

4.4 CULTURAL RESOURCES

INTRODUCTION

This section of the Draft EIR examines the potential for the proposed Project's to result in impacts to cultural resources, including archaeological, paleontological, and historic resources. This section is based on information from the *Compton Unified School District: Compton High School—Historical Resource Analysis* (Historical Report), dated June 2018, by Summit Consultants Inc., and the *Archaeological Assessment for the Compton High School Reconstruction Project* (Cultural Report), dated January 2018, by SWCA Environmental Consultants (SWCA), provided as **Appendices E** and **F**, respectively, to this Draft EIR.

ENVIRONMENTAL SETTING

Regulatory Framework

Historic resources fall within the jurisdiction of several levels of government. Federal laws provide the framework for the identification and, in certain instances, protection of historic resources. Additionally, states and local jurisdictions play active roles in the identification, documentation, and protection of such resources within their communities. The primary federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance are the National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources (California Register), Public Resources Code (PRC) 5024. As archaeological resources are also considered historic, regulations applicable to historic resources are also applicable to archaeological resources and are discussed and analyzed in this section. Descriptions of these relevant laws and regulations are presented below.

a. Federal

Archaeological Resources Protection Act

The intent of the Archaeological Resources Protection Act of 1979 (ARPA) is to ensure preservation and protection of archaeological resources on public and Native American lands.¹ ARPA places primary emphasis upon a Federal permitting process in order to control the disturbance and investigation of archaeological sites on these lands. In addition, ARPA's protective provisions are enforced by civil penalties for violation of the Act.

Under this regulation, the term "archaeological resources" include but are not limited to:

1 16 United States Code (USC). sec. 470aa–470mm, Archaeological Resources Protection Act of 1979, Public Law (PL) 96-95, as amended.

pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Nonfossilized and fossilized paleontological specimens, or any portion or piece thereof, shall not be considered archaeological resources, under the regulations under this paragraph, unless found in an archaeological context. No item shall be treated as an archaeological resource under regulations under this paragraph unless such item is at least 100 years of age.²

ARPA mandates consultation procedures before initiation of archaeological research on Native American lands or involving Native American archaeological resources. Section 4(c) requires Native American tribes be notified of possible harm to, or destruction of, sites having religious or cultural significance to that group. The Federal land manager must notify affected tribes before issuing the permit for archaeological work. Section (g)(2) specifies that permits to excavate or remove archaeological resources from Indian lands require consent of the Native American or Native American tribe owning or having jurisdiction over such lands. The permit, it is also stipulated, must include such terms and conditions as may be requested by the affected Native Americans.

Concerning the custody of archaeological resources, ARPA stipulates that any exchange or ultimate disposition of archaeological resources excavated or removed from Native American lands must be subject to the consent of the Native American or Native American tribe that owns or has jurisdiction over such lands.

Paleontological Resources Preservation Act

In 2009, the Paleontological Resources Preservation Act (PRPA) became law when President Barack Obama signed the Omnibus Public Land Management Act of 2009, Public Law 111-011.³ The PRPA requires the secretaries of the interior and agriculture to manage and protect paleontological resources on federal land using scientific principles and expertise. The PRPA includes specific provisions addressing management of these resources by federal agencies. It provides authority for the protection of paleontological resources on federal lands, including criminal and civil penalties for fossil theft and vandalism. The PRPA only applies to federal lands and does not affect private lands.

-
- 2 16 USC sec. 470aa–470mm, Archaeological Resources Protection Act of 1979, Public Law 96-95, as amended, sec. 3, accessed July 2018, available at https://www.nps.gov/subjects/historicpreservation/upload/NPS_FHPL_book_online.pdf.
 - 3 PL 111-011, tit. VI, subtit. D on Paleontological Resources Preservation (known by its popular name, the Paleontological Resources Preservation Act) (123 Stat. 1172; 16 USC 470aaa).

National Historic Preservation Act

The 1966 NHPA authorized formation of the National Register of Historic Places (National Register) and coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. Buildings, districts, sites, and structures may be eligible for listing in the National Register if they possess significance at the national, State, or local level in American history, culture, architecture, or archaeology and, in general, are more than 50 years old. Significance is measured against the following established criteria (National Register Bulletin 16):

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

Section 106 (Protection of Historic Properties) of the NHPA requires federal agencies to take into account the effects of their undertakings on historic properties. A Section 106 Review refers to the federal review process designed to ensure that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation (ACHP), an independent federal agency, administers the review process, with assistance from the State Historic Preservation Offices (SHPOs). If any impacts are identified, the agency undergoing the project must identify the appropriate SHPO to consult with during the process.

The ACHP includes requirements for consultation with Native American tribes when federal agencies are undertaking an activity that could cause harm to a historic resource or a potential historic resource under Title 36 of the Code of Federal Regulations, Part 800, Protection of Historic Properties, which became effective January 11, 2001.

National Register of Historic Places

The National Register was established by the NHPA, 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.”⁴ The National Register recognizes properties that are significant at the national, State, and/or local levels.

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of the following four established criteria:⁵ (a) Associated with events that have made a significant contribution to the broad patterns of our history; or (b) Associated with the lives of persons significant in our past; or (c) Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or (d) Potential to yield information important in prehistory or history.

b. State

California Public Resources Code

Archaeological, paleontological, and historical sites are protected pursuant to a wide variety of State policies and regulations enumerated under the PRC. In addition, cultural and paleontological resources are recognized as a nonrenewable resource and, therefore, receive protection under the PRC and CEQA.

As part of the determination made pursuant to PRC Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources (PRC Section 21083.2). PRC Section 21083.2(b) provides the following guidance on how to mitigate or avoid the significant effects that a project may have on unique archeological resources, stating:

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

- (1) Planning construction to avoid archaeological sites.*
- (2) Deeding archaeological sites into permanent conservation easements.*
- (3) Capping or covering archaeological sites with a layer of soil before building on the sites.*

4 36 Code of Federal Regulations (CFR), pt. 60.2.

5 36 CFR, pt. 60.4.

(4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

As defined within PRC Section 21083.2(g), “unique archaeological resource” means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

As defined in PRC Section 21083.2(h), “nonunique archaeological resource” means an archaeological artifact, object, or site that does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration other than the simple recording of its existence by the lead agency, if it so elects. Pursuant to PRC Section 21083.2(i), as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

If additional archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

Personnel of the proposed Project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

- Distinctive features, finishes, and construction techniques or examples of skilled craftsmanship which characterize an historic property shall be preserved.
- Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive historic feature, the new feature shall match the old in design, color, texture, and other visual qualities, and where possible, materials. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence.

- Chemical or physical treatments, such as sandblasting, that cause damage to historic materials shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
- Significant archaeological resources affected by a project shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
- New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.
- New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

State regulations mandate protection of paleontological resources on public lands, and CEQA requires evaluation of impacts to paleontological sites. Paleontological resources are also subject to certain State regulations for historical resources. Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, indicating that a project would have a significant impact on paleontological resources if it were to disturb or destroy a unique paleontological resource or site or unique geologic feature. Section 5097.5 of the PRC specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, California Penal Code Section 622.5 sets the penalties for the unlawful damage or removal of paleontological resources.

California Register of Historical Resources

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

- a) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.*
- b) Is associated with the lives of persons important in our past.*
- c) Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.*

- d) *Has yielded, or may be likely to yield, information important in prehistory or history [Public Resources Code Section 5024.1(c)].*

Historical resources meeting one or more of the criteria listed above are eligible for listing in the California Register. In addition to significance, resources must have integrity for a period of significance—the date or span of time within which significant events transpired or significant individuals made important contributions. Important archaeological resources are required to be at least 50 years old to be considered. “Integrity is the authenticity of a historical resource’s physical identity evidenced by the survival of characteristics that existed during the resource’s period of significance.” Simply put, resources must “retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance.”⁶

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

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

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

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

6 Secretary of the Interior's Standards and Guidelines, Archeology and Historic preservation. 1983.

California Environmental Quality Act

CEQA and the CEQA Guidelines have specific provisions relating to the evaluation of a project's impact on historical and unique archaeological resources.

PRC Section 21084.1 and Section 15064.5 of the CEQA Guidelines together establish the prevailing test for determining whether a resource can or must be considered a historical resource under CEQA. First, a resource is considered a historical resource for purposes of CEQA if it is listed or "deemed eligible for listing" in the California Register by the State Historical Resources Commission (SHRC).⁷ Second, it will be considered a historical resource, based on a presumption of significance, if it is either (1) listed in a local register of historic resources as defined in PRC Section 5010.1.4, or (2) identified in a local survey of historic resources meeting the criteria set forth in PRC Section 5024.1.5. If a resource meets either of these criteria, the lead agency must treat the resource as historically significant unless the "preponderance of the evidence" indicates that the resource is not historically significant. Third, a lead agency may find a resource to be a historical resource even though it is not formally listed in the California Register, listed in a local register, or identified in a local survey.⁸ Any such determination must be based on substantial evidence in light of the whole record.

CEQA also provides further guidance with respect to historical resources of an archeological nature and unique archaeological resources. A unique archeological resource is defined in PRC Section 21083.2(g) as:

[A]n archaeological artifact, object or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: (1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information, (2) has a special and particular quality such as being the oldest of its type or best available example of its type, and (3) is directly associated with a scientifically recognized important prehistoric or historic event or person.

According to the CEQA Guidelines Section 15064.5(b): "A project with an effect that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." This section of the guidelines defines historical resources as including both the built environment and archaeological resources.

7 PRC sec. 21084.1 and 15064.5

8 PRC sec. 21084.1; sec. 15064.5(a)(3)(4)

A substantial adverse change is defined in the CEQA Guidelines Section 15064.5(4)(b)(1), as “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.” The significance of an historical resource is materially impaired, according to the CEQA Guidelines Section 15064.5(4)(b)(2), when a project:

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

The CEQA Guidelines provide that “generally,” a project that follows the Secretary’s Standards “shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

At the same time, however, a failure to precisely conform to the Secretary’s Standards in all respects does not necessarily mean that a project necessarily has a significant adverse impact on historical resources. There are circumstances where a project impacting historical resources may fail to conform to the Secretary’s Standards, and yet the lead agency can conclude based on substantial evidence that the overall impact is insignificant because the project does not “materially impair” the historical resource within the meaning of Section 15064.5(b).

CEQA Guidelines Section 15064.5 subsection (c) addresses impacts on archaeological sites. That section provides as follows:

- (1) *When a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a).*
- (2) *If a lead agency determines that the archaeological site is an historical resource, it shall refer to the provisions of Section 21084.1 of the Public Resources Code and this section, Section 15126.4 of the Guidelines, and the limits contained in Section 21083.2 of the Public Resources Code do not apply.*
- (3) *If an archaeological site does not meet the criteria defined in subsection (a) but does meet the definition of a unique archaeological resource in Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2. The time and cost limitations described in Public Resources Code Section 21083.2 (c–f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.*

For historical resources of an archaeological nature, “preservation in place is the preferred manner of mitigating impacts to archaeological sites.”⁹ “When recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provisions for adequately recovering the scientifically consequential information from and about the historical resource, shall be prepared and adopted prior to any excavation being undertaken.” In practice, the California Office of Historic Preservation (OHP) has consistently determined that excavation, coupled with implementation of a data recovery plan, does not result in a significant environmental impact on a historical resource of an archaeological nature.

If a project would cause “damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state....To the extent that unique archaeological resources are not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision.”¹⁰ CEQA Guidelines Section 15064.5(f) provides that “a lead agency should make provisions for historical or unique archaeological resources accidentally discovered during construction.”

CEQA Guidelines Section 15064.5(d) specifies a process for evaluating human remains, and this issue is identified on the CEQA Checklist as an issue for evaluation in environmental documents. In addition, the

⁹ CEQA Guidelines sec. 15126.4(b)(3)(A).

¹⁰ PRC sec. 21083.2(b) and (c)

CEQA Checklist identifies the presence of paleontological resources as an environmental concern that needs to be considered.

State Health and Safety Code

If human remains are encountered unexpectedly during implementation of a project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98.¹¹

If the remains are determined to be of Native American descent, the following procedure must be observed:

- a) The immediate vicinity must be secured according to generally accepted cultural or archaeological standards or practices.
- b) The coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- c) The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the Project Applicant, inspect the site of the discovery of the Native American remains and may recommend means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods.
- d) The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the Project Applicant to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. The area must not be damaged or disturbed by further development activity until the Applicant has discussed and conferred with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.
- e) If the Project Applicant or his or her authorized representative rejects the recommendation of the MLD, the Project Applicant or MLD may request mediation per Subdivision (k) of PRC Section 5097.94.
- f) If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the mediation provided for in Subdivision (k) of PRC Section 5097.94, if invoked, fails to provide reasonable treatment, then the human remains and items associated with Native American human remains must be interred with appropriate dignity on the property in a location not subject to further and future subsurface disturbance.

¹¹ California Health and Safety Code, sec. 7050.5 and 5097.98

c. Local

City of Compton

General Plan

The City's existing General Plan was adopted in December 1991, with its 2030 Comprehensive General Plan Update currently in the working draft stages.¹² The General Plan serves as a blueprint for planning and development in the City and indicates the community's vision for the future. The City's adopted General Plan does not currently contain any goals or policies related to cultural or historic resources; nor does the City of Compton have a historic preservation ordinance.

Given that the City currently does not have an adopted historic preservation program, the existing CHS campus and the properties within the acquisition area are not evaluated for local designation.

Existing Conditions

a. Regional and Local Setting

The Project Site is in the Los Angeles Basin: a broad, level plain defined by the Pacific Ocean to the west; the Santa Monica Mountains and Puente Hills to the north; and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments. It is drained by several major watercourses, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana Rivers. The Project Site is within an urbanized setting at an elevation of approximately 68 feet above mean sea level. The Project Site is located approximately 9.3 miles north of the Port of Los Angeles, 2.3 miles west of the Los Angeles River, and directly adjacent to the east of Compton Creek (with an approximately 20-foot buffer). Until the early 20th century, when concrete flood channels were built throughout Los Angeles County, the Project Site and surrounding vicinity were subject to various flooding episodes as a result of its location near the confluence of the Los Angeles River and its tributaries

b. Cultural Setting

Prehistoric Background

Numerous chronological sequences have been devised to aid in understanding cultural changes in Southern California. The four principal prehistoric periods for the Southern California coastal region are

¹² City of Compton, *Draft 2030 Comprehensive General Plan Update* (November 6, 2014).

the Early Man, Milling Stone, Intermediate, and Late Prehistoric periods.¹³ A summary of each of these prehistoric chronological sequences for southern California is described below.

Early Man (10,000–6,000 BCE)

The earliest accepted dates for archaeological sites on the Southern California coast are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area about 10,000 years ago. On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago. Present-day Orange and San Diego Counties contain several sites dating from to 9,000 to 10,000 years ago. Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin (e.g., Los Angeles Man, La Brea Woman, and the Haverty skeletons) apparently date to the middle Holocene, if not earlier.

Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas and a greater emphasis on large-game hunting inland.

Milling Stone (6,000–3,000 BCE)

Set during a drier climatic regime than the previous horizon, the Milling Stone Horizon period is characterized by subsistence strategies centered on collecting plant foods and small animals. The importance of seed processing is apparent in the dominance of stone-grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos). Recent research indicates that Milling Stone Horizon food-procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions.

In the Ballona Wetlands area, the Milling Stone period represented the beginning of many changes in the settlement of the area. The influx of Takic-speaking peoples into the Los Angeles Basin resulted in an increase of sites, new subsistence strategies, and new mortuary practices.

Intermediate (3,000 BCE–500 CE)

The Intermediate Horizon period is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this period along the California coast. Related chipped-stone tools suitable for hunting are more abundant and diversified, and shell fishhooks became part of

13 William J. Wallace, "A Suggested Chronology for Southern California Coastal Archaeology," in *Southwestern Journal of Anthropology* 11 no. 3 (1955): 214–230.

the toolkit during this period. Mortars and pestles also became more common during this period, gradually replacing manos and metates as the dominant milling equipment, signaling a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn.

In the Ballona area, the intermediate period saw the continued growth of population; all major sites were occupied. This period also corresponds with the highest amount of precipitation in thousands of years, increasing the productivity of the wetlands and allowing for a higher population to be supported.

Late Prehistoric (500 CE–Historic Contact)

In the Late Prehistoric Horizon, there was an increase in the use of plant food resources, in addition to an increase in land and sea mammal hunting. There was a concomitant increase in the diversity and complexity of material culture during the Late Prehistoric, demonstrated by more classes of artifacts. The recovery of a greater number of small, finely-chipped projectile points suggests increased use of the bow and arrow rather than the atlatl (spear thrower) and dart for hunting. Steatite cooking vessels and containers are also present in sites from this time. In addition, there is an increased presence of smaller bone and shell circular fishhooks; perforated stones; arrow-shaft straighteners made of steatite; a variety of bone tools; and personal ornaments, such as beads made from shell, bone, and stone. There was also an increased use of asphalt for waterproofing and as an adhesive. Late Prehistoric burial practices are discussed in the **Ethnographic Overview** section below.

By 1,000 CE, fired-clay smoking pipes and ceramic vessels were being used at some sites. The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that ceramics were obtained by trade with neighboring groups to the south and east. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages. Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In anthropologist Claude Warren's cultural ecological scheme,¹⁴ the period between AD 500 and European contact is divided into three regional patterns: Chumash (Santa Barbara and Ventura Counties),

14 Claude N. Warren, "Cultural Tradition and Ecological Adaptation on the Southern California Coast," in *Archaic Prehistory in the Western United States*, Contributions in Anthropology No. 1(3), edited by Cynthia Irwin-Williams (Portales, NM: Eastern New Mexico University, 1968).

Takic/Numic (Los Angeles, Orange, and western Riverside Counties), and Yuman (San Diego County). The seemingly abrupt introduction of cremation, pottery, and small, triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside Counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino/Tongva, Juaneño, and Luiseño people in this region are considered to be the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast during this period.¹⁵

Ethnographic Background

The Project Site is in the heart of territory for the Gabrielino/Tongva native groups. Surrounding native groups include the Chumash and Tatataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The Gabrielino/Tongva lands encompassed the greater Los Angeles Basin and three Channel Islands—San Clemente, San Nicolas, and Santa Catalina. Their mainland territory was bounded on the north by the Chumash at Topanga Creek; the Serrano at the San Gabriel Mountains in the east; and the Juaneño on the south at Aliso Creek.

The Gabrielino/Tongva established large, permanent villages in the fertile lowlands along rivers and streams, and in sheltered areas along the coast, stretching from the foothills of the San Gabriel Mountains to the Pacific Ocean. A total tribal population has been estimated of at least 5,000, but recent ethnohistoric work suggests that a number approaching 10,000 seems more likely. Several Gabrielino/Tongva villages appear to have served as trade centers due in large part to their centralized geographic position in relation to the southern Channel Islands and to other tribes. These villages maintained particularly large populations and hosted annual trade fairs that would bring their population to 1,000 or more for the duration of the event.

Historical Background

Compton is one of the oldest cities in Los Angeles County, and was only the eighth to incorporate. First settled in 1867 by 30 Methodist families, the city got its name from the head of this expedition, Griffith Dickenson Compton. The pioneering families had traveled from Stockton, California, looking for new ways to sustain themselves and their families in the face of rapidly depleting gold fields. The land that that would become Compton had been originally a part of the Rancho San Pedro land grant and was subdivided in 1867 into the Temple and Gibson tract. The pioneering group from Stockton ultimately purchased 4,600

15 SWCA Environmental Consultants, *Archeological Assessment for the Compton High School Reconstruction Project* (January 2018).

acres of land in this tract from F. P. F Temple and F. W. Gibson. The first few years in the area the town was known as Gibsonville, after one of the original tract owners; shortly after, the name was changed to Comptonville, after the original expedition leader. However, a town in Yuba County was already called Comptonville, causing confusion. Finally, in 1869, the town name was shortened to Compton. For the first 20 years of the town's existence, Compton was a part of the City of Los Angeles; however, by 1887, citizens decided to petition for the incorporation of Compton into an autonomous city, a goal that was realized in May of 1888.

In the early 20th century, Compton was an almost exclusively suburban community. A portion of the City, known today as Richland Farms, was zoned for agriculture, while the remainder of the City supported residential development. Compton during this period was a largely working-class residential area, nestled between the industrial centers of Los Angeles County and the Eastside Industrial and Central Manufacturing Districts.

Through the 20th century, the City experienced various economic and social hurdles, including a loss of homeownership, which led to the City's increasing property taxes and annexing land to expand the tax base. All this occurred at the same time that the broader Southern California region was experiencing a downturn in industrial jobs, resulting in an uptick in unemployment in the City. The economic downturn had negative side effects for much of Southern California, including Compton, where unemployment and crime rose.

c. Historical Resources

The Project Site is currently developed with (1) the existing Compton High School (CHS) campus, which contains a variety of educational and recreational facilities, as well as multiple athletic fields, open spaces, and surface parking; (2) the District's Facilities Department and Pupil Services, Enrollment Center, and Special Education offices; and (3) the ten additional parcels to the southeast. A discussion of the historical development of the Project Site is found below.

Compton High School

In 1896, Compton High School began as Compton Union High School in a one room wooden School House. Between 1914 and 1925 the number of students increased to approximately 1,000 students.¹⁶ This required construction of 12 buildings for instruction and administration. In 1927, a community college was added to the campus. In 1953 the community college separated and moved to its own campus, and the high school's name was changed to Compton Senior High School. In 1933, the Long Beach earthquake

16 Includes the District's other facilities comprising the Facilities Department and the Pupil Services, Enrollment Center, and Special Education offices.

destroyed the administration building and severely damaged most of the other buildings. Of the original 12 buildings, only 2 remain today: Buildings E and G, as shown on **Figure 4.4-1: 2003 Compton High School Site Plan**. They were repaired after the 1933 earthquake and have been modified numerous times over the years. Buildings A, D, F, and K and the grandstand were added circa 1938. Buildings H and J were added circa 1950. The remaining buildings were added between circa 1950 and 1960. Numerous portable classrooms and temporary facilities have been added in more recent years. In 2004, a campus “modernization” was performed, and 7 of the buildings—H, J, K, R, S, W, and Z—were remodeled and upgraded. American Disability Act (ADA) compliant restrooms, per 2004 code requirements, were installed in Buildings B, J, K, R, and S. Miscellaneous ADA ramps have been added since then to provide access to the buildings. None of the buildings or landscape are listed in the Pacific Coast Architecture Data Base.¹⁷

The largest and most recognizable building on campus is the auditorium building, which is 2 stories in height and approximately 93,000 square feet. It has a basement that mainly contains storage areas and mechanical equipment. The higher-profile façades at the east side and the southeast and northeast corners exhibit elements of moderne-style architecture. The remainder of the façades are flat-poured, smooth concrete. The moderne elements on the front are typical vertical offset planes, with ribbed details at each window stack. The windows are single-glazed steel sash. All first-floor windows have been retrofitted with steel security screens. The windows, screens, and upper horizontal band detail are painted the school’s color, Columbia blue.

Numerous electrical, plumbing, and mechanical modifications are visible at all buildings. Large piping, conduits, and equipment are attached to the buildings’ façades and adjacent areas. There is a commixture of light fixtures mounted on the various buildings and throughout the campus grounds. The fixtures vary in age and installation method. None of the light fixtures are energy efficient per current requirements, nor is any common specification type or lighting plan evident. No attempt was made to conceal the plumbing, electrical, and mechanical systems that compromise the appearance of the building exteriors and the campus environment. Some of the equipment is obsolete and nonfunctional, yet it remains in place. Four electrical substations provide the overall campus with electricity. These substations, which are open and visible, are located immediately adjacent to the buildings. Temporary rented wood power poles are installed around the campus.

Records do not indicate what architect(s) were involved in the design and construction of the buildings and sitework prior to 1934. As previously noted, only Buildings E and G survived the 1933 Long Beach

17 Summit Consultants Inc. *Compton Unified School District: Compton High School—Historical Resource Analysis* (Historical Report) (June 2018).

earthquake. The architects responsible for design and construction beginning in 1934 are identified below in **Table 4.4-1: Compton High School Known Architects.**

**Table 4.4-1
Compton High School Known Architects**

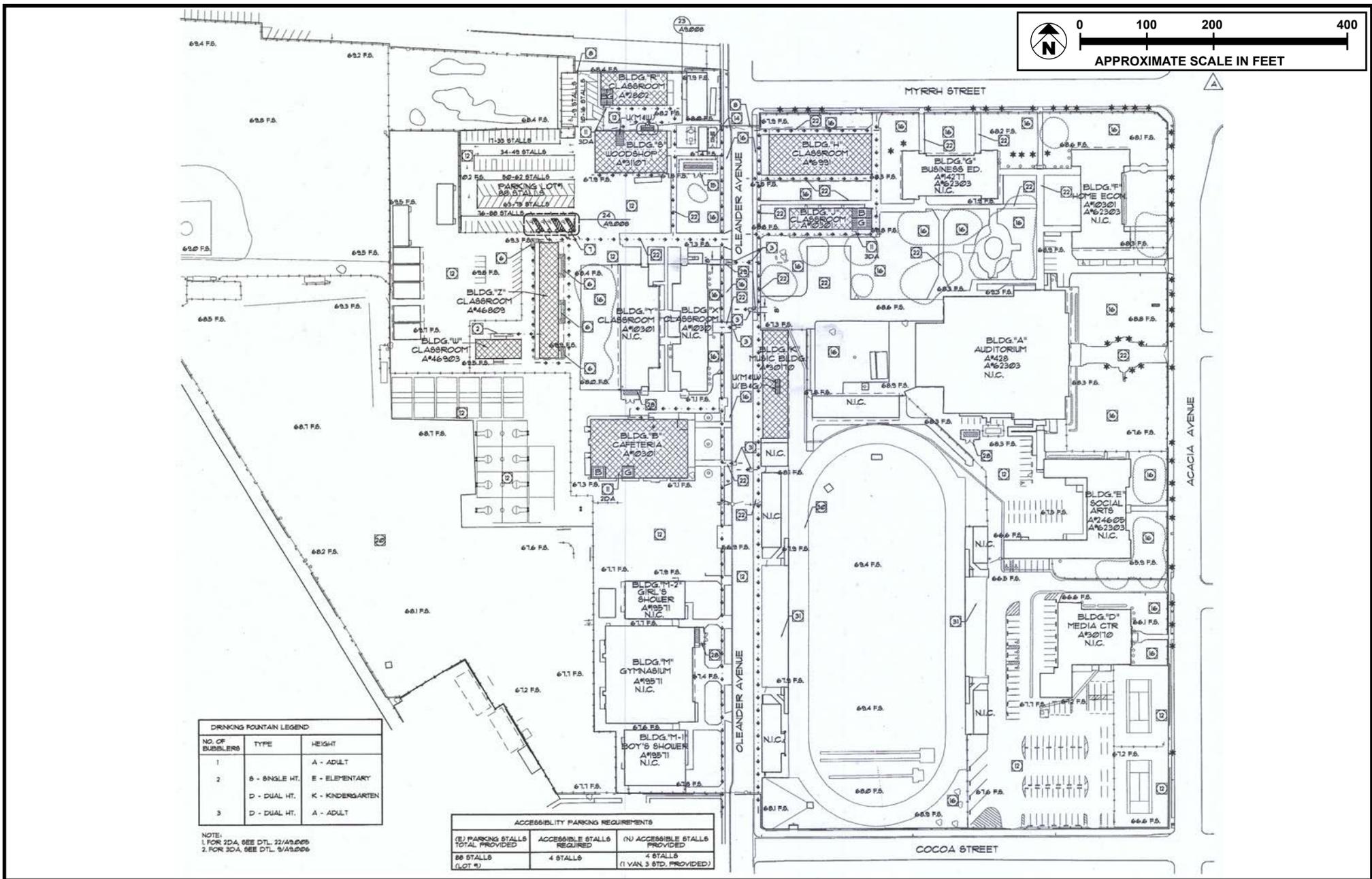
Year(s)	Architect ^a
1934–1935	John C. Austin and Frederick M. Ashley
1939–1949	Kistner, Curtis and Wright
1946	Jerome C. DeHetra
1951–1964	Kistner, Curtis and Wright
2004	Fields/Devereaux

Source: Summit Consultants, Inc., Compton Unified School District: Compton High School—Historical Resource Analysis (June 2018).

^a *Refer to Appendix E for a description of each of these architects, as provided from the Historical Directory of American Architects or the Pacific Coast Database.*

The architectural styles designed by these identified architects are institutional and utilitarian, with traces of Spanish revival and streamline moderne elements on some of the street-facing buildings. The rest of the buildings are plain façades, boxy and nondescript. The grandstand at the athletic field was constructed as a plain functional box structure circa 1938 and had a minimal quasi–streamline moderne façade added circa 1955.

The primary challenge in assessing the work products of the known architects who participated in the development of the CHS site and its buildings is to identify their individual achievements within historical context. There is a requirement to distinguish between important but typical work and those work products which rise to a higher level of significance, within a historic context. The buildings and campus environments of the CHS campus are not unique, and they are typical of institutional buildings and environments of this type and purpose. The placement, function, and building materials present are standard for school campuses nationwide and would not be considered unique or significant. None of these architects are considered to be historic persons in the City’s history or development. Last, none of the existing CHS buildings are listed in any of the federal, State, or local historic resources directories.



SOURCE: Summit Consultants, Inc. – June 2018

FIGURE 4.4-1

Meridian
Consultants

2003 Compton High School Site Plan

Acquisition Area

The Project Site also includes the uses within the acquisition area, consisting of one single-family residence and six multifamily residential buildings (ranging between 3 and 6 units in size for a total of 25 units), a church, and a commercial car wash. The carwash is abandoned and is currently in the process of being demolished. The adjacent church building at 333 W. Alondra Boulevard is a simple wood-frame and stucco 1-story building with adjacent parking areas on the east and west sides. The plain, simple design is featureless except for a short, informal, square steeple at the front façade. Adjacent to the church, moving east, is a 2-story apartment building that occupies the entire lot with no open space. It is a simple, featureless wood-frame and stucco building with aluminum windows. The building has a standard pitched roof of composition-asphalt material. Moving east, all the remaining buildings are single-story, multitenant buildings with hip-style roofs covered in composition-asphalt material. All the buildings are simple, boxlike wood-frame and stucco structures with aluminum windows.

The buildings are all featureless except for wood screening at two of the front-porch areas. All the windows and doors have rusting security bars on them. All the buildings occupy their entire lots, with no open space or landscaping, with the exception of six ornamental trees located within the acquisition area, found between the right-of-way, or dispersed between the residential parcels, as discussed in **Section 4.3: Biological Resources**. All of the buildings, except 317 W. Alondra Boulevard, have detached multiunit garage structures at their north end. These garages face the CHS campus across W. Cocoa Street.

At all properties along the south side of W. Cocoa Street, the fencing is rusting and failing. Other than the church building, all the other structures were designed and constructed in the 1950s and 1960s. The church was built in the early 1940s, and a matching addition to the building was done in 1948. Deferred maintenance and deterioration are typical to this group of buildings. Peeling paint, rusting metal work, wood rot, and termite damage are obvious throughout all buildings. The roofing materials are all in various stages of deterioration. The building at 304 W. Alondra Boulevard has a tarp covering a section of the roof that appears to have been there for quite a while. None of the buildings appear to have had any maintenance for many years. Dead, overgrown weeds and short, struggling bushes surround each building.

A search of permit records at the City's Building and Safety Department revealed minimal information. Other than the contractor for the church building, no results were found. The name of the contractor for the church building was illegible, and no architect was identified. The other buildings are typical rental developments of the 1950s and 1960s with featureless, cost-effective construction; with no differentiating features other than as a group, they all look alike. The buildings were constructed for maximum rental square footage with no amenities. The City noted that the apartments may have been

constructed by one or two developers who acted as owner-builder and subcontracted everything out. In this case, it was noted that archived records would be minimal, if at all.

The streetscape surrounding the triangular block is concrete sidewalks and asphalt, with relatively no landscaping other than previously stated. The asphalt throughout W. Cocoa Street is cracked and failing. The four-lane commercial street to the south, W. Alondra Boulevard, is lined with an assortment of commercial buildings and residential properties. All of these are in various stages of disrepair and deferred maintenance. All were constructed at various times, with no attempt at continuity of design or construction methods. There is no unifying design theme, or unique features. None of these properties are listed in any of the federal, State, or local historic resources directories.

ENVIRONMENTAL IMPACTS

Methodology

The Historic Report is based on visual observation; review of relevant research and historic contexts; and an analysis of the eligibility criteria and integrity thresholds listing in the National Register and California Register. The City of Compton does not have a historic preservation program; therefore, the Project was not evaluated for local designation. In addition, no historic building permits were available for review as part of the historic assessment. A site visit was conducted on May 11, 2018.

The Cultural Report is based a search of the California Historical Resources Information System (CHRIS) at the South Central Coastal Information Center (SCCIC), which is located on the campus of California State University, Fullerton. The search included any previously recorded cultural resources and investigations within a 0.50-mile radius of the Project Site. The CHRIS search also included a review of the National Register, the California Register, the California Points of Historical Interest list, the California Historical Landmarks list, the Archaeological Determinations of Eligibility list, and the California State Inventory of Historic Resources. SWCA also requested a Sacred Lands File search from the NAHC. In addition to reviewing prior studies and previously recorded site records, SWCA examined historical maps and aerial photographs obtained through the Los Angeles Public Library, University of Southern California Library, Huntington Library, California State University Dominguez Hills Library, and US Geological Survey. These included railway, topographic, and street maps. In assessing archaeological sensitivity and the likelihood that significant undocumented cultural resources that could be encountered by the proposed Project, the influence of natural forces and human activities were considered, as well as the specific nature of the activities proposed by the Project.

Thresholds of Significance

To assist in determining whether the proposed Project would have a significant effect on the environment, the District finds the proposed Project may be deemed to have a significant impact related to cultural resources if it would:

- Threshold CUL-1:** Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Threshold CUL-2:** Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Threshold CUL-3:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Threshold CUL-4:** Disturb any human remains, including those interred outside of formal cemeteries?

Project Impact Analysis

- Threshold CUL-1:** Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Reconstruction of CHS Campus

Existing Campus

PRC Article 2, Section 5024.1 establishes the California Register, identifies the State's historical resources, and describes what properties are to be protected. The resources listed in the California Register are determined by the SHRC according to its procedures adopted. The California Register helps identify what buildings are to be protected to the extent it is prudent and feasible, from substantial adverse change.

According to the Historical Report, neither the CHS campus nor any of its buildings appears in the California Register. In reviewing the CHS campus and all its buildings according to the criteria required by the SHRC, the results are as follows:¹⁸

- (4) The campus and buildings are not associated with major events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

18 Historical Report.

- (5) The campus and buildings are not associated with the lives of important national, State, or local persons in their respective time periods.
- (6) Only a few elements on the various buildings built prior to 1968, exhibit the characteristics of the type and period of construction. The simple streamline moderne elements on the buildings facing S. Acacia Avenue (east) have been compromised with the addition of utility conduits, security screens, and mismatched light fixtures. The buildings facing W. Myrrh Street that were damaged in the 1933 earthquake have been retrofitted with a few elements of Spanish revival features that are not original to each building. Utilities, mechanical equipment, mismatched lighting, and security screens also compromise any characteristics of the period of construction on these buildings. The remainder of the building façades are flat and characterless. Most of the original doors, windows, and hand railings have been changed out over the years.

The campus buildings were designed as cost-efficient utilitarian structures. Commercial building materials popular during the various periods of construction were utilized to create simple functional classroom and office buildings. There are no unusual windows or unique trim details. Original door hardware and interior floor finishes have been changed out. The restrooms in five of the buildings were completely remodeled in 2004–2005, and there are no remaining characteristic elements of the period of construction.

- (7) The type and style of construction of all buildings is simple, square, and boxy, and does not represent an important creative work or possess high artistic value. Functionality and cost-efficient materials are more recognizable than any design features.
- (8) The buildings are not likely to yield important information in history. No major events or distinguished occurrences are on record for the buildings or the campus.
- (9) None of the buildings or the campus collectively have ever been formally determined eligible or nominated for listing in the National Register.
- (10) The buildings and the campus are not what would be considered points of historical interest by the general population.
- (11) The buildings and the campus do not contribute to a historical district. They are not located in an historical district.
- (12) The buildings and campus are not designated as local landmarks or historical properties under any county or municipal ordinance and do not meet designation criteria per the State guidelines. There are no local ordinances or guidelines adopted by the City for landmark or resource designation.
- (13) Neither the CHS campus nor any of its buildings have been recommended by the OHP for listing in the California Register in accordance with criteria adopted by the SHRC. Only two properties in or near the City of Compton are listed as State Historical Resources: Heritage House, built in 1869, located within the City; and Dominguez Ranch House Adobe, built in 1826, located in nearby Rancho Dominguez.

Furthermore, the City does not have a historical resource data bank, cultural/historical commission, or Planning Department official to record, monitor, or administer properties of historical age. No historical guidelines or requirements are available from planning and/or building officials. The City does have a list of six local historical resources, none of which are school districts or school buildings. The list appears to have been created by a group of citizens and is not an official city roster. Two local resources are listed by the SHRC, and one of those is also listed in the National Register. City ordinances and guidelines are centered toward residential and commercial development without any stipulated concern for potentially historical resources. The City does have an Architectural Review Committee, which appears to be focused on new construction. No data was available as to any review of potential historic districts or buildings being considered.

The City's General Plan only provides provisions related to school campuses related to requirements for off-street parking spaces based on the number of classrooms and seats in those classrooms. There are no other provisions or references regarding school buildings or campuses. There are no provisions or recommendations regarding historical resources or properties. The City's Planning Commission and the Redevelopment Agency are currently pursuing and promoting projects with the greatest potential for generating new revenues and public benefits.

Integrity is not only the level of a property's physical condition; also important is the ability of a property to convey its significance. The evaluation of integrity can be subjective; however, it must be grounded in an understanding of the property's physical features and how they relate to its significance. In order to determine why, where and when a property is a significant resource requires a determination of which specific aspects of integrity are most important. The Historical Report identified the following seven recognized aspects of integrity:

- (1) Location is the place where the properties are constructed. The CHS and adjacent W. Cocoa Street do not have historical significance in and of themselves. No major historical events are recorded to have occurred at the site. As is typical with all school campuses that were constructed during the 1930s and 1940s, the schools were conveniently located in the center of the developing residential neighborhoods. The selected campus sites were a result of population and logic, rather than integrity of location.
- (2) Design is the combination of elements that create the form, plan, space, structure, and style of a property. Design includes such elements as organization of space, proportion, scale, technology, ornamentation and materials. The materials and ornamentation of CHS and the W. Cocoa Street properties are not representative of unique craftsmanship and therefore, are not of primary importance. Even though a few of the campus buildings have some streamline moderne and Spanish revival elements, these are simple and are not unique ornamentation. The proportion, scale, and orientation of the auditorium building to the school campus space are very typical of an auditorium

on any school campus of that period and into present day designs. Even though the building is large, it does not occupy or identify as a central hub or icon of the campus. These elements were actually standard for a utilitarian building constructed in its time period. Typical moderne elements always include curved lines, curved corners, horizontal decorative bands, geometric motifs, glass block and ceramic tile murals. The auditorium building does not embody any of the key elements of the moderne style, and the design integrity is minimal. The design of the other campus buildings is simple and utilitarian. They are box like with typical classrooms and small offices inside. There is no unique or exemplary use of form or style. The plans are basic and useful for their intent. There is no unusual use of the space and proportions. The exteriors were designed to house simple classroom or staff office uses. No unusual materials were used in their construction. In fact, all materials are standard commercial materials. There are no representations of unique craftsmanship or ornamentation. The materials used for the W. Cocoa Street properties are standard commercial-grade building materials assembled as featureless boxes.

- (3) Setting is the physical environment of a property. The CHS campus is located in a residential neighborhood surrounded by single- and multifamily residences. This is typical of the majority of school campuses nationwide. The setting is not unique and has no historical significance. During the City's growth period, school campuses were intentionally located for access by the surrounding growing residential neighborhood. The setting and location are not unusual but actually very common. The campus is not a cultural and architectural focal point in the City. The setting does not contribute to any historical integrity.
- (4) The materials used for construction of all the buildings are standard building materials. Concrete, milled lumber, plaster, and composition roofing products are not unusual or revolutionary for their period of construction and have no historical significance. The stepped-parapet wall detail and fluted vertical elements are the most defining features of the auditorium building. These are considered typical elements of moderne design but do not represent an outstanding or unique architectural feature. These features only occur on the east façade and the northeast and southeast corners. The remainder of the building is simple, flat concrete. The wall details and fluted elements are simple and indistinct as a defining feature. The physical materials used for the construction of all the buildings were in common use for public buildings after the 1933 earthquake and continue to be in common use today. However, the use of hazardous additives to these same construction materials has been eliminated from the current market products. As previously noted, the materials used for construction of the other buildings are common commercial materials. The only architectural details that might be considered features of Buildings G and H are the terra-cotta eyebrow awnings and a few archtop windows on the presentation side of the buildings. These suggest Spanish revival style. These elements were added at a later date and are not original construction. The standard materials used throughout the buildings prior to 1970 are suspected to contain hazardous components and additives.
- (5) Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history. Even though the structures were well built for their time periods, there are no individual components, such as joinery, tooling, carving, painting, turning, or graining, that would be

considered evidence of an artisan's labor and skill. The quality of workmanship can furnish important evidence of unique techniques or crafts that were used during historical periods. There are no national, State, local technological, or aesthetic examples of significant workmanship present in any of the buildings. The buildings are void of any significant artwork or architectural details. The integrity of unique workmanship is not present as a cultural resource qualification.

- (6) Association is the direct link between an important event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Even though the buildings on the campus and the W. Cocoa Street properties appear to be sufficiently intact, archival records offer no justification that any significant historical event or activity occurred at or with the buildings. Because feelings and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of any property as a historical structure. The campus buildings have served the students of the CHS campus since their construction. The buildings' purpose was to provide a venue for education and interaction. However, this is not an unusual or important historical event, but rather the planned and expected service of any school building. It is likely that the buildings have also served as a place of assembly for the surrounding neighborhood to meet for miscellaneous events. Similar to common student use, neighborhood use of an auditorium and athletic field is not unusual or unique throughout history. These activities are expected and are not significant. The campus buildings were constructed and used for student education purposes and comprise typical classrooms inside of a box-shell exterior.

Classroom use is not unusual or unique throughout history. Instruction in a classroom is expected and is not significant. No important historical events are on record to have occurred in any of the buildings. Sometimes buildings can be associated with notable architects or engineers. The CHS campus has been designed by a variation of architects and exhibits multiple simple architectural styles over the years. Architectural firms that have participated in construction projects onsite include John C. Austin and Frederick Ashley; Kistner, Curtis & Wright; Jerome C. DeHetra; and Fields/Devereaux. In surveying the accumulated works of these various architects for the campus as a whole, no underlying common theme or uniqueness of design exists. The buildings do not unify distinguishing architectural characteristics that would qualify them as valuable representatives of significant style, time period or method of construction. There is some presence of both moderne elements and Spanish revival, but no important contribution to integrity of association by an important event or person. Research on the CHS campus does not reveal any significant educational advancement or innovation occurred at the school. Research also does not reveal that a prominent educator or student attained any noteworthy achievements at the school.

- (7) "Feeling" is the aura that a property has for inducing a historic or aesthetic sense of a past period of time. The evolution of improvements to the CHS campus has occurred over an extended period of time, from 1934 to 1964, in addition to the pre-1933 construction that was mostly destroyed in the earthquake. A collection of styles and assortment of materials does not evoke the quality of a

particular past period of time. Additions and modifications have continued to the present day, further obscuring any historic or aesthetic sense of an era or recognizable point in time.

The generally accepted requirements for a property to qualify for the National Register or California Register are the retention of at least four of the above aspects of integrity without an obvious level of compromise. None of these buildings retain an acceptable measure of integrity for listing them in the National Register or California Register.

Acquisition Parcels

The sequence of buildings along W. Cocoa Street is a series of mixed use properties, including single- and multifamily residential uses, a church, and a carwash. The buildings were not inspected individually due to fencing and gating, but no current Building Code upgrades appear visible. No fire sprinklers, fire alarms, second floor egress, or other life safety improvements are obvious. Minimal rental property requirements required by local and State authorities, like smoke/carbon monoxide detectors are assumed to be installed at the interior bedrooms and hallways. However, this is not verifiable. No exterior emergency egress lighting is visible on the buildings.

Summary Evaluation of Cultural Resources

CEQA guidelines evaluate a building's significance and its impact on the environment. If a building is listed as a historic resource on an established roster, or register, its level of significance is not questionable. The National and the California Register are the two most extensive and venerated listings of historic resources in the nation. Buildings and places on either of these two registers qualify as a resource of enhanced distinction. As such, any activity that may cause direct or indirect change to the resource would also cause change to its surrounding environment.

As previously identified, the buildings associated with the CHS campus and the acquisition area are not listed or referred to on any national or State register or collection of data. The Secretary of the Interior's Standards and the criteria established by the SHRC do not support qualifying the buildings within the CHS campus or acquisition area as mandated historical resources. These properties have not been determined to be eligible for listing in either the National Register or the California Register. Thus, the Historical Report did not identify any mandatory resources on the Project Site.

The City has not determined that the buildings associated with the CHS campus or acquisition area are historical resources. The campus and buildings have not been identified as a significant historic resource and the City does not have any evidence on record that the buildings on the CHS campus or the acquisition area are historically significant. Given that these buildings have not qualified, or been considered to be

resources to date, it is unlikely that they will become significant in the future. The presumption of historic status is rebutted by the lack of evidence on record.

No substantial evidence exists to support the historical significance status of the CHS campus and acquisition area. Their physical condition, architectural design, and overall integrity do not justify the enhanced distinction as a historical resource. The buildings' historical context and the environmental impacts to the site and neighborhood are limited and minimal. Without any supporting evidence by historical resource studies, or a formal determination by a local city agency, the historic resource designation is a discretionary decision by the property owner. In order to be considered historical resources, the buildings must reach a requisite threshold of significance. These buildings and the campus as a whole appear to possess no architectural or contextual level of significance.

As identified in the Historical Report, the buildings are not significant politically, socially, or culturally. The architecture and engineering are not outstanding, or unique. The buildings have no economic, scientific, military, or agricultural significance. The CHS campus is not a prominent institution in the District, or the City as a whole. As a result of numerous phases of remodeling, the buildings no longer convey any unique architectural significance from their original construction. The featureless utilitarian box design of the buildings within the acquisition area are not architecturally unique or significant.

Impacts would be less than significant.

Relocation of District Uses

As part of the Project, the District's Facilities Department and the Pupil Services, Enrollment Center, and Special Education offices would be demolished and relocated to existing District facilities with available capacities at Caldwell Elementary School and Cesar Chavez Continuation High School.

The Historical Report did not identify any resources of historical significance on the CHS campus. Thus, demolition of these other District facilities on the Project Site would not result in any impacts to historical resources. In addition, the relocation of the District facilities would not alter the existing facilities at Caldwell Elementary School and Cesar Chavez Continuation High School, which are not identified as historical resources of significance.

Impacts would be less than significant.

Threshold CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Reconstruction of CHS Campus

No known archaeological sites are associated with the Project Site or have been recorded within 0.5 miles of the site. Due to the location of nearby Native American archaeological sites, including the Native American villages that would have been near the current I-710 and I-405 freeway interchange, the Project Site is near several natural features that would have provided Native American peoples with abundant resources including a natural marsh, Compton Creek, and the Los Angeles River. Therefore, the Project area is deemed sensitive for buried archaeological sites.

The Project Site has been subject to several phases of construction and demolition since the CHS campus' opening in 1896; however, portions of the existing CHS campus are used as athletic fields, including the current location of the football stadium, that appear never to have been otherwise developed.

In the prehistoric and protohistoric period, the Project Site was located within a marshy area near a confluence of several creeks and rivers, which would have subjected the area to periodic flooding. The influence of flooding on archaeological preservation is likely to have varied within the Project Site, based on small-scale topographic features and strength of an individual flood event, either preserving some material or eroding the surface material. It is likely that native sediments will be encountered as part of the proposed Project. There is also at least some probability that archaeological material associated with prehistoric or historical Native American activities could be present within redeposited sediments.

Impacts to archaeological resources would be potentially significant.

Relocation of District Uses

As part of the Project, the District's Facilities Department and the Pupil Services, Enrollment Center, and Special Education offices would be demolished and relocated to existing District facilities with available capacities at Caldwell Elementary School and Cesar Chavez Continuation High School.

Given that the relocated uses would be contained within already existing buildings at each of the new locations, construction is not warranted. As such, there would be no ground-disturbing activities that could result in the discovery of potential archaeological resources.

Impacts would be less than significant.

Threshold CUL-3: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Reconstruction of CHS Campus

Paleontological resources are valued for the information they yield about the history of the earth and its past ecological settings. The Project Site and surrounding properties are located in an urbanized area that have been previously disturbed by construction activities. There are no unique geologic features located on the Project Site. In addition, the Project Site is characterized by soils consisting of quaternary-aged alluvial deposits,¹⁹ which have a low potential to contain paleontological resources.

While the discovery of paleontological resources on the Project Site is considered unlikely, construction of the proposed Project would adhere to PRC Section 21083.2 which requires all earth-disturbing work to be temporarily suspended or redirected until a qualified paleontologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines.

With adherence to these regulatory requirements, impacts would be less than significant.

Relocation of District Uses

As part of the Project, the District's Facilities Department and the Pupil Services, Enrollment Center, and Special Education offices would be demolished and relocated to existing District facilities with available capacities at Caldwell Elementary School and Cesar Chavez Continuation High School.

Given that the relocated uses would be contained within already existing buildings at each of the new locations, construction is not warranted. As such, there would be no ground-disturbing activities that could result in the discovery of potential paleontological resources.

Impacts would be less than significant.

19 Ninyo & Moore Geotechnical & Environmental Science Consultants, *Geotechnical Evaluation, Compton High School Reconstruction* (January 2018).

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

Reconstruction of CHS Campus

A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project Site. The Project Site is located in an urbanized area and has been subject to grading and development in the past.

While no formal cemeteries, other places of human internment, or burial grounds or sites are known to occur within the Project area, there is always a possibility that human remains can be encountered during ground-disturbing activities. Construction of the proposed Project would adhere to California Health and Safety Code Section 7050.5, which states that no further disturbance shall occur until the Los Angeles County Coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. The Los Angeles County Coroner must be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

With adherence to these regulatory requirements, impacts would be less than significant.

Relocation of District Uses

As part of the Project, the District's Facilities Department and the Pupil Services, Enrollment Center, and Special Education offices would be demolished and relocated to existing District facilities with available capacities at Caldwell Elementary School and Cesar Chavez Continuation High School.

Given that the relocated uses would be contained within already existing buildings at each of the new locations, construction is not warranted. As such, there would be no ground-disturbing activities that could result in the discovery of potential human remains.

Impacts would be less than significant.

CUMULATIVE IMPACTS

The analysis of cumulative impacts to historic resources is based on whether impacts of the proposed Project and related projects, when taken as a whole, substantially diminish the number of historic resources within the same or similar context or property type. As discussed previously, the proposed Project would not significantly impact any historic resources. Thus, the proposed Project would not contribute to cumulative impacts to historic resources and would result in a less than significant impact.

The proposed Project, in combination with cumulative development, could contribute to the disturbance of land, which could potentially contain archaeological and paleontological resources. Determinations regarding the significance of impacts of the related projects on archaeological and paleontological resources would be made on a case-by-case basis and, if necessary, the applicants of the related projects would be required to adhere to applicable with federal, State, and local requires and/or implement appropriate mitigation measures. The proposed Project's potential impacts to archaeological and paleontological resources would be less than significant with adherence to regulatory requirements and implementation of the recommended mitigation measures. Therefore, the proposed Project would not contribute to any potential cumulative impacts on archaeological and paleontological resources.

Impacts would not be cumulatively considerable.

MITIGATION MEASURES

The following mitigation measures has been identified to reduce potentially significant impacts related to cultural resources:

- MM CUL-1** Retention of a Qualified Archaeologist. The District should retain a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, during the excavation phase to carry out all mitigation measures related to archaeological resources.
- MM CUL-2** Worker Training. Prior to the commencement of ground-disturbing activities, at the Project kickoff, the selected qualified archaeologist or their designee will provide a briefing to construction crews to provide information on regulatory requirements for the protection of cultural resources. As part of this training, construction crews shall be briefed on proper procedures to follow should unanticipated cultural resource discoveries be made during construction. Workers will be provided contact information and protocols to follow if inadvertent discoveries are made. Additionally, workers will be shown examples of the types of cultural resources that would require notification of the Project archaeologist.

MM CUL-3 Monitoring of Initial Ground Disturbance for Archaeological Resources. A qualified archaeological monitor shall be retained to monitor initial ground-disturbing activities in areas that have previously been developed only as parking lots or athletic fields, specifically the current football stadium location and the parking lots at the north central portion of the campus. During initial ground disturbance, field observations regarding the geoarchaeological setting shall be made to determine whether undisturbed sediments capable of preserving archaeological remains still exist adjacent to or beneath those sediments disturbed by agricultural and urban development, and the depth at which these sediments would no longer be capable of containing archaeological material. If it is determined that these areas have previously been disturbed and native sediment does not remain intact, monitoring may be reduced. If native sediment is encountered and the location is determined to retain sensitivity, monitoring should continue. The archaeological monitor shall work under the supervision of the qualified archaeologist.

MM CUL-4 Inadvertent Discoveries. In the event that archaeological resources are exposed during ground-disturbing activities, work in the immediate vicinity of the find must stop until a qualified archaeologist can evaluate the significance of the find. Ground-disturbing activities may continue in other areas. If the discovery proves significant under CEQA (Section 15064.5f; PRC 21082), additional work, such as testing or data recovery, may be warranted. Should any prehistoric or historical Native American artifacts be encountered, additional consultation with NAHC-listed tribal groups should be conducted immediately.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As discussed above, **Mitigation Measures MM CUL-1, MM CUL-2, MM CUL-3, and MM CUL-4** would ensure that Project-level impacts to archaeological resources would be less than significant. All other impacts would remain less than significant.