Technical Memorandum

To:	Shannon Soto, Ed.D. Chief Administrative Officer Compton Unified School District 501 South Santa Fe Compton, CA 90221	From:	Charlane Gross, M.A., RPA Senior Archaeologist Barbara Heyman, Principal Environmental Planning Terraphase Engineering Inc.
Date:	February 16, 2026	Project No.:	0215.001ab.001A
Subject:	**Cultural Resources Technical Memorandum for Proposed Centennial High School Modernization Project, Compton, California**		

Terraphase Engineering, Inc. was retained by the Compton Unified School District (District) to prepare a cultural resources technical memorandum to satisfy the requirements of the California Environmental Quality Act (CEQA) for the Centennial High School Modernization Project (Project) at 2606 North Central Avenue in Compton, California (site).[1]

Terraphase conducted a records search through the California Historical Resources Information System's South Central Coastal Information Center (SCCIC), the official state repository for cultural resources records and reports in Los Angeles County, and reviewed relevant literature, aerial photographs, historical maps, and project-specific studies to assess the potential for the Project to cause a substantial adverse change to historical resources, as defined in PRC § 5020.1(q) and the CEQA Guidelines.[2, 3] Local Native American tribes were also contacted to identify potential tribal cultural resources (TCRs) within the Project site and vicinity.

This technical memorandum summarizes the Project location and environmental setting, proposed improvements, and applicable regulatory framework under CEQA and related state laws. It also presents the background research, record searches, and tribal consultation conducted to evaluate potential historical and archaeological resources and TCRs, along with an analysis of potential impacts and recommended mitigation measures to ensure compliance and resource protection.

[1] https://lci.ca.gov/ceqa/getting-started/

[2] https://leginfo.legislature.ca.gov/PRC/division5/chapter1/article2/5020.1

[3] "Chapter 3. Guidelines for Implementation of the California Environmental Quality Act," 14 CCR §§ 15000-15387, https://govt.westlaw.com/calregs/title14/division6/chapter3

File: tm-CentennialHS ModPrj-CEQA-0215-001ab-001A-DTE_042826

Project Location

The Project site, 2606 North Central Avenue, Compton, California, is within Township 3 South, Range 13 west, Sections 8 and 9, in Los Angeles County as depicted on the United States Geological Survey's South Gate and Inglewood quadrangle maps. The campus encompasses one parcel (Assessor's Parcel Number 6145-001-900) bounded by El Segundo Boulevard to the north, North Central Avenue to the west, West 131st Street to the south, and North Parmalee Avenue to the east.

Figures illustrating the site location and existing development footprint are provided in **Attachment A**.

Environmental Setting

The Project site is fully developed with educational facilities, which include multiple one-story classroom buildings, administrative offices, a gymnasium, cafeteria, library, and portable classrooms. Paved parking lots primarily occupy the western half of the campus. The eastern half features a football stadium with bleachers, as well as various athletic courts and fields. The oldest buildings on campus date back to the school's founding in 1954.

The surrounding area is urbanized and consists predominantly of single- and multi-family residential developments. Institutional and commercial use properties located along major corridors, and a channelized segment of Compton Creek runs to the east of the site.

A geotechnical investigation conducted in 2025 (Fenagh Engineering and Testing [Fenagh] 2025) identified fill material composed of lean clay and clayey sand extending approximately 2 to 4 feet below ground surface (bgs). Beneath the fill, native alluvium primarily consisting of lean clay and silt was encountered to a depth of approximately 20 feet bgs. This transitions into poorly graded sand with gravel, interlayered with silty sand and lean clay, extending to approximately 51.5 feet bgs. Perched groundwater was observed between 43 and 47 feet bgs. However, historical high groundwater levels—based on California Geological Survey's 2006 Seismic Hazard Evaluation Reports 027 and 034 (Plate 1.2)—indicate that the highest groundwater level at the Project site is approximately 10 feet bgs (Fenagh 2025).

Topographic maps and map plates included in Fenagh's geotechnical report indicate that the channelized portion of Compton Creek may closely follow its original natural alignment, passing near the northeastern corner of the Project site adjacent to the athletic fields. Topographic maps dating back to 1923 indicate that Compton Creek may have already been channelized by that time; earlier mapping was not available for review.

Project Description

The proposed Project involves a comprehensive redevelopment of the existing high school campus to modernize facilities, optimize campus layout and accessibility, and enhance educational and recreational spaces to better serve current and future students. The Project would include the demolition of most existing buildings, infrastructure, and athletic fields, followed by the construction of new academic,

administrative, performing arts, and athletic facilities. Associated site improvements would include new hardscape and landscaped areas, featuring drought-tolerant native plantings and permeable paving to support sustainability goals. The proposed Project site is included in **Attachment A**. The Project is not intended to increase student capacity but to optimize and modernize the existing campus layout and facilities.

Regulatory Setting

CEQA requires that projects funded by or requiring discretionary approval from public agencies in California consider their potential effects on unique archaeological resources (PRC § 21083.2).[4] Historical resources are defined as buildings, sites, structures, or objects that possess historical, architectural, archaeological, cultural, or scientific significance (PRC § 5020.1). CEQA Guidelines (14 CCR § 15064.5) define three cases in which a property may qualify as a historical resource for the purpose of CEQA review:

- The resource is listed in or determined eligible for listing in the California Register of Historical Resources (CRHR).
- The resource is included in a local register of historic resources, as defined in PRC § 5020.1(k), or is identified as significant in a historical resources survey that meets the requirements of PRC § 5024.1(g),[5] unless the preponderance of evidence demonstrates that the resource is not historically or culturally significant.
- The lead agency determines that the resource may be a historical resource as defined in PRC § 5020.1(j) or § 5024.1, or significant as supported by substantial evidence in light of the whole record. PRC § 5024.1 defines eligibility requirements and states that a resource may be eligible for inclusion in the CRHR if it:
    1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
    2. Is associated with the lives of persons important in our past;
    3. Embodies the distinctive characteristics of a type, period, region, or method of construction, represents the work of an important creative individual, or possesses high artistic values; or
    4. Has yielded, or may be likely to yield, information important in prehistory or history.

Assembly Bill 52 (AB 52), enacted in 2014, establishes a formal process for consultation between CEQA lead agencies and California Native American tribes traditionally and culturally affiliated with the geographic area of a proposed project.[6] Consultation is only required if a tribe has submitted a written request to the lead agency for notice of projects within its traditional territory. Importantly, consultation

[4] https://leginfo.legislature.ca.gov/PRC/division13/chapter2.6/21083.2

[5] https://leginfo.legislature.ca.gov/PRC/division5/chapter1/article2/5024.1

[6] https://leginfo.legislature.ca.gov/AB52

must begin prior to the release of a CEQA environmental document and must be conducted in good faith, with the goal of reaching a mutual agreement on mitigation measures to avoid or reduce impacts to TCRs.

Background Research

This section summarizes the background research, record searches, historical evaluations, and tribal coordination efforts conducted to identify and assess potential cultural and historical resources and TCRs within and surrounding the Project site.

South Central Coastal Information Center Record Search

On August 7, 2025, the SCCIC provided the results of a cultural resources records search for the area surrounding the proposed Project site (Records Search File No. 27059-12604). As part of the records search, the SCCIC reviewed the following state and federal inventories:

- Built Environment Resources Directory for Los Angeles County
- California Register of Historical Resources
- California Historical Landmarks
- California Points of Historical Interest
- National Register of Historic Places

The SCCIC reported that no archaeological sites or cultural resources are known to exist within the proposed Project site or within a 0.5-mile radius. Although eight archaeological studies have been conducted within the 0.5-mile radius, none were located within the Project site boundaries. These reports are listed in Table 1.

Table 1. Cultural Resource Reports within 0.5 miles of the Project Site

Report No.	Title	Author(s)	Date
LA-01111	*Impact on Archaeological Resources of the Proposed Willowbrook Park for the Los Angeles County Department of Parks and Recreation*	Bove, Frederick J.	1977
LA-02877	*Cultural Resources Survey, 1711 East 126th St., Willowbrook District, Los Angeles County*	Valentine-Maki, Mary Svete and Steve Svete	1993
LA-06877	*Negative Phase I Archaeological Survey of Approximately 9.56 Acres for the Salinas Avenue Housing Project 13024 Salinas Avenue - APN 6134-033-900 Unincorporated Compton, Los Angeles County, California*	Maki, Mary K.	2003
LA-09188	*Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA13086B (Fierro Building), 2714 South Compton Avenue, Compton, Los Angeles County, California*	Bonner, Wayne H.	2007

Table 1. Cultural Resource Reports within 0.5 miles of the Project Site

Report No.	Title	Author(s)	Date
LA-09814	*Archaeological Survey Report of Approximately 15.5 Acres for the Ujima Village Demolition & Conversion to Park, 941 East 126th St., Willowbrook, Los Angeles County, CA*	Mary Maki	2009
LA-09901	*A Cultural Resources Assessment for the Proposed City of Compton Well No. 20 Improvements Project, located within Sibrie Park on West El Segundo Blvd., Compton, Los Angeles County, California*	Jeanette A. McKenna	2008
LA-11150	*West Basin Municipal Water District Harbor/ South Bay Water Recycling Project*	Maxwell, Pamela	2003
LA-13173	*Cultural Resources Assessment Earvin "Magic" Johnson Recreation Area State Master Plan Amendment/Ujima Village Master Plan Project, City of Los Angeles, Los Angeles County, California*	Brunzell, David	2014

Source: SCCIC

Historical Resources Evaluation

Several buildings proposed for demolition are more than 50 years old and were evaluated for potential eligibility for listing in the CRHR and the National Register of Historic Places. A historical evaluation conducted by Ascent Environmental in 2025 concluded that the school does not meet the eligibility criteria for either register, and is therefore not considered a historical resource under CEQA. Additionally, the site has not been identified by the City of Compton as a potential historic resource. As a result, the demolition of campus infrastructure would result in a less-than-significant impact under CEQA. The evaluation memorandum and the associated City of Compton Department of Parks and Recreation site record form are included in **Attachment B**.

Historical Maps

Historical United States Geological Survey topographic maps from the years 1896, 1899, 1902, 1923, 1924, 1937, 1942, 1943, 1947/1948, 1949/1950, 1952, 1964, 1972, 1981, 2012, 2015, 2018, and 2021 were reviewed. Full images were not available for the 1899, 1902, 1942, or 1943 editions. A single structure appears on the western edge of the site in 1896 but is no longer present by 1923. On the 1947/1948 map, three structures are visible on the northwestern corner; however, by 1949/1950, these are replaced by an internal east–west roadway and a small structure on the western edge. The 1952 map shows no changes, while the 1964 map depicts a full campus of buildings concentrated on the western half of the site. Additional structures appear to the south in 1972 and to the east in 1981. Later maps do not depict individual structures.

Aerial Photographs

Aerial photographs (at a scale of 1 inch equaling 500 feet) were reviewed for the years 1923, 1928, 1938, 1947, 1952, 1963, 1972, 1977, 1981, 1989, 1994, 2002, 2005, 2009, 2012, 2016, and 2020. From 1923 to 1947, a farm complex with row crops and internal roadways is visible on the western portion of the site. By 1952, initial school construction is evident, and by 1963, the campus appears fully developed, with athletic fields on the eastern half. New buildings are visible in the 1972 and 1981 images. No significant changes are observed in the aerial photographs from 1989 onward.

Native American Heritage Commission Record Search

A request for a Sacred Lands File search was submitted to the Native American Heritage Commission (NAHC) on June 4, and a response was received on June 27, 2025. The NAHC reported a negative result for the Sacred Lands File search and provided a list of Native American tribes and individuals to contact. This contact list is included in **Attachment C**.

Tribal Coordination

On August 15, 2025, the District sent letters to representatives of the following tribes requesting information regarding cultural resources in the vicinity of the Project site: Cahuilla Band of Mission Indians, Gabrieleño Band of Mission Indians – Kizh Nation (Kizh Nation), Gabrieleño Tongva Indians of California Tribal Council, Gabrieleño Tongva Nation, Gabrieleño Tongva Tribe, Gabrieleño/Tongva San Gabriel Band of Mission Indians, Santa Rosa Band of Cahuilla Indians, and Soboba Band of Luiseño Indians.

The District received a single response from the Kizh Nation, requesting consultation. Due to scheduling conflicts, the Kizh Nation offered consultation with the District via email. The correspondence between the Kizh Nation and District are included in **Attachment C.** The Kizh Nation's response includes the following key points:

- The City of Compton lies within the ancestral tribal territory of the Kizh Nation.
- The Project site lies near the ancestral villages of Tajauta and Huut'nga, both significant settlements within the historical landscape of the Los Angeles Basin.
- Due to the tribe's long-standing presence in the region, proximity to the Los Angeles River, and nearby ethnographic sites, the Kizh Nation considers the Project site to be highly sensitive for the presence of undiscovered tribal cultural resources (TCRs) that may remain buried beneath the surface.

The response also included mitigation measures to address potential project impacts to TCRs (see **Attachment C** for the full text). The District and Kizh Nation concluded consultation on January 16, 2026, via a final email from the District confirming acceptable mitigation measures that would be implemented during the construction phase's ground disturbing activities; see section, Impact Analysis and Mitigation, below.

Field Survey

The proposed Project site is fully developed and within an urbanized setting, confirmed by a site visit conducted by Terraphase on April 4, 2025, and a pedestrian survey performed by Ascent Environmental on March 15, 2025. Therefore, an archaeological pedestrian survey was not completed.

Impact Analysis and Mitigation

This section evaluates the potential impacts of the proposed Project on built and subsurface cultural resources and identifies mitigation measures to ensure that any such impacts are reduced to a less-than-significant level.

Built Environment

The Project would involve the demolition of most of the historical on-site structures. However, based on the evaluation conducted by Ascent Environmental (**Attachment B**), these buildings do not meet the eligibility criteria for listing on the California Register of Historical Resources or the National Register of Historic Places. Therefore, they are not considered a historical resource, and their removal would not result in a significant impact under CEQA.

Subsurface Resources

The SCCIC records search, literature and map review, and NAHC Sacred Lands File search did not identify any known historical resources within the Project site. Additionally, geotechnical testing conducted for the Project determined that the upper 2 to 4 feet of soil across the site consists of fill material. Therefore, cultural monitoring for archaeological resources is not recommended for ground-disturbing activities that remain within this fill zone. Moreover, the geotechnical report identified groundwater within gravel deposits at approximately 10 feet bgs, indicating that cultural monitoring would not be necessary once excavation reaches this stratum.

However, no subsurface investigation has been conducted at the Project site to determine if resources are present below the existing improvements. Additionally, the site is in close proximity to the Compton Creek, the Los Angeles River, and ethnographic villages, which suggest an increased potential for buried archaeological resources. As there is a possibility that tribal cultural resources could be encountered during ground-disturbing activities, the District will implement the following mitigation measures, which will reduce potential impacts to tribal cultural resources to less than significant.

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The District will retain a Native American Monitor from, or approved by, the Gabrieleño Band of Mission Indians – Kizh Nation. The Monitor will be retained prior to the commencement of any ground-disturbing activities for the Project at all project locations (including on-site and off-site locations specified in the project description and/or required in connection with the Project, such as public improvement work). “Ground-disturbing activities” include, but are not limited to,

demolition and removal of pavement and improvements below the ground, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A monitoring agreement will be prepared between the District and the Native American Monitor and executed prior to the commencement of any ground-disturbing activity or the issuance of any permit necessary to begin such activity.

C. On days when ground-disturbing activities, as defined in subsection A above, are scheduled and as confirmed by the District and/or its construction contractor, the Native American Monitor will complete daily monitoring logs. These logs will describe the relevant ground-disturbing activities, the type of construction activities performed, the locations of such activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Kizh Nation. Monitoring logs will identify and describe any discovered cultural resources—including, but not limited to, Native American cultural and historical artifacts, remains, and places of significance (collectively, "tribal cultural resources" or "TCRs")—as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitoring logs will be provided to the District upon completion.

D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh Nation from the District and/or its construction contractor that all ground-disturbing activities and phases that involve ground disturbance at the project site are complete; or (2) a determination and written notification by the Kizh Nation to the District that no future planned construction activity or development phase at the project site possesses the potential to impact Kizh Nation TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery (not less than a 50-foot radius) shall cease and shall not resume until the TCR has been fully assessed by the Kizh Monitor and/or a Kizh archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and manner deemed appropriate by the Tribe and the District, and for any purpose the Tribe and District deem appropriate, including educational, cultural, and/or historical purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in Public Resources Code (PRC) section 5097.98(d)(1) as inhumation or cremation, in any state of decomposition or skeletal completeness. Funerary objects (referred to as "associated grave goods" in PRC section 5097.98) shall also be treated in accordance with this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, PRC section 5097.9 and Health and Safety Code section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated pursuant to PRC section 5097.98(d)(1) and (2).

D. If preservation on site is the Kizh Nation's preferred treatment for discovered human remains and/or burial goods, the District will identify a suitable location onsite for the remains/burial goods to be interned.

E. Any discovery of human remains or burial goods shall be kept confidential to prevent further disturbance.

References

California Geological Survey. 2006a. "Plate 1.2. Historically Highest Ground Water Contours and Borehole Log Data, Inglewood Quadrangle, California." *Seismic Hazard Zone Report for the Inglewood 7.5-Minute Quadrangle, Los Angeles County, California.* Seismic Hazard Zone Report 027. Published 1998; Last Revised January 13, 2006. https://www.conservation.ca.gov/cgs/documents/publications/shzr/SHZR_027_Inglewood.pdf.

California Geological Survey. 2006b. "Plate 1.2. Historically Highest Ground Water Contours and Borehole Log Data Locations, South Gate Quadrangle, California." *Seismic Hazard Zone Report for the South Gate 7.5-Minute Quadrangle, Los Angeles County, California.* Seismic Hazard Zone Report 034. Published 1998; Last Revised January 17, 2006. https://www.conservation.ca.gov/cgs/documents/publications/shzr/SHZR_034_South_Gate.pdf.

Cunningham, Alta, and Amber Engle. 2025. "Historical Resources Evaluation of Centennial High School, Compton, California." Memorandum to Reza Mohamadzadeh and Stan Barankiewicz.. June 2025.

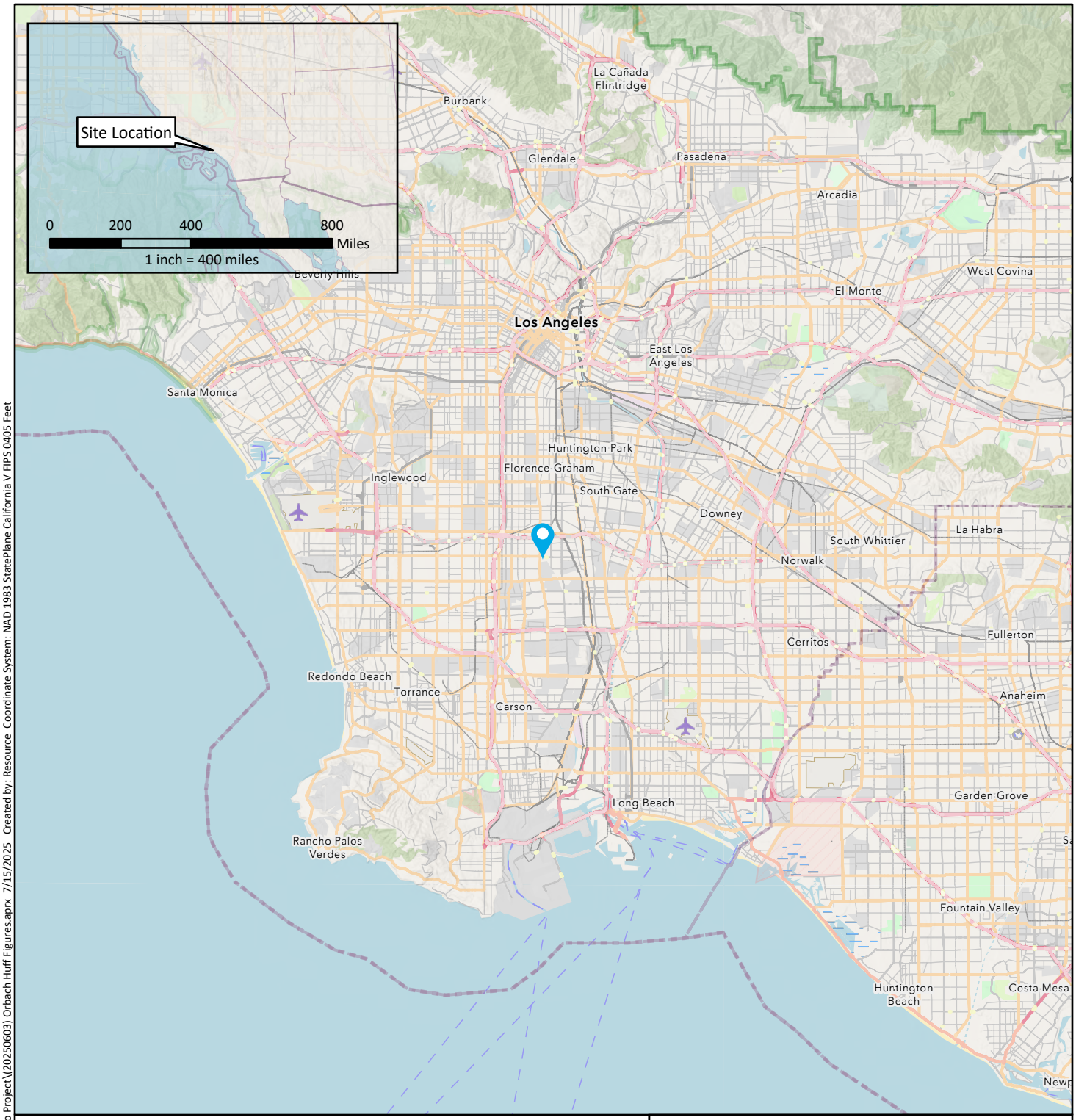
Fenagh Engineering and Testing (Fenagh). 2025. *Geotechnical And Geohazard Investigation Whole Site Modernization Centennial High School 2606 N. Central Avenue Compton, California 90222.* Report prepared for Compton Unified School District. June 2025.

McCawley, William. 1996. *The First Angelinos, The Gabrieleño Indians of Los Angeles.* A Maliki Museum Press/Ballena Press Cooperative Publication.

Ninyo & Moore. 2025. *Phase I Environmental Site Assessment Compton Unified School District Centennial High School Reconstruction Project 2606 North Central Avenue Compton, California.* Report prepared for Orbach Huff & Henderson LLP. September 2025.

Attachment A

Figures



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Feet

1 inch = 30,000 feet

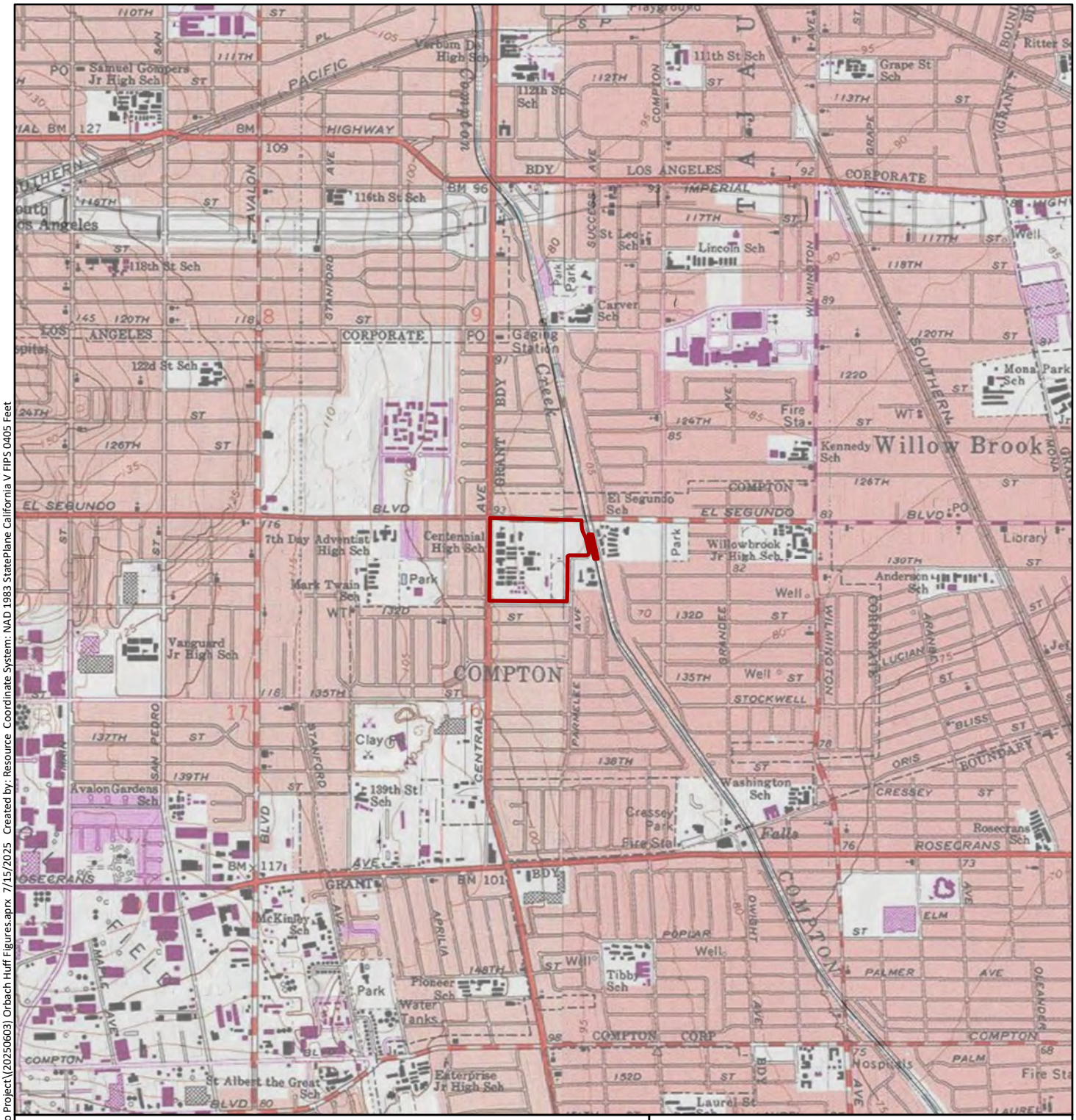
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Legend

Site Location

SAFETY FIRST	CLIENT: Compton Unified School District	**Site Location**
terraphase engineering	PROJECT: CEQA - Negative Declaration 2606 North Central Avenue, Compton, CA	
	PROJECT NUMBER: 0215.B001	**FIGURE 1**

File: N:\GIS\Prj\0215 Orbach Huff Suarez & Henderson LLP\Pro Project\(20250603) Orbach Huff Figures.aprx 7/15/2025 Created by: Resource Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



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Site Boundary

Base Map: USGS 7.5 Minute Topographic Quadrangle. South Gate, CA (1988). Inglewood, CA (1982).

SAFETY FIRST

terraphase engineering

CLIENT: Compton Unified School District

PROJECT: CEQA - Negative Declaration
2606 North Central Avenue, Compton, CA

PROJECT NUMBER: 0215.B001

Site Layout and Vicinity

FIGURE 2

File: N:\GIS\Prj\0215 Orbach Huff Suarez & Henderson LLP\Pro Project\(20250603) Orbach Huff Figures.aprx 7/15/2025 Created by: Resource Coordinate System: NAD 1983 StatePlane California V FIPS 0405 Feet



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1 inch = 300 feet

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Legend

Site Boundary

Aerial Imagery Source: Nearmap (May 2, 2025)

SAFETY FIRST

terraphase engineering

CLIENT: Compton Unified School District

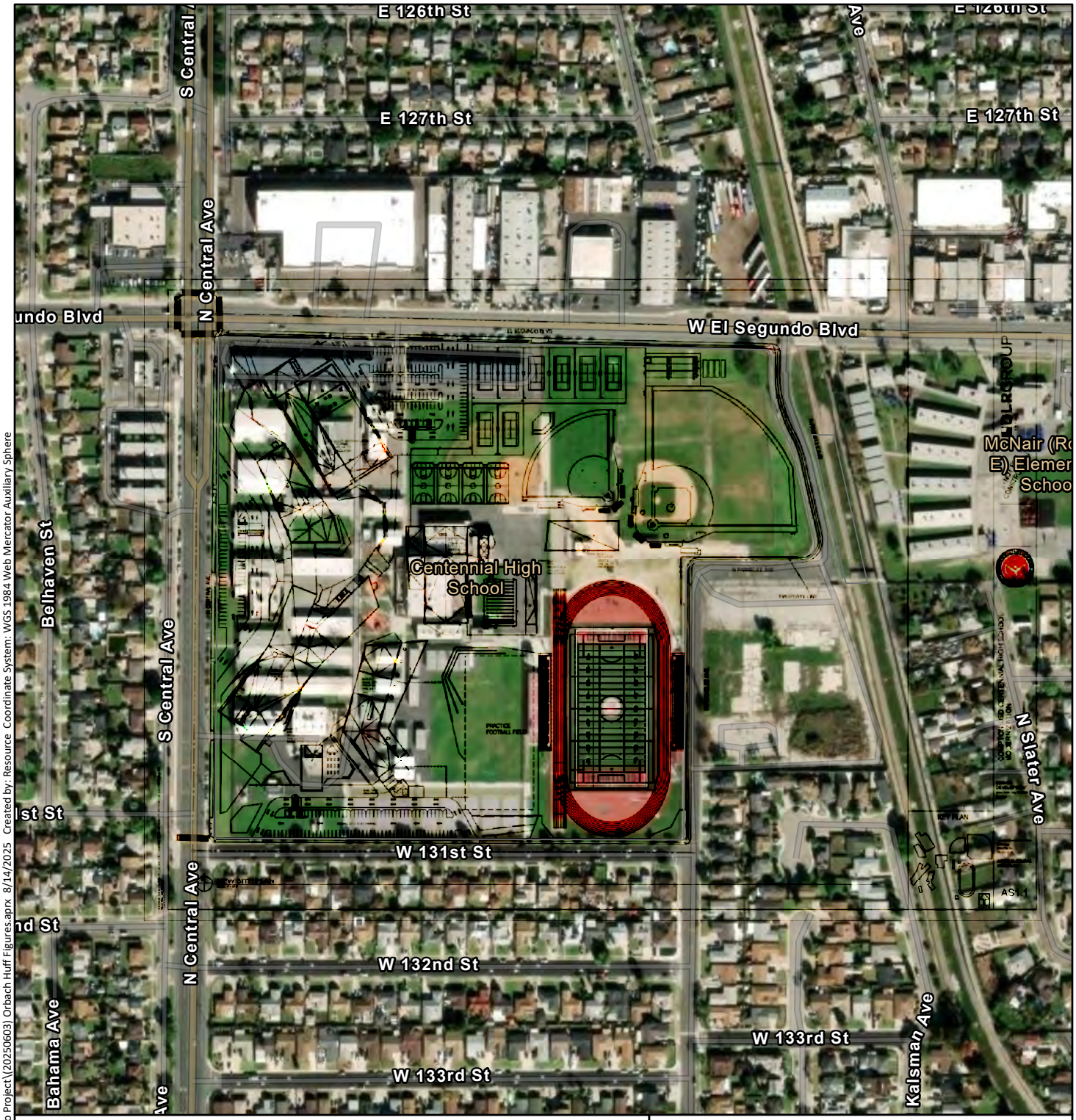
PROJECT: CEQA - Negative Declaration
2606 North Central Avenue, Compton, CA

PROJECT NUMBER: 0215.B001

Site Aerial

FIGURE 3

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SAFETY FIRST

terraphase engineering

CLIENT:	Compton Unified School District
PROJECT:	CEQA - Negative Declaration 2606 North Central Avenue, Compton, CA
PROJECT NUMBER:	0215.B001

Site Plan

FIGURE 4

File: N:\GIS\Prj\0215 Orbach Huff Suarez & Henderson LLP\Pro Project\(20250603) Orbach Huff Figures.aprx 8/14/2025 Created by: Resource Coordinate System: WGS 1984 Web Mercator Auxiliary Sphere

Attachment B

Historic Resources Evaluation and DPR Form

Memo

455 Capitol Mall, Suite 300
Sacramento, CA 95814
916.444.7301

Date: June 18, 2025

To: Reza Mohamadzadeh and Stan Barankiewicz, Orbach Huff & Henderson LLP

From: Alta Cunningham and Amber Engle, Ascent

Subject: Historical Resources Evaluation of Centennial High School, Compton, California

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Purpose and Scope: Orbach Huff & Henderson LLP retained Ascent to complete a historical resources evaluation of Centennial High School in Compton, California, as required by the CEQA guidelines at Title 14 California Code of Regulations Section 15064.5, which requires that historical resources must be identified that could potentially be impacted by the project. Therefore, it was evaluated using the National Register of Historic Places (NRHP) and California Register of Historical Resources (CRHR) criteria. The full evaluation is contained in the attached California Parks and Recreation (DPR) 523 forms.

Applicable Regulations:

CEQA requires public agencies to consider the effects of their actions on "historical resources;" pursuant to PRC Section 21084.1, a "project 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." Under State CEQA Guidelines Section 15064.5(a), historical resources include the following:

1) A resource listed in, or determined to be eligible by the State Historical Resources Commission for listing in, the CRHR is considered a historical resource (PRC Section 5024.1).
2) A resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g), will be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
3) Any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource will be considered by the lead agency to be historically significant if the resource meets the criteria for listing in the CRHR (PRC Section 5024.1).
4) 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 historical resources (pursuant to PRC Section 5020.1[k]), or not identified in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

Findings of the Investigation: An intensive survey of the Centennial High School campus was conducted March 15, 2025, by Ascent's architectural historians. All of the buildings on campus were recorded through digital photography and notes. Archival research, including aerial and topographic maps, were examined to determine the age of the buildings. Other archival sources used to determine the history of the school and people associated with it included the school's website, Ancestry.com, alumni groups, yearbooks, documentaries, various newspaper articles, and other contextual publications. A full list of reference is provided in "B12. References" in the attached DPR 523 form. Centennial High School was determined to be historic-age and was subsequently evaluated for eligibility for the NRHP and CRHR.

Available research has failed to provide any direct association between Centennial High School and significant events (Criterion A/1) or people (Criterion B/2). While many individuals that have made significant contributions to our history via their chosen professions are associated with Centennial High School as they were students there at one time, the school itself is not associated with what these individuals are significant for. Their contributions to history are not directly associated with the Centennial High School campus. The campus was constructed in the Mid-Century Modern style of architecture using a Finger Plan, both of which were very common in school construction in the 1940s through the 1960s. There is no evidence that architect Jerome C. DeHetre, A.I.A., or the Heirshberg Construction Co. are masters in their fields. As such, Centennial High School does not appear to meet the requirements for significance under NRHP/CRHR Criterion C/3. Construction details about the buildings at Centennial High School are known and common. Criterion D/4 generally applies to archaeological resources or other resources that through study of construction details can provide information that cannot be obtained in other ways. Construction details about the buildings at Centennial High School are known and common; therefore, Centennial High School does not appear to be significant under NRHP/CRHR Criterion D/4 because it is not likely to yield any additional important information about our history.

The full, detailed evaluation is in the attached DPR 523 form.

Recommendations: Centennial High School is not considered a historical resource under CEQA. No additional work is recommended with regard to Centennial High School.

Personnel Qualifications: Alta Cunningham has over 20 years of experience in the environmental consulting field. Her experience as an architectural historian includes archival research, historic building and structure surveys and evaluations, evaluating projects for consistency with the Secretary of the Interior's Standards, and cultural resources documentation for NEPA and CEQA projects ranging from single building evaluations to district-wide surveys for CEQA, Public Resources Code Section 5024, and Section 106 compliance documents. Alta received her Bachelor of Science in History from the University of California, Davis, and a Master of Arts in Historic Preservation from the Savannah College of Art and Design. She meets the Secretary of the Interior's Professional Qualification Standards for architectural history and history.

Amber Engle has over 23 years of professional experience in environmental compliance and cultural resources management, with an emphasis on Northern California. She has an expert-level understanding of NEPA, CEQA, Section 106 of the National Historic Preservation Act, and cultural resources survey methodology and evaluation procedures. Amber's cultural resources management experience includes archival research, historic building and structure surveys and evaluations, and cultural resources documentation for NEPA and CEQA projects ranging from single building evaluations to district-wide surveys. She has worked on a variety of projects throughout California, Oregon, Washington, and Nevada completing projects for cities, counties, school and utility districts, and private sector clients. Her expertise includes all phases of environmental compliance from inventory and evaluation to mitigation strategy and compliance during construction. Amber meets the Secretary of the Interior's Professional Qualification Standards for architectural history and history.

If you have any comments or questions, please contact Alta Cunningham at 916.661.0029.

Thank you,



Alta Cunningham, M.A.

State of California ♘ The Resources Agency
DEPARTMENT OF PARKS AND RECREATION

PRIMARY RECORD

Primary #
HRI #
Trinomial
NRHP Status Code 6Z

Other Listings
Review Code Reviewer Date

Page 1 **of** 52 ***Resource Name or #:** (Assigned by recorder) Centennial High School
P1. Other Identifier: Centennial Senior High School

***P2. Location:** ☐ **Not for Publication** ☒ **Unrestricted**

***a. County** Los Angeles **and** (P2c, P2e, and P2b or P2d. Attach a Location Map as necessary.)

***b. USGS 7.5' Quad** Inglewood, South Gate **Date** 2021 **T** 3S ; **R** 13W ; **of** **of Sec** ; **B.M.**

c. Address 2606 N Central Avenue City Compton Zip 90222

d. UTM: Zone 11S , 384084.62 mE/ 3753393.88 mN

e. Other Locational Data: Assessor's ID No: 6145-001-900

***P3a. Description:**

The subject property is the Centennial High School campus, an approximately 33-acre parcel at the southeast corner of North Central Avenue and El Segundo Boulevard in Compton, California.

The campus includes 26 permanent buildings, 15 portable buildings, a football field and track, two baseball fields, basketball courts, and tennis courts. (Continued on page 4)

***P3b. Resource Attributes:** HP15. Educational building

***P4.Resources Present:** ☒Building ☒Structure ☐Object ☐Site ☐District ☐Element of District ☐Other (Isolates, etc.)



P5b. Description of Photo: (view, date, accession #) West facade, looking northeast, 03/15/2025

***P6. Date Constructed/Age and Source:**
c1953 / historicaerials.com
☒ Historic ☐ Prehistoric ☐ Both

***P7. Owner and Address:**
Compton Unified School District

***P8. Recorded by:**
Alta Cunningham / Amber Engle
Ascent Environmental
Sacramento, CA 95814

***P9. Date Recorded:** 03/15/2025

***P10. Survey Type:** Intensive

***P11. Report Citation:** none

***Attachments:** ☒ NONE ☒Location Map ☒Continuation Sheet ☒Building, Structure, and Object Record
☐ Archaeological Record ☐ District Record ☐ Linear Feature Record ☐ Milling Station Record ☐ Rock Art Record
☐ Artifact Record ☐ Photograph Record ☐ Other (List):

BUILDING, STRUCTURE, AND OBJECT RECORD

***Resource Name or #** Centennial High School ***NRHP Status Code** 6Z
Page 2 **of** 52

B1. Historic Name: Centennial Senior High School
B2. Common Name: Centennial High School
B3. Original Use: educational buildings B4. Present Use: educational buildings
***B5. Architectural Style:** Mid-Century Modern / Finger-Plan
***B6. Construction History:** Constructed 1953. c1961 expansion to the west (historic aerials)

***B7. Moved?** ☒ **No** ☐ **Yes** ☐ **Unknown** **Date:** N/A **Original Location:** N/A
***B8. Related Features:** none
B9a. Architect: Jerome C. DeHetre, A.I.A. b. Builder: Heirshberg Construction Co.

***B10. Significance: Theme** N/A **Area** N/A
Period of Significance N/A **Property Type** N/A **Applicable Criteria** N/A

The subject property does not appear to be eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR).

Regional History

The Spanish colonization of California was achieved through a program of military-civilian-religious conquest. Under this system soldiers secured areas for settlement by suppressing Native and foreign resistance and established fortified structures (presidios) from which the colony would be governed. Civilians established towns (pueblos) and stock-grazing operations (ranchos) that supported the settlement and provided products for export. The missionary component of the colonization strategy was led by Spanish priests, who were charged with converting Native Americans to Catholicism, introducing them to Spanish culture, and training them as a productive labor force. Ultimately, four presidios and 21 missions were established in Spanish California between 1769 and 1821. There were three missions in this area, the San Gabriel Mission was founded in 1771, the Pueblo of Los Angeles in 1781, and the San Fernando Mission in 1797. The surrounding land, which was primarily used for pasturage, was split into large land grants and the population began to spread out from the missions (City of Los Angeles 2012). (Continued on page 7)

B11. Additional Resource Attributes: (List attributes and codes) none

***B12. References:** See Continuation Sheet, page 48.
B13. Remarks: none

***B14. Evaluator:** Amber Engle, M.A.
***Date of Evaluation:** April 11, 2025

(This space reserved for official comments.)



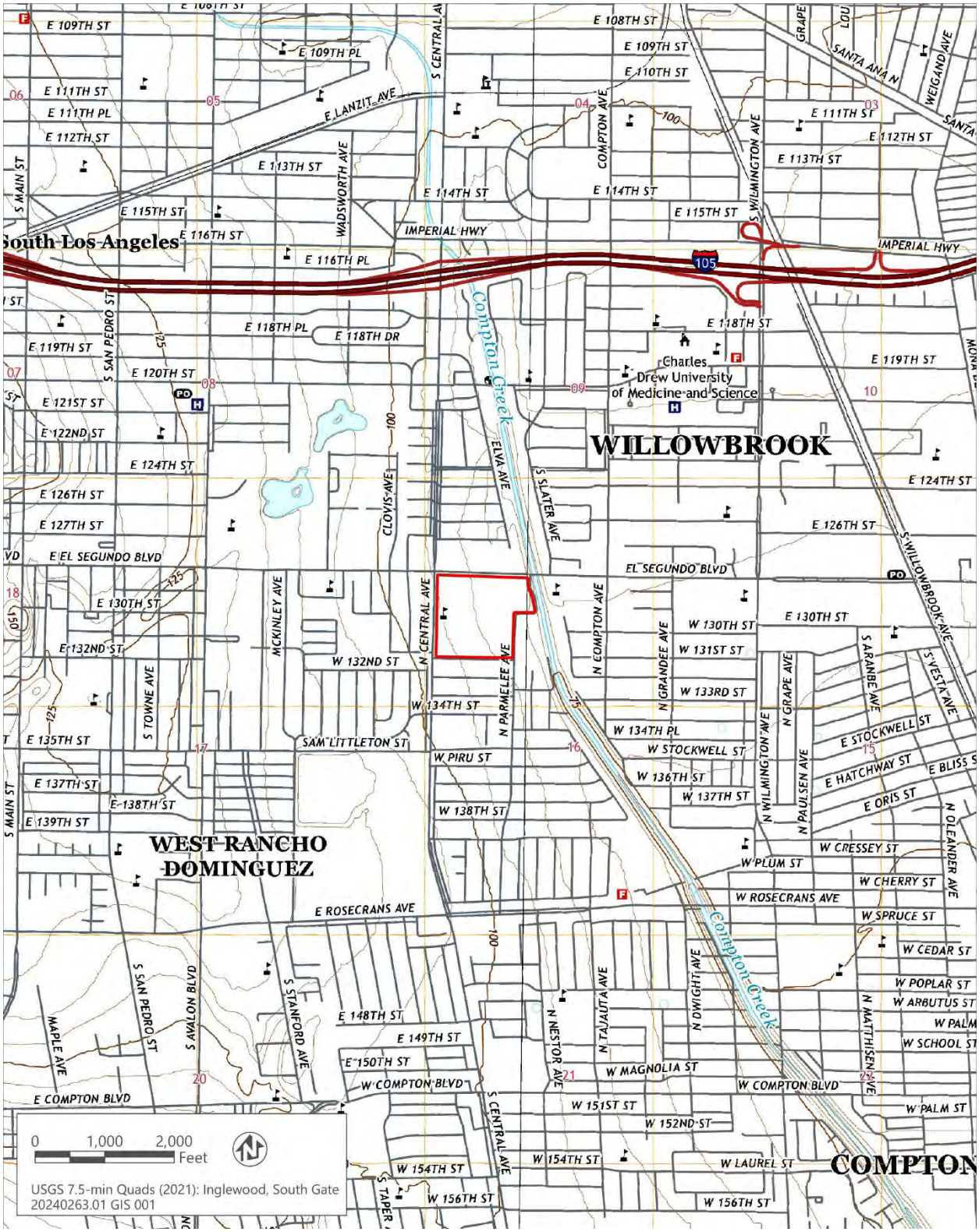
State of California ♘ Natural Resources Agency
DEPARTMENT OF PARKS AND RECREATION

Primary#
HRI #
Trinomial

LOCATION MAP

Page 3 of 52 Resource Name or # Centennial High School

*Map Name: USGS 7.5 minute Inglewood, South Gate quad *Scale: 1:24,000 *Date of map: 2021



P3a. Description (continued)

The buildings are concentrated on the west side of the campus with the athletics fields on the east side. The Administration/Library Building fronts N. Central Avenue and is flanked by classroom building (Units AA, BB, CC, DD, L, and M) (Figure 9, Photos 1 through 3, 13, and 14). Behind these buildings, and connected by a covered breezeway, is another row of classrooms (Photos 11, 12, and 15). Beyond this second row of classrooms is the main quad, called Senior Square, which is flanked by more classroom buildings as well as utility buildings. On the east side of Senior Square is the gymnasium which is flanked by the girls' and boys' locker room buildings.

The building that houses the administrative offices and library is a one-story building with an irregular footprint. The multi-level roof is flat with parapet walls. The exterior walls are primarily clad in stucco and brick with a small section clad in v-groove, horizontal wood siding (Figure 16). Door types include solid with no windows and aluminum framed glass. Window types include fixed and casement. The primary, west, façade is asymmetrical and includes two sets of double doors, which are surrounded by fixed windows and a raised brick planter. The main entry is enclosed by a metal fence and gate. A courtyard enclosed by a low brick wall is present on the east side of the library. Benches are built into the low brick wall.

The Cafeteria is a one-story building with an irregular footprint, a portion of which is a two-story height (Figure 14, Photo 10). The multi-level roof is flat with parapet walls. The walls are primarily clad in stucco with portions clad in brick at the water table as well.

Music building is a large building with stucco clad walls and a flat roof with parapet walls (Photo 18). The west façade is clad with brick at the water table. Entry into the classrooms is provided on the west façade. A shade structure is attached to the east façade which covers a seating area for the students during lunch. The west façade includes

The Gymnasium is flanked by the boys' and girls' locker room buildings (Figure 18, Photos 4 through 7). The walls of these buildings are clad in stucco. The roofs of the locker room buildings are flat with and the roof of the gymnasium is a truss type roof. Beyond the gymnasium and locker rooms to the west are the athletic fields (Photo 8).

The woodshop (Unit M) and auto shop (Unit N) buildings are both large buildings with rectangular footprints and walls clad in stucco (Photos 16 and 17). Roof types include flat and low pitched gabled. Door types include large, metal, roll-up and solid pedestrian.

The classroom buildings are all single-story with flat or low pitched gabled roofs. The walls are clad in stucco and brick. The doors are solid and the metal framed windows include hopper, awning, and fixed type. Metal posts support the wide eaves that cover the hallways as well as the breezeway roofs that connect the classroom buildings (Photo 15). All classrooms are accessible via exterior doors. Units D, E, G, H, J, K, L, W, X, and Y each contain multiple classrooms with a main entry on one façade (either north or south) and a rear door on the opposite façade (Photos 11, 12, and 15). Units AA, BB, CC, and DD include a double row of classrooms with main entries on both the north and south facades (Figure 9, Photos 3, 13, and 14).

Units H and P are small, one story utility buildings (Photo 9). They both have rectangular footprints, brick clad walls, and flat roofs.

Figure 1 shows the layout of the campus and Table 1 shows map IDs, building names, construction dates and current building functions.

P3a. Description (continued)



Figure 1. Centennial High School campus with building IDs

P3a. Description (continued)

Table 1 – Current Campus Buildings

Map ID	Building Name	Construction Date	Building Function
Cafeteria	Cafeteria	1953, expanded in 1961	cafeteria
Admin/Library	Unit A – Administration /Library	1953	administrative offices, library
Senior Square	Senior Square	1953	classrooms /quad
Music	Music & Choir Building	1953	classrooms
D	Unit D – 30s Row	1953	classrooms
E	Unit E – 30s Row / Science Lab	1953	classrooms /labs
G	Unit G – 50s Row	1953	classrooms
H	Unit H – 80s Row	1961	classrooms
I	Unit I	1953	utilities
J	Unit J – 60s Row	1953	classrooms
K	Unit K – 70s Row	1953	classrooms
L	Unit L – 80s Row	1961	classrooms
M	Unit M – 90s Row	1953	classrooms
N	Unit N – 90s Row	1961	classrooms
P	Unit P	1953	utilities
Q	Unit Q – Boys' Locker Room	1961	boys' locker room
R	Unit R – Girls' Locker Room	1961	girls' locker room
V	Unit V	1953	utilities
W	Unit W – 40s Row	1953	classrooms
X	Unit X – 70s Row	1961	classrooms
Y	Unit Y – 80s Row	1961	classrooms
AA	Unit AA – 10s Row	1961	classrooms
BB	Unit BB – 20s Row	1961	classrooms
CC	Unit CC – 30s & 40s Row	1961	classrooms
DD	Unit DD – 60s & 70s Row	1961	classrooms
EE	Unit EE – gymnasium	1961	gymnasium

B10. Significance (continued)

Mexico achieved independence from Spain in 1822, and California became a distant outpost of the Mexican Republic. Under a law adopted by the Mexican congress in 1833, the former mission lands were secularized and subdivided into land grants. Then, beginning in the early 1840s, Mexico's hold on California was threatened by the steady overland migration of American settlers into the region. War between the U.S. and Mexico commenced in May 1846, and the American victory over Mexico was formalized in February 1848 with the Treaty of Guadalupe Hidalgo. Under the Treaty, the United States acquired the present states of California, Nevada, Utah, New Mexico, Arizona, and parts of Wyoming and Colorado from Mexico (City of Los Angeles 2012).

While California joined the Union as a non-slavery state, the state legislature wrote restrictions into its state laws prohibiting African American citizens from testifying against a Caucasian in court, receiving a public education, owning public land, or voting. Access to local resources such as housing, employment, public education, and accommodations were limited. Housing restrictions caused overcrowding in those neighborhoods where African Americans were allowed to live and physical conditions of these neighbors deteriorated as banks refused to grant loans to their residents. African Americans initially migrated to the West Coast at the turn of the 20th century to escape the racism and violence of the South (Sapphos Environmental, Inc. 2009).

Compton History

Compton is located in the center of Los Angeles County. Originally a farming town, in 1866 Francis Temple and Fielding Gibson purchased part of Ranch San Pedro from Spanish colonizers. In 1867, a group of approximately 30 came down from the San Joaquin Valley and established Compton. The group was led by Griffith D. Compton and William Morton. Independent communities were established throughout Los Angeles County at this time and generally focused either on agriculture or tourism. By 1887, Compton had a hotel, drug stores, dry goods and grocery stores, a jewelry shop, and hardware, harness, wagon, and blacksmith shops. In May 1888, Compton became the seventh town in Los Angeles County to incorporate (Straus 2014).

Compton became a post-World War I suburban dream with single-family homes within an easy commute to downtown Los Angeles laid out around industry and transportation hubs. However, Compton struggled to provide municipal services as the tax base was primarily residential based and the modest, single-family homes on small lots did not generate the necessary income for the city (Straus 2014). In 1921, the first housing covenant to exclude all non-whites was implemented in Compton. Tactics used to maintain segregation included (SWCA Environmental Consultants 2018):

- police harassment of African Americans,
- real estate agents being threatened with losing their licenses for integrating,
- Federal Housing Administration denial of loans in areas without covenants,
- Compton City Councils rejection of a public housing complex.

By the mid-20th century, the city was in a crisis with the city funds drained and debt accrued from rebuilding after the 1933 earthquake. The 6.3 magnitude earthquake resulted in 118 people dead and more than $40 million in property damage over a 20-mile radius (Straus 2014).

In 1938, the newly founded regional Metropolitan Water District finished construction of the Hoover Dam in Nevada and began construction on a 30-mile-long pipeline that connected Compton, and other southern California cities, to the Los Angeles Aqueduct, located in Eagle Rock (Sapphos Environmental, Inc. 2009).

B10. Significance (continued)



Figure 2. 1946 Aerial of Compton

In the first half of the 20th century the neighborhood was predominately occupied by white residents through the use of racial covenants and deed restrictions (Straus 2014). Prior to World War II, Compton was 95 percent white and by 1948, the exclusion of African Americans was still so successful that only 50 lived in Compton in a population of 45,000 (SWCA Environmental Consultants 2018; Feder-Haugabook 2017). Also, in 1948 the Supreme Court declared racial covenants unconstitutional in the Shelley v. Kraemer decision (Rothstein 2017). However, it did not abolish deed restrictions, which were voluntary and continued until the 1960s (Sapphos Environmental, Inc. 2009). Between 1957 and 1968 Congress adopted civil rights laws that made discrimination illegal in public accommodations and transportation, voting, and employment. In 1968 the Fair Housing Act prohibited discriminations based on race, religion, national origin, sex, handicap and family status in the sale, rental, and financing of housing (Rothstein 2017). Compton was a desirable suburb so when these restrictions were lifted, the demographics of Compton changed drastically. In the 20th century it shifted from majority white in the 1950s, African American in the 1970s, and Latino in the 1990s (Straus 2014). As African Americans began to move in whites left to live in other all, or majority, white neighborhoods. This phenomenon was called “white flight.” By 1960, African Americans made up 40 percent of Compton’s population and by 1970 that rose to 65 percent.

B10. Significance (continued)

Several events pushed Compton into the national spotlight in the second half of the 20th century, including the 1965 Watts Riots, the establishment of the LAPD CRASH (Community Resources Against Street Hoodlums) Unit in 1979, release of the song *Straight Outta Compton* by N.W.A., the movie Colors in 1988, and the police beating of Rodney King and subsequent trial in 1992 which acquitted the police officers involved (Feder-Haugabook 2017).

The commercial exodus and reduction of municipal services of the 1970s resulted in middle-class families moving out and poorer residents moving in (Feder-Haugabook 2017). This was in the midst of an economic turmoil nationwide; called the Great Inflation when in the period between 1965 and 1982 there were four economic recessions, two severe energy shortages, and wage and price controls (Bryan 2013). Growing unemployment and poverty in Compton led to a rise in crime and the formation of street gangs such as the Crips and the Bloods. The arrival of crack cocaine in the 1980s was devastating to Compton with some street gangs shifting their focus and becoming drug gangs (Feder-Haugabook 2017). In 2000, the percentage of residents that lived below the poverty line was 28 percent, while California's was 14.2 percent and the nation's was 12.4 percent at the time (Straus 2014).

Gonzales Park Neighborhood

The subject property is in the Gonzales Park Neighborhood, which is located on the northwest corner of the city limits of Compton. The neighborhood has an irregular footprint and is generally bound by W. Rosecrans Avenue to the south, a waterway to the east, W. 132nd Street and W. El Segundo Boulevard to the north, and N. Stanford Avenue, N. McKinley Avenue, and N. Central Avenue to the west (Figure 3). The approximately 14 acre park, after which the neighborhood is named, is located at the southeast corner of the neighborhood on the north side of W. Cressey Street just west of N. Dwight Avenue. Based on population density, Gonzales Park Neighborhood is considered urban. The majority of the neighborhood consists of residential homes, with commercial used concentrated along N. Central Avenue and some light industrial uses at the northwest corner of N. Central Avenue and E. Rosecrans Avenue. It currently has a concentration of homes built between 1940 and 1969 with 85.6 percent of the homes built during the Baby Boomer generation (1945-64) (NeighborhoodScout.com 2025).

In 1933 it was considered a white, working-class neighborhood (Straus 2014). The demographic changes in Compton, discussed above, were also reflected in the Gonzales Park Neighborhood with a noted increase in the African American population after racially motivated restrictions were deemed unconstitutional.

B10. Significance (continued)

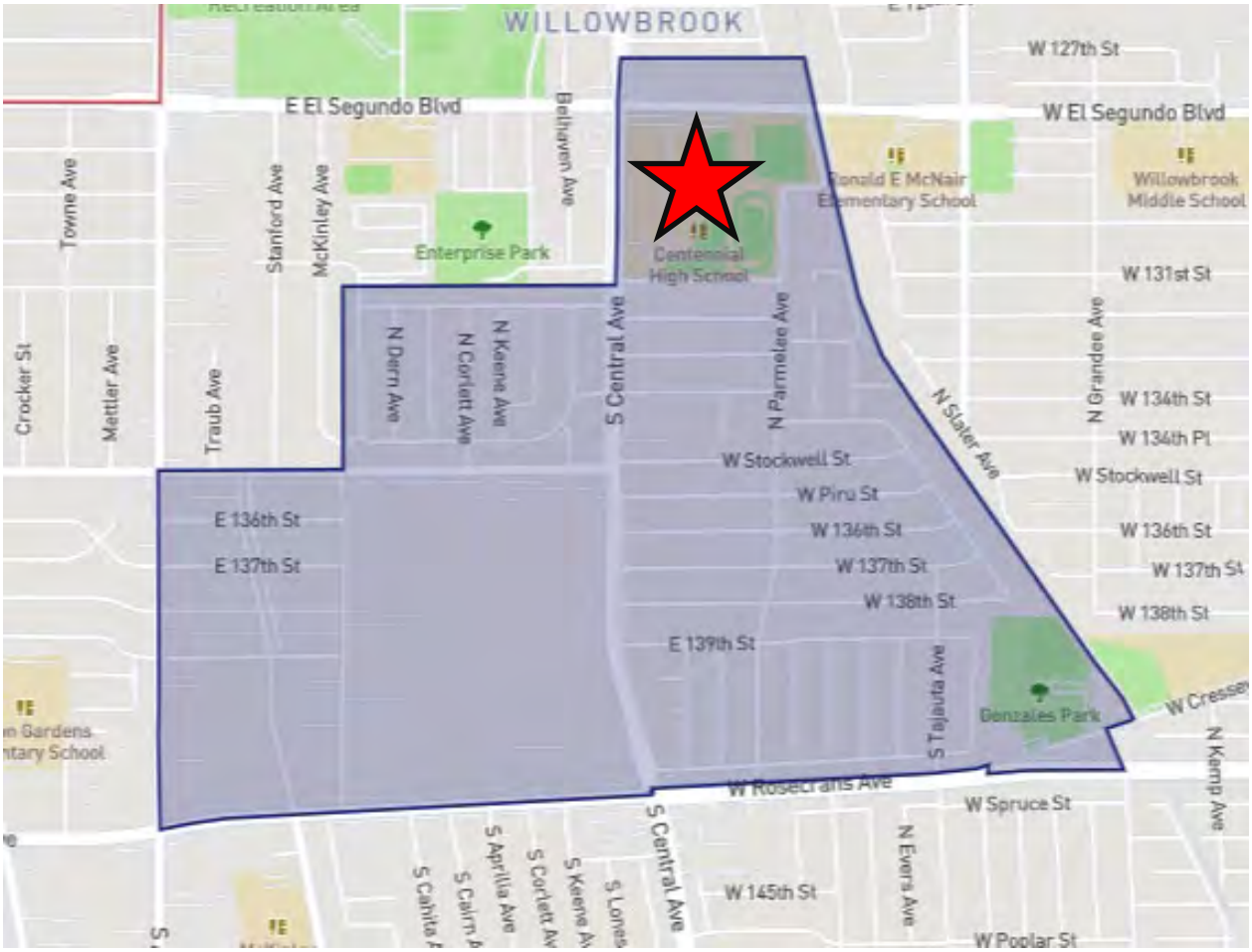


Figure 3. Gonzales Park Neighborhood.
Red star indicates the location of Centennial High School

B10. Significance (continued)

Rap/Hip Hop

"Hip Hop is more than music; it's a cultural movement that incorporates different elements of art. Four foundational elements characterize hip hop culture. The original four main pillars of hip hop include DJing/turntablism, MCing/rapping, B-boying/breaking, and visual/graffiti art" (Icon Collective, LLC 2025).

In 1973, DJ Kool Herc, a Jamaican born New Yorker, was experimenting at a South Bronx party with a technique of repeated musical breaks using two turn tables that would later become the foundation of Hip Hop music (Black History in Two Minutes or So 2020). Other notable pioneers included Afrika Bambaataa and Grandmaster Flash (Icon Collective, LLC). Hip Hop was largely underground with early recordings circulating around neighborhoods and the greater New York area on cassette tapes. Rap first came to national prominence the United States in 1979 with the release of the Sugarhill Gang's song "Rapper's Delight" which was released on the independent African American-owned label Sugar Hill (Black History in Two Minutes or So 2020).

In the 1980s, Rap and Hip Hop spread to Southern California. Many of the emerging artists in California grew up and got their start in the Los Angeles area. Regional styles began to emerge including West Coast Hip Hop, Gangsta Rap, Southern Rap, and Rap Rock. Prominent artists at this time included N.W.A., Dr. Dre, Tupac Shakur, Snoop Dogg, The Notorious B.I.G., Nas, and Jay-Z (Icon Collective LLC 2025).

Gangsta Rap, a subgenre of Hip Hop, lyrics often depict violence and other activities related to street gangs. It emerged on the west coast in the 1980s with the debut of rappers like Ice-T and the group N.W.A., which originally consisted of rappers Easy-E, Dr. Dre, Ice Cube, DJ Yella, and MC Ren. The music's popularity skyrocketed with young people in places like Compton and the greater Los Angeles area as they could relate to the situations depicted in the lyrics (Tate 2025; Oppenheim 2020). The album *Straight Otta Compton* by N.W.A. specifically highlighted the conditions under which the youth of Compton were struggling to survive.

Gangs

Formed in the 1950s, Slauson is considered the first "modern" African American gang in the Los Angeles area. Boys were not allowed to join clubs like Boy Scouts so they formed their own club with other kids their own age in their neighborhoods, but police and community called them gangs. "Fighting" was more competitive and only involved fists (Peralta 2008).

In Los Angeles, the most well-known Black street gangs are the Crips and the Bloods. Raymond Washington is credited with founding the Crips in 1969 at Freemont High School in South Central Los Angeles (Sides 2004).

The founders of the Bloods, Victor Sylvester Scott (a.k.a. Pudding) and Vincent/Benson Owens, attended Centennial High School in Compton. They formed the gang the Piru Boys (a.k.a. Westside Piru, Westside Bompton Pirus, Bompton Westside Piru) after being attacked by a group of boys led by Raymond Washington, leader of the Crips. The Piru Boys, Lotus Park Hustlers, and 59brands and other non-Crip affiliated gangs formed an alliance, later calling themselves Bloods, to protect themselves from the Crips. Piru Boys were one of the first "Blood" gangs established in LA (Valdez 1996) in 1972. Gang affiliation is determined by the neighborhood you live in and the Piru Boys neighborhood was centered around Piru Street, which is located 6 blocks south of Centennial High School.

"As the isolated street gang skirmishes of the late 1970s devolved into a brutal guerilla war for control of the lucrative crack cocaine trade in the 1980s, young Comptonites turned their guns upon themselves, spraying their own neighborhoods with bullets, riddling with lethal lead the very homes that had inspired such hope in the 1950s" (Sides 2004).

B10. Significance (continued)

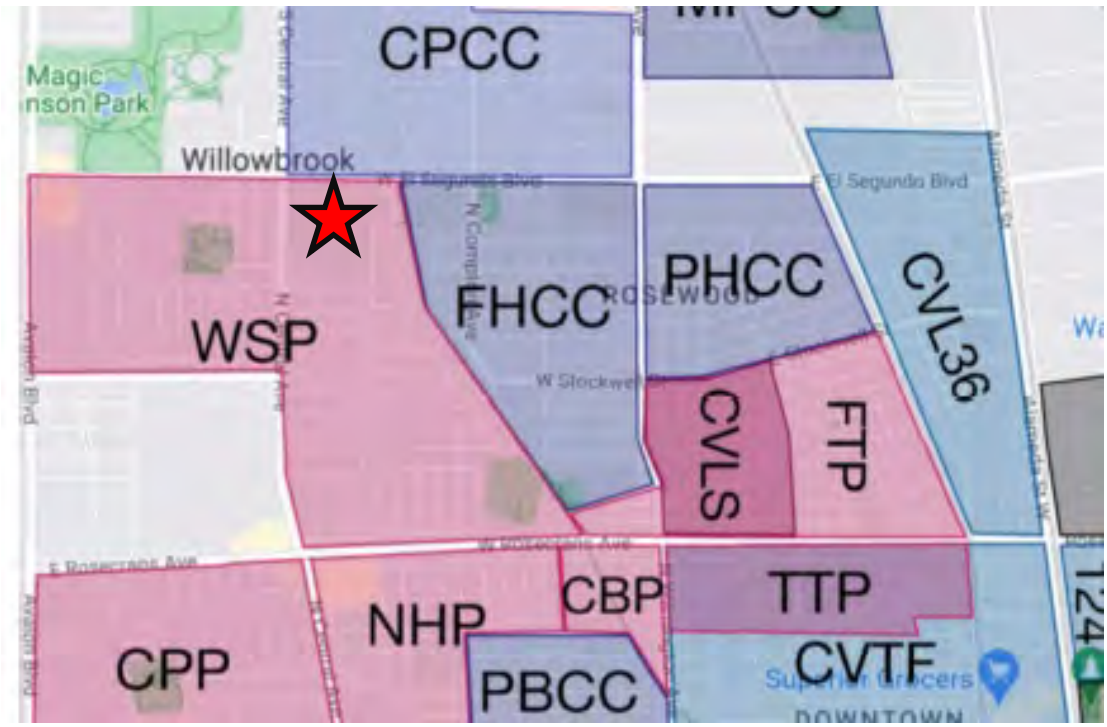


Figure 4. Compton Gang Map 2024
Note: Red star indicates the location of Centennial High School. WSP = Westside Piru

Public Education

Prior to the establishment of the public education school system, children were educated through a variety of private enterprises including church-supported schools, local schools organized by towns or parents, tuition-based schools set up by schoolmasters, charity schools, boarding schools, "dame schools" run by women out of their homes, private tutors/home schooling, and apprenticeships. These options were primarily available only to white children (Center on Education Policy 2020). The move to compulsory education in the United States began at the state level of governance with laws individually adopted by each state.

In 1642, a law was passed in Massachusetts (then the Massachusetts Bay Colony) that required every town to appoint a man to ensure that all children were educated in religion and law. In 1647, Massachusetts passed another law that attempted to address the shortcomings of the 1642 law by requiring that each town of fifty or more appoint a person to teach children to read and write and a town of 100 or more had to establish a grammar school in preparation for university (Ramsey 1985). As early as 1785, federal ordinances were passed that granted federal lands to new states for the purpose of creating schools (Center on Education Policy 2020). Compulsory education was seen as a way to integrate immigrants into society and combat child labor while others saw the value in an informed electorate. In a report in 1847, Horace Mann, the first Secretary to the State Board of Education in Massachusetts, recommended that children aged 4 to 16 attend school 10 months out of the year and be taught by people that had high intellectual and moral qualifications. Mann became a proponent of education for all to provide equal opportunity to all (Ramsey 1985). In 1852, Massachusetts was the first state to enact a compulsory education law, which applied to children between the ages of 8 and 14 and required attendance for at least 12 weeks (Yeban 2024; Ramsey 1985).

B10. Significance (continued)

In 1821, the Boston School Committee created the first high school, English Classical School (Ramsey 1985). In California's first constitution in 1849, the post of Superintendent of Public Instruction was created. Superintendents, beginning with Judge John G. Marvin of Sonora, helped build the foundation of the public school system in California. In 1851, the first free public school opened in San Francisco. Superintendents continued to advocate for public education by lobbying the legislature for financial support, longer school years, and high schools. The State Board of Education was created in 1852. In 1874, attendance at school was compulsory for children 8 to 14 and state aid was based on the number of children in each district. High schools were not supported financially until 1902. In 1911, the law was changed to only provide funding for children that attended school. The State Department of Education was established in 1921 (CDE 2024). In 1938, children ages 8 to 16 were required to attend school in California and work permits were required for children 14 to 16 years old (Ramsey 1985).

By the 20th century, school was mandatory in all of the states. The Fair Labor Standards Act helped combat child labor and support compulsory education by setting a minimum age for child labor (Ramsey 1985).

The Evolution of School Design

The following excerpt is from the LAUSD's Historic Context Statement, 1870 to 1969:

> In the early years of American school design, the most typical building type for educational facilities had been the wood-framed, one-room schoolhouse—a basic typology that attempted "to be all things for all children," as well as all things for all teachers and educational methods. Rapid urbanization throughout the United States called for a new approach. Large-scale schools, with classrooms accommodating several dozen pupils, were needed. With the increased demand, public schools started separating children into grades, with separate classrooms for each rather than a single large room housing all grades.
>
> The new building typology tended to be rectangular in plan, with multistory massing, sanitation systems and facilities placed in a basement, and classrooms designed for large groups of students seated in rows. High ceilings accommodated tall windows, which provided the main source of interior illumination. In his study of the history of the American school, R. Thomas Hille observed that "a typical urban school from this era was organized in a single block of one or two floors, with standardized classrooms on each floor organized symmetrically around a central hallway. … School furniture was already standardized and typically included individual desks organized in rows and bolted to the floor."
>
> This typology fit the curricula and methods of the time. Before the Progressive Education Movement gained momentum throughout the United States, beginning in the 1880s, primary and secondary schools continued to follow traditional methods emphasizing rote memorization and discipline, in an atmosphere that was regimented and authoritarian (rather than flexible and participatory).[…]
>
> It took time for school plant design to catch up with evolving educational methods. As noted Connecticut school architect Warren Richards Briggs (1850–1933) argued in 1906, "no one will deny [that] the public system of education has been carried in our country during the last half century to a degree of perfection heretofore unknown to any country of the world." Yet, he wrote, "can it be said, however, with equal assurance that our school buildings have kept pace with our educational systems? Are they as complete in their design and construction as the educational system in its plan and equipment?"

B10. Significance (continued)

Among architects and educators it was widely recognized that reform and standardization were needed. During the late nineteenth century, especially in urban schools, systems for sanitation and safety "were less than ideal and varied considerably from location to location, with little in the way of regulatory oversight." This area was the first to be widely studied and significantly changed during this time, as many resources were devoted to developing and improving health and safety standards and systems.

In Briggs's 1906 book, Modern American School Buildings, the architect contributed one of many guides available for standardized schools. The scale of Briggs's schools remained imposing and monumental, with the entire school contained within a single, multistory building. But the new standardized schools offered the best building infrastructure available at the time, with improved heating, ventilation, and sanitation systems, as well as recommendations for the ideal size and configuration for windows, doors, emergency exits, and other features.

In the early twentieth century, the movement to standardize and improve schools gained momentum and took off in earnest. American school architecture "advanced from the low point of complete neglect to a high point of monumentalism. School buildings changed from small, shabby units to large, beautiful edifices, glorifying the people's devotion to education." Education-related organizations and trade publications around the country helped forward the cause. Overall, urban school plants still tended to be imposing "bigblock" institutions "designed to house as many students as possible."[…]

By the 1950s, many of the design ideas considered experimental in the 1930s had matured and become the national standard for schools. Stylistically, schools might include some historicist detailing reflecting popular styles (such as Colonial Revival). But, overall, a unified campus design, building types and plans that accommodated a high degree of indoor-outdoor integration, ample outdoor spaces, and sheltered corridors marked the typology as the mature version of the functionalist school plant. The priority remained the creation of a domestic scale for schools. Campuses displayed a one-story massing for elementary schools, and up to two stories for middle and high schools. Site plans, which often featured a decentralized, pavilion-like layout, lacked the formality and monumentality that characterized earlier eras of school design.

School types expressive of these ideals include the finger-plan (1940s–1950s) and cluster-plan (1950s), and variations on their basic themes. Combinations of these basic forms, which flexed according to available lot size and school enrollment, are also evident.[…] (Sapphos Environmental, Inc. 2009)

Finger-Plan

The concept of the finger-plan began with Richard Neutra in 1928. Finger-Plan schools became popular in the postwar period and became the most common school plan type in the United States in the 1940s. This plan type required a large plot of land as the buildings were single story and spread out. Facilities generally included a gymnasium and playing fields, workshops, dining room/cafeteria, a parking area, and a network of classroom wings. These finger-like classroom wings were configured with ample outdoor space between the them and large windows to allow in natural light and fresh air. Covered outdoor corridors connected the buildings on campus. This modular design allowed for easy expansion of the school as needed (Sapphos Environmental, Inc. 2009).

B10. Significance (continued)

Mid-Century Modern

The Mid-Century Modern style was very common in the 1930s through the 1970s in educational, commercial, and residential design (McAlester 2015). Mid-Century Modern is an umbrella term for the Organic Modernism, International, Googie, Space Age, and Brutalist architectural styles with International Style being the most unadorned style (Cardinalis 2025). The end of World War II in 1945 led to a population boom as young soldiers returned home and started families. This baby boom led to a construction boom which included the construction of new schools to serve the growing population. Due to the popularity of the Mid-Century Modern styles and the in the 1950s they were ubiquitously applied to new schools being constructed.

Compton Unified School District

A one-room elementary schoolhouse was constructed for Compton in 1869 and in 1872 a two-story grammar school was constructed to serve students through 8th grade. In 1891, instruction for 9th graders began. In 1896, education was extended through 12th grade and the Compton Unified School District (CUSD) was formed. CUSD established a high school, Compton High School, without state funding being provided. State funding for high schools in California began being provided approximately 10 years after Compton High School was constructed (Straus 2014). As with other municipal services, there has been a struggle throughout the 20th century to fund the public schools due to the city's low tax base.

Subject Property – Centennial High School

Compton Unified School District redeveloped the subject property in 1953 with the construction of Centennial High School (originally Centennial Senior High School) (Figures 7 and 8). Prior to that, the campus site was developed with a horse riding academy (Centennial High School 1959). The school was designed by Jerome C. DeHetre, Architect, and constructed by the Heirshberg Construction Co. Centennial Senior High School opened with an administrative/library building, 8 classroom buildings, a woodshop, a cafeteria, and a track. Two small buildings near the track are no longer extent and their purpose unknown (Figures 8 and 25).

Between 1959 and 1961 a major expansion was constructed that doubled the facilities including an all-purpose gym, larger showers in both boys' and girls' gym areas (locker rooms), 23 new classrooms, P.E. activity rooms, expansion of the cafeteria and eating areas covered, and 6 tennis courts (Centennial High School 1959) (Figures 9 through 15).

A football field was added at the center of the track in c1963, lockers were removed at an unknown date, and a classroom building between Units D and G was demolished c2003.

Jerome C. DeHetre, A.I.A. and Heirshberg Construction Co.

Jerome C. DeHetre received his provisional certificate from the California State Board of Architectural Examiners in 1937, at which time his address was 816 N. Willow Street in Compton (Architect & Engineer 1937). He was a Member of the American Institute of Architects (AIA) from at least 1946 to 1959 (Hadley 2018). In 1956, DeHetre is listed as one of three architects in Compton, California with an address of 414 N. Burris Street (American Architects' Directory 1956). DeHetre is credited with designing the 1957 convent building at Mission Santa Ines (Costello et al 1998) and the 1952 Henry Mayo Newhall Auditorium at Hart High School (Figure 6; Santa Clarita Valley History 2025). No other examples of his work we found during research.

No information was discovered regarding the Heirshberg Construction Co.



Figure 5. Robert Lee Frost High School Auditorium, Culver City, CA. Mid-Century Modern – Googie Style



Figure 6. Hart High School Auditorium. Mid-Century Modern – International Style

B10. Significance (continued)

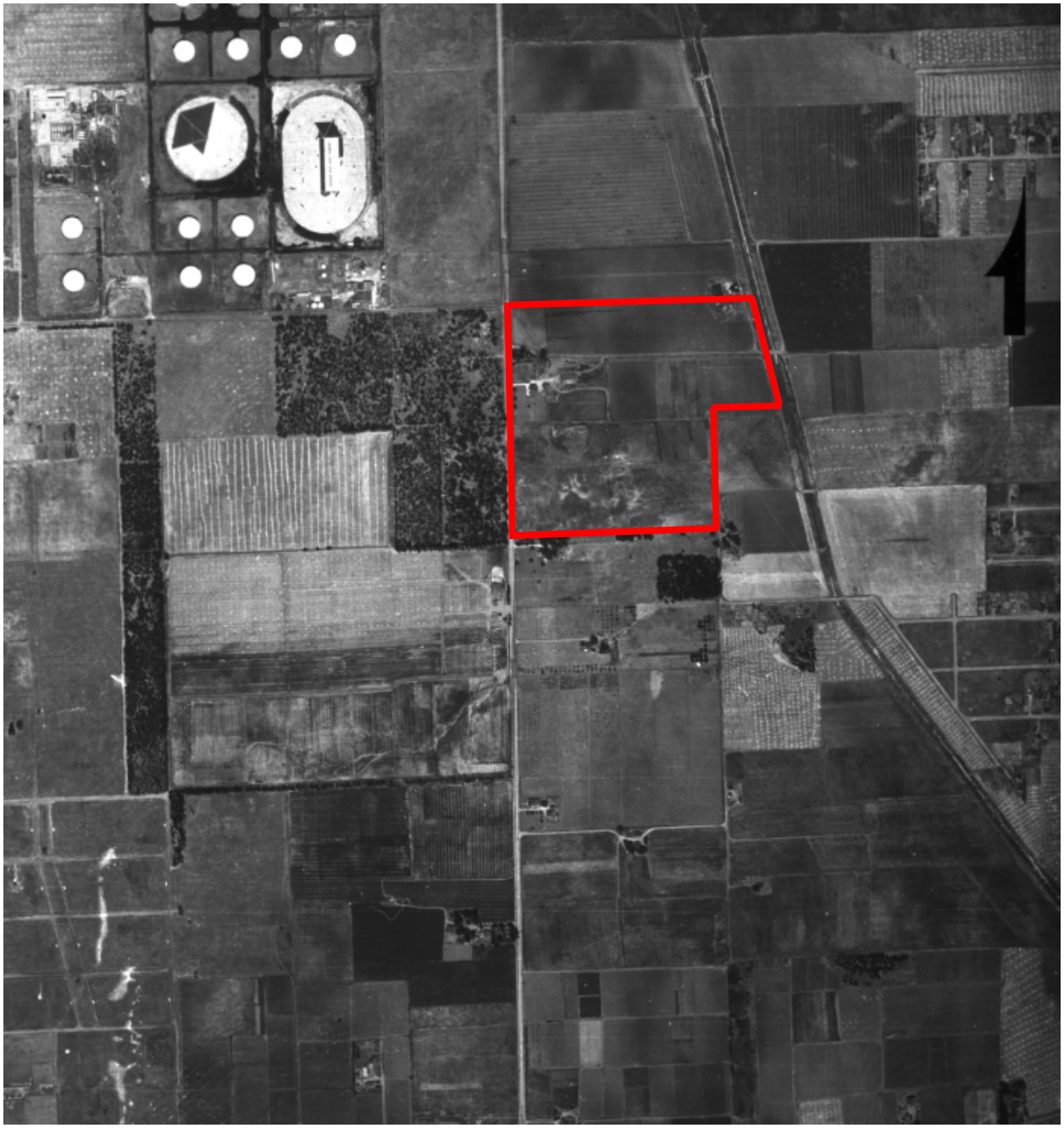


Figure 7. 1938 Aerial map
Note: Red outline indicates approximate Centennial High School boundary

B10. Significance (continued)



Figure 8. 1956 Aerial map
Note: Red outline indicates Centennial High School boundary

B10. Significance (continued)



Figure 9. 1961 yearbook. From left to right – Units AA, BB, and CC under construction



Figure 10. 1961 yearbook. Campus construction.

B10. Significance (continued)

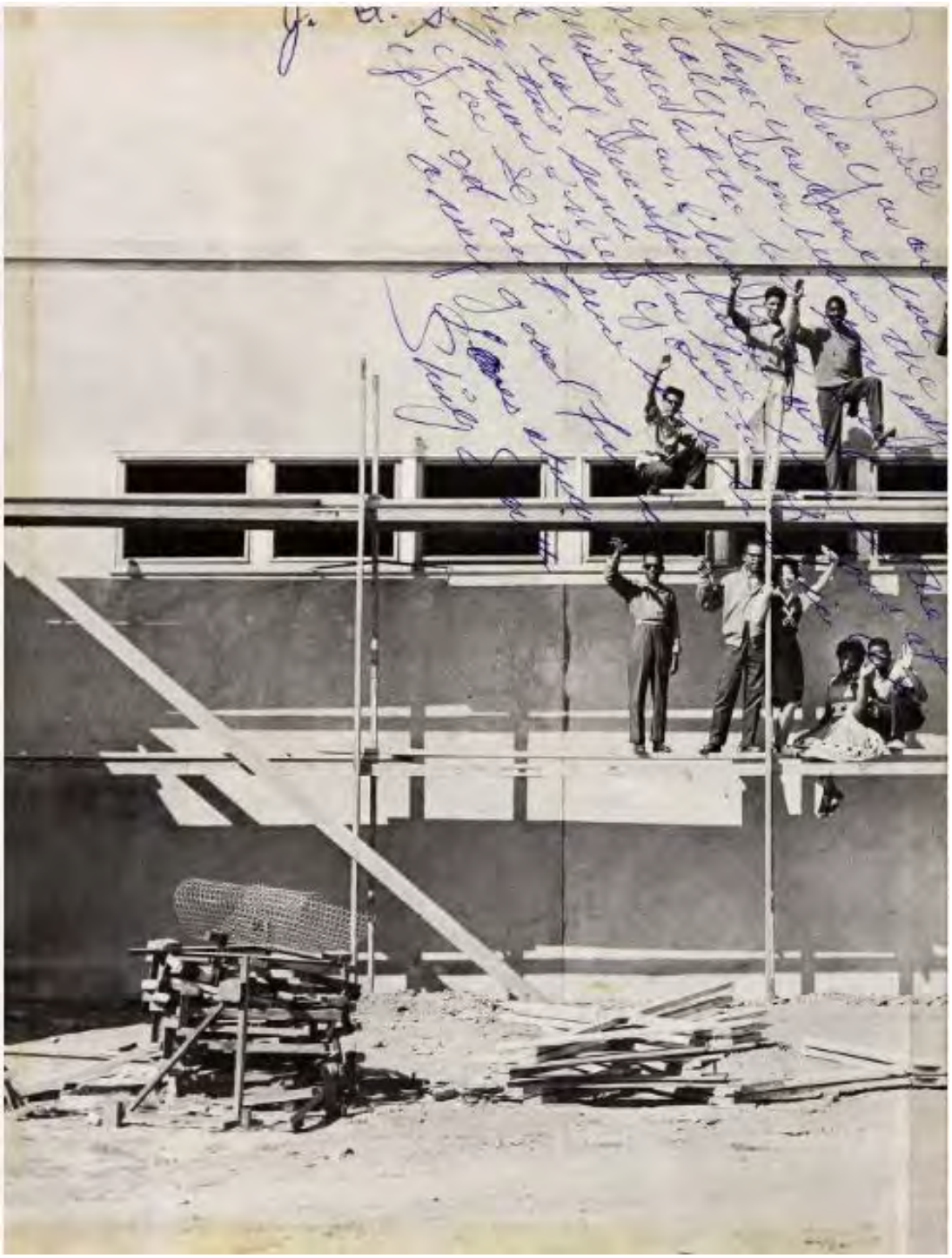


Figure 11. 1961 yearbook. Campus construction.

B10. Significance (continued)

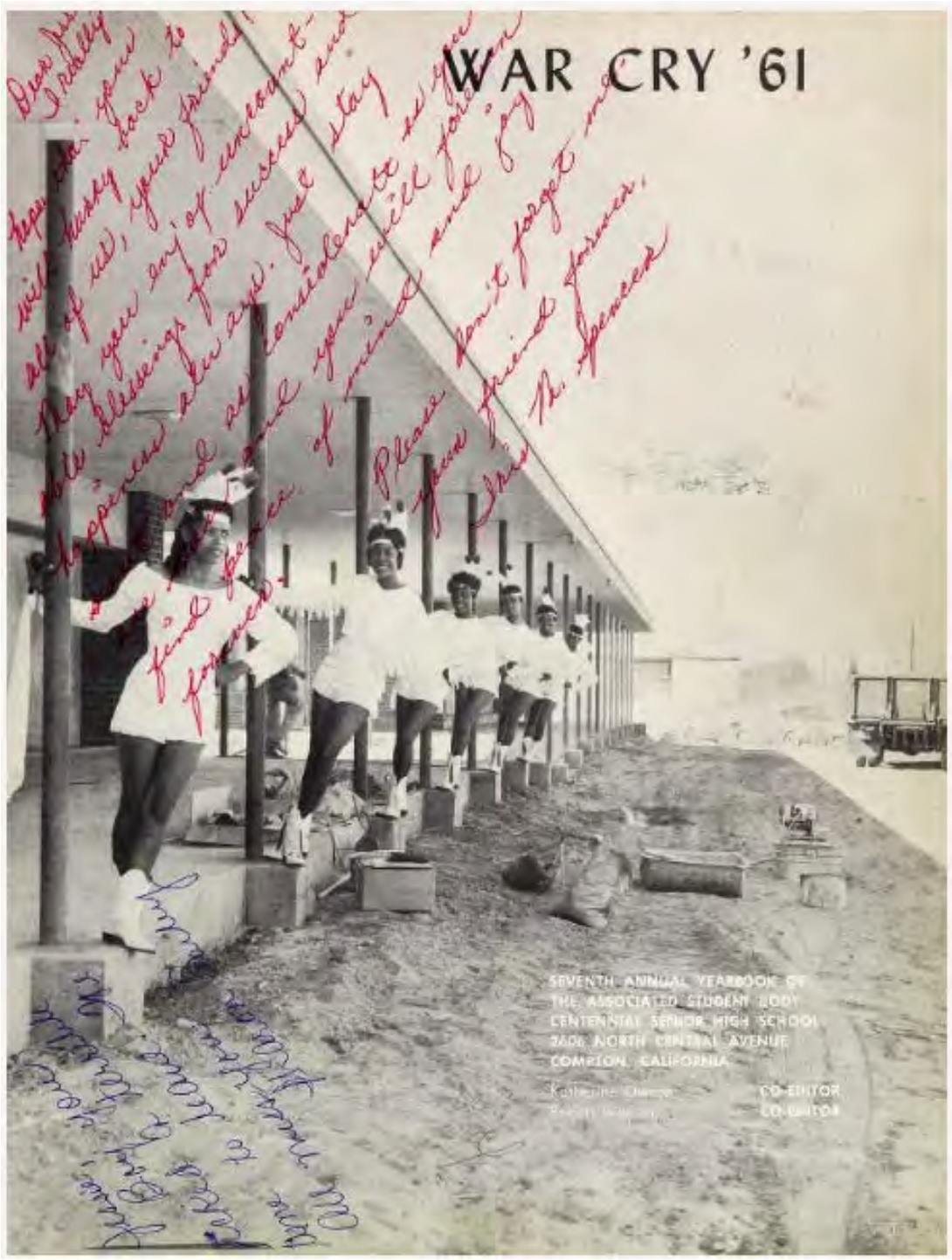


Figure 12. 1961 yearbook. Campus construction.

B10. Significance (continued)



Figure 13. 1961 yearbook. Campus construction.

B10. Significance (continued)



Figure 14. 1961 yearbook. Cafeteria expansion, looking north.

B10. Significance (continued)



Figure 15. 1961 yearbook, installation of new sign on N. Central Avenue.

B10. Significance (continued)



Figure 16. 1962 yearbook. Administration Building/Library east facade, looking northwest.

B10. Significance (continued)

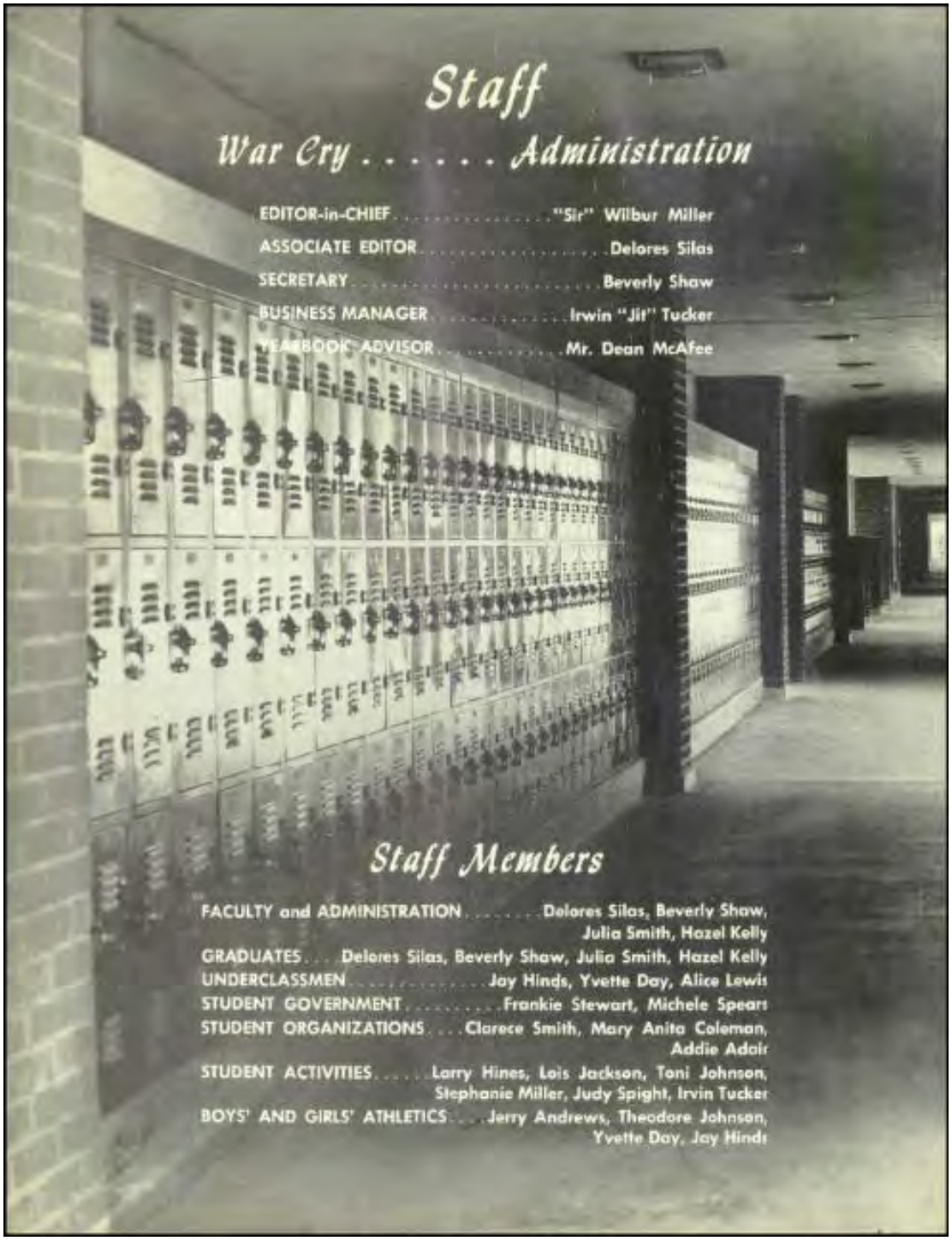


Figure 17. 1962 yearbook, covered breezeway with lockers (lockers no longer extant)

B10. Significance (continued)



Figure 18. 1963 yearbook. Gymnasium, looking southeast.

B10. Significance (continued)



Figure 19. 1964 yearbook, main entrance.



Figure 20. 1964 yearbook. West façade of Administration/Library Building.

B10. Significance (continued)



Figure 21. 1965 yearbook. Girls' lock room, south façade.
Note: Shows windows that have since been removed/filled in.



Figure 22. 1965 yearbook. Girls' lock room, south façade.
Note: Shows windows that have since been removed/filled in.

B10. Significance (continued)



Figure 23. 1968 Graduation photo. N. Central Avenue on the left.

B10. Significance (continued)



Figure 24. 1969 yearbook. Unit G on the left and Gymnasium (Unit EE) on the right, looking east.

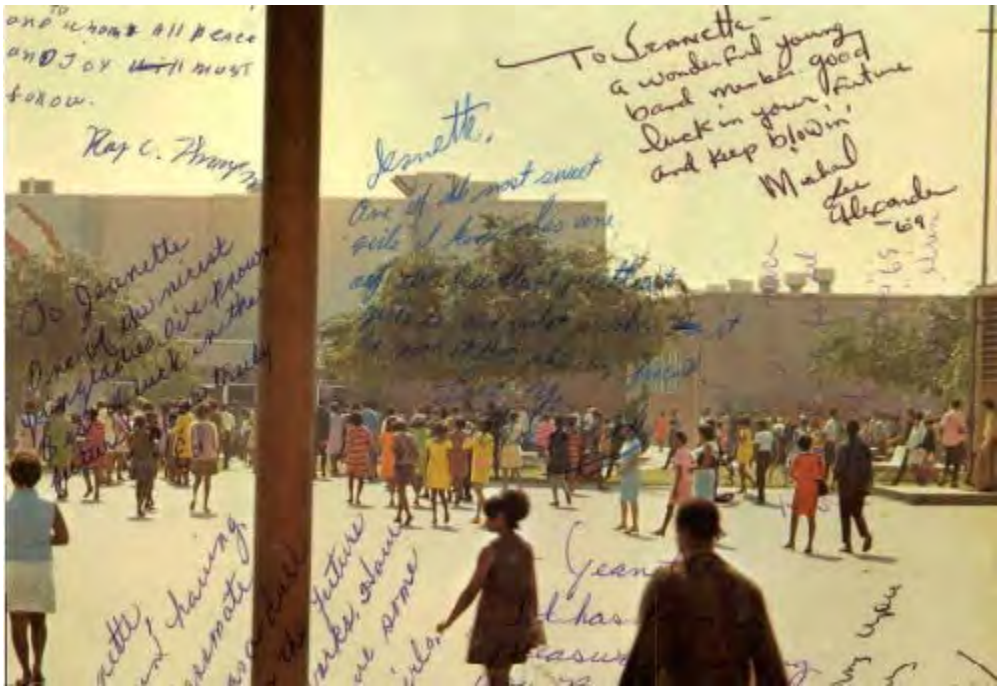


Figure 25. 1969 yearbook. Gymnasium (Unit EE), looking east.

B10. Significance (continued)



Figure 26. 1973 yearbook. West façade of gym.
Note: Doors have since been replaced

B10. Significance (continued)



Figure 27. 1971 Aerial map

B10. Significance (continued)

Notable Alumni

Centennial High School boasts a large number of successful and/or notorious former students in a wide variety of fields including entertainment, athletics, law/business/education/politics. A number of notorious gang members have also attended the school including the founders of the Bloods. The following tables contain a select representation of these former students.

Table 2 - Entertainment

Notable Alumni	HS Years at Centennial	Known for...
Dr. Dre (Andre Romell Young)	1979 (Freshman Year only)	Musician – rapper, record producer, music executive, actor, CEO of Aftermath Entertainment and Beats Electronics. N.W.A. *Straight Outta Compton* (Easy E, Ice Cube, MC Ren, DJ Yella).
DJ Quik (David Marvin Blake)	1986-1989	Musician/Producer – West Coast Hip Hop/G-Funk style, first studio album 1991, Platinum Album (*Quik is the Name*), nominated for a Grammy in 2001.
2nd II None – Gangsta D (Deon Barnett)	1987-1989	Musician – West Coast Hip Hop, first album 1990, first studio album 1991
2nd II None – KK (Kelton McDonald)	1986-1989	Musician – West Coast Hip Hop, first album 1990, first studio album 1991
Hi-C (Crawford Wilderson)	1986-1989	Musician - West Coast Hip Hop
Kendrick Lamar Duckworth (K.Dot)	2005 (senior year)	Musician – rapper 2018 Pulitzer Prize for Music Associated with Dr. Dre / Aftermath Entertainment (distributed through Interscope Records), Top Dawg Entertainment (TDE) / Anthony "Top Dawg" Tiffith, Dave Free
Alfanette “Alfie” Silas-Durio	1974	Professional singer
Alonzo Eric Williams “Lonzo”	1975	Record executive (Lonzo “The World Class Grand Master” of the Wrecking Cru), Founder of the Hip Hop Hall of Fame and Entertainment Center, “Godfather of West Coast Rap”

B10. Significance (continued)

Notable Alumni	HS Years at Centennial	Known for...
Tammie Gibson	1976	Professional singer (recorded with Stevie Wonder, Michael Jackson, Quincy Jones, Madonna, Larry Graham, Elton John, The Temptations)
Geary L. Faggette	1971	Professional musician; music teacher; director & musician for Andre Crouch, Madonna, and movie & film scores.
Cynthia Sewart-Simons	1975	Professional singer; movies – Blessed & Cursed 2010, The Gospel 2005, The Parkers 2004, Show Time Cable Series Soul Food – 2004.
Ronald Bruner Sr.	1974	Professional musician drummer
Voncielle Faggett	1973	Professional singer
Rodney Friend	1975	Professional Gospel songwriter, singer and musician
Phillip Charles	1976	Professional musician - guitarist
David Foreman	1982	Professional musician - guitarist
Lawrence McKinney	1979	Professional musician – bass guitarist
Keith R. Lundy	1962	Motion picture camera operator, first Black set painter in Hollywood
George Ausborne Taylor III (a.k.a. Big Fase 100)	1989-1993	Rapper

Table 3 - Athletes

Notable Alumni	HS Years at Centennial	Known for…/when
Charles Everett Dumas	1952-1954	High jumper – 1956 Olympic Champion
Deonte Burton	2010	Basketball
Lonnie Smith	1974	Baseball

B10. Significance (continued)

Notable Alumni	HS Years at Centennial	Known for...
Floyd Hodge	1977	Football
Jeanette Bolden	1978	Olympic athlete
Roy White	1961	Baseball
Don Wilson	1963	MLB player
Carl “Reggie” Smith	c1960	Baseball
Larry Allen	c1985	NFL player
Ken Dennis	2010	Masters world record sprinter
Allen Ellis	c1965	NFL player
Donte Gamble	c1992	CFL player
Mitch Johnson	c1956	NFL player
Paul Lowe	c1953	NFL player
Don Wilson	1963	Baseball
Lenny Randle	1967	MLB
Wayne Simpson	1963-1967	MLB
Bobby Thompson	c1953	NFL
Roy White	1961	Baseball

B10. Significance (continued)

Table 4 – Law/Business/Education/Politics

Notable Alumni	HS Years at Centennial	Known for…/when
Frank Kahlil Wheaton	1969 – Senior class president	Attorney, agent (actors and sports figures), actor Founded The Group Sports/Entertainment Representatives in 1984
Dion Teague	1975	Dean of Students
Joyce Madry-Johnson	1975	Community College Dean of Career Education
Reginald "Reggie" Sirls	1976	Principal of Morningside High School
Yvette Mayhorn-Harps	1978	Principal
Timothy Mason	1975	University Professor
Douglas Melson	1976	Attorney
Natalie Roberts	1975	Attorney
Jacqueline "Jacquet" Williams	1963	Formed Black Flight Attendants of America (BFAOA)
Mickey Cureton	1967	Dean of Students, Assistant Principal & Principal at Lynwood High School
Jerlilia L. Ryan	1975	CEO at Independent Real Estate Brokerage Co. – Jerlilia L. Ryan Realty
Jose F. Bright	1978	Attorney
Linda Hodo	1979	Educator, writer, publisher, motivational speaker
Omar Bradley	1976	Mayor of Compton 1993-2001, Compton City Councilman 1st District 1991-1993

B10. Significance (continued)

Table 5 – Law Enforcement/Military

Notable Alumni	HS Years at Centennial	Known for…/when
Oceal Green-Victory	1975	Commander at the Los Angeles County Sheriff's Department
Pfc. James Anderson Jr.	1964 (graduated)	Marine Corp Private First Class First Black Marine to receive the Medal of Honor (August 21, 1968)
Sidney Spear	1975	Pilot Instructor for United Airlines, Air Force, Flight engineer
Tyrone Johnson	1975	Army National Guard, Army

Table 6 - Gangs

Notable Alumni	HS Years at Centennial	Known for…
Sylvester Scott	c1972	Founder of the Piru Street Boys (a.k.a. West Side Pirus)
Benson/Vincent Owens	c1972	Founder of the Piru Street Boys (a.k.a. West Side Pirus)

B10. Significance (continued)

NRHP and CRHR Evaluation

To be considered eligible for listing in the NRHP/CRHR under Criterion A/1, a property must be associated with events that have made a significant contribution to the broad patterns of our nation's, California's, or local history. The subject property is a high school that was established in 1953 and expanded in 1961 to serve a growing student population in the surrounding neighborhood. The historic record does not indicate that the subject property is associated with events that have made a significant contribution to history; therefore, it does not appear to be eligible for the NRHP/CRHR under Criterion A/1.

To be considered eligible for listing in the NRHP/CRHR under Criterion B/2, a property must be associated with the lives of persons significant in our past. While many individuals that have made significant contributions to our history via their chosen professions are associated with Centennial High School as they were students there at one time, the school itself is not associated with what these individuals are significant for. For example, some of the more notable alumni discussed in the above historical context include Dr. Dre, Kendrick Lamar, DJ Quik, Gangsta D, KK, Sylvester Scott, and Benson/Vincent Owens. Their contributions to history are not directly associated with the Centennial High School campus. Historical research did not reveal specific and significant individuals that have direct important association with the subject property. Therefore, the subject property does not appear to be eligible for the NRHP/CRHR under Criterion B/2.

Under NRHP/CRHR Criterion C/3, a building must embody distinctive characteristics of a type, period, or method of installation, or represent the work of a master, or possess high artistic values. The campus was constructed in the Mid-Century Modern style of architecture using a Finger Plan, both of which were very common in school construction in the 1940s through the 1960s. Jerome C. DeHetre, A.I.A. was the architect and the Heirshberg Construction Co. was the builder. Very little information was available for either DeHetre or the Heirshberg Construction Co. in the archival record. There is no evidence that these individuals/companies are masters in their fields. Therefore, the subject property does not appear to possess sufficient design or construction value to be eligible for the NRHP/CRHR under Criterion C/3.

Criterion D/4 generally applies to archaeological resources or other resources that through study of construction details can provide information that cannot be obtained in other ways. Construction details about the buildings at Centennial High School are known and common. The property does not appear to be significant under this criterion because it is not likely to yield any additional important information about our history.

Integrity Consideration

For a property to retain and convey historic integrity it must possess most of the seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Centennial High School retains a moderate to high degree of integrity. It has had regular maintenance and the one major expansion in the early 1960s was designed to blend into the original style of the campus. Therefore, it does not detract from the original design, materials, workmanship, or feeling of the subject property and these aspects retain a moderate to high degree of integrity. The campus retains high integrity for location and association as it has not been moved since construction and the setting has not been significantly altered as it remains surrounded by residential development. However, eligibility for listing on the NRHP and the CRHR rests on twin factors of significance and integrity. A resource must have both significance and integrity to be considered eligible. Loss of integrity, if sufficiently great, will become more important than the historical significance a resource may possess and render it ineligible. Likewise, a resource can have complete integrity, but if it lacks significance, it must also be considered ineligible. Therefore, although Centennial High School retains integrity, it lacks significance and therefore does not appear eligible for individual listing in either the CRHR or the NRHP.

P3a. Description (continued)



Photo 2. Left to right - Administrative Building/Library, Unit DD, Unit L, and Unit M. West facades fronting N. Central Avenue. Ascent 2025.



Photo 3. Left to right – Unit AA, Unit BB, and Unit CC. West facades fronting N. Central Avenue. Ascent 2025.

P3a. Description (continued)



Photo 4. Gymnasium with Senior Square in the foreground, west façade. Ascent 2025.



Photo 5. Unit R – Girls' locker room, east and north facades, looking southwest. Ascent 2025.

P3a. Description (continued)



Photo 6. Unit R – Girls' locker room, west and south facades, looking northeast. Ascent 2025.



Photo 7. Unit Q – Boys' locker room, east and north facades, looking northwest. Ascent 2025.

P3a. Description (continued)



Photo 8. Football field and track, looking southeast. Ascent 2025.



Photo 9. Unit P – utility building, north and west façades, looking southeast. Ascent 2025.

P3a. Description (continued)



Photo 10. Cafeteria, west and south façades, looking northeast. Ascent 2025.



Photo 11. Unit K, south façade, looking northeast, representative of original classroom buildings. Ascent 2025.

P3a. Description (continued)



Photo 12. Unit K, north façade, looking southeast, representative of original classroom buildings. Ascent 2025.



Photo 13. Unit BB, south façade, looking northwest, representative of 1960s classroom. Ascent 2025.

P3a. Description (continued)



Photo 14. Unit BB, north façade, looking northwest, representative of 1960s classroom. Ascent 2025.



Photo 15. Unit Y, west and south façades, looking northeast, representative of a small classroom building. Ascent 2025.

P3a. Description (continued)



Photo 16. Unit M, south and east façades, looking northwest, former woodshop. Ascent 2025.

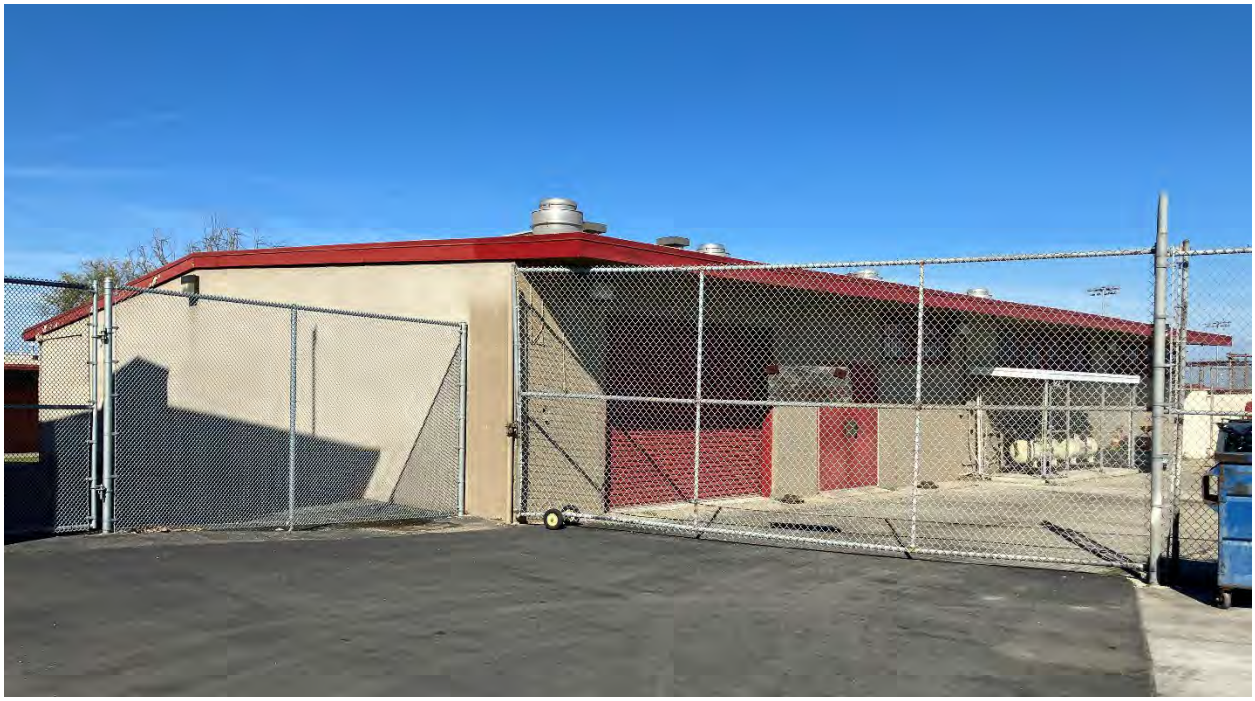


Photo 17. Unit N, west and south façades, looking northeast, auto shop. Ascent 2025.

P3a. Description (continued)



Photo 18. Music/Choir, north and west façades, looking southeast. Ascent 2025.

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Attachment C

NAHC Contact List, Native American Consultation

NATIVE AMERICAN HERITAGE COMMISSION

CHAIRPERSON
Reginald Pagaling
Chumash

VICE-CHAIRPERSON
Buffy McQuillen
Yokayo Pomo, Yuki, Nomlaki

SECRETARY
Sara Dutschke
Miwok

PARLIAMENTARIAN
Wayne Nelson
Luiseño

COMMISSIONER
Isaac Bojorquez
Ohlone-Costanoan

COMMISSIONER
Stanley Rodriguez
Kumeyaay

COMMISSIONER
Reid Milanovich
Cahuilla

COMMISSIONER
Bennae Calac
Pauma-Yuima Band of Luiseño Indians

COMMISSIONER
Vacant

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June 27, 2025

Charlane Gross
Terraphase Engineering

Via Email to: charlane.gross@terraphase.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Centennial High School Rebuild Project, Los Angeles County

To Whom It May Concern:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

    - Any report that may contain site forms, site significance, and suggested mitigation measures.

      All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of the Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Andrew.Green@nahc.ca.gov.

Sincerely,

Andrew Green

Andrew Green
Cultural Resources Analyst

Attachment

Native American Heritage Commission
Native American Contact List
Los Angeles County
6/27/2025

Tribe Name	Fed (F) Non-Fed (N)	Contact Person	Contact Address	Phone #	Fax #	Email Address	Cultural Affiliation	Counties	Last Updated
Cahuilla Band of Indians	F	BobbyRay Esparza, Cultural Director	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		besparza@cahuilla-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	6/28/2023
Cahuilla Band of Indians	F	Erica Schenk, Chairperson	52701 CA Highway 371 Anza, CA, 92539	(951) 590-0942	(951) 763-2808	chair@cahuilla-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	2/1/2024
Cahuilla Band of Indians	F	Anthony Madrigal, Tribal Historic Preservation Officer	52701 CA Highway 371 Anza, CA, 92539	(951) 763-5549		anthonymad2002@gmail.com	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	6/28/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Christina Swindall Martinez, Secretary	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	8/18/2023
Gabrieleno Band of Mission Indians - Kizh Nation	N	Andrew Salas, Chairperson	P.O. Box 393 Covina, CA, 91723	(844) 390-0787		admin@gabrielenoindians.org	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	8/18/2023
Gabrieleno/Tongva San Gabriel Band of Mission Indians	N	Anthony Morales, Chairperson	P.O. Box 693 San Gabriel, CA, 91778	(626) 483-3564	(626) 286-1262	GTTribalcouncil@aol.com	Gabrieleno	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	12/4/2023
Gabrielino Tongva Indians of California Tribal Council	N	Robert Dorame, Chairperson	P.O. Box 490 Bellflower, CA, 90707	(562) 761-6417	(562) 761-6417	gtongva@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/16/2023
Gabrielino Tongva Indians of California Tribal Council	N	Christina Conley, Cultural Resource Administrator	P.O. Box 941078 Simi Valley, CA, 93094	(626) 407-8761		christina.marsden@alumni.usc.edu	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/16/2023
Gabrielino/Tongva Nation	N	Sandonne Goad, Chairperson	106 1/2 Judge John Aiso St., #231 Los Angeles, CA, 90012	(951) 807-0479		sgoad@gabrielino-tongva.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	3/28/2023
Gabrielino-Tongva Tribe	N	Charles Alvarez, Chairperson	23454 Vanowen Street West Hills, CA, 91307	(310) 403-6048		Chavez1956metro@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	5/30/2023
Gabrielino-Tongva Tribe	N	Sam Dunlap, Cultural Resource Director	P.O. Box 3919 Seal Beach, CA, 90740	(909) 262-9351		tongvatcr@gmail.com	Gabrielino	Los Angeles,Orange,Riverside,San Bernardino,Santa Barbara,Ventura	5/30/2023
Santa Rosa Band of Cahuilla Indians	F	Mercedes Estrada, Cultural Director	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	mestrada@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	5/21/2025
Santa Rosa Band of Cahuilla Indians	F	Steven Estrada, Tribal Chairman	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	sestrada@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	4/8/2024
Santa Rosa Band of Cahuilla Indians	F	Vanessa Minott, Tribal Administrator	P.O. Box 391820 Anza, CA, 92539	(951) 659-2700	(951) 659-2228	vminott@santarosa-nsn.gov	Cahuilla	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	4/8/2024
Soboba Band of Luiseno Indians	F	Joseph Ontiveros, Tribal Historic Preservation Officer	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-5279	(951) 654-4198	jontiveros@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023
Soboba Band of Luiseno Indians	F	Jessica Valdez, Cultural Resource Specialist	P.O. Box 487 San Jacinto, CA, 92581	(951) 663-6261	(951) 654-4198	jvaldez@soboba-nsn.gov	Cahuilla Luiseno	Imperial,Los Angeles,Orange,Riverside,San Bernardino,San Diego	7/14/2023

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed Centennial High School Rebuild Project, Los Angeles County.

Record: PROJ-2025-003467
Report Type: AB52 GIS
Counties: Los Angeles
NAHC Group: All

GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians recognized by the State of California as the aboriginal tribe of the Los Angeles basin

Tuesday, October 7, 2025

Shannon Soto
Chief Administrative Officer
Compton Unified School District
City of Compton
ssoto@compton,k12.ca.us

Dear Shannon Soto,

Please find below the substantial evidence submitted by the Gabrieleño Band of Mission Indians – Kizh Nation in relation to your project. This documentation fulfills the legal requirement under the California Environmental Quality Act (CEQA) and Assembly Bill 52 (AB 52) to establish our Tribe's cultural and ancestral affiliation to the project area

The area now known as the City of Compton lies within the ancestral tribal territory of the Gabrieleño Band of Mission Indians – Kizh Nation (also known as the Quiichi Nation), the first people of the Los Angeles Basin. The Kizh Nation's ancestral lands encompassed the Los Angeles Basin, the southern Channel Islands, and extended into portions of Orange, Riverside, and San Bernardino Counties. Before European contact, the region consisted of a sophisticated system of villages, trade routes, and waterways that supported thriving Indigenous communities for thousands of years.

Indigenous Background of the Project Area

For more than 10,000 years, the Kizh people inhabited the fertile plains and riverine landscapes of what is now Compton. The Los Angeles and San Gabriel Rivers provided essential water, transportation, and sustenance, while the surrounding wetlands, oak groves, and grasslands supported a rich diversity of plant and animal life. The Kizh people skillfully managed their environment through sustainable harvesting, controlled burning, and seed cultivation, maintaining ecological balance and abundance throughout the region.

Ancestral Villages and Resources

The project area lies near the ancestral Kizh villages of Tajauta and Huut'nga, both significant settlements within the historical landscape of the Los Angeles Basin.

- Tajauta Village was located in the vicinity of present-day Compton and Willowbrook, near natural springs and riparian corridors that once flowed through the area. The village was sustained by freshwater sources, oak woodlands, and wetland ecosystems that provided acorns, fish, small game, and basket-making materials.
-
- Huut'nga Village, located nearby, was part of the extensive network of Kizh settlements interconnected by ancient foot trails and trade routes. These villages maintained close relationships through trade, marriage, and ceremonial gatherings, forming an integral part of the social and spiritual landscape of the Kizh Nation.

Spanish Colonial Period and Rancho Tajauta

Andrew Salas, Chairman | Nadine Salas, Vice-Chairman | Dr. Christina Swindall Martinez, Secretary
Mike Jesus Lemos, Treasurer I | Samantha Lemos, Treasurer II | Richard Gradias, Chairman of the council of Elders
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With the onset of Spanish colonization in the late 18th century, the Kizh people experienced profound disruption to their ancestral lifeways. Many were forcibly relocated to Mission San Gabriel and Mission San Fernando as part of the Spanish mission system. The lands that encompass present-day Compton later became part of Rancho Tajauta, a Spanish land grant established during the colonial era. Rancho Tajauta included much of the surrounding territory, including parts of Compton, Watts, and Willowbrook. The imposition of ranchos displaced Indigenous families, restricted their access to water and food sources, and resulted in the loss of sovereignty over their sacred and ancestral lands.
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Archaeological Sensitivity and Resources

Archaeological and ethnographic studies throughout the Los Angeles Basin have documented the long-standing presence of Kizh communities through findings such as habitation sites, shell beads, milling stones, ground stone tools, and midden deposits. Given Compton's proximity to the Los Angeles River and the location of the Tajauta and Huut'nga villages, this area is considered highly sensitive for the presence of undiscovered tribal cultural resources (TCRs) that may remain buried beneath the surface.

Significance and Protective Measures

The Gabrieleño Band of Mission Indians – Kizh Nation recognizes the deep cultural, spiritual, and historical significance of the Compton area. As the direct lineal descendants of the first peoples of this region, the Tribe asserts its role as the consulting authority under Assembly Bill 52 (AB 52) and the California Environmental Quality Act (CEQA). Given the high sensitivity of this area, it is imperative that a qualified Kizh Nation Native American monitor be present onsite during all ground-disturbing activities to ensure that any potential discoveries of tribal cultural resources are handled appropriately and respectfully.

The Tribe respectfully requests that the City of Compton incorporate the Kizh Nation's specific mitigation measures into all project conditions to ensure the protection, preservation, and cultural integrity of these ancestral lands.

Respectfully,



Hereditary Chief Andrew Salas
Gabrieleño Band of Mission Indians–Kizh Nation

Andrew Salas, Chairman | Nadine Salas, Vice-Chairman | Dr. Christina Swindall Martinez, Secretary
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GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION
California State Recognized Aboriginal Tribe of the Los Angeles Basin
(Historically known as the Gabrieleño Tribal Council - San Gabriel Band of Mission Indians)

GABRIELENO BAND OF MISSION INDIANS – KIZH NATION - PROPOSED TCR MITIGATION MEASURES

Proposed Centennial HS Modernization Project

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The project applicant/lead agency shall retain a Native American Monitor from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation. The monitor shall be retained prior to the commencement of any "ground-disturbing activity" for the subject project at all project locations (i.e., both on-site and any off-site locations that are included in the project description/definition and/or required in connection with the project, such as public improvement work). "Ground-disturbing activity" shall include, but is not limited to, demolition, pavement removal, potholing, auguring, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.
B. A copy of the executed monitoring agreement shall be submitted to the lead agency prior to the earlier of the commencement of any ground-disturbing activity, or the issuance of any permit necessary to commence a ground-disturbing activity.
C. The monitor will complete daily monitoring logs that will provide descriptions of the relevant ground-disturbing activities, the type of construction activities performed, locations of ground-disturbing activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Tribe. Monitor logs will identify and describe any discovered TCRs, including but not limited to, Native American cultural and historical artifacts, remains, places of significance, etc., (collectively, tribal cultural resources, or "TCR"), as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitor logs will be provided to the project applicant/lead agency upon written request to the Tribe.
D. On-site tribal monitoring shall conclude upon the latter of the following (1) written confirmation to the Kizh from a designated point of contact for the project applicant/lead agency that all ground-disturbing activities and phases that may involve ground-disturbing activities on the project site or in connection with the project are complete; or (2) a determination and written notification by the Kizh to the project applicant/lead agency that no future, planned construction activity and/or development/construction phase at the project site possesses the potential to impact Kizh TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery shall cease (i.e., not less than the surrounding 50 feet) and shall not resume until the discovered TCR has been fully assessed by the Kizh monitor and/or Kizh archaeologist. The Kizh will recover and retain all discovered TCRs in the form and/or manner the Tribe deems appropriate, in the Tribe's sole discretion, and for any purpose the Tribe deems appropriate, including for educational, cultural and/or historic purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in PRC 5097.98 (d)(1) as an inhumation or cremation, and in any state of decomposition or skeletal completeness. Funerary objects, called associated grave goods in Public Resources Code Section 5097.98, are also to be treated according to this statute.
B. If Native American human remains and/or grave goods are discovered or recognized on the project site, then Public Resource Code 5097.9 as well as Health and Safety Code Section 7050.5 shall be followed.
C. Human remains and grave/burial goods shall be treated alike per California Public Resources Code section 5097.98(d)(1) and (2).
D. Preservation in place (i.e., avoidance) is the preferred manner of treatment for discovered human remains and/or burial goods.
E. Any discovery of human remains/burial goods shall be kept confidential to prevent further disturbance.

PLEASE NOTE THE FOLLOWING:

Any/all revisions to the Kizh's proposed TCR mitigations set forth above must be requested in writing, and not more than ten (30) calendar days from the date that we consulted on the subject Project so that we can conclude consultation. Requested revisions shall be delivered to the Kizh via email at admin@gabrielenoindians.org, and in a Word document, redline format. Please include as the email subject: "REQUEST FOR MITIGATION REVISIONS," and identify the project name and location/address. If revisions are not requested within 10 calendar days of consultation, the Kizh's proposed mitigations are presumed accepted as proposed (i.e., as set forth above).

The laws preserving the confidentiality of Native American documents and records prohibits the inclusion of any information about the location of Native American artifacts, sites, sacred lands, or any other information that is exempt from public disclosure pursuant to the Public Records Act. (Cal. Code Regs. § 15120(d) Rocklin (2011) 197 Cal.App.4th 200, at p. 220. Please be advised that these protective mitigation

measures are property of the KIZH Nation Tribal government and no other entity or Tribal government nor should they be utilized for any other Tribal government or entity and are protected under the AB130 confidentiality act During AB 52/AB 130/SB 18 consultation, the Gabrieleño Band of Mission Indians – Kizh Nation provided substantial evidence: (1) confirming their direct ancestral connection to and cultural affiliation with the geographic area that encompasses the subject project; and (2) establishing their expertise of known and undiscovered tribal cultural resources located in the project's geographic area. Therefore, the parties acknowledge and agree that the project's impacts to tribal cultural resources will be mitigated by and through the Kizh Nation's tribal monitoring for all ground-disturbing project-related activities. To ensure fulfillment and compliance with the law and policy contemplated by CEQA, NEPA, CERCLA, and other relevant state and federal legislation, the parties further agree that the Kizh Nation's expertise of the tribal cultural resources located in the project's geographic area shall not be implemented by another entity without the prior written consent of the Kizh Nation.

Thank you for your anticipated cooperation.

GABRIELEÑO BAND OF MISSION INDIANS - KIZH NATION
Historically known as The San Gabriel Band of Mission Indians recognized by the State of California
as the aboriginal tribe of the Los Angeles basin

Legal Thresholds for "Substantial Evidence" in Tribal Consultation

RE: CEQA and AB 52 Tribal Consultation

Attn: Lead Agency Representative

This letter is submitted by the Gabrieleño Band of Mission Indians – Kizh Nation to clarify the legal definition and threshold of "substantial evidence" as required under the California Environmental Quality Act (CEQA) and Assembly Bill 52 (AB 52). These statutes govern how Tribes are determined to be eligible for consultation and involvement in cultural resource protection.

I. Legal Definition of "Substantial Evidence"

Pursuant to CEQA Guidelines § 15384(a):

> *"Enough relevant information and reasonable inferences from that information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached."*

In practical terms, "substantial evidence" is fact-based, documented proof, and not merely opinion or unverified narrative. Lead agencies are required to rely on this standard when determining which tribes have legal standing in consultation, mitigation, monitoring, and repatriation processes under CEQA and AB 52.

Valid examples of substantial evidence include:

- Archaeological records
- Historical documentation
- Spanish/Mexican land grant records and mission-era maps
- Genealogical data showing ancestral ties to the area
- Oral histories (when supported by documentation)
- Expert reports or peer-reviewed scholarly assessments

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admin@gabrielenoindians.org

II. What Does Not Qualify as Substantial Evidence?

The intent of CEQA and AB 52 is not to create symbolic inclusivity, but to ensure that only those tribes with documented, lineal, cultural, or ancestral affiliation to a project area are consulted. The law is clear: participation must be based on fact-based documentation, not preference, emotion, or assumption.

According to **CEQA Guidelines § 15384**:

> *"Substantial evidence shall include facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts."*

Conversely, **§ 15384(b) states**:

> *"Argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence that is not credible shall not constitute substantial evidence."*

Invalid examples include:

1. Unsubstantiated Opinions – Generalized claims such as "we feel connected to this area" without accompanying documentation.
2. Speculative Assertions – Guesswork or assumptions without factual or historical support.
3. Form Letters or Equity-Based Requests – Requests made "in the spirit of respect" or for equitable inclusion with no specific tie to the site.
4. NAHC List Status Alone – Being listed on the NAHC Consultation Contact List does not establish cultural affiliation or descent. The NAHC has clarified this list is strictly for contact purposes.
5. Unverified or Fabricated Sources – Misrepresented or plagiarized documents, or third-party claims made without evidence.

Allowing participation based on such unsupported assertions undermines the legal foundation of CEQA, violates the rights of lineal descendant tribes, and puts the lead agency at legal risk.

III. Legal Precedent: *Koi Nation v. City of Clearlake* (2020)

This pivotal court case illustrates the legal requirement to honor substantial evidence. The Koi Nation provided maps, Tribal records, and historical evidence of its ancestral ties to a project site in Clearlake. The City dismissed the evidence and issued a Mitigated Negative Declaration (MND) instead of conducting full consultation.

The California Court of Appeal ruled in favor of the Koi Nation, concluding that:

- The Tribe met the substantial evidence standard, triggering the requirement for full CEQA review;
- The city violated CEQA by dismissing the evidence and failing to conduct proper consultation;

- The presence of substantial evidence that cultural resources may be affected required the preparation of an EIR.

Lead agencies are legally obligated to consult and coordinate with tribes that present documented, fact-based evidence of cultural affiliation to a project area. This case confirms that agencies may not substitute convenience, preference, or assumptions in place of the legal requirement to engage Tribes who provide substantial evidence of *ancestral* connection.

IV. Why This Matters

Pursuant to AB 52 and CEQA, consultation must be based on "substantial evidence" demonstrating a tribe's cultural or ancestral affiliation to the specific project area. Failure to apply the substantial evidence standard results in:

- Invalidation of tribal consultation efforts
- Potential CEQA litigation and project delays
- Legal and ethical harm to culturally affiliated tribes
- Risk of project rejection or reversal

V. The Position of the Kizh Nation

The Gabrieleño Band of Mission Indians – Kizh Nation maintains and submits substantial archaeological, historical, genealogical, and cultural evidence of our ancestral presence in the Greater Los Angeles Basin and associated project areas. This documented affiliation compels our inclusion in all stages of consultation, monitoring, and cultural resource treatment.

We respectfully urge your agency to uphold CEQA and AB 52's legal standards and to reject unsupported claims that seek involvement based on speculative or generalized assertions. Inclusion in tribal consultation is a legal matter—not a discretionary one.

Should your agency require further documentation, expert testimony, or legal case references to support this position, we are available to provide additional materials upon request.

Respectfully,



Hereditary Chief Andrew Salas
Gabrieleño Band of Mission Indians–Kizh Nation

Andrew Salas, Chairman | Nadine Salas, Vice-Chairman | Dr. Christina Swindall Martinez, Secretary
Mike Jesus Lemos, Treasurer I | Samantha Lemos, Treasurer II | Richard Gradias, Chairman of the council of Elders
PO Box 393 Covina, CA 91723 www.gabrielenoindians.org
admin@gabrielenoindians.org

From:	Shannon Soto
To:	Kara Grant
Cc:	Andrew Salas; Sophia Pina; "Andy Salas"
Subject:	RE: Proposed Centennial HS Modernization - Unlawful AB 52 Consultation Closure
Date:	Friday, January 16, 2026 12:52:18 PM
Attachments:	image001.png

Good Afternoon.

Thank you for your continued engagement regarding the Centennial High School Modernization Project. The District appreciates the Kizh Nation's input and recommendations.

After further review, the District will incorporate your suggested tribal cultural resource mitigation measures, slightly modified to be Project-specific, into the Project's CEQA documentation:

TCR-1: Retain a Native American Monitor Prior to Commencement of Ground-Disturbing Activities

A. The District will retain a Native American Monitor from, or approved by, the Gabrieleño Band of Mission Indians – Kizh Nation. The Monitor will be retained prior to the commencement of any ground-disturbing activities for the Project at all project locations (including on-site and off-site locations specified in the project description and/or required in connection with the Project, such as public improvement work). "Ground-disturbing activities" include, but are not limited to, demolition and removal of pavement and improvements below the ground, potholing, augering, grubbing, tree removal, boring, grading, excavation, drilling, and trenching.

B. A monitoring agreement will be prepared between the District and the Native American Monitor and executed prior to the commencement of any ground-disturbing activity or the issuance of any permit necessary to begin such activity.

C. On days when ground-disturbing activities, as defined in subsection A above, are scheduled and as confirmed by the District and/or its construction contractor, the Native American Monitor will complete daily monitoring logs. These logs will describe the relevant ground-disturbing activities, the type of construction activities performed, the locations of such activities, soil types, cultural-related materials, and any other facts, conditions, materials, or discoveries of significance to the Kizh Nation. Monitoring logs will identify and describe any discovered cultural resources—including, but not limited to, Native American cultural and historical artifacts, remains, and places of significance (collectively, "tribal cultural resources" or "TCRs")—as well as any discovered Native American (ancestral) human remains and burial goods. Copies of monitoring logs will be provided to the District upon completion.

D. On-site tribal monitoring shall conclude upon the latter of the following: (1) written confirmation to the Kizh Nation from the District and/or its construction contractor that all ground-disturbing activities and phases that involve ground disturbance at the project site are complete; or (2) a determination and written notification by the Kizh Nation to the District that no future planned construction activity or development phase at the project site possesses the potential to impact Kizh Nation TCRs.

TCR-2: Unanticipated Discovery of Tribal Cultural Resource Objects (Non-Funerary/Non-Ceremonial)

A. Upon discovery of any TCRs, all construction activities in the immediate vicinity of the discovery (not less than a 50-foot radius) shall cease and shall not resume until the TCR has been fully assessed by the Kizh Monitor and/or a Kizh archaeologist. The Kizh Nation will recover and retain all discovered TCRs in the form and manner deemed appropriate by the Tribe and the District, and for any purpose the Tribe and District deem appropriate, including educational, cultural, and/or historical purposes.

TCR-3: Unanticipated Discovery of Human Remains and Associated Funerary or Ceremonial Objects

A. Native American human remains are defined in Public Resources Code (PRC) section 5097.98(d)(1) as inhumation or cremation, in any state of decomposition or skeletal completeness. Funerary objects (referred to as "associated grave goods" in PRC section 5097.98) shall also be treated in accordance with this statute.

B. If Native American human remains and/or grave goods are discovered or recognized on the Project site, PRC section 5097.9 and Health and Safety Code section 7050.5 shall be followed.

C. Human remains and grave/burial goods shall be treated pursuant to PRC section 5097.98(d)(1) and (2).

D. If preservation on site is the Kizh Nation's preferred treatment for discovered human remains and/or burial goods, the District will identify a suitable location onsite for the remains/burial goods to be interned.

E. Any discovery of human remains or burial goods shall be kept confidential to prevent further disturbance.

Thank you,
Shannon

Shannon Soto, Ed.D.
Chief Administrative Officer
Compton Unified School District
310-639-4321, ext. 55086

From: Kara Grant <kara@grant-law.net>
Sent: Monday, December 22, 2025 1:50 PM
To: Shannon Soto <ssoto@compton.k12.ca.us>
Cc: Andrew Salas <chairman@gabrielenoindians.org>; Sophia Pina <sophia_pina@gabrielenokizh.org>; 'Andy Salas' <admin@gabrielenoindians.org>
Subject: Proposed Centennial HS Modernization - Unlawful AB 52 Consultation Closure

Good Afternoon

I am writing as legal counsel of the Gabrieleno Band of Mission Indians - Kizh Nation regarding the Proposed Centennial HS Modernization Project.

It is unlawful for the District to close consultation based on the incorrect recitation of the substantial evidence provided to you during AB 52 consulation for this project. In particular, the Kizh Village site of Huutnga encompasses the project site as well as the larger city of Compton. Your statement that this village site is in the "City of Yorba Linda, more than 30 miles east of Centennial High School," is false. Substantial evidence, including historical maps, showing the correct location of the ancestral village site of Huutnga and that it encompasses this project site and the larger City of Compton, were provided to the District on or about December 18, 2025. In addition, the District has available to it through other projects, substantial evidence that contradicts its proposed findings for the subject project.

- **See Site CA-LAN-389 (the Amupunga site). This site was originally recorded by Chartkoff and Gutman in 1969 and i's location was described as "...overlooking Compton Creek (1000 feet to the east) and the Los Angeles River; 500 ft west of Alameda Street, 2500-3000 ft north of Del Amo Avenue; 4000 ft south of Del Amo Seminary" (Chartkoff and Gutman 1969a). The site was defined as "...a surface site which apparently once had depth and was probably a seasonal village or camp site." They also note that many pieces of shell were scattered "...along the eastern bluffs overlooking the tidal marshes for 4000 ft.*

Moreover, it is well-established and regularly noted by the Native American Heritage Commission, that the absence of a positive SLF database search does not support a finding that resources are unlikely to exist in that subject geographic area. The conclusion that "the likelihood of encountering tribal cultural resources diminishes significantly beyond approximately 100 meters from the channelized Compton Creek" is similarly contradicted by the substantial evidence provided by the Tribe and available to the District.

Lastly, the District's demand for "site-specific evidence to support the imposition of expanded mitigation" lacks legal support. CEQA does not impose this requirement on consulting Native American tribes under AB 52 or any other statutory framework. The District cannot impose greater restrictions on tribal cultural resource preservation than California law allows, and to do so amounts to an abuse of discretion by the District.

The District's unfounded positions and demands indicate a lack of good faith. As such,

consultation necessarily remains open unless and until an agreement on the mitigations is reached and/or no such agreement could be reached despite good faith efforts by both parties. Neither of these conditions to consultation closure have occurred. For these reasons, the Kizh Nation reserves the right to request project avoidance in the event the District does not comply with its duties and adhere to California law with respect to the consideration and implementation of TCR mitigation measures.

Please confirm receipt of this email and thank you for your anticipated cooperation.

Sincerely,

Kara Grant

___

Kara E. Grant | Attorney at Law
K G L , P C
t | (714) 321-7472
e | kara@grant-law.net

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