

3.4 CULTURAL RESOURCES AND TRIBAL CULTURAL RESOURCES

Cultural resources are defined by the California Environmental Quality Act (CEQA) as historic-period buildings, structures, and objects as well as prehistoric or historic-period archaeological resources. Public Resources Code (PRC) Section 21074(a)(1) and (2) defines tribal cultural resources as “*sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe*” that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR) or included in a local register of historic resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence.

This analysis describes the existing cultural setting within the vicinity of the Beach Cities Health District (BCHD) campus and discusses known cultural resources on the Project site. This section then assesses the potential effects associated with the redevelopment of the BCHD campus under the proposed BCHD Healthy Living Campus Master Plan (Project) on cultural resources and tribal cultural resources.

This analysis is based on the Historic Resources Assessment prepared by LSA (2018) and peer reviewed by Wood Environment & Infrastructure Solutions, Inc. (Wood) senior architectural historian. This analysis is also based on the findings of an archaeological literature and records search prepared by Wood archaeologists as well as the information from the Redondo Beach Historic Ordinance (Ord. No. 2554) (1989), Historic Resources Surveys conducted by the City of Redondo Beach (1986 and 1996), Torrance General Plan Community Resources Element (2010), and Torrance Historic Preservation Ordinance (Ord. No. 3822) (2017).

3.4.1 Environmental Setting

Prehistory

There is evidence for human occupation of mainland Southern California dating back 10,500 or more years. Based on the small number of sites dated to this period, population densities along the coast may have been low initially. However, many prehistoric sites may have been lost, inundated, or deeply buried as a result of rising sea levels, erosion, aggradation (i.e., accumulation of sediments), and other natural forces.

Prehistoric human occupation and cultures within coastal Southern California evolved significantly over more than 10,000 years based on changes in climate, food availability, technological innovations, and utilization and changes in population densities and cultural characteristics. Although prehistoric remains within the region could be from any of the various past cultural epochs,

they would most likely represent past occupation by the Gabrieleño/Tongva or other Takic people. The Gabrieleño/Tongva occupied territory that included the Los Angeles Basin south to parts of Orange County and north to Topanga Canyon and the southern Channel Islands. The total Gabrieleño/Tongva territory covered more than 1,500 square miles and included the watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers and the islands of Santa Catalina, San Clemente, and San Nicolas. Within this large territory were more than 50 villages with populations that ranged from approximately 50 to 150 individuals. The fully developed Gabrieleño/Tongva culture was a socially and economically complex hunting and gathering group, very advanced in their culture, social organization, religious beliefs and art and material object production. The tribe was known for its artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. It is believed their economic system exchanged goods and managed food reserves (i.e., storage and processing), which allowed them to maintain permanent year-round villages. The Gabrieleño/Tongva are estimated to have had a population numbering around 5,000 in the pre-contact period (Kroeber 1925). Gabrieleño/Tongva populations and culture underwent dramatic changes following European contact. Introduced diseases weakened and killed large numbers of native peoples, and most villages were abandoned by 1810. Those Gabrieleño/Tongva that survived built the Spanish Missions and the Mexican and American ranches that followed.

Due to subsequent urban development beginning in the late nineteenth century and early twentieth century, the full extent and density of Gabrieleño/Tongva occupation of the South Bay is difficult to accurately characterize. However, based on the records searches for the proposed Project conducted through the South Central Coastal Information Center (SCCIC) at California State University, Fullerton (see Appendix D), no prehistoric sites or evidence of settlement have previously been recorded within the immediate vicinity of the Project site. Further, no prehistoric or historic-period archaeological resources have been previously identified on the Project site.

History

Redondo Beach and Torrance

Initial European contact with the Gabrieliño began in 1542, followed by more intensive exploration in 1769, when Spanish explorer, Gaspar de Portola, passed through Gabrieliño territory. In 1771, Mission San Gabriel was established approximately 23 miles northeast of the Project site and Mission San Fernando Rey de España, in 1797, approximately 30 miles north of the Project site. By the early 1800's, the majority of the surviving Gabrieliños had entered the mission system at one of these locations. In 1781, El Pueblo de La Reina de Los Angeles, which would later become the City of Los Angeles in the twentieth century, was established approximately 16 miles northeast of the Project site as a civilian settlement made up of families of African, Native American, and Spanish

descent. As the pueblo prospered and grew, it ushered in the Rancho era as thousands of acres of surrounding lands were granted to individuals as ranchos or farmsteads by the Spanish crown, and later the Mexican government, as repayment for the service the individual contributed.

Redondo Beach includes portions of three different ranchos: San Pedro, Los Palos Verdes, and Sausal Redondo. San Pedro, the largest and oldest of the three ranchos, was bounded on the east by the San Gabriel River, on the south and west by the Pacific Ocean, and on the north by Redondo Bay. Its boundaries include most of the modern-day Redondo Beach, Torrance, Gardena, and Compton (Cleland 1951). Early economic development in the region started with the Pacific Salt Works along Redondo Bay which succumbed to local competition following the arrival of the Southern Pacific Railroad in the mid-1870s. In 1892, Redondo Beach was incorporated and, by the early 1900s, thrived as a port city and shipping point for lumber and oil.

In 1911, Jared Sidney Torrance, a Pasadena real estate promoter, purchased approximately 3,000 acres of the Rancho San Pedro with the intention of creating a new city that incorporated design elements of the garden city movement of the late nineteenth century (City of Torrance 2010). To accomplish this, Jared Torrance hired the Olmsted Brothers, Frederick Law Olmsted Jr. and Charles Olmsted, of Brookline, Massachusetts, sons of Frederick Law Olmsted, a landscape architect whose work included Central Park in New York City and the original Stanford University campus. Groundbreaking for the model city commenced in 1912 with the renowned Irving Gill as the chief architect (City of Torrance 2010).

The 1920s marked the expansion of commercial and residential development in the area near Redondo Beach and Torrance. The introduction of the automobile supported new commercial developments such as gasoline stations and restaurants. Single-family farms were slowly being replaced with housing tracts. As with several other cities in California, World War II and post-World War II led to booms in residential and commercial development. New families moved to the cities during World War II as employment increased at the defense plants located in the area. Following World War II, veterans returned from the war and faced a shortage of rental properties. As a result of this shortage, veterans purchased vacant lots to build future homes. This accelerated growth led to a demand for a more urban amenities such as shopping centers, civic institutions, and medical facilities increased. The cities continued to grow and support industrial, residential, tourist, and commercial uses.

Project Site

The increased demand for urban medical facilities and services following the post-World War II economic and population boom was especially escalated in previously rural areas. To accommodate this need, in 1946, following a speech by President Truman outlining five goals to improve national health, Congress passed the Hospital Survey and Construction Act which provided Federal funding to support construction of hospitals and clinics in underserved communities. In California, the Local Hospital District Law (Local Health Care District Law) was passed in 1945 and authorized the formation of hospital districts for the purposes of allowing maintenance of local hospitals in underserved counties with small populations. In 1950, a report prepared for the medical division of the Citizens' Emergency Corps found that Los Angeles area hospitals were inadequate to service existing needs and were not prepared to provide needed services in the scenario of a major local disaster, thus

prompting the creation of the South Bay Hospital District and the construction of the South Bay Hospital Building (LSA 2018). The hospital was expanded with an approximately 12,300-square-foot (-sf) addition on the south side of the building completed in 1970 (Gnerre 2015; LSA 2018). However, by the late 1970s, the hospital began to struggle financially as it tried to compete with nearby privately-owned competitors. By 1984, the 203-bed hospital was privatized due to economic concerns. In the mid-1990s, the South Bay Hospital District changed its name to the Beach Cities Health District. Today BCHD continues to own and operate the facility as an outpatient medical campus with a variety of tenant health care providers (LSA 2018).



The former South Bay Hospital was originally constructed in 1958. The 150-bed, four-story hospital opened in early August 1960 after 27 months of construction.



Construction of a new hospital wing began in 1968, expanding the hospital to 203 beds.

Historic Architectural Resources

“Historic architectural resources” include standing buildings, structures, and objects of historic importance. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined for the area.

Properties subject to review under CEQA include those meeting the criteria for listing in the NRHP, CRHR, National Register of Historic Places (NRHP), or designation under a local ordinance or identified in a historic resources survey. Lead agencies under CEQA may also determine that an unlisted resource may be a historic resource as defined in Public Resources Code sections 5020.1(j) or 5024.1 (refer to CEQA Guidelines Section 15064.5[a][4]).

Project Site

Existing development on the Project site includes: the 5-story Beach Cities Health Center and attached single-story Maintenance Building located at 514 North Prospect Avenue; the 3-story Beach Cities Advanced Imaging Building located at 510 North Prospect Avenue; and the 3-story Providence Little Company of Mary Medical Institute Building located at 520 North Prospect Avenue. A 2-level subterranean parking garage, a 3-story parking structure, and various paved surface parking lots are also located on the



The former South Bay Hospital's south- and west-facing elevations include a fourth story balcony addition and replaced front canopy, giving the building a modern aesthetic.

Project site. The vacant Flagler Lot at the southwest corner of Flagler Lane and Beryl Street is undeveloped and characterized by patches of ruderal, weedy vegetation.

The Beach Cities Health Center and the attached Maintenance Building, both of which are located at 514 North Prospect Avenue, are historic-period buildings that were constructed in 1960 and therefore meet the 50-year threshold for consideration as potential historic resources for the purposes of Federal, State, and local regulations and policies.

The former South Bay Hospital is designed in the International style, featuring a multi-level flat roof and unadorned, smooth, white exterior walls occasionally punctuated by horizontal bands of metal framed windows. Such features are common of the minimalist International style, best

characterized by its lack of decorative elements, instead incorporating the following design features:

- Simple geometric forms, often rectilinear;
- Balance and regularity, but not necessarily symmetry;
- Reinforced concrete and steel construction with a non-structural skin;
- Unadorned, smooth wall surfaces typically of glass, steel, or stucco painted white;
- Complete absence of ornamentation and decoration;
- Often cantilevered upper floor or balcony;
- Flat roof without a ledge or eaves;
- Large areas of glass; and
- Metal window frames set flush with the exterior walls, often in horizontal bands as its distinguishing features.



A modern, one-story addition has been added to a 1-story bay on the east side of the east stairwell as seen from the south and east.

Originating in Bauhaus interdisciplinary design school in Germany and migrating to the U.S. with German architects who relocated during the Depression Era, the International style garnered popularity in the post-World War II years and typically appeared in large, non-residential projects.

The former South Bay Hospital was designed by the well-known architectural firm, Walker, Kalionzes and Klingerman and built by notable builders M.J. Braock and Sons and R.J. Daum Construction Company. Kalionzes is best known as the principal architect for the 1952 Byzantine-style Saint Sophia Greek Orthodox Cathedral, which is a designated Los Angeles Historic-Cultural Monument (LSA 2018).

Numerous alterations and additions were made to the hospital from 1962 through 2009. The vast majority of these were for interior alterations, but permits for exterior alterations and/or additions were issued as well in 1963, 1968, 1976, 1979, and 2007. These alterations included the following:

- 4-story balcony addition on the west elevation;
- Expanded, 1-story lobby area on the south elevation;
- Replacement of an original folded plate canopy with an arched canopy supported by four round columns over the entry walkway;

- Nondescript 1-story addition on the northwest corner of the building; and
- 1-story addition to a 1-story bay on the east side of the east stairwell.

LSA (2018) evaluated the Beach Cities Health Center and the attached Maintenance Building for historic architectural significance using the criteria for listing in the CRHR and the criteria for designation as a Redondo Beach Landmark (see Appendix D). The findings of this evaluation are summarized below:

Under Criteria 1/A, the former South Bay Hospital is associated with the post-WW II population boom and the resulting demand for housing and related amenities including medical facilities. It is associated with at least two pieces of important legislation, the Federal Hospital Survey and Construction Act (Hill-Burton Act) and the State Local Hospital District Law (The Local Health Care District Law). The Federal law provided funding for construction of new medical facilities, and the State law established regulations for the formation of district hospitals. Numerous communities in California took advantage



The west elevation of the original 1960 building retains a high degree of integrity and features smooth, white wall surfaces and minimalist designs characteristic of the International style.

of these, forming hospital districts and building new or improving existing healthcare facilities. The South Bay Hospital District was not exceptional in this regard. In addition, while the building still houses medical facilities, it is no longer a hospital and does not provide emergency room services or overnight care. Alterations to accommodate these new uses have further compromised its ability to convey an association with its origins as a district hospital.

Under Criteria 2/B, although a number of people who were active in the local community were associated with the development and operation of the former South Bay Hospital District and the former South Bay Hospital, none appears to have derived any historic significance specifically from their association with this building.

Under Criteria 3/C/D, the former South Bay Hospital was originally designed in the International style and retains many of the character-defining features of that style. However, 1-story additions to the façade (south elevation), west elevation, and east elevation have compromised the integrity of design, materials, and workmanship. Modern construction elsewhere on the property has

compromised the integrity of setting and feeling, and because the building is no longer used for its original purpose, integrity of association has also been compromised to a degree. The building is associated with prominent architects and builders. However, this building does not represent any innovations in design or construction or utilize unique materials. Additionally, the architects appear to have worked in the prevailing styles of the time, and there is no indication that this building was ever featured for its design in any publication or that it ever won any design awards. M.J. Brock and Sons is no longer in business, but was best known for residential projects. Daum Construction Company is still in business, but does not cite the former South Bay Hospital as one of its representative projects.

Criterion 4 is normally associated with archaeological resources. The former hospital building was constructed in 1960 using common methods and materials and does not have the potential to provide any information important to the prehistory or history of the local area, California, or the Nation.

With regard to Local Criterion E, the former South Bay Hospital does not have a unique location or singular physical characteristic that represents an established and familiar visual feature or landmark of a neighborhood, community, or city.

For these reasons, the building does not meet the criteria for listing in the CRHR or the City of Redondo Beach Historic Ordinance (Ord. No. 2554). Further, the building is not part of a designated historic district (LSA 2018).

The two medical office buildings (510 and 520 North Prospect Avenue) were added to the campus in 1976 and 1989, respectively and do not meet the 50-year threshold generally required for consideration as potential historic resources under the CRHR (California Code of Regulations [CCR] Section 4852[d][2]). Similarly, given their age, these buildings are not eligible for consideration as a Redondo Beach Landmark, a building must be at least 50 years. There is an exception buildings that are at least 30 years if the Redondo Beach Preservation Commission determines that the resource is very exceptional. However, for all the reasons described for the former South Bay Hospital Building these two medical office buildings have not been determined by the Redondo Beach Preservation Commission to be very exceptional and do not meet the criteria for designation as a Redondo Beach Landmark.

Historic Resources within the Project Vicinity

As previously described, Wood senior archaeologists conducted a literature and records search through the SCCIC at California State University, Fullerton to identify known historic or archaeological resources and prior studies within 0.5 miles of the Project site. Sources consulted

during the SCCIC records search include: NRHP, CRHR, California Historical Landmarks, California Points of Historical Interest, and California Inventory of Historic Resources. The literature and records search indicated that six previous investigations have been undertaken at the Project site, and a further 14 have been undertaken within a 0.5-mile radius of the Project site. No previously recorded resources are known within the Project site, but four historic-period resources are documented within the 0.5-mile radius, only one of which is listed in the NRHP, CRHR, or a local register.

- *P-19-177669/Redondo Beach Original Townsite Historic District.* This resource is an NRHP, CRHR, and locally-listed historic district containing 48 contributing elements and 19 associated historic properties comprising a neighborhood built just outside of the original center of Redondo Beach.

There are also three historic-period resources identified in the area as part of the Southern California Edison (SCE) electrical grid, which are not eligible for listing in the NRHP, CRHR, or the local register. These resources include:

- *P-19-189960.* This resource is a steel lattice electrical tower, part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2011, and determined to be ineligible for listing.
- *P-19-190298.* This resource is also a steel lattice electrical tower, also part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2012, and determined to be ineligible for listing.
- *P-19-190323.* This resource is also a steel lattice electrical tower, also part of the SCE electrical grid. The resource was evaluated for NRHP-, CRHR-, and local register-eligibility in 2013, and determined to be ineligible for listing.

The City of Redondo Beach also maintains a Historic Resources Register which is a combined list of all properties in Redondo Beach listed in the NRHP or CRHR and/or designated as local landmarks. According to the Redondo Beach Historic Resources Register, four buildings located within the vicinity of the Project site have been designated for protection under the City of Redondo Beach Historic Ordinance (Ord. No. 2554), one of which is also listed in the NRHP and as a contributor to the Original Townsite Historic District. The listed resources are shown in Table 3.4-1. No historic resources recorded in the Torrance Historic Resource Survey (1979) occur in the immediate vicinity of the Project site.

Table 3.4-1. Historic Architectural Resources within Redondo Beach

Name	Address	Proximity to Project Site	Status
Morrell House at Dominguez Park	298 Flagler Lane	650 feet north	Local Landmark
Queen Anne House at Dominguez Park	302 Flagler Lane	750 feet north	Local Landmark
Hibbard House/ Original Townsite Historic District	328 N. Gertruda Avenue	0.43 miles southwest	Listed in NRHP
-	820 Beryl Street	0.23 miles southwest	Locally Significant

Note: The City of Torrance has surveyed hundreds of historic resources within its Olmsted Tract (also referred to as the Torrance Tract or Old Torrance Tract), an area of the City originally planned by Fredrick Law Olmsted Jr. and includes a number of buildings designed by the noted Southern California Architect Irving Gill (Page and Turnbull 2018). The Olmsted Tract and its contents are located in the eastern area of the City and not in proximity to the proposed Project site.

Sources: City of Redondo Beach 2019a; 2019b.

The Morrell House, located at 298 Flagler Lane, is a designated Redondo Beach Landmark characterized by a combination of Queen Anne and Craftsman detailing. The Morrell House was originally constructed in 1906 on Catalina Avenue just north of Diamond Street. However, following the purchase of this property for redevelopment as condominiums in the late 1980s, the developer donated the building, and the City of Redondo Beach allocated a



The Morrell House is a designated Redondo Beach Landmark that was related to Dominguez Park from its original location on Catalina Avenue, just north of Diamond Street.

new location in Dominguez Park, creating Heritage Court. The building is located within Dominguez Park between 190th Street and Beryl Street, approximately 650 feet north from the Project site. The Morrell House faces west with a direct view of an adjacent residential apartment complex. The view to the north of the building includes the Redondo Beach Historical Museum parking lot and the Queen Anne House, another designated Redondo Beach Landmark located in the courtyard (refer to Table 3.4-1). The Morrell House is located within a developed urban area of Redondo Beach predominantly surrounded by single-family residences.

The Queen Anne House, located at 302 Flagler Lane, is a designated Redondo Beach Landmark. As with the Morrell House, the Queen Anne House was also relocated to the site in the late 1980s in an effort to form Heritage Court. The building is located in Heritage Court within Dominguez Park between 190th Street and Beryl Street, approximately 750 feet north from the Project site. The Queen Anne House faces west with a view of the

Heritage Courtyard and adjacent residential apartments across the street. The Queen Anne House is immediately surrounded by the Dominguez Park and parking lots to the north, east and south, and medium-density multi-family residential development to the west.



The Queen Anne House is a designated Redondo Beach Landmark and serves as the Redondo Beach Historical Museum.

The Hibbard House, located at 328 North Gertruda Avenue, is listed in the NRHP and part of the Original Townsite Historic District. This neighborhood was largely built between 1906 and 1914, with houses in a mix of styles typical of the period (i.e., Craftsman and Colonial Revival). The district was added to the NRHP in June of 1988. The Hibbard House is located in a residential neighborhood approximately 0.43 miles southwest of the Project site, facing west towards single-family and low-density multi-family residences.



The Hibbard House, constructed in 1910, is listed on the National Register of Historic Places.

The craftsman home located at 820 Beryl Street was designated as a historically significant building by the City of Redondo Beach since its listing in the Historic Resource Survey conducted by the City of Redondo Beach in 1986 (City of Redondo Beach 2019b). The Historic Resource Survey used a ranking system of “A,” “B,” “C,” “D,” with “A” being most significant. The structure at 820 Beryl Street is ranked as an “A.” This property is surrounded by single-family and low-density multi-family residential homes and Beryl Heights Elementary School to the east.

Archaeological Resources

Archaeological resources both represent and document activities, accomplishments, and traditions of past cultures, and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period, and include deposits of physical remains of the past (e.g., artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained) or areas where prehistoric or historic activity measurably altered the earth.

As previously described, the literature and record search results indicate no archaeological resources have been recorded at the Project site. A lack of known archaeological sites is not a reliable indicator of archaeological sensitivity. In developed urban settings, the original ground surface is typically not available for inspection and prehistoric and historic archaeological deposits may be preserved at depth under existing buildings and structures.

Native American Outreach and Tribal Cultural Resources

A search of the Native American Heritage Commission's (NAHC's) Sacred Lands File was requested to determine the presence of any Native American cultural resources within a 0.5-mile buffer extending from the boundaries of the Project site. The NAHC indicated that the results of the Sacred Lands File search were negative (see Appendix D). However, the NAHC identified five Native American tribes and/or individuals that would potentially have specific knowledge as to whether cultural resources are identified in the Area of Potential Effect:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians-Kizh Nation;
- Anthony Morales, Chairperson, Gabrieleno/Tongva San Gabriel Band of Mission Indians;
- Robert Dorame, Chairperson, Gabrielino Tongva Indians of California Tribal Council;
- Sandonne Goad, Chairperson, Gabrielino/Tongva Nation; and
- Charles Alvarez, Gabrielino-Tongva Tribe.

As part of the tribal consultation process required by Assembly Bill (AB) 52, BCHD sent a request for tribal consultation to the list of tribes provided by the NAHC. The letters, which were sent on July 29, 2019, described the proposed Project and location and requested input on the proposed Project from these individuals and organizations. Of the five tribes/individuals contacted, one tribe, the Gabrieleño Band of Mission Indians – Kizh Nation, responded with a request for formal consultation. A telephone call held on September 16, 2020 between Mr. Andrew Salas, Tribal Chairperson, Matthew Teutimez, Tribal Biologist, and Ed Almanza, representative of BCHD. Tribal representatives were aware of the proposed Project and its location from BCHD's earlier correspondence, and advised that the potential exists for the proposed Project to impact tribal cultural resources (see Impact CUL-4). Mr. Salas requested that BCHD provide for tribal

monitoring by a representative of the Gabrieleño Band of Mission Indians – Kizh Nation during all ground disturbances associated with the proposed Project. Mr. Salas, on behalf of the Gabrieleño Band of Mission Indians – Kizh Nation, also requested that specific measures be implemented in the event of unanticipated discovery of tribal cultural resources, archaeological resources, human remains, and/or associated funerary objects.

3.4.2 Regulatory Setting

Federal Laws and Regulations

National Historic Preservation Act

The National Register of Historic Places was established by the National Historic Preservation Act (NHPA) to help identify and protect properties that are significant cultural resources at the Federal, State, and/or local levels. As previously described, four criteria have been established to determine if a resource is significant to American history, architecture, archaeology, engineering, or culture and should be listed in the NRHP. These criteria include:

1. It is associated with events that have made a significant contribution to the broad patterns of our history;
2. It is associated with the lives of persons significant in our past;
3. It embodies 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;
4. It yields, or may be likely to yield, information important in prehistory or history.¹

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years in age must meet one or more of the above criteria to be eligible for listing in the NRHP. However, the NRHP does not prohibit the consideration of properties less than 50 years in age whose exceptional contribution to the development of U.S. history, architecture, archaeology, engineering, or culture can be clearly demonstrated under NRHP criteria.

In addition to meeting the Criteria for Evaluation, a property must have integrity, which is defined as “*the ability of a property to convey its significance.*” According to NRHP Bulletin 15, the NRHP recognizes seven aspects or qualities that, in various combinations, define integrity. To

¹ *Guidelines for Completing National Register Forms*, National Register Bulletin 16, U.S. Department of Interior, National Park Service, September 30, 1986. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the NRHP.

retain historic integrity a property will always possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance. The seven factors that define integrity are location, design, setting, materials, workmanship, feeling and association.

In assessing a property's integrity, the NRHP criteria recognize that properties change over time; therefore, it is not necessary for a property to retain all its historic physical features or characteristics. The property must, however, retain the essential physical features that enable it to convey its historic identity.

State Laws and Regulations

The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA at the State level. The OHP also carries out the duties as set forth in the PRC and maintains the CRHR as well as the California Historic Resources Inventory. The State Historic Preservation Officer is an appointed official who implements historic preservation programs within the State's jurisdictions. CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historic resources.

California Register of Historical Resources

The CRHR is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change.” CEQA Guidelines Section 15064.5(a)(3) states that a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the CRHR (PRC Section 5024.1; CCR Section 4852).

A historic resource eligible for listing in the CRHR must meet one or more of the criteria of significance and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historic resources that have been rehabilitated or restored may be evaluated for listing.

The CRHR automatically includes “all properties formally determined eligible for, or listed in, the National Register of Historic Places,” and certain specifics, and California Points of Historical Interests that have been evaluated and recommended for inclusion on the CRHR. Unless a resource listed in a survey has been demolished, lost substantial integrity, or there is a preponderance of evidence indicating that it is otherwise not eligible for listing, a lead agency should consider the

resource to be potentially eligible for the CRHR. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or identified in an historic resources survey, does not preclude a lead agency from determining that the resource may be an historic resource as defined in PRC Sections 5020.1(j) or 5024.1.

California Environmental Quality Act

CEQA includes regulations that address historic resources. As described in PRC 21084.1, “*historic resources*” are defined according to PRC Section 5020.1(k) as “*any object, building, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California*” (OHP 2005). Resources included in a local register of historic resources (pursuant to PRC Section 5020.1[k]), or identified as significant in an historic resources survey (meeting the criteria in PRC Section 5024.1[g]), are also considered “*historic resources*” for purposes of CEQA. The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historic resources, or identified in a historic resources survey, does not preclude a lead agency from determining that the resource may be a historic resource as defined in PRC Sections 5020.1(j) and 5024.1.

Assembly Bill 52

AB 52 amended CEQA to require that lead agencies notify and consult in good faith with California Native American tribes requesting consultation regarding projects that may impact tribal cultural resources. Tribal cultural resources may include site, features, places, cultural landscapes, sacred places, or objects with cultural value to a California Native American tribe. Under AB 52, a project with a potential to impact tribal cultural resources such that it would cause a substantial adverse change constitutes a significant effect on the environment unless mitigation reduces such effects to a less than significant level.

State Laws and Regulations Governing Human Remains

The disposition of human remains is governed by California Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98, and may fall within the jurisdiction of the NAHC. If human remains are discovered, the County Coroner must be notified immediately and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98, will immediately notify

those persons it believes to be most likely descended from the deceased Native American(s) so they can inspect the burial site and make recommendations for treatment or disposal. CEQA Guidelines Section 15064.5 also assigns special importance to human remains and specifies procedures to be used when Native American human remains are discovered.

City of Redondo Beach Local Policies and Regulations

Redondo Beach Historic Ordinance

The Redondo Beach Historic Ordinance (Ord. No. 2554) in Redondo Beach Municipal Code (RBMC) Title 10 Chapter 4 is intended to promote the public health, safety, and general welfare by providing for the identification, protection, enhancement, perpetuation, and use of historic resources such as buildings and structures, sites and places within the City that reflect special elements of the City's architectural, artistic, cultural, historic, political, and social heritage (City of Redondo Beach 1989).

A historic resource may be designated a landmark, and an area may be designated an historic district if it meets one or more of the following criteria:

1. It exemplifies or reflects special elements of the City's cultural, social, economic, political, aesthetic, engineering, or architectural history; or
2. It is identified with persons or events significant in local, State, or national history; or
3. It embodies distinctive characteristics of a style, type, period, or method of construction, or is a valuable example of the use of indigenous materials or craftsmanship; or
4. It is representative of the notable work of a builder, designer, or architect; or
5. Its unique location or singular physical characteristic(s) represents an established and familiar visual feature or landmark of a neighborhood, community, or the City.

In order to be eligible for consideration as a landmark, a historic resource must be at least 50 years old; with the exception that an historic resource of at least 30 years of age may be eligible if the City's Preservation Commission determines that the resource is very exceptional, or that it is threatened by demolition, removal, relocation, or inappropriate alteration.

Historic Resources Survey

The City of Redondo Beach has conducted two surveys in the development of its historic resource list. A structure is considered a historic resource if it is designated as a national or State landmark or meets the criteria described under the Redondo Beach Historic Ordinance (Ord. No. 2554). The

1986 Historic Resource Survey includes the City's original townsite and adjacent areas to the south. Included are structures, sites and artifacts related to the history of the City from the origins of the community to and including 1946. The survey identified approximately 1,400 buildings pre-dating 1946 and with the original townsite, the Clifton-by-the-Sea area, and Clifton Heights area.

The 1996 Historic Resources Survey was designed to supplement the 1986 investigations and expand the surveyed area. Areas north of 190th Street/Anita Avenue (North Redondo), areas located east of the 1986 study, and some isolated areas location the southern portion of the City were included. Not including addresses identified in the 1986 Survey, the 1996 Survey team found 1,565 addresses to be located within the City and pre-dating 1950, none of which are located on the Project site.

City of Torrance Local Policies and Regulations

Torrance General Plan Community Resource Element

The Torrance General Plan Community Resource Element states that the goal of the historic preservation policies are to demonstrate respect and pride for the foundations of the City through the establishment of a long-range vision for the protection of historic resources in the City and to goals and policies to achieve that vision (City of Torrance 2010). The Community Resource Element is organized into objectives, and policies. Some of the policies include identifying and evaluating local structures and sites of historic interest, encouraging the preservation of public and private buildings which are of local, historic, or cultural importance balancing historic preservation goals with the interests of private property owners, the establishment of a historic policy and programs for recognition of historic assets within the City.

Torrance Historic Preservation Ordinance

The Torrance Historic Preservation Ordinance (Ord. No. 3822) establishes the Torrance Register of Historic Resources and allows the designation of a property or area by the Historic Preservation Commission if eligible (City of Torrance 2017). The primary purpose of the Historic Preservation Ordinance is to promote the public health, safety, and general welfare by providing for the identification, designation, protection, enhancement, perpetuation and use of historic resources that reflect themes important in the City's heritage.

To be eligible for designation as a landmark or historic district in the Torrance Register of Historic Resources, a property or area shall meet one or more of the following requirements below:

1. Listed in the CRHR and NRHP, if the property has not undergone substantial exterior alteration since its designation and retains integrity;

2. Identified as eligible in a survey adopted by the Torrance City Council;
3. Determined by a qualified historic preservation professional through a historic assessment to meet at least one (1) or more of the criteria outlined in Torrance Municipal Code (TMC) Section 91.50.050 or 91.50.060.

Torrance Municipal Code

TMC Section 91.50.050 lists criteria for a property to be designated as a historic landmark. These criteria consider the structure's association with historic events, persons, or renowned architects, artistic or aesthetic value, potential to yield information about the prehistory or history of the City, state, or nation. The criteria also consider if the property embodies the distinct characteristic of a type, period, or style, or method of construction, or if property is among the last, best remaining examples of an architectural or historic type of specimen.

3.4.3 Impact Assessment and Methodology

Thresholds for Determining Significance

The following thresholds of significance for cultural resources are based on Appendix G of the CEQA Guidelines. For the purposes of this EIR, the proposed Project would be considered to have a significant adverse impact on cultural resources if:

- a) The project would cause a substantial adverse change in the significance of an historic resource as defined in CEQA Guidelines Section 15064.5;
- b) The project would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; and/or
- c) The project would disturb any human remains, including those interred outside of formal cemeteries.

Implementation of the proposed Project would be considered to have a significant adverse impact on tribal cultural resources if it would:

- a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is at least one of the following:
 - i. Listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k); or

- ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.

Historic Resources

Analysis of impacts to historic architectural resources requires that a lead agency first determine whether a building, structure, object, or feature is a historic resource as defined in CEQA Guidelines Section 15064.5. If the lead agency determines a building, structure, object, or feature is determined to be a historic resource, its significance may be considered to be materially impaired by a project through demolition or alteration. The resource may also be materially impaired by demolition or incompatible new construction that alters the setting of the resource, thereby diminishing its integrity and significance.

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 a historic resource may have a significant effect on the environment. A substantial adverse change means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings, resulting in material impairment of the historic resource (CEQA Guidelines Section 15064.5[b][1]). According to CEQA Guidelines Section 15064.5(b)(2), the significance of a historic resource is materially impaired when a project:

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

Removal, demolition, or alteration of historic resources can directly impact their significance by destroying the historic fabric of an archaeological site, structure, or historic district. Direct impacts can be assessed by identifying the types and locations of proposed development, determining the

exact locations of cultural resources within the project vicinity, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

The maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction of a historic resource in a manner consistent with The Secretary of the Interior's Standards and Guidelines (Weeks and Grimmer 1995) generally will constitute mitigation of impacts to a less than significant level. Documentation of historic buildings and structures, including documentation to the standards of the Historic American Buildings Survey or Historic American Engineering Record, may reduce impacts but may not reduce them to less than significant levels.

The Secretary of the Interior's Standards for the Treatment of Historic Properties (36 Code of Federal Regulations [CFR] Part 68) defines four options for the treatment of historic buildings: 1) preservation; 2) rehabilitation; 3) restoration; and 4) reconstruction. These standards are not prescriptive but instead provide general guidelines and are intended to be flexible and adaptable to specific project conditions, including aspects of adaptive use, functionality, and accessibility. The goal is to balance continuity and change and retain historic building fabric to the maximum extent feasible. The National Park Service has compiled a series of bulletins to provide guidance on specific historic preservation topics.

Archaeological Resources and Human Remains

CEQA provides guidelines for mitigating impacts to archaeological resources in CEQA Guidelines Section 15126.4. According to the CEQA Guidelines, public agencies should, whenever feasible, seek to avoid damaging effects on any historic resource of an archaeological nature. The following factors shall be considered for a project involving such an archaeological site:

1. Preservation in place (i.e., avoidance) is the preferred manner of mitigating impacts to archaeological sites. Preservation in place maintains the relationship between artifacts and the archaeological context. Preservation may also avoid conflict with religious or cultural values of groups associated with the site.
2. Preservation in place may be accomplished by, but is not limited to, the following:
 - Planning construction to avoid archaeological sites;
 - Incorporation of sites within parks, greenspace, or other open space;
 - Covering the archaeological sites with a layer of chemically stable soil before building tennis courts, parking lots, or similar facilities on the site;
 - Deeding the site into a permanent conservation easement.

3. When data recovery through excavation is the only feasible mitigation, a data recovery plan, which makes provision for adequately recovering the scientifically consequential information from and about the historic resource, shall be prepared and adopted prior to any excavation being undertaken. Such studies shall be deposited with the California Historical Resources Information System. Archaeological sites known to contain human remains shall be treated in accordance with the provisions California Health and Safety Code Section 7050.5.
4. Data recovery shall not be required for a historic resource if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the archaeological or historic resource, provided that the determination is documented and that the studies are deposited with the California Historical Resources Information System.

Tribal Cultural Resources

CEQA provides recommendations for mitigating impacts to tribal cultural resources in PRC Section 21084.3. According to these recommendations, public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process provided for in PRC Section 21080.3.2, Section 21084.3 lists the following examples of mitigation measures that, if feasible, may be considered to avoid or minimize the significant adverse impacts:

1. Avoidance and preservation of the resources in place, including, but not limited to:
 - a. Planning and construction to avoid the resource and protect the cultural and natural context; and
 - b. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
2. Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - c. Protecting the cultural character and integrity of the resource;
 - d. Protecting the traditional use of the resource; and
 - e. Protecting the confidentiality of the resource.

3. Permanent conservation easements of other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
4. Protecting the resource.

Methodology

Historic Resources

Under CEQA, a proposed development must be evaluated to determine how it may impact the potential eligibility of a structure(s) or a site for designation as a historic resource. Based on CEQA Guidelines Section 15064.5(b)(2) presented above, the proposed Project would have a significant impact on historic resources if it would demolish, destroy, relocate, or alter a historic resource or its setting such that its historic significance or integrity as a historic resource would be materially impaired, rendering it no longer eligible as a historic resource. The analysis of the potential impacts of the proposed Project on historic resources is based on a review of information and analysis available in several reports:

- Historic Resources Assessment prepared by LSA (2018);
- Peer Review of the Historic Resources Assessment prepared by Wood's architectural historian;
- Redondo Beach Historic Resources Survey (1986 and 1996); and
- Torrance General Plan Community Resources Element (2010).

The Historic Resources Assessment included a records search of the NRHP and its annual updates, determinations of eligibility for the NRHP and CRHR. The Redondo Beach Historic Resources Register and the Torrance Olmsted District Torrance California Survey of Historic Resources were also reviewed to identify any previously surveyed properties within the Project site and the surrounding vicinity. Site inspections were made to assess existing conditions and to describe the remaining historic integrity of the former South Bay Hospital Building and associated Maintenance Building as well as the outpatient medical office buildings and the other structures developed on the campus in the 1980s. Criteria of the NRHP and CRHR as well as the Redondo Beach Historic Ordinance (Ord. No. 2554) and City of Torrance Historic Preservation Ordinance (Ord. No. 3822), were applied to evaluate these each of these resources.

Archaeological Resources and Human Remains

Investigation of potential archaeological resources at the Project site was conducted through an archaeological literature and records search at the SCCIC at California State University, Fullerton

and consultation of the NRHP, CRHR, California Historical Landmarks, California Points of Historical Interest, and California Inventory of Historic Resources.

Tribal Cultural Resources

The impact analysis for tribal cultural resources is based on information provided during consultation with California Native American tribes that requested consultation pursuant to AB 52, the findings of the literature and records search, Project site-specific geologic and topographic conditions, and the footprint and depth of the subsurface excavation associated with the proposed Project.

3.4.4 Project Impacts and Mitigation Measures

Impact Description (CUL-1)

- a) *The project would cause a substantial adverse change in the significance of an historic resource as defined in CEQA Guidelines Section 15064.5;*

CUL-1 Redevelopment of the Beach Cities Health District (BCHD) campus would include the proposed demolition of Beach Cities Health Center and the attached Maintenance Building during Phase 1 as well as the demolition of the existing parking structure and potentially the Beach Cities Advanced Imaging Center during Phase 2. However, no historic architectural resources exist on the campus and the proposed redevelopment of the campus would not damage or result in a substantial change in the historic setting of historic architectural resources in the vicinity of the Project site. Therefore, impacts would be *less than significant*.

The implementation of Phase 1 would begin with the removal of the northern surface parking lot and the construction of the Residential Care for the Elderly (RCFE) Building. The Beach Cities Health Center would remain in place for the duration of construction of the RCFE Building to allow some of BCHD's existing programs to continue. However, following the completion of the proposed construction activities, the existing uses would be relocated from the Beach Cities Health Center to the new RCFE Building and the Beach Cities Health Center and attached Maintenance Building would be demolished. The footprint of this building would be converted to a surface parking lot and open space within the interior portion of the campus. During Phase 2, the existing parking structure and potentially the Beach Cities Advance Imaging Building would be demolished and redeveloped with a Wellness Pavilion, Aquatics Center, and Center for Health and Fitness (CHF) as well as a new parking structure.

As described in Section 3.4.1, *Environmental Setting*, the Historic Resources Assessment prepared for the BCHD campus by LSA (2018) identified the Beach Cities Health Center (former South Bay Hospital Building) and the attached Maintenance Building as historic-period structures that are more than 50 years old; however, it was determined that these buildings do not meet any of the criteria for listing as a historic resource in CRHR, or designation as a local landmark under the Redondo Beach Historic Ordinance (Ord. No. 2554). The other existing structures on the campus – including the two outpatient medical office buildings and the existing parking structure – also do not meet any of these criteria. Further, the Project site is not listed in the Torrance Register of Historic Resources or located within the Torrance Tract Overlay Zone. Therefore, the demolition of the Beach Cities Health Center and attached Maintenance Building during Phase 1 as well as the existing parking structure and Beach Cities Advanced Imaging Building during Phase 2 would not result in a significant impact to historic architectural resources under the criteria set forth in CEQA Section 15064.5(b)(3).

As described in Table 3.4-1, the Morell House and Queen Anne House are located within the immediate vicinity of the Project site within Dominguez Park. These buildings have been previously determined to be Redondo Beach Landmarks in accordance with the criteria described in the Redondo Beach Historic Ordinance (Ord. No. 2554) (refer to Section 3.4.2, *Regulatory Setting*). According to the Redondo Beach Historic Resources Survey, there are no other significant or potentially significant historic architectural resources in the immediate vicinity of the Project site.

Potential impacts to historic built resources can include physical damage or the loss of character defining features and alteration of the historic setting. As described in Section 3.11, *Noise*, redevelopment of the BCHD campus would not result in substantial ground-borne vibration that could physically damage either of the two nearby historic buildings (see Section 3.11, *Noise*). With regard to their historic setting, both the Morell House and Queen Anne House were relocated to their current location in Dominguez Park in the late 1980s. As such, these buildings have been previously removed from their original historic settings and context. Additionally, the area surrounding the current location of Morell House and Queen Anne House has already been substantially redeveloped over the years with the construction former South Bay Hospital, Redondo Village Shopping Center, and other surrounding uses including Dominguez Park, which was formerly a landfill that was operated from 1904 to 1967. As such, the existing surrounding development does not contribute to the character-defining features that establish of the Morell House and Queen Anne House as Redondo Beach Landmarks.

Given that the proposed Project would not physically damage or substantially change the historic setting or context of any historic architectural resources, the potential impacts associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Impact Description (CUL-2)

- b) *The project would cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5; and/or*

CUL-2 Ground disturbing activities associated with the proposed Project – particularly demolition of existing pavements and excavation of subterranean levels during Phase 1 and Phase 2 – could uncover previously unknown prehistoric or historic archaeological deposits that qualify as archeological resources as defined CEQA Guidelines Section 15064.5. Damage or destruction of any such archaeological resources would be considered a potentially significant impact. However, this impact would be *less than significant with mitigation*.

Under the proposed Project, major earthwork would involve demolition, grading, and excavation of the previously disturbed Project site. Phase 1 would begin with the demolition of approximately 100,000 sf of pavements include the existing northern surface parking lot and associated perimeter circulation road. Subsequent construction of the RCFE Building would begin with a 26-foot-deep excavation for the subterranean service area and loading dock. Similarly, Phase 2 would include a 26-foot-deep subterranean excavation for the proposed parking structure and other service areas. These excavations would occur in a 20,000-sf area at the corner of Flagler Lane and Beryl Street and an area of between 23,100 sf and 39,200 sf near the central area of the BCHD campus. Earth movement across the remainder of the Project site would include relatively minor grading to even the terrain in the central area of the BCHD campus.

The Project site has been extensively disturbed beginning with the construction of the former South Bay Hospital (and associated basement) in 1958 as well as the subsequent expansion in the 1960s. Thereafter, the Beach Cities Advanced Imaging Building, Providence Little Company of Mary Medical Institute Building, and the associated subterranean parking garage and parking structure were constructed in the 1980s, causing further soil disturbance on the Project site. Utilities including electrical lines, water lines, sewer lines, and storm drains have also been installed throughout the Project site to support these facilities. Based on the results of the literature and records search, no archaeological resources were identified during any of these construction episodes. Consequently, given the extensive ground disturbance that has occurred previously, the Project site is unlikely to

contain any intact, previously undisturbed archaeological resources and the potential for the proposed Project improvements to impact previously unknown prehistoric or historic-period archaeological resources is considered to be low.

Nevertheless, with the implementation of MM CUL-1 and MM CUL-2, agreed to during AB 52 consultation with the Gabrieleño Band of Mission Indians – Kizh Nation, any previously unknown buried archaeological resources inadvertently discovered during construction would be protected and curated, if encountered. Therefore, impacts associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant with mitigation*.

Mitigation Measures (MM)

MM CUL-1 Cultural Resources Monitoring Plan. *Prior to issuance of a demolition or excavation/grading permit, a Cultural Resources Monitoring Plan shall be developed by a qualified archaeologist, with provisions for review and input by representatives of the Native American tribe(s) that consulted on the project pursuant to Assembly Bill (AB) 52. The Cultural Resources Monitoring Plan shall identify those specific locations on the Project site where a qualified archaeologist and Native American tribal monitor shall be required during ground disturbing activities – including (but not limited to) clearing/grubbing, excavations, grading, and trenching – during the construction activities associated with Phase 1 and Phase 2 of the proposed Project. The rate of excavation, the types of activities, their proximity to known archaeological resources, the provenance and character of materials being excavated (e.g., non-cultural fill, younger alluvium, or older alluvium), the depth of excavation, and if found, the abundance and type of prehistoric archaeological or tribal resources encountered, will determine the frequency of monitoring in these areas. Full-time field observation shall be reduced to part-time inspections or ceased entirely if determined appropriate by the qualified archaeologist and Native American tribal monitor. The Cultural Resources Monitoring Plan shall also include a Treatment Plan that sets forth explicit criteria for appropriately mitigating impacts to archaeological resources that may be eligible for the California Register of Historic Resources (CRHR), human remains, and/or burial goods or other significant tribal resources inadvertently discovered during ground disturbing activities. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary.*

MM CUL-2 *Inadvertent Discoveries.* *A qualified professional archaeologist and approved Native American monitor shall be retained for the duration of ground-disturbing activities. In the event of any inadvertent discovery of prehistoric or historic-period archaeological and/or tribal resources during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop. Construction activities shall temporarily be redirected to areas located more than 50 feet from the find. The qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. All tribal cultural resources unearthed by ground disturbing activities shall be evaluated by the Native American monitor. Any required testing or data recovery shall be directed by the qualified archaeologist and Native American monitor pursuant to the Treatment Plan.*

Residual Impacts

With the implementation of MM CUL-1 and MM CUL-2, the potential for impacts to archaeological resources would be *less than significant*. In the event of an unanticipated discovery there would be a clear Treatment Plan and any required testing or data recovery would be completed, as necessary.

Impact Description (CUL-3)

- c) *The project would disturb any human remains, including those interred outside of formal cemeteries.*

CUL-3 **While unlikely, unknown, isolated Native American human remains could potentially be inadvertently uncovered during construction activities associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. In the event of this occurrence, Beach Cities Health District (BCHD) would immediately cease activity in the vicinity of the discovery and comply with existing regulations. Therefore, impacts would be *less than significant*.**

The nearest known cemetery to the Project site is the Pacific Crest Cemetery, located approximately 1.4 miles northeast of the Project site. As described in Impact CUL-2 above, the Project site has previously been disturbed during construction of the existing facilities at the BCHD campus. No human remains have been discovered during any of the construction episodes at the existing BCHD campus.

However, as described further in Impact CUL-4, during AB 52 consultation the Gabrieleño Band of Mission Indians – Kizh Nation described that the Project site is in an area known to have had a high level of tribal activity including trade routes. It is possible that the area within and around these trade routes contains isolated burials and cremations.

Although human remains have not been identified previously within the Project site or the surrounding vicinity, it is possible that human remains could be preserved at depth beneath the existing building foundations and adjacent surface parking lots. In the unlikely event that human remains are discovered during excavation or grading associated with Phase 1 or Phase 2 of the proposed Project, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall be halted. A qualified professional archaeologist shall inspect the remains and confirm that they are human and, if so, shall immediately notify the coroner in compliance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the coroner determines the remains are Native American, the coroner shall contact the NAHC. As provided in PRC Section 5097.98, the NAHC shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent would make recommendations for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in PRC Section 5097.98.

With compliance to existing requirements in California Health and Safety Code Section 7050.5, CEQA Guidelines Section 15064.5, and PRC Section 5097.98, any impacts to human remains associated with Phase 1 and Phase 2 of the proposed Project would be *less than significant*.

Impact Description (CUL-4)

- a) *Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is at least one of the following:*
 - i. *Listed or eligible for listing in the CRHR, or in a local register of historic resources as defined in PRC Section 5020.1(k); or*
 - ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1(c), the lead agency shall consider the significance of the resource to a California Native American tribe.*

CUL-4 Potential tribal cultural resources, as defined in Public Resources Code (PRC) Section 21074, may be inadvertently uncovered during excavation and grading associated with the Phase 1 preliminary site development plan and the more general Phase 2 development program. Damage or destruction of such tribal cultural resources would be a potentially significant impact. However, impacts would be reduced to *less than significant with mitigation*.

As previously described, a search of the NAHC's Sacred Lands File was requested to determine the presence of any Native American cultural resources within a 0.5-mile buffer extending from the boundaries of the Project site. The NAHC indicated that the results of the Sacred Lands File search were negative. However, during AB 52 consultation, the Gabrieleño Band of Mission Indians – Kizh Nation advised that the Project site is an area of high cultural sensitivity because of the presence of traditional trade routes. Higher elevations, such as the site of the BCHD campus, may have served as look-out locations.

Maps shared by the tribe illustrate the probable alignment of a traditional trade route (now the Hermosa Greenbelt and former railroad right-of-way). Trade routes were heavily used by the tribe for movement of trade items, visiting family, going to ceremonies, accessing recreation areas, and accessing foraging areas. As such, these areas can contain seasonal or permanent ramadas or trade depots, seasonal and permanent habitation areas, and isolated burials and cremations. Watercourses and water bodies within the region may have also supported seasonal or permanent settlements, seasonal or permanent trade depots, ceremonial and religious prayer sites, and burials and cremation sites. Additionally, salt beds in the region provided unique minerals and salts that were used for food flavoring and preservation, medicinal therapies and cleansers, and spiritual ceremonies in sand drawings.

Due to the concerns raised by the Gabrieleño Band of Mission Indians – Kizh Nation during AB 52 consultation, MM CUL-1 and MM CUL-2 would be required in order to avoid impacting or destroying potential previously unknown resources that may be inadvertently unearthed during the ground disturbing activities. Implementation of these measures would ensure that any potential impacts associated with Phase 1 and Phase 2 of the proposed Project would remain *less than significant with mitigation*. Pursuant to PRC Section 21082.3(d) consultation with the Gabrieleño Band of Mission Indians – Kizh Nation was concluded on December 15, 2020.

Residual Impact

With the implementation of MM CUL-1 and MM CUL-2, the potential for impacts to archaeological resources would be *less than significant*. In the event of an unanticipated discovery

there would be a clear Treatment Plan and any required testing or data recovery would be completed, as necessary.

Cumulative Impacts

A cumulative impact to cultural resources would result if the impacts associated with the proposed Project, along with other pending, approved, and recently completed projects in Redondo Beach, Torrance, and the other neighboring South Bay communities would cumulatively impact historic architectural resources, archaeological resources, or tribal cultural resources. Excavation, grading, and other ground disturbing activities associated with cumulative development in Redondo Beach, Torrance, Hermosa Beach, and Manhattan Beach (refer to Section 3.0.2, *Cumulative Impacts*) could increase the potential for prehistoric or historic cultural resources to be altered, disturbed, or otherwise damaged. The potential to create adverse cumulative impacts to such resources depends on the nature of each project, including its specific site and surroundings. However, all pending, approved, or recently completed projects would be required to comply with the laws and regulations related to historic architectural resources, archeological resources, discovery of human remains, and tribal cultural resources cited and discussed in the analysis above. Given the extensive ground disturbance that has occurred previously, the Project site is unlikely to contain any intact, previously undisturbed archaeological resources and the potential for the proposed Project improvements to impact previously unknown prehistoric or historic-period archaeological resources is considered to be low. Additionally, with implementation of MM CUL-1 and MM CUL-2, in the unlikely event that buried cultural resources are discovered during construction, ground-disturbing activities in the immediate vicinity of the discovery shall stop and a qualified archaeologist and/or Native American monitor shall evaluate the significance of the discovery based on the Treatment Plan prior to resuming any activities that could impact the discovery. The Treatment Plan shall also include requirements for a final technical report on all cultural resource studies and requirements for curation of artifacts and other recovered remains, including appropriate treatment of tribal resources, as necessary. Therefore, regardless of the potential impacts of other pending, approved, and recently completed projects, the proposed Project would have less than significant residual impacts and *would not substantially contribute to cumulatively significant impacts*.

