

**Appendix K1 Gary Stickel's Letter Commenting on the
Cultural Resources Investigation Report**

Appendices

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Mr. Andrew Salas
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October 17, 2018

Re: my review of the report entitled, “Solana Residential Development within the City of Torrance, Los Angeles County, California” by Reylenn Properties, LLC.

The following is my professional review of the above referenced report that was authored by Liz Denniston, M.A. and Evelyn Chandler, M.A., representing Paleo Solutions, Inc. of Monrovia, CA.

As the executive summary in the report states, Paleo Solutions, Inc. was retained by Reylenn Properties to conduct a Cultural Resources Management (CRM) study which they called a “cultural resources assessment” for the property of the planned development. They also stated that they conducted a “cultural resources record search and literature review” and a “cultural resources survey” in order to produce their report. The proposed project plans to build a multi-residential development located at the intersection of Hawthorn Blvd. and Via Valamonte in the City of Torrance. Although the overall property is 24.7 acres, the development will take place on 5.7 acres, which area they refer to as “Project area.”

The literature search was conducted at the regional state archive known as the South Central Coastal Information Center, located at Cal State Fullerton. That search was conducted for a 0.5-mile radius of the project area. Nine previous CRM studies have been conducted within the project area and three sites have been recorded within that area. They are all historic cultural sites, as opposed to prehistoric ones, and they include the Jose Dolores Sepulveda Adobe Home (P-19-186563) and two utility pole structure sites. The report also stated that an “intensive pedestrian survey of the Project area was performed.” Their results were that “No cultural resources were identified within the Project area,” and they went on to conclude that “As a result, the Project area has low sensitivity for cultural resources and no further management recommendations are necessary” beyond standard State measures regarding the unanticipated discoveries of human remains and cultural resources. In my professional judgment, their report is seriously deficient in all levels, except for their presentation of the legal mandate, as shall be explained below.

Under the report’s section entitled “Cultural Setting” and its subsection entitled “Regional Prehistory,” they only cite William Wallace’s 1955 chronology, and they state that “Humans have lived in the region of southern California for at least 10,000 years.” The report fails to mention that there is confirmed evidence that the greater Southern California area was occupied by humans far earlier. That is, the presentation fails to mention the Farpoint Site (CA-LAN-451; Stickel 2007), which was located on Point Dume on the Malibu coast and which had a developed midden site and evidence of the Clovis Culture – the earliest identifiable culture in North America. The evidence that the Farpoint Site was indeed Clovis was verified by our national museum, The Smithsonian, by its chief archaeologist Dr. Dennis Stanford (2007). The minimum date for the culture is ca. 13,000 B.P. which was presented in an article in the national journal *Science* (Waters and Stafford 2007). Therefore the report’s chronology is off by three millennia.

Under the next subsection, “Ethnography,” the authors make the statement, “The Project is in an area historically occupied by the Gabrielino, also known as Tongva.” That statement is inaccurate and false. “Gabrielino” is a misspelling of the true term of Gabrieleno, which was perpetrated by Kroeber (1925; cf. Stickel 2016). The term “Tongva” is an illegitimate term that is being used by impostors claiming to be local Indians. So-called Tongva leaders have been researched by a nationally certified genealogist and Vice Chair of the California Esselen Tribe, Lady Lorraine Escobar, and she has documented their illegitimacy and notified the California State Native American Heritage Commission (Escobar 2018). The true ethnic name of the Tribe that occupied the greater Los Angeles Basin including the project area is Kizh (see Stickel 2016, which also explains

the origin and misuse of Tongva). The report also states as fact that the “Gabrielino...likely entered the Los Angeles Basin as recently as 1500 years before present.” That has been a long-standing but unproven hypothesis on the part of archaeologists. There is substantial material evidence that the Kizh have lived in the area for as long as 9,000 years.

Regarding the cited literature for the study, in the “REFERENCES” section, there are errors in the bibliography, such as the book by Chartkoff and Chartkoff on California archaeology, which is listed as “1988” when the accurate date is 1984. Moreover, only two of the references to the Gabrielenos are listed, whereas it omits other salient reference such as Johnston (1962) and the Kizh Tribe’s own 2013 published book, which discusses their tribal territory and culture (Salas-Teutimes et al. 2013). Also regarding the cited literature, non-relevant sources are cited, such as D.B. Roger’s 1929 book *Prehistoric man of the Santa Barbara Coast*, and area far from the City of Torrance’s area. Also, the citations include three publications on the Chumash Tribe, while the project area is in the Kizh tribal territory, not Chumash; therefore, they are irrelevant.

Regarding the “Field Methods” section, the report states that “A qualified Paleo Solutions archaeologist completed an intensive survey of the Project area....” However, neither the person nor qualifications were presented. The section also mentions that the survey was conducted by walking transects spaced “no more than 10 meters apart.” Based on the my 50-years’ experience in conducting surveys in this area, which includes having conducted hundreds of surveys, a ten-meter spacing is inadequate as such spacing could locate an extensive village site for example, but would miss more limited sites and artifacts, such as lithic work stations and very important artifacts such as the Shaman Stone that was recently discovered on another project in the Hollywood area, which was an isolated artifact. The report did note that the area was highly disturbed. Such disturbed areas should not be overemphasized as not containing important cultural data. For example, one of the oldest human skeletal remains of the area, “Los Angeles Man,” was found in a highly disturbed context to the north at Ballona Creek (Berger et al. 1971). Importantly, the report failed to discuss or mention that the Torrance area and the Palos Verdes Peninsula to the south are arguably the most densely populated area by the ancient Kizh (see the tribal territory map by Stickel and Flaherty 2015) and therefore the areas are highly sensitive with regard to the potential discovery of ancient Kizh cultural resources.

The report concludes in its “SUMMARY AND RECOMMENDATIONS” section that “No cultural resources were identified within the project area...As a result, the Project has a low sensitivity for cultural resources and no further management recommendations are necessary beyond standard protection measures...(regarding the State legal mandate and regarding discoveries of human remains or other cultural resources).”

In conclusion here, I have found the report to be deficient in terms of accuracy and appropriateness of references; the report is inaccurate as to the true tribal name of the indigenous people of the area, i.e. the Kizh; the study did not adequately site-survey the subject property; the study failed to provide proper recommendations regarding cultural resources to the client and the City. In my professional opinion, notwithstanding the disturbance of the property previously as noted, the property should be re-surveyed by a qualified and experienced archaeologist at a maximum of a 5-meter interval. That would professionally provide for discovery of significant isolated human remains or artifacts. Importantly, the report failed to recommend that a qualified Kizh Tribal Monitor be present during all ground disturbances for the development.

Truly yours,



Gary Stickel, Ph.D. (UCLA)
Consulting Archaeologist

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