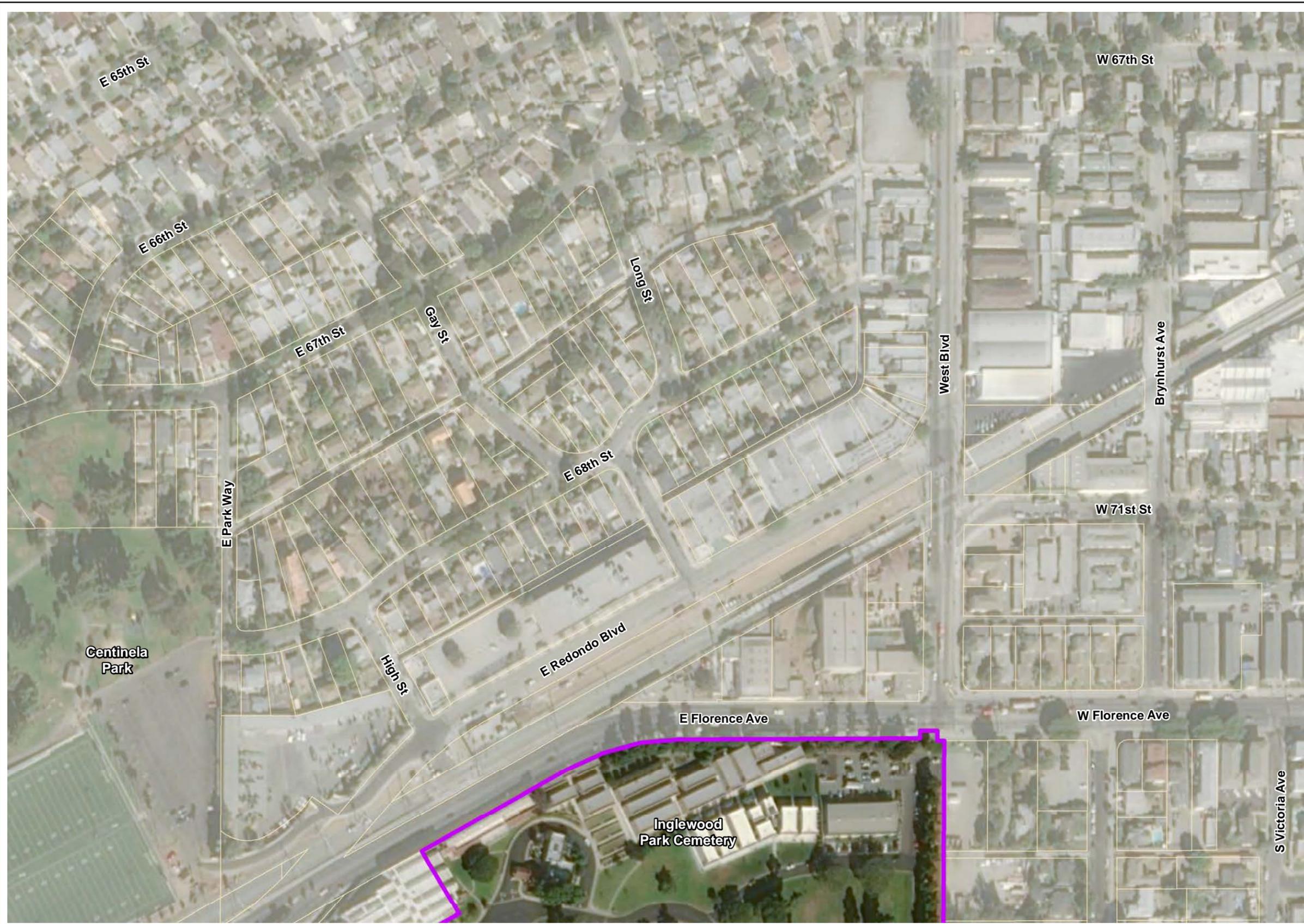
# Appendix A

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APE Map



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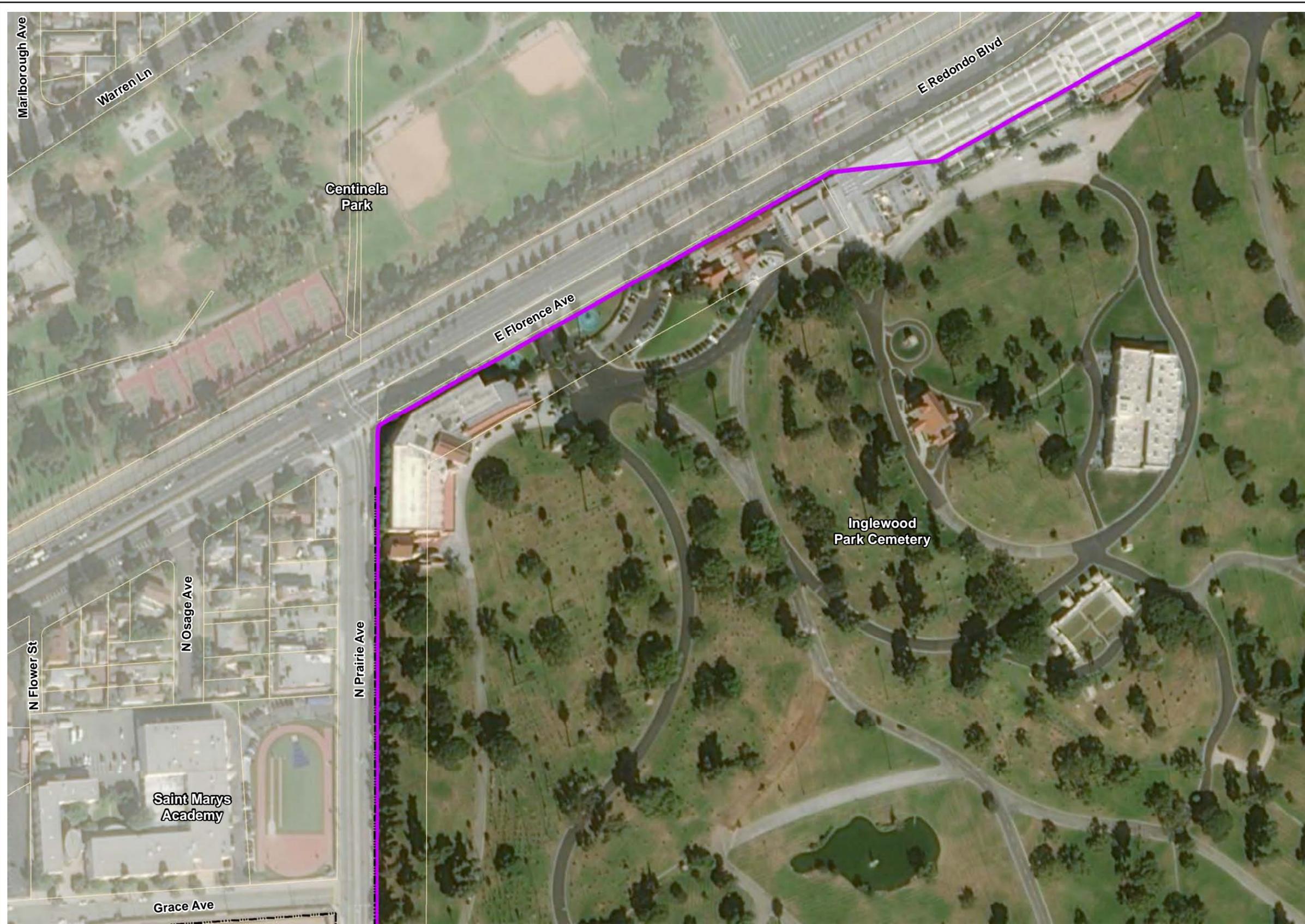


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  - Project Design
  - Right-of-way
  - Parcel Boundary

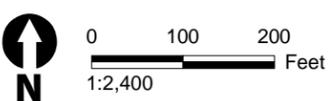


**Figure 1, Sheet 1 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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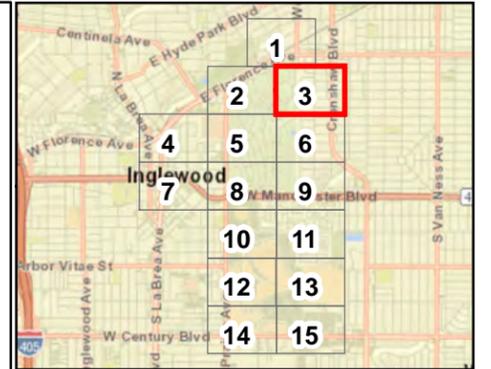
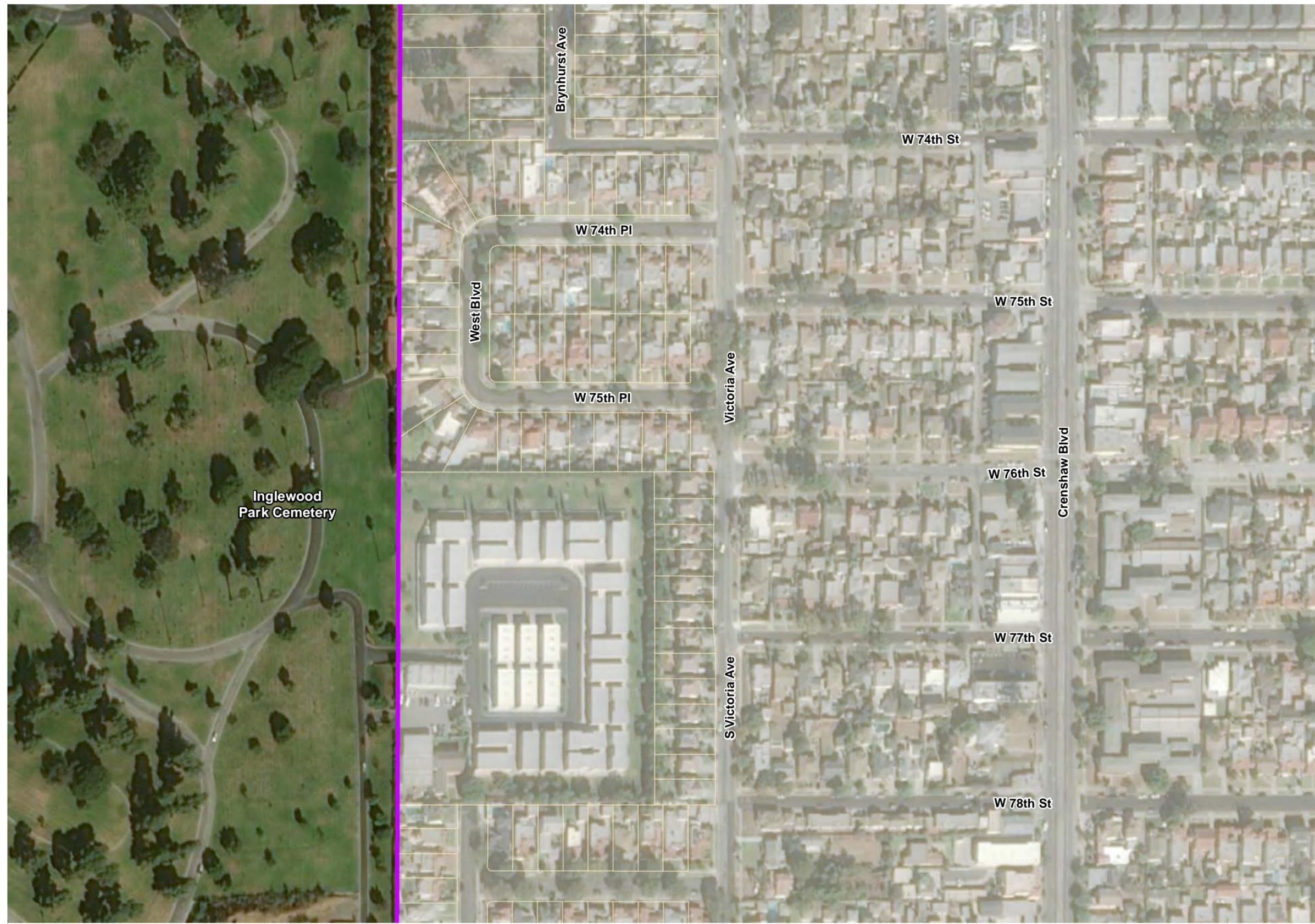


- Legend**
- APE
  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 2 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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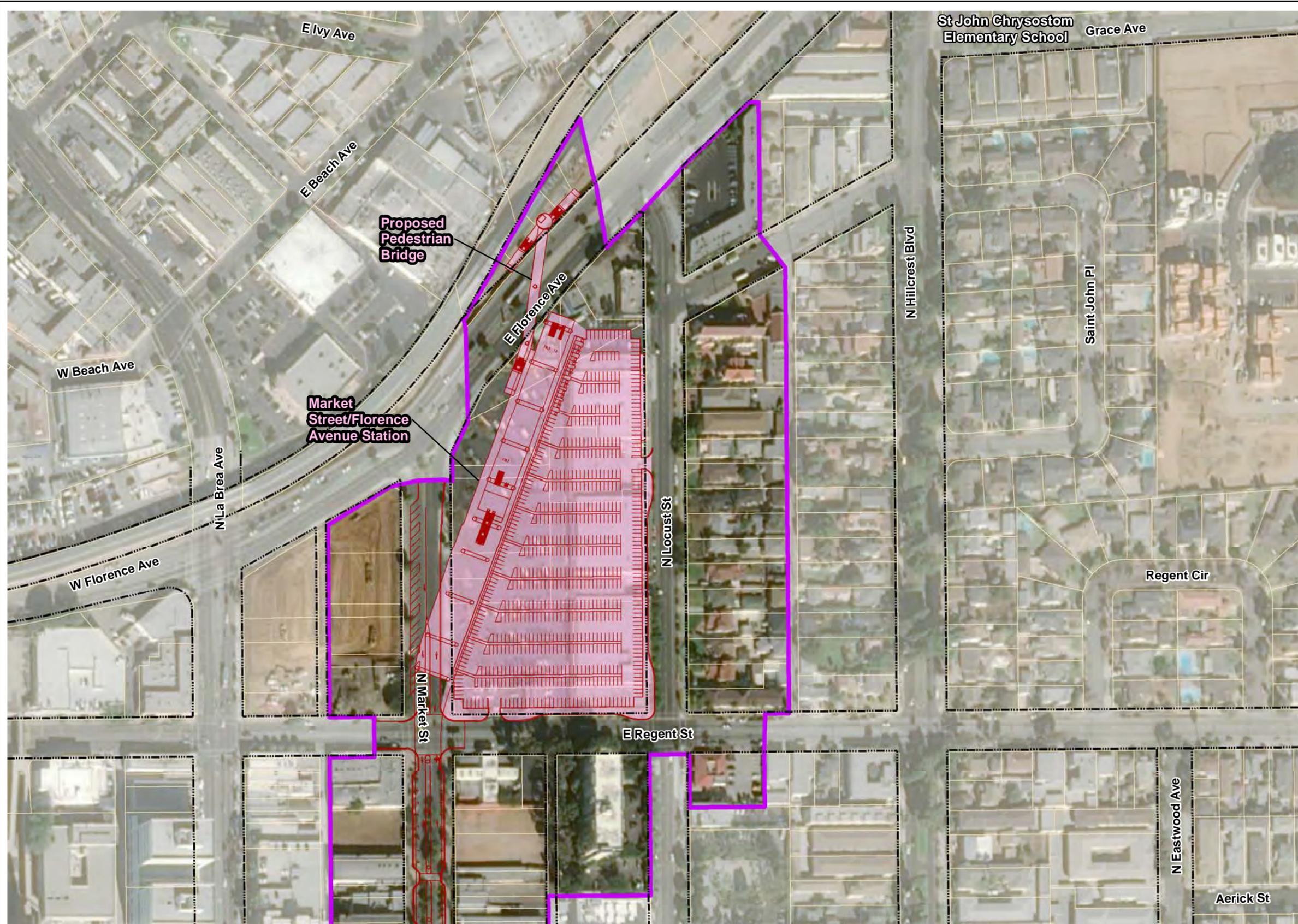


- Legend**
- APE
  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 3 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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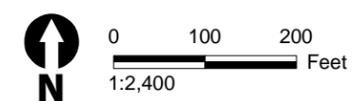
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- APE
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  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 4 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

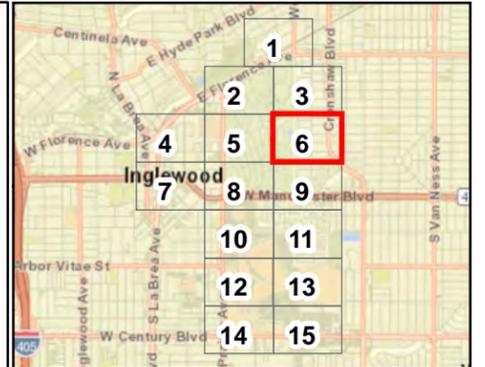


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**Figure 1, Sheet 5 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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- Legend**
- APE
  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 6 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

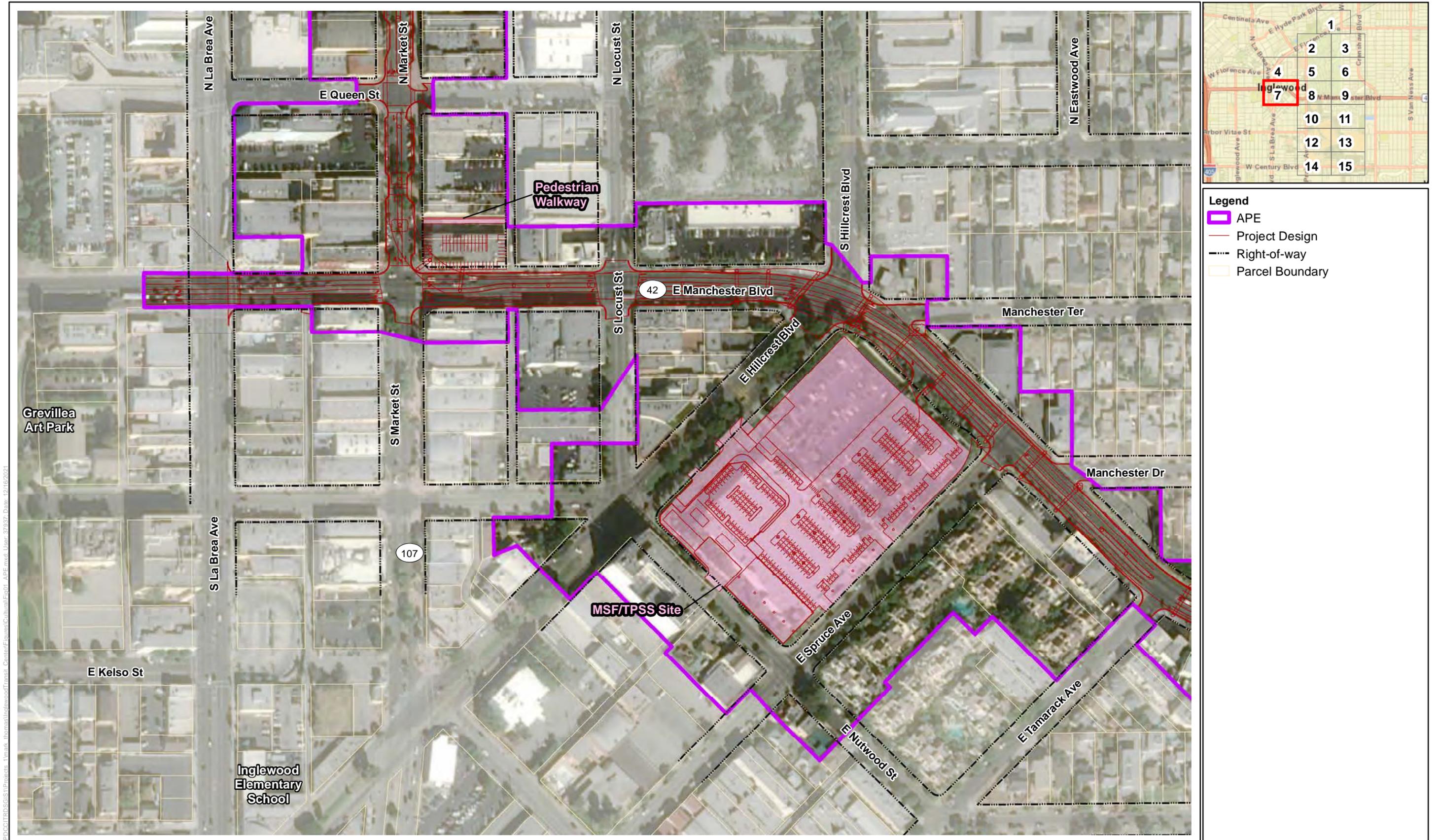
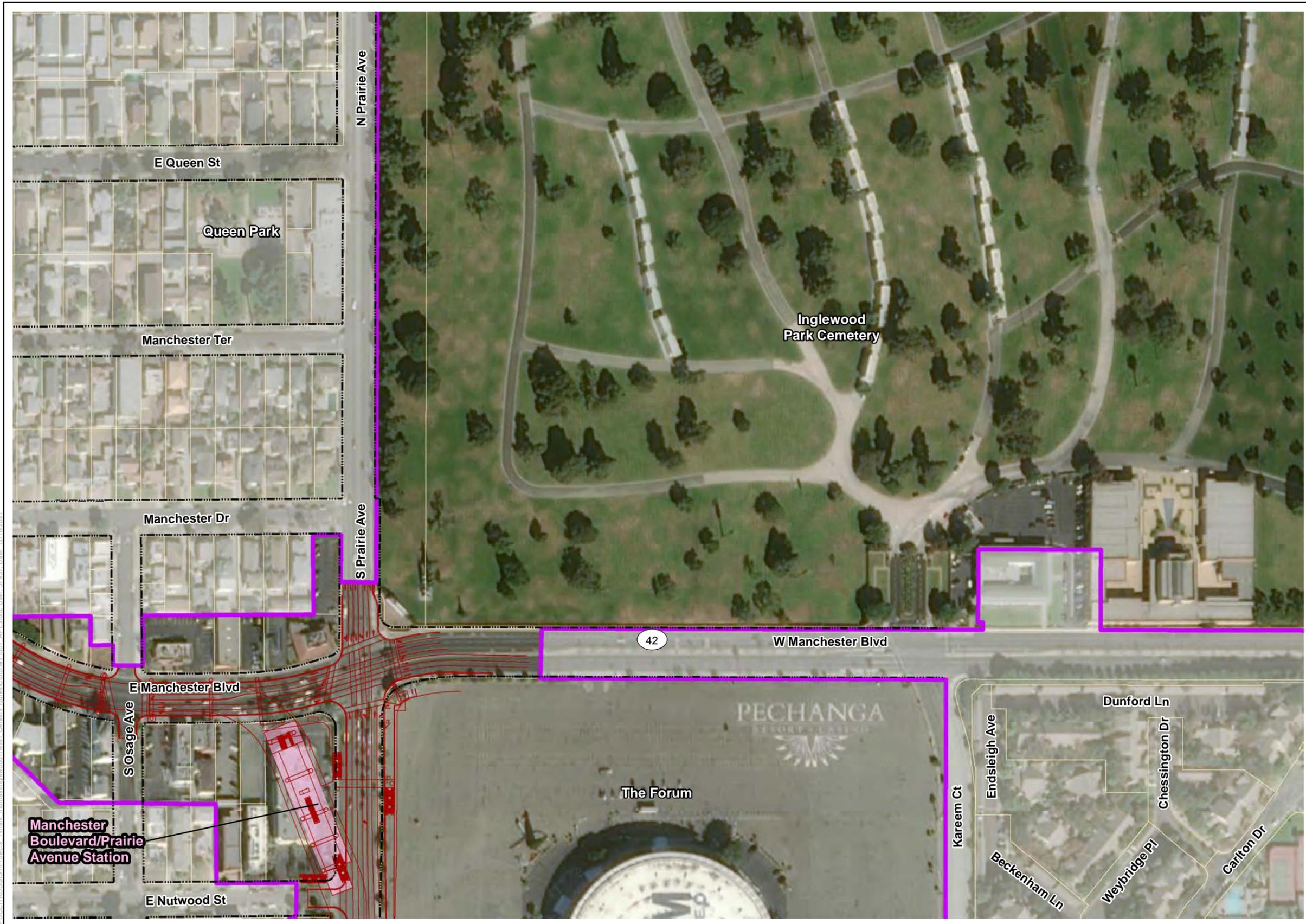
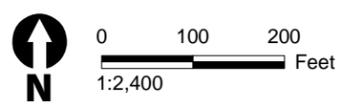


Figure 1, Sheet 7 of 15  
 Area of Potential Effects (APE)  
 Inglewood Transit Connector

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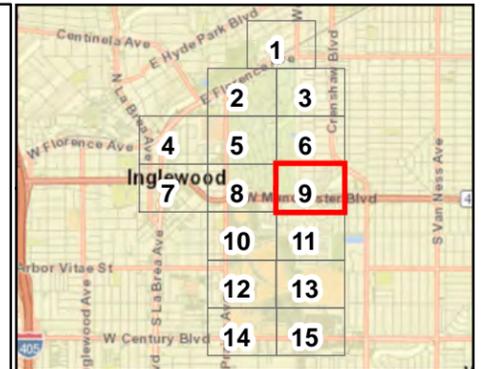


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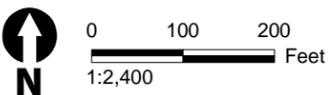


**Figure 1, Sheet 8 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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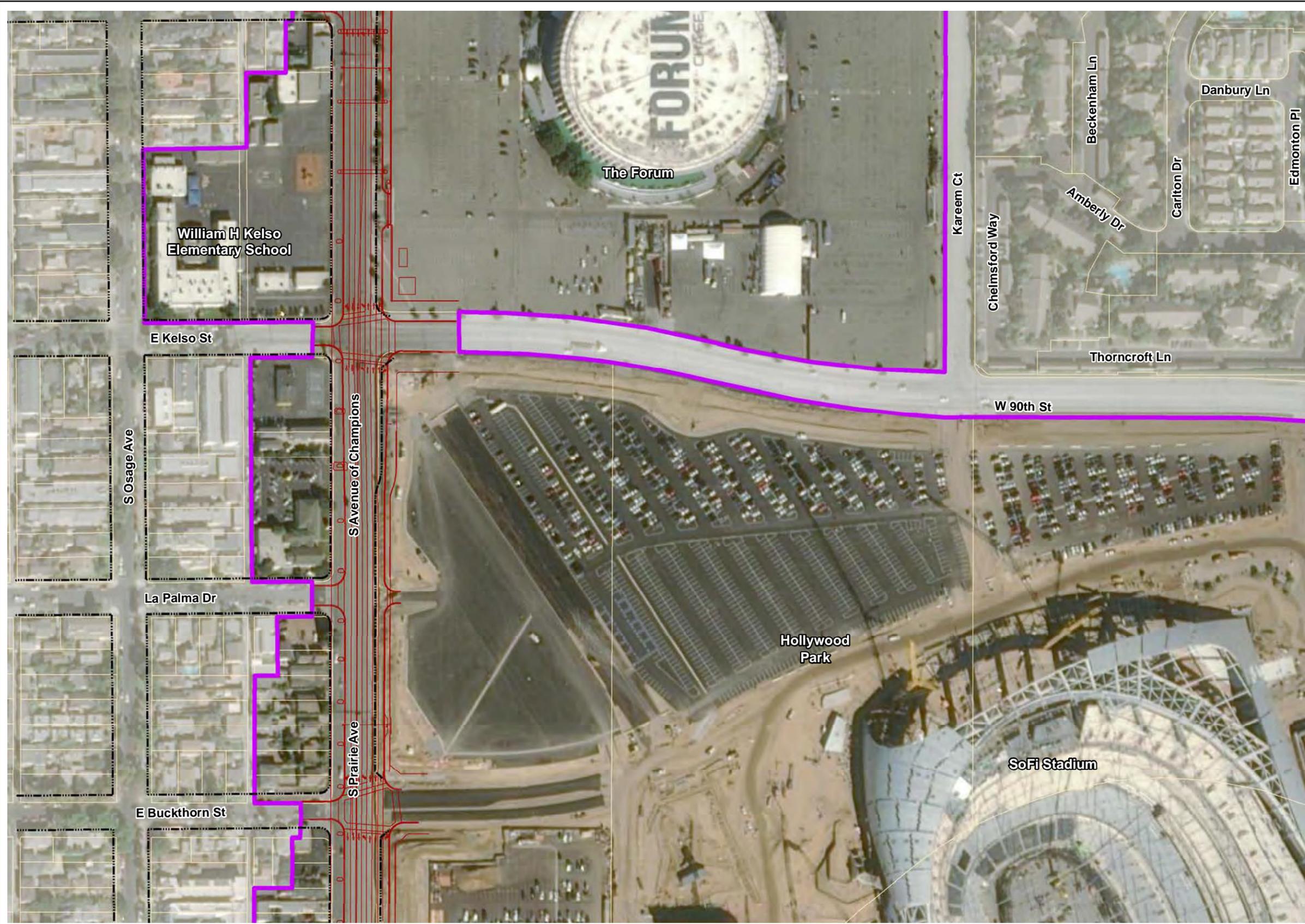


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  - Right-of-way
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**Figure 1, Sheet 9 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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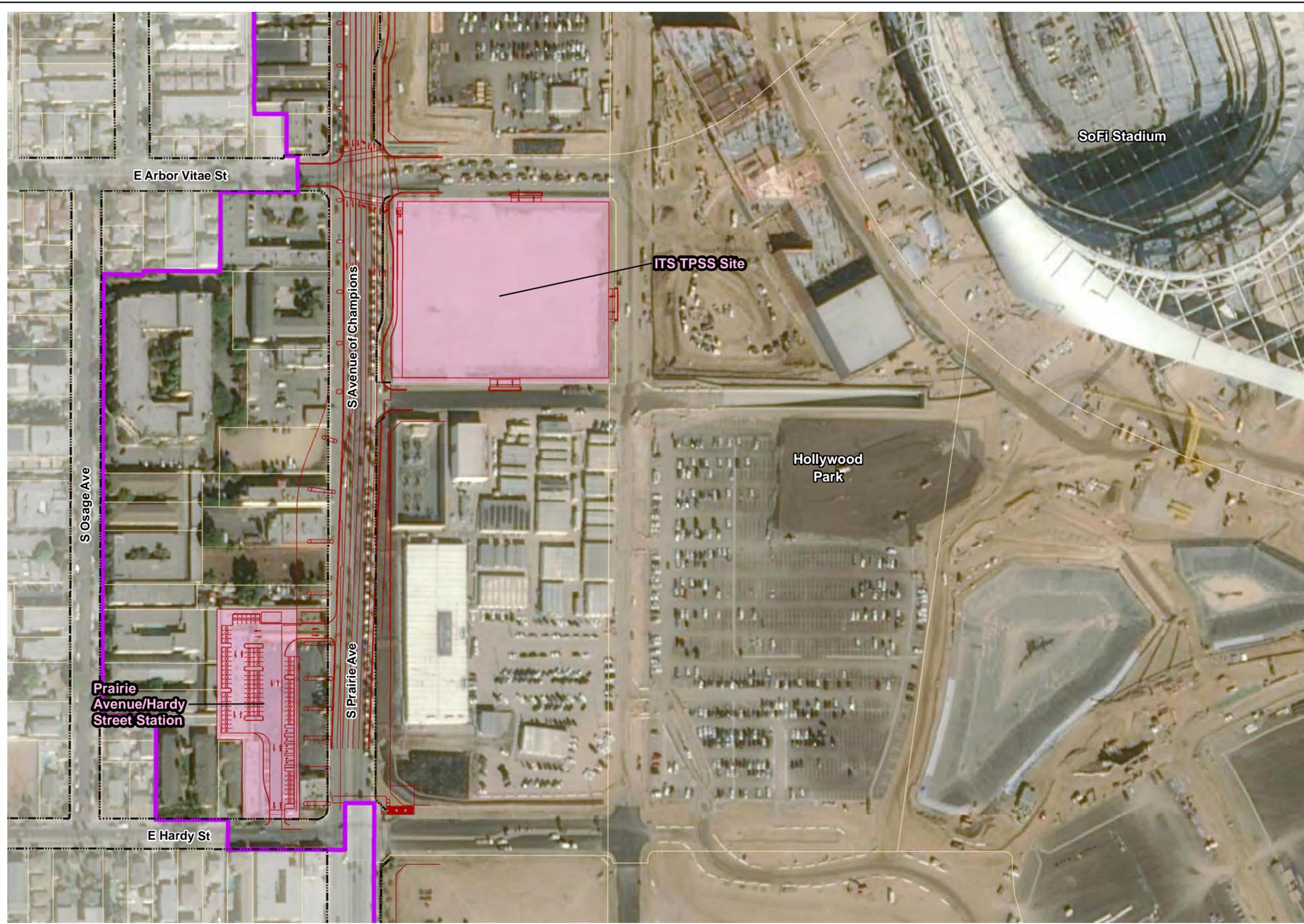
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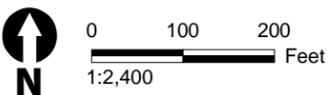
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**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**



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- Legend**
- APE
  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 12 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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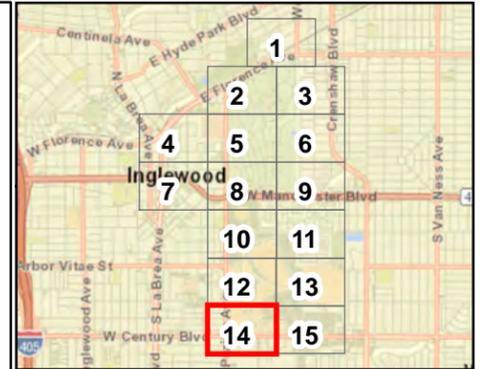


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  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 13 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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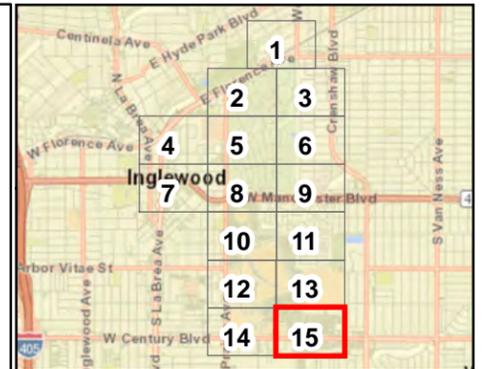


- Legend**
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  - Parcel Boundary



**Figure 1, Sheet 14 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

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- Legend**
- APE
  - Project Design
  - Right-of-way
  - Parcel Boundary



**Figure 1, Sheet 15 of 15**  
**Area of Potential Effects (APE)**  
**Inglewood Transit Connector**

# Appendix B

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Daily Monitoring Form



## Daily Monitoring Report

<b>Project Number:</b>		<b>Project Name:</b>	
<b>Monitor:</b>			
<b>Date:</b>	<b>Start Time (24 hour):</b>	<b>Stop Time (24 hour):</b>	
<b>Weather (Temperature, wind speed, cloud cover, precipitation):</b>			

**Daily activities and compliance summary in format of Time – Activity (i.e., 07:00 – Arrived at project site):**

**Summary of project related communications:**

**COMPLIANCE**  **REMEDIATION ACTION NEEDED** (see Non Compliance Report)

**Worker Environmental Education Program provided:**  Yes  No

**Activities Monitored:**

**Depth of Ground Disturbance:**

**Soils Description:**

**See final page for additional notes regarding non-compliances, if any.**

**Native American Monitor Name and Affiliation:**

**Archaeological Discovery Made?**  Yes  No

**Paleontological Discovery Made?**  Yes  No

**Photo Documentation:**

**Cultural Resources Monitoring Log: Cultural Discovery Form**

(add continuation sheets as necessary)

Page \_\_\_\_ of \_\_\_\_

Project No.: \_\_\_\_\_ Project Name: \_\_\_\_\_ Monitor: \_\_\_\_\_ Date: \_\_\_\_\_

**Cultural Data: Cultural Resources Identified?**  **Yes** (complete this page)  **No** (do not complete this page)**Archaeological Features Observed and Artifacts Collected**

PD No.	Description of feature/artifact and of location	Notes/Comments

Description of Site Sediments and Stratigraphy:

Additional Cultural-Specific Notes/Comments: \_\_\_\_\_

Communication with PI/Senior Archaeologist/Project Manager/ Field Personnel: