


Appendix I

Tribal Cultural Resources

Appendix I

SWCA Environmental Consultants, *Tribal Cultural Resources Assessment for the 6300 West Third Street Project, Los Angeles, California*, October 12, 2020, revised February 2, 2021.

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TRIBAL CULTURAL RESOURCES ASSESSMENT FOR THE 6300 WEST THIRD STREET PROJECT, LOS ANGELES, CALIFORNIA

October 12, 2020

Revised February 2, 2021

PREPARED FOR

Holland Partner Group
5000 E. Spring Street
Suite 500
Long Beach, CA 90815

PREPARED BY

SWCA Environmental Consultants
51 West Dayton Street
Pasadena, California 91105

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Prepared for

Holland Partner Group

5000 E. Spring Street
Suite 500
Long Beach, CA 90815

Prepared by

Chris Millington, M.A., RPA,
Trevor Gittelhough, M.A.,
and
Alex Wesson, B.A

SWCA Environmental Consultants

51 West Dayton Street
Pasadena, California 91105
(626) 240-0587
www.swca.com

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MANAGEMENT SUMMARY

Purpose and Scope: Holland Partner Group (the project applicant), retained SWCA Environmental Consultants (SWCA) to conduct a tribal cultural resources review and sensitivity assessment in support of the proposed 6300 West Third Street Project (project) in the city and county of Los Angeles, California. The project applicant proposes to construct one high-rise, mixed-use commercial and residential building on a 3.9-acre property located at 6300 West Third Street (project site). The City of Los Angeles Department of City Planning (DCP) is the lead agency for the project. The following study was conducted to analyze any potential impacts this project may have on tribal cultural resources located in the project site to comply with the California Environmental Quality Act (CEQA), including Assembly Bill 52 (AB 52) and relevant portions of Public Resources Code (PRC) Section 5024.1, Title 14 California Code of Regulations (CCR) Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The following report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to evaluate the presence or likelihood of tribal cultural resources within the project site.

Dates of Investigation: SWCA conducted a CHRIS search for the project site plus a 0.8-km (0.5-mile) radius on July 5, 2018, at the South Central Coastal Information System (SCCIC) located at California State University, Fullerton. SWCA received the results of a Sacred Lands File (SLF) search from the Native American Heritage Commission (NAHC) on July 16, 2018. AB 52 notification letters were sent to ten tribal groups on June 26, 2018. SWCA also understands that DCP held a tribal consultation call on January 16, 2019 with Chairman Salas of the Gabrieleño Band of Mission Indians–Kizh Nation; and DCP received follow up information from that call on January 17, 2019, July 3, 2020, and January 6–7, 2021 that were considered in this technical analysis.

Summary of Findings: A CHRIS records search and archival research identified 12 previously recorded cultural resources within a 0.8-km (0.5-mile) radius of the project site. None of the resources were located within the project site, one of the sites identified (P-19-000159) includes Native American human remains, commonly known as the La Brea Woman, recovered in 1915 from asphalt seeps in the La Brea Tar Pits 0.7 km (0.4 miles) to the southeast of the project site. The NAHC's SLF results were negative, though the letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area. DCP submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. One response has been received from the Gabrieleño Band of Mission Indians–Kizh Nation who stated that the project is located in a highly sensitive area; and their follow up information indicated that the project site is located in historically-known Rancho La Brea. Based on review of the information submitted during consultation, as well as other information applicable specifically to the development site, the City concluded that there is no substantial evidence indicating that a known tribal cultural resource is located on the development site. Based on the evidence in the record, the City concluded consultation on January 28, 2021. A letter dated January 28, 2021 was sent to Chairman Salas summarizing the City's efforts to engage in meaningful and good faith consultation and stating the conclusion of the AB 52 consultation process.

The nearest named Gabrielino villages to the project site are all located between 9.5 and 12 km (5.9 and 7.5 miles) away. Other unnamed Native American settlements have been documented approximately 4.5 km (2.8 miles) south of the project site along the former course of the Los Angeles River (now Ballona Creek). The La Brea Tar Pits served as a significant source of asphaltum to Native Americans for at least 10,000 years. Other water features including perennial springs and small wetlands are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains within approximately 3 to 5 km (1.9 to 3.1 miles) of the project site would have been frequented by Native Americans. The proximity to these natural resources, especially the asphaltum source, suggests an increased level of sensitivity for tribal cultural resources in the area above background levels.

The record of industrial uses on the project site originated in 1890s with the discovery of the Salt Lake Oil Field and development under ownership of Arthur Gilmore. Subsequent disturbances to the physical setting were noted to have occurred throughout the twentieth century. Geotechnical boring identified 1.5 m (5.0 feet) of fill described as loose silty sand atop natural alluvial sediments extending to at least a depth of 30.6 m (100.5 feet). The borings did not contain asphaltic materials. While the previous disturbances to the site are likely to have destroyed or otherwise displaced any tribal cultural resources on the surface or shallowly buried within the project site, tribal cultural resources in the form of buried archaeological objects and features can occur in artificial fill or other “disturbed” (i.e., non-native) soils, though intact deposits more likely to retain their significance when they are recovered from native soils. Furthermore, it is possible that deeply buried tribal cultural resources can occur in the project site within the alluvial sediments identified below the artificial fill.

SWCA finds the project site has sensitivity for containing tribal cultural resources. This position is based on the potential level of sensitivity of the area and its proximity to a asphaltum source, the prehistoric Native American remains found at the La Brea Tar Pits, and the types of alluvial sediments in the area that are capable of preserving tribal cultural resources. The sensitivity for this project site indicates that the project could reasonably result in a foreseeable direct or indirect impact to tribal cultural resources if adequate mitigation is not provided, as recommended below.

Conclusion: No previously recorded tribal cultural resources have been identified within the project site. No asphaltum was discovered in the boring samples. The estimated depth of excavation for the project is estimated at 30 feet below the surface, which would require excavation of the underlying alluvial sediments and removal of the overlying artificial fill. There is potential for unidentified tribal cultural resources within the project site. Specifically, there is potential to encounter Prehistoric-period artifacts or features deeply buried within native alluvial soils below or (less likely) intermixed with artificial fill or otherwise recently disturbed sediments. Based on the environmental setting in the vicinity, the type of Native American resources that could occur would most likely be objects and features associated with former camps and include flaked stone tools, tool-making debris, stone milling tools, shell, sediment discoloration or carbonization, and depressions or other features indicative of a former living surface.

Therefore, SWCA recommends retaining a qualified archaeologist, preparing a Tribal Cultural Resources Monitoring Mitigation Monitoring Program and a Worker Environmental Awareness Program (WEAP), and conducting tribal cultural resources monitoring to ensure proper treatment of any resources that may be discovered during construction activities. These recommended mitigation measures should be carried out in concert with other measures established for archaeological resources. In addition, to the extent applicable, the City may impose its standard condition of approval for the inadvertent discovery of tribal cultural resources, which would also reduce the potential to impact resources. Therefore, the potential impacts to tribal cultural resources are considered less than significant with the incorporation of mitigation.

Disposition of Data: The final report and any subsequent related reports will be submitted to the project applicant, DCP, and the SCCIC at California State University, Fullerton. Research materials and the report are also on-file at the SWCA Pasadena Office.

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INTRODUCTION

Holland Partner Group (the project applicant), retained SWCA Environmental Consultants (SWCA) to conduct a tribal cultural resources assessment for the proposed 6300 West Third Street Project (project) in the city and county of Los Angeles, California. The project applicant proposes to construct a mixed-use commercial and residential building located at 6300 West Third Street (project site). The City of Los Angeles Department of City Planning (DCP) is the lead agency for the project. The ground disturbing activities proposed by the project are defined as the area of potential impact (API).¹ The following study was conducted to analyze any potential impacts this project may have on tribal cultural resources located in the project site to comply with the California Environmental Quality Act (CEQA), including Assembly Bill 52 (AB 52) and relevant portions of Public Resources Code (PRC) Section 5024.1, Title 14 California Code of Regulations (CCR) Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The following report documents the methods and results of a confidential records search of the California Historical Resources Information System (CHRIS) and archival research used to evaluate the presence or likelihood of tribal cultural resources within the API.

SWCA Cultural Resources Project Manager Chris Millington, M.A., Registered Professional Archaeologist (RPA), and Trevor Gittelhough, M.A., conducted background research and prepared many of the figures. Additional figures were prepared by GIS Specialist John Walls. Mr. Millington, Mr. Gittelhough, and Senior Archaeologist Alex Wesson, B.A. co-authored the report. Cultural Resources Principal Investigator Heather Gibson, Ph.D., RPA, reviewed the report for quality assurance/quality control. The report was edited by Michelle Trevino. All figures in the report are included in Appendix A. Copies of the report are on file with SWCA's Pasadena Office, DCP, and the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

PROJECT DESCRIPTION

The project site is at the southeast corner of Third Street and Fairfax Avenue in the city of Los Angeles, California (Figure 1–Figure 3). The project site is in the La Brea neighborhood of Los Angeles. The site is currently occupied by a two-story commercial structure with a basement level and an associated asphalt-paved parking lot. The site is bounded by Third Street to the north, Fairfax Avenue to the west, South Ogden Drive to the east, and to the south by a driveway and Hancock Park Elementary School. This location is plotted in an unsectioned portion of Township 1 South, Range 14 West as depicted on the U.S. Geological Survey (USGS) Hollywood, California, 7.5-minute topographic quadrangle.

The project applicant proposes to redevelop a portion of the existing commercial center located at the southeastern corner of Fairfax Avenue and Third Street. The eastern portion of the shopping center currently occupied by Kmart, other retail tenants, and surface parking would be demolished and replaced by new construction. The current proposed project anticipates two levels of retail with approximately 331 residential units above. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling trucks, and a drill. The maximum anticipated depth of excavation below the existing surface grade is estimated at approximately 30 feet. The API for the project includes all areas in which ground disturbances

¹ Whereas the project's geographic location and results of the background research reference the project site, references to the API are made when potential impacts under CEQA are specifically being considered, e.g., in the discussion of tribal cultural resources sensitivity and impact analysis stated in the conclusion.

are proposed to occur. The API measures 3.25 acres (141,753 square feet) and occupies the eastern portion of the project site, approximately (Figure 3).

REGULATORY SETTING

State Regulations

The California Office of Historic Preservation (OHP), a division of the California Department of Parks and Recreation (DPR), is responsible for carrying out the duties described in the California PRC and maintaining the California Historic Resources Inventory and CRHR. The state-level regulatory framework also includes CEQA, which requires the identification and mitigation of substantial adverse impacts that may affect the significance of tribal cultural resources.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether tribal cultural resources may be adversely affected by a proposed project. Under CEQA, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment” (PRC Section 21084.1). Answering this question is a two-part process: first, the determination must be made whether the proposed project involves tribal cultural resources. Second, if tribal cultural resources are present, the proposed project must be analyzed for a potential “substantial adverse change in the significance” of the resource.

TRIBAL CULTURAL RESOURCES

Assembly Bill 52 of 2014 (AB 52) amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as one of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

AB 52 Tribal Consultation

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC), whether or not they are federally recognized. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency decides to undertake a project, the lead agency has 14 days to send formal notification to Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project site and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contract information for the agency contact, and notice that the tribe has 30 days to request, in writing, consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe's request for consultation. Furthermore, consultation must be initiated prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

Consistent with the stipulations stated in Senate Bill 18 (Government Code Section 65352.4), consultation may include discussion concerning the type of environmental review necessary, the significance of the project's impacts on the tribal cultural resources, and, if necessary, project alternatives or the appropriate measures for preservation and mitigation that the California Native American tribe may recommend to the lead agency. The consultation shall be considered concluded when either the parties agree to measures mitigating or avoiding a significant effect, if one exists, on a tribal cultural resource; or a party, acting in good faith and after reasonable effort, concludes that agreement cannot be reached (PRC Section 21082.3.2[b]).

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is "an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change" (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP) and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR. According to PRC Section 5024.1(c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- **Criterion 2:** It is associated with the lives of persons important in our past.

- **Criterion 3:** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- **Criterion 4:** It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR. While all sites are evaluated according to all four of the CRHR criteria, the eligibility for tribal cultural resources of an archaeological nature are typically considered under Criterion 4. Most Native American sites are lacking identifiable or important association with specific persons or events of regional or national history (Criteria 1 and 2), or lacking the formal and structural attributes necessary to qualify as eligible under Criterion 3.

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe may meet Criterion 4 of the CRHR if it displays one or more of the following attributes: chronologically diagnostic, functionally diagnostic, or exotic artifacts; datable materials; definable activity areas; multiple components; faunal or floral remains; archeological or architectural features; notable complexity, size, integrity, time span, or depth; or stratified deposits. Determining the period(s) of occupation at a site provides a context for the types of activities undertaken and may well supply a link with other sites and cultural processes in the region. Further, well-defined temporal parameters can help illuminate processes of culture change and continuity in relation to natural environmental factors and interactions with other cultural groups. Finally, chronological controls might provide a link to regionally important research questions and topics of more general theoretical relevance. As a result, the ability to determine the temporal parameters of a site's occupation is critical for a finding of eligibility under Criterion 4 (information potential). Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that cannot be dated are unlikely to possess the quality of significance required for CRHR eligibility. The content of a site, object, or feature of an archaeological nature provides information regarding its cultural affiliations, temporal periods of use, functionality, and other aspects of its occupation history. The range and variability of artifacts present in the site can allow for reconstruction of changes in ethnic affiliation, diet, social structure, economics, technology, and other aspects of culture.

Treatment of Human Remains

The disposition of burials falls first under the general prohibition on disturbing or removing human remains under California Health and Safety Code (CHSC) Section 7050.5. More specifically, remains suspected to be Native American are treated under CEQA at CCR Section 15064.5; PRC Section 5097.98 illustrates the process to be followed if remains are discovered. If human remains are discovered during excavation activities, the following procedure shall be observed:

- Stop immediately and contact the County Coroner:
1104 N. Mission Road
Los Angeles, CA 90033
323-343-0512 (8 am to 5 pm Monday through Friday) or
323-343-0714 (After hours, Saturday, Sunday, and Holidays)
- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendant (MLD) of the deceased Native American.

- The MLD has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC.

City of Los Angeles Condition of Approval

The DCP has developed conditions of approval that apply on a case-by-case basis regarding tribal cultural resources are found during construction activities. For this project, and the purposes of this report, the measures recommended herein are sufficient to support a finding that impacts of construction activities on the project site would have less than significant impacts on tribal cultural resources. In the event that the City imposes conditions of approval (in addition to the recommendations in this report) then those conditions would further minimize potential impacts.

METHODS

The following section presents an overview of the methodology used to identify the potential for tribal cultural resources within the project site.

CHRIS Records Search

On July 5, 2018, SWCA conducted a confidential search of the CHRIS records at the SCCIC on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.8-km (0.5-mile) radius of the project site, as well as any selectively chosen outside the radius to aid in the assessment of tribal cultural resource sensitivity. The SCCIC maintains records of previously conducted studies and known archaeological resources (including those that meet the definition of a tribal cultural resource or have potential to meet the criteria); it also maintains copies of the OHP's portion of the Historic Resources Inventory.

Confidential CHRIS results include specific information on the nature and location of sensitive archaeological sites, which should not be disclosed to the public or unauthorized persons and are exempt from the Freedom of Information Act. The information included in a confidential CHRIS records search is needed to assess the sensitivity for undocumented tribal cultural resources and to inform the impact analysis. The search included any previously recorded archaeological resources (i.e., excludes historic buildings) within the project site and surrounding 0.8-km (0.5-mile) area.

Archival Research

Concurrent with the confidential CHRIS records search, SWCA also reviewed property-specific historical and ethnographic context research to identify information relevant to the project site. Research focused on a variety of primary and secondary materials relating to the history and development of the project site, including historical maps, aerial and ground photographs, ethnographic reports, and other environmental data. Historical maps drawn to scale were georeferenced using ESRI ArcMAP v10.5 to show precise relationships to the project site. Sources consulted included the following publicly accessible data sources:

- City of Los Angeles OHR (SurveyLA);
- City of Los Angeles Department of Building and Safety (building permits);
- David Rumsey Historical Map Collection;
- Huntington Library Digital Archives;
- Library of Congress;

- Los Angeles Public Library Map Collection;
- Sanborn Fire Insurance Company Maps (Sanborn maps);
- USGS historical topographic maps;
- University of California, Santa Barbara Digital Library (aerial photographs); and
- University of Southern California Digital Library.

In addition to the above, SWCA reviewed the geotechnical report prepared for the project by Geocon West, Inc. (2018). Geocon West, Inc. conducted limited subsurface boring, identified the earth materials underlying the project site, noted their properties, and offered a preliminary discussion of geotechnical aspects of the project.

Sensitivity Assessment

In circumstances where a known tribal cultural resource is not present, SWCA assesses the potential for the presence of an unidentified resource. The determination considers whether a location was favorable for Native American habitation, the historical use of the vicinity, and the physical setting of the area. The assessment also considers whether the setting is capable of containing buried material.

In cases where there is a lack of data gathered on a site, to assess the presence or absence of material below the surface, the resulting sensitivity is by nature qualitative. The sensitivity ranges along a spectrum of increasing probability for encountering such material. Indicators of favorable habitability for Native Americans are proximity to natural features (e.g., perennial water source, plant or mineral resource, animal habitat) and other known Native American archaeological sites, flat topography, prominent viewsheds, and relatively dry conditions. Areas with a favorable setting for habitation or temporary use, soil conditions capable of preserving buried material, and little to no disturbances are considered to have a higher sensitivity. Areas lacking these traits are considered to have lower sensitivity. Areas with a combination of these traits as are considered as having a moderate level of sensitivity.

ENVIRONMENTAL SETTING

The project site is in the Los Angeles Basin, a broad, level plain defined by the Pacific Ocean to the west, the Santa Monica Mountains and Puente Hills to the north, and the Santa Ana Mountains and San Joaquin Hills to the south. This extensive alluvial wash basin is filled with Quaternary alluvial sediments deposited as unconsolidated material eroded from the surrounding hills. Several major watercourses drain the Los Angeles Basin, including the Los Angeles, Rio Hondo, San Gabriel, and Santa Ana rivers. The Project site and vicinity are within a fully urbanized setting on an open aspect plain at an elevation of 56 meters (184 feet) above mean sea level. This site is located in the norther portion of the Peninsular Ranges and approximately 1,000 feet south of the Santa Monica Fault Zone. This location is 14.2 km (8.8 miles) northeast from the current shoreline of the Pacific Ocean. An 1894 topographic map shows that before urbanization, the project site was on a relatively level alluvial plain southeast of the Santa Monica Mountains. One higher-order (i.e., smaller) streams is plotted east of the project site and is one of several small tributaries flowing into Ballona Creek—formerly the Los Angeles River—that would have seasonally drained water from the surrounding hills. Before the last decades of the nineteenth century the project site and surrounding parts of the alluvial plain were used for ranching, followed by extensive industrial and commercial development during the late nineteenth and early twentieth centuries.

Geocon West Inc. (Geocon) took six geotechnical bores across the entirety of the project site measuring 20 cm (8 inches) in diameter and extended 4.75 m (15.5 feet) to 30.6 m (100.5 feet) below the concrete surface. The initial 1.5 m (5.0 feet) of the bore was described as fill composed of loose silty sand. Natural alluvial sediments composed the remainder of the sample and may extend past the 30.6 m (100.5 feet) bored for

this project (Geocon 2018). The alluvium includes varying compositions of silty sand and sandy silt and sands (Geocon 2018). These alluvial deposits are consistent with depositional trends for the Los Angeles basin.

CULTURAL SETTING

Prehistory

Prehistoric Overview

In the last several decades, researchers have devised numerous prehistoric chronological sequences to aid in understanding cultural changes in southern California. Building on early studies and focusing on data synthesis, Wallace (1955, 1978) developed a prehistoric chronology for the southern California coastal region that is still widely used today and is applicable to near-coastal and many inland areas. Four horizons are presented in Wallace's prehistoric sequence: Early Man, Milling Stone, Intermediate, and Late Prehistoric. Although Wallace's 1955 synthesis initially lacked chronological precision due to a paucity of absolute dates (Moratto 1984:159), this situation has been alleviated by the availability of thousands of radiocarbon dates obtained by southern California researchers in the last three decades (Byrd and Raab 2007:217). As such, several revisions were subsequently made to Wallace's 1955 synthesis using radiocarbon dates and projectile point assemblages (e.g., Koerper and Drover 1983; Koerper et al. 2002; Mason and Peterson 1994). The summary of prehistoric chronological sequences for southern California coastal and near-coastal areas presented below is a composite of information in Wallace (1955) and Warren (1968), as well as more recent studies, including Koerper and Drover (1983).

HORIZON I: EARLY MAN (CA. 10,000–6,000 BC)

The earliest accepted dates for archaeological sites on the southern California coast are from two of the northern Channel Islands, located off the coast of Santa Barbara. On San Miguel Island, Daisy Cave clearly establishes the presence of people in this area approximately 10,000 years ago (Erlandson 1991:105). On Santa Rosa Island, human remains have been dated from the Arlington Springs site to approximately 13,000 years ago (Johnson et al. 2002). Present-day Orange and San Diego counties contain several sites dating from 9,000 to 10,000 years ago (Byrd and Raab 2007:219; Macko 1998:41; Mason and Peterson 1994:55–57; Sawyer and Koerper 2006). Although the dating of these finds remains controversial, several sets of human remains from the Los Angeles Basin (e.g., "Los Angeles Man," "La Brea Woman," and the Haverly skeletons) apparently date to the Middle Holocene, if not earlier (Brooks et al. 1990; Erlandson et al. 2007:54).

Recent data from Horizon I sites indicate that the economy was a diverse mixture of hunting and gathering, with a major emphasis on aquatic resources in many coastal areas (e.g., Jones et al. 2002), and a greater emphasis on large-game hunting inland.

HORIZON II: MILLING STONE (6,000–3,000 BC)

Set during a drier climatic regime than the previous horizon, the Milling Stone horizon is characterized by subsistence strategies centered on collecting plant foods and small animals. The importance of the seed processing is apparent in the dominance of stone grinding implements in contemporary archaeological assemblages, namely milling stones (metates) and handstones (manos). Recent research indicates that Milling Stone horizon food procurement strategies varied in both time and space, reflecting divergent responses to variable coastal and inland environmental conditions (Byrd and Raab 2007:220).

HORIZON III: INTERMEDIATE (3,000 BC–AD 500)

The Intermediate horizon is characterized by a shift toward a hunting and maritime subsistence strategy, along with a wider use of plant foods. An increasing variety and abundance of fish, land mammal, and sea mammal remains are found in sites from this horizon along the California coast. Related chipped stone tools suitable for hunting are more abundant and diversified, and shell fishhooks became part of the toolkit during this period. Mortars and pestles became more common during this period, gradually replacing manos and metates as the dominant milling equipment and signaling a shift away from the processing and consuming of hard seed resources to the increasing importance of the acorn (e.g., Glassow et al. 1988; True 1993).

HORIZON IV: LATE PREHISTORIC (AD 500–HISTORIC CONTACT)

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

By AD 1000, fired clay smoking pipes and ceramic vessels were being used at some sites (Drover 1971, 1975; Meighan 1954; Warren and True 1961). The scarcity of pottery in coastal and near-coastal sites implies that ceramic technology was not well developed in that area, or that occupants were trading with neighboring groups to the south and east for ceramics. The lack of widespread pottery manufacture is usually attributed to the high quality of tightly woven and watertight basketry that functioned in the same capacity as ceramic vessels.

During this period, there was an increase in population size accompanied by the advent of larger, more permanent villages (Wallace 1955:223). Large populations and, in places, high population densities are characteristic, with some coastal and near-coastal settlements containing as many as 1,500 people. Many of the larger settlements were permanent villages in which people resided year-round. The populations of these villages may have also increased seasonally.

In Warren's (1968) cultural ecological scheme, the period between AD 500 and European contact, which occurred as early as 1542, is divided into three regional patterns: Chumash (Santa Barbara and Ventura counties), Takic/Numic (Los Angeles, Orange, and western Riverside counties), and Yuman (San Diego County). The seemingly abrupt introduction of cremation, pottery, and small triangular arrow points in parts of modern-day Los Angeles, Orange, and western Riverside counties at the beginning of the Late Prehistoric period is thought to be the result of a Takic migration to the coast from inland desert regions. Modern Gabrielino, Juaneño, and Luiseño people in this region are considered the descendants of the Uto-Aztecan, Takic-speaking populations that settled along the California coast in this period.

Ethnographic Overview

The project site is in an area historically occupied by the Gabrielino (Bean and Smith 1978:538; Kroeber 1925: Plate 57). Surrounding native groups included the Chumash and Tataviam/Alliklik to the north, the Serrano to the east, and the Luiseño/Juaneño to the south. There is well-documented interaction between the Gabrielino and many of their neighbors in the form of intermarriage and trade.

The name “Gabrielino” (sometimes spelled Gabrieleno or Gabrieleño) denotes those people who were administered by the Spanish from Mission San Gabriel. This group is now considered a regional dialect of the Gabrielino language, along with the Santa Catalina Island and San Nicolas Island dialects (Bean and Smith 1978:538). In the post-European contact period, Mission San Gabriel included natives of the greater Los Angeles area, as well as members of surrounding groups such as Kitanemuk, Serrano, and Cahuilla. There is little evidence that the people we call Gabrielino had a broad term for their group (Dakin 1978:222); rather, they identified themselves as an inhabitant of a specific community with locational suffixes (e.g., a resident of Yaanga was called a Yabit, much the same way that a resident of New York is called a New Yorker; Johnston 1962:10).

Native words suggested as labels for the broader group of Native Americans in the Los Angeles region include Tongva (or Tong-v; Merriam 1955:7–86) and Kizh (Kij or Kichereno; Heizer 1968:105), although there is evidence that these terms originally referred to local places or smaller groups of people within the larger group that we now call Gabrielino. Nevertheless, many present-day descendants of these people have taken on Tongva as a preferred group name because it has a native rather than Spanish origin (King 1994:12). Thus, the term Gabrielino is used in the remainder of this report to designate native people of the Los Angeles Basin and their descendants.

The Gabrielino subsistence economy was centered on gathering and hunting. The surrounding environment was rich and varied, and the tribe exploited mountains, foothills, valleys, deserts, riparian, estuarine, and open and rocky coastal eco-niches. Like that of most native Californians, acorns were the staple food (an established industry by the time of the Early Intermediate period). Inhabitants supplemented acorns with the roots, leaves, seeds, and fruits of a variety of flora (e.g., islay, cactus, yucca, sages, and agave). Freshwater and saltwater fish, shellfish, birds, reptiles, and insects, as well as large and small mammals, were also consumed (Bean and Smith 1978:546; Kroeber 1925:631–632; McCawley 1996:119–123, 128–131).

The Gabrielino used a variety of tools and implements to gather and collect food resources. These included the bow and arrow, traps, nets, blinds, throwing sticks and slings, spears, harpoons, and hooks. Groups residing near the ocean used oceangoing plank canoes and tule balsa canoes for fishing, travel, and trade between the mainland and the Channel Islands (McCawley 1996:7). Gabrielino people processed food with a variety of tools, including hammer stones and anvils, mortars and pestles, manos and metates, strainers, leaching baskets and bowls, knives, bone saws, and wooden drying racks. Food was consumed from a variety of vessels. Catalina Island steatite was used to make ollas and cooking vessels (Blackburn 1963; Kroeber 1925:629; McCawley 1996:129–138).

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

Deceased Gabrielino were either buried or cremated, with inhumation more common on the Channel Islands and the neighboring mainland coast, and cremation predominating on the remainder of the coast and in the interior (Harrington 1942; McCawley 1996:157). Remains were buried in distinct burial areas, either associated with villages or without apparent village association (Altschul et al. 2007). Cremation ashes have been found in archaeological contexts buried within stone bowls and in shell dishes (Ashby and Winterbourne 1966:27), as well as scattered among broken ground stone implements (Cleland et al. 2007). Archaeological data such as these correspond with ethnographic descriptions of an elaborate mourning

ceremony that included a variety of offerings, including seeds, stone grinding tools, otter skins, baskets, wood tools, shell beads, bone and shell ornaments, and projectile points and knives. Offerings varied with the sex and status of the deceased (Dakin 1978:234–365; Johnston 1962:52–54; McCawley 1996:155–165).

Native American Communities in Los Angeles

The settlement of Native American communities in Southern California during the prehistoric period has been studied extensively by archaeologists over time, including Chace (1969) who argued that coastal areas were used mainly for food procurement while villages were located inland; Hudson (1969, 1971) who argued that Native Americans moved seasonally between villages, located in sheltered coastal areas, inland prairies, and mountain areas, and temporal camps, located on the exposed coast; and Mason and Petersen (1994) who argued that major estuaries in the region were territory centers for clan-based groups in *Rancherias*, which were occupied year round while several smaller sites were used to gather resources during various times of the year (Douglass et al. 2016: 61-62). Generally, all models share the assumption that Native American groups in the region utilized various habitats, moving throughout the region at different times throughout the year. These prehistoric subsistence and settlement patterns are generally believed to have remained the same until the first permanent Native American settlement was established at Mission San Gabriel (Douglass et al. 2016: 385).

The precise location of most Native American villages in the Los Angeles Basin is subject to much speculation, maps depicting villages throughout the greater Los Angeles area show these sites located along rivers or streams, and several maps have been produced throughout the twentieth century depicting this settlement pattern (Figure 4–Figure 7). Native American place-names referred to at the time of Spanish contact did not necessarily represent a continually occupied settlement within a discrete location, rather in at least some cases, the communities were represented by several smaller camps scattered throughout an approximate geography, shaped by natural features that were subject to change over generations (see Johnston 1962:122). Further complicating any efforts to pin-point the location of a village site is the fact that many of the villages had long since been abandoned by the time ethnographers, anthropologists, and historians attempted to document any of their locations. By the time any such effort was made, Native American lifeways had been irrevocably changed and the former village sites or areas were impacted by urban and agricultural development. In some cases Spanish-era Rancho grants may have bounded Indian villages, and in others the Spanish ranchos adopted Native American placenames, such as *Kaweenga*, *Tujunga*, *Topanga*, and *Cucamonga*. Alternative names and spellings for communities, and conflicting reports on their meaning or locational reference further complicate efforts at determining the location of actual village sites. McCawley quotes Kroeber for his remarks on the difficulty of reliably locating former village sites, writing that “the opportunity to prepare a true map of village locations ‘passed away 50 years ago’” (Kroeber 1925:616 cited in McCawley 1996: 32). Thus, even with ethnographic, historical, and archaeological evidence, it can be difficult to conclusively establish whether any given assemblage represents the remains of the former village site.

The nearest named villages to the project site within the Los Angeles Basin include *Guaspet/Waachnga*, near the Ballona wetlands, and *Kuruvunga* to the east/southeast near Santa Monica, and Yaangna, Geveronga, and Maawnga to the east/northeast near downtown Los Angeles. The closest of these is *Kuruvunga* (also known as *Kuruvunga* Springs or Tongva Springs), near present-day University High School, but taken together the named sites are all located within a 9.5- to 12-km (5.9- to 7.5-mile) radius of the project site. Other unnamed Native American settlements have been documented approximately 4.5 km (2.8 miles) south of the project site near wetlands (for which Las Cienegas is named) formed along the former course of the Los Angeles River (now Ballona Creek).

The project site is not near any former Gabrielino communities listed in ethnographic sources. A major source of asphaltum (La Brea Tar Pits) is located approximately 1 km (0.6 miles) to the southeast of the

project site, but no asphaltum materials were recovered in the boring samples taken from the site during geotechnical explorations. The asphaltum source at the La Brea Tar Pits is known to have been an important resource for the Gabrielino, and human remains found at the site suggest it was known to Native Americans more than 10,000 years ago. Also, further south of the La Brea Tar Pits, water features including perennial springs and small wetlands formed along tributaries of Ballona Creek (formerly Los Angeles River) are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains and would have been frequented by Native Americans. Smaller habitation sites were not typically noted by early ethnographers and Spanish colonizers; therefore, the lack of explicit data pointing to a site in the area does not indicate a lack of Native American activity in the area. Captain Gaspar de Portolá's expedition across the Los Angeles Basin followed a route from nearby Gabrielino settlements to the asphaltum source (Seaman 1914).

History

Post-contact history for the state of California is generally divided into three periods: the Spanish period (1769–1822), Mexican period (1822–1848), and American period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican–American War, signals the beginning of the American period, when California became a territory of the United States.

Spanish Period (1769–1822)

Spanish explorers made sailing expeditions along the coast of southern California between the mid-1500s and mid-1700s. In search of the legendary Northwest Passage, Juan Rodríguez Cabrillo stopped in 1542 at present-day San Diego Bay. With his crew, Cabrillo explored the shorelines of present Catalina Island as well as San Pedro and Santa Monica bays. Much of the present California and Oregon coastline was mapped and recorded in the next half-century by Spanish naval officer Sebastián Vizcaíno. Vizcaíno's crew also landed on Santa Catalina Island and at San Pedro and Santa Monica bays, giving each location its long-standing name. The Spanish crown laid claim to California based on the surveys conducted by Cabrillo and Vizcaíno (Bancroft 1886:96–99; Gumprecht 2001:35).

More than 200 years passed before Spain began the colonization and inland exploration of Alta California. The 1769 overland expedition by Captain Gaspar de Portolá marks the beginning of California's Historic period, occurring just after the King of Spain installed the Franciscan Order to direct religious and colonization matters in assigned territories of the Americas. With a band of 64 soldiers, missionaries, Baja (lower) California Native Americans, and Mexican civilians, Portolá established the Presidio of San Diego, a fortified military outpost, as the first Spanish settlement in Alta California. In July 1769, while Portolá was exploring Southern California, Franciscan Fr. Junípero Serra founded Mission San Diego de Alcalá at Presidio Hill, the first of the 21 missions that would be established in Alta California by the Spanish and the Franciscan Order between 1769 and 1823.

The Portolá expedition first reached the present-day boundaries of Los Angeles in August 1769, thereby becoming the first Europeans to visit the area. Father Juan Crespí, a member of the expedition, named the campsite by the river Nuestra Señora la Reina de los Angeles de la Porciúncula or "Our Lady the Queen of the Angeles of the Porciúncula." Two years later, Fr. Junípero Serra returned to the valley to establish a Catholic mission, the Mission San Gabriel Arcángel, on September 8, 1771 (Engelhardt 1927). In 1781, a group of 11 Mexican families traveled from Mission San Gabriel Arcángel to establish a new pueblo called El Pueblo de la Reyna de Los Angeles ("the Pueblo of the Queen of the Angels"). This settlement consisted

of a small group of adobe-brick houses and streets and would eventually be known as the Ciudad de Los Angeles (“City of Angels”).

Mexican Period (1822–1848)

A major emphasis during the Spanish period in California was the construction of missions and associated presidios to integrate the Native American population into Christianity and communal enterprise. Incentives were also provided to bring settlers to pueblos or towns, but just three pueblos were established during the Spanish period, only two of which were successful and remain as California cities (San José and Los Angeles). Several factors kept growth within Alta California to a minimum, including the threat of foreign invasion, political dissatisfaction, and unrest among the indigenous population. After more than a decade of intermittent rebellion and warfare, New Spain (Mexico and the California territory) won independence from Spain in 1821. In 1822, the Mexican legislative body in California ended isolationist policies designed to protect the Spanish monopoly on trade, and decreed California ports open to foreign merchants.

Extensive land grants were established in the interior during the Mexican period, in part to increase the population inland from the more settled coastal areas where the Spanish had first concentrated their colonization efforts. The secularization of the missions following Mexico’s independence from Spain resulted in the subdivision of former mission lands and establishment of many additional ranchos.

During the supremacy of the ranchos (1834–1848), landowners largely focused on the cattle industry and devoted large tracts to grazing. Cattle hides became a primary southern California export, providing a commodity to trade for goods from the east and other areas in the United States and Mexico. The number of nonnative inhabitants increased during this period because of the influx of explorers, trappers, and ranchers associated with the land grants. The rising California population contributed to the introduction and rise of diseases foreign to the Native American population, who had no associated immunities.

American Period (1848–Present)

War in 1846 between Mexico and the United States began at the Battle of Chino, a clash between resident Californios and Americans in the San Bernardino area. This battle was a defeat for the Americans and bolstered the Californios’ resolve against American rule, emboldening them to continue the offensive in later battles at Dominguez Field and in San Gabriel (Beattie 1942). However, this early skirmish was not a sign of things to come and the Americans were ultimately the victors of this two-year war. The Mexican–American War officially ended with the Treaty of Guadalupe Hidalgo in 1848, which resulted in the annexation of California and much of the present-day southwest, ushering California into its American period.

California officially became a state with the Compromise of 1850, which also designated Utah and New Mexico (with present-day Arizona) as U.S. territories. Horticulture and livestock, based primarily on cattle as the currency and staple of the rancho system, continued to dominate the southern California economy through 1850s. The Gold Rush began in 1848; with the influx of people seeking gold, cattle were no longer desired mainly for their hides, but also as a source of meat and other goods. During the 1850s cattle boom, rancho vaqueros drove large herds from southern to northern California to feed that region’s burgeoning mining and commercial boom. Cattle were at first driven along major trails or roads such as the Gila Trail or Southern Overland Trail, then were transported by trains when available. The cattle boom ended for southern California as neighbor states and territories drove herds to northern California at reduced prices. Operation of the huge ranchos became increasingly difficult, and droughts severely reduced their productivity (Cleland 1941).

On April 4, 1850, only two years after the Mexican–American War and five months prior to California’s achieving statehood, Los Angeles was officially incorporated as an American city. Settlement of the Los

Angeles region continued steadily throughout the Early American period. Los Angeles County was established on February 18, 1850, one of 27 counties established in the months prior to California's acquiring official statehood in the United States. At that time, the city was bordered on the north by the Los Felis and the San Rafael Land Grants and on the south by the San Antonio Luge Land Grant. Many of the ranchos in the area now known as Los Angeles County remained intact after the United States took possession of California; however, a severe drought in the 1860s resulted in many of the ranchos being sold or otherwise acquired by Americans. Most of these ranchos were subdivided into agricultural parcels or towns (Dumke 1944).

Ranching retained its importance through the mid-nineteenth century, and by the late 1860s, Los Angeles was one of the top dairy production centers in the country (Rolle 2003). By 1876, the county had a population of 30,000 (Dumke 1944:7). Los Angeles maintained its role as a regional business center, and the development of citriculture in the late 1800s and early 1900s further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the region, contributed to the impact of the real estate boom of the 1880s on Los Angeles (Caughey and Caughey 1977; Dumke 1944). By the late 1800s, government leaders recognized the need for water to sustain the growing population in the Los Angeles area. Irish immigrant William Mulholland personified the city's efforts for a stable water supply (Dumke 1944; Nadeau 1997). By 1913, the City of Los Angeles had purchased large tracts of land in the Owens Valley, and Mulholland planned and completed the construction of the 240-mile aqueduct that brought the valley's water to the city (Nadeau 1997).

Los Angeles continued to grow in the twentieth century, in part due to the discovery of oil in the area and its strategic location as a wartime port. The county's mild climate and successful economy continued to draw new residents in the late 1900s, with much of the county transformed from ranches and farms into residential subdivisions surrounding commercial and industrial centers. Hollywood's development into the entertainment capital of the world and southern California's booming aerospace industry were key factors in the county's growth in the twentieth century.

Los Angeles: From Pueblo to City

On September 4, 1781, 44 settlers from Sonora, Mexico, accompanied by the governor, soldiers, mission priests, and several Native Americans, arrived at a site along the Rio de Porciúncula (later renamed the Los Angeles River), which was officially declared El Pueblo de Nuestra Señora de los Angeles de Porciúncula, or the Town of Our Lady of the Angels of Porciúncula (Robinson 1979:238; Ríos-Bustamante 1992; Weber 1980). The site chosen for the new pueblo was elevated on a broad terrace 0.8 km (0.5 mile) west of the river (Gumprecht 2001). By 1786, the area's abundant resources allowed the pueblo to attain self-sufficiency, and funding by the Spanish government ceased.

Efforts to develop ecclesiastical property in the pueblo began as early as 1784 with the construction of a small chapel northwest of the plaza. Though little is known about this building, it was located at the pueblo's original central square near the corner of present-day Cesar Chavez Avenue and North Broadway (Newcomb 1980:67–68; Owen 1960:7). Following continued flooding, however, the pueblo was relocated to its current location on higher ground, and the new town plaza soon emerged.

Alta California became a state in 1821, and the town slowly grew as the removal of economic restrictions attracted settlers to Los Angeles. The population continued to expand throughout the Mexican period and on April 4, 1850, only 2 years after the Mexican–American War and 5 months prior to California earning statehood, the city of Los Angeles was formally incorporated. Los Angeles maintained its role as a regional business center in the early American period and the transition of many former rancho lands to agriculture, as well as the development of citriculture in the late 1800s, further strengthened this status (Caughey and Caughey 1977). These factors, combined with the expansion of port facilities and railroads throughout the

region, contributed to the real estate boom of the 1880s in Los Angeles (Caughey and Caughey 1977; Dumke 1944).

Newcomers poured into the city, nearly doubling the population between 1870 and 1880, resulting in an increased demand for public transportation options. As the city neared the end of the nineteenth century, numerous privately owned passenger rail lines were in place. Though early lines were horse and mule drawn, they were soon replaced by cable cars in the early 1880s and by electric cars in the late 1880s and early 1890s. Many of these early lines were subsequently consolidated into Henry E. Huntington's Los Angeles Railway Company (LARY) in 1898, which reconstructed and expanded the system into the twentieth century and became the main streetcar system for central Los Angeles, identified by their iconic "yellow cars." During this period, Huntington also developed the much larger Pacific Electric system (also known as the "red cars") to serve the greater Los Angeles area. Just as the horse-and-buggy street cars were replaced by electric cars along the same routes, gas-powered buses (coaches) eventually served former yellow car routes. Both the red cars and LARY served Los Angeles until they were eventually discontinued in the early 1960s.

Los Angeles continued to grow outward from the city core in the twentieth century in part due to the discovery of oil and its strategic location as a wartime port. The military presence led to the growth in the aviation and eventually aerospace industries in the city and region. Hollywood became the entertainment capital of the world through the presence of the film and television industries and continues to tenuously maintain that position. With nearly 4 million residents, Los Angeles is the second largest city in the United States (by population), and it remains a city with worldwide influence that continues to struggle with its population's growth and needs.

RANCHO LA BREA

In 1803, Marino Castro arrived in Los Angeles with a viceregal license to occupy the area of La Brea and form a settlement there (Seaman 1914). The mission friars, however, objected as they were not only using the land to graze their cattle but also the asphaltum from the large pits to roof their adobe buildings. This extended their control over the land for an additional 25 years before Governor Exheandia granted one square league (4,444.4 acres) to Antonio Rocha in 1928 (Guinn 1910; Parks 1929; Seaman 1914). This was unique in that Antonio Rocha was not a Mexican citizen but a Portuguese immigrant, making Rancho La Brea the first land granted to a foreigner. Only by forming a partnership with one Nemesio Dominguez were they able to get Rancho La Brea (Bertao and Dias 1987). Despite their ownership of the land, the Pueblo of Los Angeles retained possession of the tar pits to provide for the citizens of the city.

With his death in 1837, Rocha's widow took control of the land, and in 1852 Nemesio Dominguez sold his interest to her and Rocha's heirs when the United States attempted to take possession of the land (Bertao and Dias 1987). Rocha's son, Jose Gorge Rocha, eventually sold Henry Hancock all rights and interests to Rancho La Brea in 1860, but not before James Thompson had signed a five year lease around 1852. Hancock proceeded to sell portions of his holdings, including the 480 acres leased to James Thompson in 1868. An 1870 Los Angeles County Assessor map (Figure 8) identifies Thompson's land as including the entire northwest quarter of Section 21 (and project site), as well as portions of adjoining quarter-sections to the west and northwest. The map shows a structure in the quarter of Section 21, north of the project site, situated mid-way along a trail heading east/southeast from a building on the Rocha property and terminating south/southeast of the project site at some structures annotated as "Tar" (La Brea Tar Pits). Known as "Don Santiago," Thompson was an established ranchero and in addition to grazing sheep, served as Los Angeles Sheriff in the 1850s. It's unclear whether the adobe building constructed on the property (identified on the 1870 map) was built by Thompson, if it had been constructed earlier and left unoccupied by Rocha, or if Thompson had constructed a new adobe using an older foundation (Wallach 2013). Bankruptcy in 1880 prompted Thompson to sell his Rancho La Brea land holdings to dairy farmers Arthur Freemont Gilmore

and Julius Carter. An 1880 map (Figure 9) delineating land owners within Rancho La Brea shows the Thompson property in more detail, including the adobe structure and unimproved trails leading south to the tar pits (annotated as “refinery”), and an improved road (3rd Street) passing through the southern portion (see also, Figure 10).

GILMORE OIL COMPANY

When Arthur Fremont Gilmore bought the land from James Thompson, he originally desired to make it into a dairy farm. This changed drastically in the 1890s when he discovered oil, the Salt Lake Field, under his land (Figure 11). He started the Gilmore Oil Company, in 1899 and although it began small, with just two wells, the Gilmore Oil Company grew to be the dominant oil company on the west coast (Hinkley 2012). By 1939 the company controlled more than 2,000 acres of oil property and owned four refineries, 50 bulk distribution centers, and 3,500 gas stations in three states, all from its headquarters in Los Angeles. When Arthur Fremont Gilmore died in 1918 his son, Earl Bell Gilmore, was the driving force behind the Gilmore Oil Company. Earl Gilmore had a flair for promotion that included radio jingles, the famous “Red Lion” logo and “Blu-Green” gas, sponsorship of races of all types of vehicles from planes to boats to cars, and even a traveling circus complete with lions (Seims and Darr 2014). Oil soon dried up on the Los Angeles oil fields owned by the Gilmore Oil Company, and the land was left vacant until the 1930s with the development of the Los Angeles Farmers Market, The Gilmore Stadium, and the Gilmore Drive-in (Hamlin and Arena 2009).

Historical Development of the Project Site

Once situated amid barley and wheat fields, in the late 1800s the project site was on the margin of the great expanse beyond the western city limits of Los Angeles. During the nineteenth century there were very few landmarks between the agricultural fields and grazing lands that lay beyond the city boundary and the Pacific Ocean. In his memoir, merchant Harris Newmark describes the surroundings in 1854 as “one huge field, practically unimproved and undeveloped” extending from Spring Street to the coast (Newmark 1930:112). During the earlier division of Spanish holdings into land grants, a vast public space separated the La Brea and Las Cienegas Ranchos to the west and the city of Los Angeles to the east. Los Angeles annexed the portion of this land that includes the project site as the Western Addition in 1896.

After the 1896 annexation of the Western Addition, the city limit had expanded west to Vermont Avenue and road alignments were shifted to accommodate the modern urban grid oriented to the cardinal directions. Though other nearby areas were subdivided, much of Rancho La Brea continued as open ranch land until the early twentieth century with the discovery of oil. Even after the oil fields began to dry up, the project site was still open vacant land until 1950 with the development of the nearby Park La Brea and the Town & Country Village within the project site. The Town & Country Village was subsequently redeveloped during the 1960s that included demolition of the previous commercial building and new construction of the buildings currently occupying the project site. It is unclear to what extent the redevelopment maintained portions of the parking lot in the northern portion of the project site.

RESULTS

CHRIS Records Search

Previously Conducted Studies

Results of the records search at the SCCIC indicate that 56 cultural resource studies have been conducted within 0.8 km (0.5 mile) of the project site (Table 2). Of these, 26 explicitly address archaeological resources, whereas four are focused on historic architecture, nine were conducted as a literature search and/or management and planning reports, eight were general research, and nine were overview studies

conducted for the region. None of the studies were conducted specifically within the project site; however, several studies have been conducted in areas near the project site. These include four studies (LA-1932, LA-02881, LA-07368, and LA-06444) conducted between 1988 and 2003 in association with the Park La Brea development to the east, and two studies (LA-01939 and LA-02763) conducted between 1988 and 1990 to the north as environmental reviews for the Farmer's Market and Grove commercial properties. All of the studies were conducted prior to the passage of AB 52; therefore, tribal cultural resources, as such, are not specifically addressed in these studies.

Table 1. Previously Conducted Cultural Resource Studies within 0.5 miles of the Project Site

SCCIC Report Number	Title	Study Type	Author: Affiliation	Year	Relationship to Project Site
LA-00128	Evaluation of the Archaeological Resources and Potential Impact of Proposed Pan Pacific Park, Los Angeles County	Archaeological, Field Study	Kaufman, Susan Hector (University of California, Los Angeles Archaeological Survey)	1976	Outside
LA-01578	Technical Report Archaeological Resources Los Angeles Rapid Rail Transit Project Draft Environmental Impact Statement and Environmental Impact Report	Archaeological, Field Study	Anonymous (Westec Services, Inc.)	1983	Outside
LA-01932	Park La Brea EIR No. 88-347-2c (GPA) State Clearinghouse No. 88080307	Archaeological, Field Study	Anonymous (Michael Brandman Associates)	1989	Outside
LA-01939	Draft Environmental Impact Report EIR No. 87-515 Sub(zv)(yv)(zc) Sch. No. 87102102	Archaeological, Field Study	Anonymous (ETI)	1988	Outside
LA-01968	Cultural Resources Literature Review of Metro Rail Red Line Western Extension Alternatives, Los Angeles, Los Angeles County, California	Literature Search	Bissell, Ronald M. (RMW Paleo Associates, Inc.)	1989	Outside
LA-02331	The La Brea Cogged Stone	Other Research	Salls, Roy A.	1978	Outside
LA-02360	The La Brea Atlatl Foreshafts: Inferences for the Millingstone Horizon	Other Research	Salls, Roy A.	1986	Outside
LA-02737	Chapter 19 the Shien'kan Site:	Archaeological, Other Research	Farnsworth, Laurie Wilkie, Janet Kipling, and Roy A. Salls	1986	Outside
LA-02763	EIR No. 87-515-sub(zv)(yz)(zc) State Clearinghouse No. 87102102	Management / Planning	Anonymous (Environmental Review Section)	1990	Outside
LA-02816	Native American Placenames in the Vicinity of the Pacific Pipeline: Part 2: Gaviota to the San Fernando Valley: Draft	Overview Report	King, Chester (Topanga Anthropological Consultants)	1993	N/A
LA-02881	Park La Brea Supplemental Draft EIR No. 88-347-zc (gpa)(sub)(cub) State Clearinghouse No. 88080307	Management / Planning	Anonymous (None)	1991	Outside
LA-03465	Epic Discoveries I Made at La Brea	Other Research	Gipsman, Jacob (UCLA Department of Anthropology)	1973	Outside
LA-03466	A Delineation of My Experiences at Rancho La Brea	Other Research	Frost, David (UCLA Department of Anthropology)	1973	Outside
LA-03467	Epic Discoveries I Made at La Brea	Other Research	Gordon, Marlene (UCLA Department of Anthropology)	1973	Outside
LA-03468	The Ranch La Brea Project	Other Research	Gilden, Eugene R. (UCLA Department of Anthropology)	1973	Outside

Table 1. Previously Conducted Cultural Resource Studies within 0.5 miles of the Project Site

SCCIC Report Number	Title	Study Type	Author: Affiliation	Year	Relationship to Project Site
LA-03471	Monitoring of Median Improvements, Wilshire Boulevard from Fairfax Avenue to La Brea Avenue	Monitoring	Turner, Robin, Mark Selverston, and Roberta S. Greenwood (Greenwood and Associates)	1996	Outside
LA-03496	Draft Environmental Impact Report Transit Corridor Specific Plan Park Mile Specific Plan Amendments	Management / Planning	Anonymous (Unknown)	0	Outside
LA-03501	Archaeological Record Search and Impact Evaluation for the Los Angeles Wastewater Program Management (NOS-NCOS) Project Los Angeles, California	Literature Search, Management / Planning	Dillon, Brian D.	1990	Outside
LA-03511	Assessment of the Archaeological Impact by the Development of the Waste Water Facilities Plan W.O. 31389	Overview Report	Romani, John F. (Northridge Archaeological Research Center, CSUN)	1977	N/A
LA-03583	The Los Angeles Basin and Vicinity: A Gazetteer and Compilation of Archaeological Site Information	Overview Report	Bucknam, Bonnie M. (Archaeological Research, Inc.)	1974	N/A
LA-03773	Preliminary Assessment of Potential Impacts and Evaluation of Cultural Resources Along Proposed Transit System Alignment Alternatives in the City of Los Angeles, Los Angeles County, California	Overview Report	Singer, Clay A. (Archaeological Resource Management Corp.)	1978	N/A
LA-03796	Technical Report of Cultural Resources Studies for the Proposed WTG-west, Inc. Los Angeles to San Francisco and Sacramento, California Fiber Optic Cable Project	Overview Report	(BioSystems Analysis, Inc.)	1989	N/A
LA-04323	Cultural Evolution in the Archaic/Mesolithic: A Research Design for the Los Angeles Basin	Overview Report	Hill, James N. (Archaeological Resource Management Corp.)	1985	N/A
LA-04410	Cultural Resource Assessment for the AT&T Wireless Services Facility Number 331, Located at 425 South Fairfax Avenue, City and County of Los Angeles, California	Archaeological, Field Study	Duke, Curt (LSA Associates, Inc.)	1999	Outside
LA-04518	The Miracle Mile of Wilshire Boulevard	Architectural/Historical	Rockey, David (The Archaeology of Los Angeles)	1999	Outside
LA-04558	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 421-03, in the County of Los Angeles, California	Literature Search	Duke, Curt (LSA Associates, Inc.)	1999	Outside
LA-04578	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 421-01, County of Los Angeles, California	Literature Search	Duke, Curt (LSA Associates, Inc.)	1999	Outside
LA-05350	Cultural Resource Assessment for AT&T Wireless Services Facility Number R295.1, County of Los Angeles, Ca	Archaeological, Field Study	Duke, Curt (LSA Associates, Inc.)	2000	Outside
LA-05354	Archaeological Survey for the Fairfax Branch Library Project, Los Angeles, Ca	Archaeological, Field Study	Foster, John M. (Greenwood and Associates)	2001	Outside
LA-06442	The Grove at Farmers Market Phase I Archaeological Monitoring	Monitoring	Messick, Peter (Greenwood and Associates)	2002	Outside

Table 1. Previously Conducted Cultural Resource Studies within 0.5 miles of the Project Site

SCCIC Report Number	Title	Study Type	Author: Affiliation	Year	Relationship to Project Site
LA-06444	Archaeological Monitor Report Three Parcels at Park La Brea Los Angeles, California	Monitoring	Greenwood, Roberta S. and Messick, Peter (Greenwood and Associates)	2002	Outside
LA-07178	Report on Cultural Resources Mitigation and Monitoring Activities Fluor/level (3) Los Angeles Local Loops	Excavation, Monitoring	Unknown (William Self Associates)	2001	Outside
LA-07359	Final Archaeological Mitigation Monitoring Report for the Park La Brea Parcel B Project Los Angeles, California	Monitoring	Gust, Sherri and Mary Pat Hickson (Cogstone Resource Management, Inc.)	2003	Outside
LA-07363	The Grove at Farmers Market, the Farmers Market Expansion Project, & the Gilmore Adobe Landscaping Project Los Angeles, Los Angeles County, California	Monitoring	Dietler, Sara, Gust, Sherri, and Alarcon, Sara (Cogstone Resource Management, Inc.)	2003	Outside
LA-07368	Final Archaeological Mitigation Monitoring Report for the Park La Brea Parcel a Project Los Angeles California	Monitoring, Other Research	Gust, Sherri and Mary Pat Hickson (Cogstone Resource Management, Inc.)	2003	Outside
LA-07369	Final Archaeological and Paleontological Mitigation Monitoring Report for the Park La Brea Community Center Project Los Angeles County, California	Excavation, Monitoring	Gust, Sherri and Mary Pat Hickson (Cogstone Resource Management, Inc.)	2003	Outside
LA-07370	Archaeological and Paleontological Monitoring Report for Phase I of the Grove at Farmers Market, (CA-LAN-3045h) Los Angeles, Los Angeles County, California	Monitoring	Gust, Sherri and Sara Dietler (Cogstone Resource Management, Inc.)	2003	Outside
LA-07562	Additional Information for DSEIS, Core Study Alignments 1, 2, 3, 4, and 5	Architectural / Historical, Evaluation, Literature Search	Greenwood, Roberta S. (Greenwood and Associates)	1987	Outside
LA-07565	Technical Report Archaeology Los Angeles Rail Rapid Transit Project "Metro Rail" Core Study, Candidate Alignments 1 to 5	Management/Planning	Unknown (Greenwood and Associates)	1987	Outside
LA-07566	Technical Report DSEIS, Core Study Alignments 1, 2, 3, 4, and 5	Archaeological, Architectural / Historical, Other Research	Hatheway, Roger G. and Peter, Kevin J. (Greenwood and Associates)	1987	Outside
LA-07568	Paleontological Resource Survey and Impact Evaluation for a Proposed Rapid Transit System in the City of Los Angeles, Los Angeles County, California	Overview Report	Bernor, Raymond L. (Archaeological Resource Management Corp.)	1978	N/A
LA-08020	Technical Report: Cultural Resources Los Angeles Rail Rapid Transit Project "metro Rail" Core Study	Architectural / Historical, Evaluation	Anonymous (Southern California Rapid Transit District)	1987	Outside
LA-09203	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11564B (RT 5967 W. 3rd), 5967 West 3rd Street, Los Angeles, Los Angeles County, California	Archaeological, Field Study	Bonner, Wayne H. (Michael Brandman Associates)	2007	Outside

Table 1. Previously Conducted Cultural Resource Studies within 0.5 miles of the Project Site

SCCIC Report Number	Title	Study Type	Author: Affiliation	Year	Relationship to Project Site
LA-09226	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate SV11560A (Wilshire Medical RT), 6221 Wilshire Boulevard, Los Angeles, Los Angeles County, California	Archaeological, Field Study	Bonner, Wayne H. (Michael Brandman Associates)	2007	Outside
LA-09540	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate SV11696A (Cabinet City), 425 South Fairfax Ave., Los Angeles, Ca	Archaeological, Field Study	Bonner, Wayne H. and Kathleen A. Crawford (Michael Brandman Associates)	2009	Outside
LA-09541	Direct APE Historic Architectural Assessment for T-Mobile USA Candidate SV11696A (Cabinet City), 425 South Fairfax Avenue, Los Angeles, California	Architectural/Historical, Evaluation	Bonner, Wayne H. and Kathleen A. Crawford (Michael Brandman Associates)	2009	Outside
LA-10507	Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report	Archaeological, Evaluation, Field Study, Other Research	Anonymous (Westec Services, Inc.)	1983	Outside
LA-11005	Westside Subway Extension Historic Property Survey Report and Cultural Resources Technical Report	Other Research	Unknown, Mr./Mrs. (Cogstone)	2010	Outside
LA-11473	Verizon Wireless- CBS Inc IBR, 7800 Beverly Boulevard, Los Angeles, CA	Other Research	Hollins, Jeremy (URS)	2011	Outside
LA-11642	Westside Subway Extension Project, Historic Properties and Archaeological Resources Supplemental Survey Technical Reports	Archaeological, Field Study, Other Research	Daly, Pam and Sikes, Nancy (Cogstone)	2012	Outside
LA-11732	Natural Scientific Landmark Program National Park Service department of Interior, Rancho La Brea Tar Pits- Hancock Park California	Archaeological, Field Study	Sly, William (LA County Museum of Natural History)	1963	Outside
LA-11747	Programmatic Agreement Compliance Report, twenty-first Reporting Period, July 1, 2005-- March 31, 2006	Overview Report	Sakai, Rodney (Historic Resources Group)	2006	N/A
LA-11748	Programmatic Agreement Compliance Report Fifteenth Reporting Period July 1-- December 31, 2002	Overview Report	Sakai, Rodney (SHPO & Advisory Council on Historic Preservation)	2003	N/A
LA-11785	Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension	Management / Planning	Rogers, Leslie (U.S. Department of Transportation Federal Transit Admin. & LA County Metro Transit Authority)	2012	Outside
LA-12049	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11560A (Wilshire Medical RT), 6221 Wilshire Boulevard, Los Angeles, Los Angeles County, California	Archaeological, Architectural / Historical, Evaluation, Field Study	Bonner, Wayne (MBA)	2012	Outside

Table 1. Previously Conducted Cultural Resource Studies within 0.5 miles of the Project Site

SCCIC Report Number	Title	Study Type	Author: Affiliation	Year	Relationship to Project Site
LA-12160	Cultural resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11696A (Cabinet City) 425 South Fairfax Avenue, Los Angeles, Los Angeles County, California	Archaeological, Architectural / Historical, Evaluation, Field Study	Bonner, Wayne and Crawford, Kathleen (MBA)	2012	Outside

Previously Recorded Cultural Resources

The CHRIS records search identified a total of 12 previously documented cultural resources within a 0.8-km (0.5-mile) radius of the project site (Table 2). Seven of the resources are buildings, one is a building and archaeological site (P-19-003945; Gilmore adobe), three are Historic-period archaeological sites (P-19-001261, P-19-002964, and P-19-171007), and one is an archaeological site with Historic- and Prehistoric-period components (P-19-000159; La Brea Tar Pits). Site P-19-000159 is the only resource identified in the records search that includes materials associated with Native Americans and could be considered a tribal cultural resource. The site was recorded originally recorded in 1949 as a prehistoric archaeological site consisting of human remains, wooden artifacts, a stone “cog,” a mano, shell beads, and various floral and faunal remains, including those of extinct mammals as well as a domesticated dog (unassociated with the human remains). The material was recovered within asphalt seeps of the La Brea Tar Pits. Originally identified in 1914, the human remains recovered from the site are now commonly referred to as those of the La Brea Woman. Since Heizer’s first formal recordation of the site in 1949, various studies have been conducted with the purpose of dating the bone, most recently by Fuller et al. (2016). Fuller and his colleagues dated the remains to $9,080 \pm 15$ radiocarbon years before present (10,200-10,250 calibrated years before present). The age of the remains are generally consistent relative dates based on the shell beads and some of the extinct fauna found in association. A trash pit containing Historic-period archaeological remains were also recovered from an adjacent location in the tar pits and documented as a separate site (P-19-001261). Hancock Park and the La Brea Tar Pits are also individually recorded as a historical place (P-19-171007), the boundary of which overlaps the two archaeological sites previously discussed, but these resources do not include Native American affiliated materials. All three of these resources are located between 0.6 and 0.9 km (0.4 and 0.6 miles) to the southeast of the project site.

Table 2. Previously Recorded Resources Within 0.5 Mile of the Project Site

Primary No.	Trinomial	Name(s) or Designations	Time Period	Resource Type	Description	Recording Year (Name, Affiliation)	Relationship to Project Site
P-19-000159	CA-LAN-000159/H	La Brea Tar Pits	Prehistoric, Historic	Site	AH16 (Other); AP09 (Burials); AP16 (Other)	1949 (R.F. Heizer)	Outside
P-19-001261	CA-LAN-001261H	Shen-En-Kan (GtJ)	Historic	Site	AH04 (Privies / dumps / trash scatters); AH09 (Mines / quarries / tailings)	1986 (Roy Salls, UCLA)	Outside
P-19-002964	CA-LAN-002964H	Park La Brea	Historic	Site	AH04 (Privies/dumps/trash scatters)	2002 (Alice Hale, Greenwood & Associates)	Outside
P-19-003045	CA-LAN-003045H	The Grove at Farmer's Market and the Gilmore Adobe	Historic	Building, Structure, Site	AH04 (Privies / dumps / trash scatters); AH15 (Standing structures)	2002	Outside
P-19-152504	--	Haig M Prince; OHP Property Number - 025006	Historic	Building	HP10 (Theater)	1982 (S. Van Wormer, Westec)	Outside
P-19-171007	--	Hancock Park, La Brea Tar Pits; OHP Property Number - 024999; CHL 170	Historic	Site	AP16 (Other); HP31 (Urban open space)	1982 (T. Jaques & N. Michali, Westec Services)	Outside
P-19-173051	--	May Company Wilshire / Los Angeles County Museum of Art West; OHP Property Number - 027080	Historic	Building	HP07 (3+ story commercial building); HP15 (Educational building)	1982 (Jacques, Terri, Westec Services); 2010; 2011 (Pamela Daly, Cogstone)	Outside
P-19-175263	--	Hancock Park School; OHP Property Number - 097774	Historic	Building	HP15 (Educational building)	1995 (C. McAvoy, HRG)	Outside
P-19-187466	--	Erica Courtney; OHP Property Number - 156589	Historic	Building	HP03 (Multiple family property); HP07 (3+ story commercial building)	2004 (C. Taniguchi, MBA); 2011 (K.A. Crawford, Crawford Historic Services)	Outside
P-19-188461	--	Cabinet City	Historic	Building	HP06 (1-3 story commercial building)	2009 (Crawford, K. A., Michael Brandman Associates)	Outside
P-19-189263	--	Johnie's Coffe Shop Restaurant	Historic	Building	HP06 (1-3 story commercial building)	2010	Outside
P-19-190068	--	Wilshire Medical Center Building	Historic	Building	HP07 (3+ story commercial building)	2007 (K. Crawford, Crawford Historic Services); 2012 (K. A. Crawford, Crawford Historic Services)	Outside

Archival Research

SWCA's archival research included a review of historical maps for the project site and vicinity and focused on documenting modifications to the physical setting and identifying any potential natural or artificial features with relevance to use by Native Americans (e.g., stream courses, vegetation, historical topography, roads, habitation markers) or use of the location by non-Native American people in the Historic period. One important landmark was the *brea* ("tar") pits, now known as the La Brea Tar Pits, located 1.6 km (1.0 mile) south of the project site. Asphaltum—the naturally formed substance found in seeps—was an important resource to Native American populations, who used it as a binding and waterproofing element. The asphaltum at the La Brea Tar Pits would have been accessed via footpaths from neighboring camp and village sites, including Yaanga and Geveronga, located east of the project site. Though no reliable maps exist showing the precise location of such Native American travel routes, it is likely that many of the routes designated by the Spanish, Mexican, and American inhabitants followed some of the same alignments. The Kirkman-Harriman map (Kirkman 1938) (see Figure 7) illustrates this pattern of historically significant points connected by travel corridors composed of superimposed paths from multiple time periods. Outside the project site, Kirkman's map depicts a number of pathways including "Camino Real" 2.6 miles (4.2 km) to the north—the road connecting the nearby Spanish missions and Los Angeles Pueblo—and two parallel east-west routes—Portolá Expedition and "La Brea Road"—between 0.3 and 0.4 miles (0.5 and 0.6 km) to the south (Kirkman 1938).

Review of a Sanborn Fire Insurance map, newspaper articles, and building permits document the development of the project site as an industrial and commercial block within La Brea and its conversion to its current use as a commercial building and parking lot. Before the 1900s the property was primarily grazing land, but by 1920 topographic maps and aerial photographs show the project site heavily developed with oil wells drilling for the Salt Lake Oil Field (see Figure 11, Figure 12). By 1926 most of the oil derricks had been removed and some buildings begin to appear on maps. The first Sanborn Fire Insurance maps showing the project site were published in 1926 and show the lot composing the block as undeveloped. The 1950 Sanborn maps show the existence of the Town & County Market taking up the entire block (Figure 13).

NATIVE AMERICAN COORDINATION

Sacred Lands File Search

On July 16, 2018, SWCA received the results of a Sacred Lands File (SLF) search from the NAHC. The NAHC letter indicated negative results. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological or tribal cultural resource. The NAHC provided a list of 16 Native American contacts and suggested contacting them to provide information on sacred lands that may not be listed in the SLF. Ten of these individuals were already included in the City's AB 52 notification list, and all additional outreach was conducted as part of compliance with AB 52 (PRC Section 21082.3), described below. The NAHC letter is included in Appendix B.

AB 52 Notification and Consultation

As lead agency, the City mailed letters to 10 Native American tribes included on the City's consultation list. Letters were sent out to all contacts on June 26, 2016. Table 3 summarizes the results of Native American outreach conducted in compliance of AB 52 (PRC Section 21082.3). To date, the City has received one response to the notification letters. Andrew Salas, Chairman of the Gabrieleño Band of Mission Indians-Kizh Nation, stated the project site is in a sensitive area and that the project may cause a substantial adverse change in the significance of tribal cultural resources, and requested a Native American

monitor be present during all ground disturbances carried out during the project. The letter provided some information on tribal history and traditional land uses and noted that resources may be present below existing developments. Chairman Salas requested formal consultation with the City. SWCA also understands that DCP held a tribal consultation call on January 16, 2019 with Chairman Salas; and DCP received follow up information from that call on January 17, 2019, July 3, 2020, and January 6–7, 2021. The information submitted during consultation included a several historical maps of the area around the Development Site and Los Angeles, general articles regarding Native American civilization, an unsigned letter regarding general AB52 importance and mitigation measures, and three emails regarding other projects in the area and generalized information regarding the Rancho La Brea landscape. The report analyzed the information submitted during consultation, as well as other information applicable specifically to the development site, and concluded that there is not substantial evidence indicating that a known tribal cultural resource is located on the development site. Overall, the information submitted during the tribal consultation was provided to SWCA and considered in this analysis. On January 6 and January 7, 2021, the Gabrieleño Band of Mission Indians – Kizh Nation provided additional information about Gabrielino history, comments regarding the mitigation measures, and proposed revisions to the proposed mitigation measures. The City considered the Gabrieleño Band of Mission Indians – Kizh Nation’s comments, along with the additional information provided and made modifications to the proposed mitigation measures, which are incorporated here. Based on the evidence in the record, the City concluded consultation on January 28, 2021. A letter dated January 28, 2021 was sent to Chairman Salas summarizing the City’s efforts to engage in meaningful and good faith consultation and stating the conclusion of the AB 52 consultation process. DCP’s notification letters, the response letter, and close of consultation letter is included here as Appendix C. Information submitted during the tribal consultation are confidential; copies of all correspondences and information submitted during the tribal consultation are included here as Appendix D, which is confidential and excluded from publicly circulated copies of this report.

Table 3. Native American Outreach Results

Native American Contact	City of Los Angeles Consultation Effort	Tribal Response
Gabrielino/Tongva Tribe Linda Candelaria, Co-Chairperson 1199 Avenue of the Stars, unit 1100 Los Angeles, CA 90067	06/26/2018: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Indians of California Tribal Council Robert F. Dorame, Chairperson P.O. Box 490 Bellflower, CA 90707	06/26/2018: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva Nation Sam Dunlap, Cultural Resources Director PO Box 86908 Los Angeles, CA 90086	06/26/2018: Letter sent by U.S. Mail.	No response.
Fernandeño Tataviam Band of Mission Indians Kimia Fatehi 1019 2nd Street San Fernando, CA 91340	06/26/2018: Letter sent by U.S. Mail.	No response.

Native American Contact	City of Los Angeles Consultation Effort	Tribal Response
Gabrieleno/Tongva Nation Sandonne Goad, Chairperson 106 1/2 Judge John Aiso St., #231 Los Angeles, CA 90012	06/26/2018: Letter sent by U.S. Mail.	No response.
Torres Martinez Desert Cahuilla Indians Michael Mirelez, Cultural Resources Coordinator PO Box 1160 Thermal, CA 92274	06/26/2018: Letter sent by U.S. Mail.	No response.
Gabrielino/Tongva San Gabriel Band of Mission Indians Anthony Morales, Chairperson P.O. Box 693 San Gabriel, CA 91778	06/26/2018: Letter sent by U.S. Mail.	No response.
Soboba Band of Luiseño Indians Joseph Ontiveros, Cultural Resources Director, and Ms. Morillo PO Box 487 San Jacinto, CA 92581	06/26/2018: Letter sent by U.S. Mail.	No response.
Gabrieño Band of Mission Indians-Kizh Nation Andrew Salas, Chairperson P.O. Box 393 Covina, CA 91723	06/26/2018: Letter sent by U.S. Mail. 12/13/2018: updated project information sent by letter. 01/16/2019: consultation call. 07/02/2020: additional information requested by email. 01/06/2021: request for comment to proposed mitigation measures sent by email. 01/28/2021: consultation closed, letter sent as email attachment.	7/6/2018: Response letter sent to the City acknowledging receipt of notification letter and discussing some traditional land uses, indicating the area is highly sensitive for tribal cultural resources, and requesting formal consultation. 01/17/2019, 07/03/2020, 01/06/2021, 01/07/2021: Information and comments submitted via email to DCP.
San Fernando Band of Mission Indians John Valenzuela, Chairperson PO Box 221838 Newhall, CA 91322	06/26/2018: Letter sent by U.S. Mail.	No response.

SENSITIVITY ASSESSMENT

Tribal Cultural Resources

A CHRIS records search and archival research identified 12 previously recorded cultural resources within a 0.8-km (0.5-mile) radius of the project site. None of the resources were located directly within the project site or API. Site P-19-000159 includes Native American human remains, commonly known as the La Brea Woman, recovered in 1915 from asphalt seeps in the La Brea Tar Pits 0.7 km (0.4 miles) to the southeast of the project site. Site P-19-000159 has not been specifically assessed as a tribal cultural resource but likely meets the criteria. The NAHC's SLF results were negative. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area. DCP submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. One response has been received from the Gabrieleño Band of Mission Indians–Kizh Nation who stated that the project is located in a highly sensitive area and that the project site is located in the area formerly known as Rancho

La Brea, which was also an important landscape for the native Gabrielino prior to the rancho era (i.e., Spanish and Mexican Periods). Consultation with the Gabrieleño Band of Mission Indians–Kizh Nation was closed on January 28, 2021, and no substantial evidence was found that indicates a tribal cultural resource is located within the project site.

The nearest named villages to the project site are all located between 9.5 and 12 km (5.9 and 7.5 miles) of the project site. Other unnamed Native American settlements have been documented approximately 4.5 km (2.8 miles) south of the project site along the former course of the Los Angeles River (now Ballona Creek). The La Brea Tar Pits served as an important source of asphaltum for Native Americans dating back at least 10,000 years. Other water features including perennial springs and small wetlands are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains within approximately 3 to 5 km (1.9 to 3.1 miles) of the project site would have been frequented by Native Americans. Middle and late-twentieth century maps show a relatively small south-flowing stream was once located approximately 300 (984 feet) to the west. The stream appears to have been intermittent or ephemeral and only contained water during the wet season for short periods of time. The proximity to these natural resources, especially the asphaltum source, suggests an increased level of sensitivity for tribal cultural resources above background levels, especially remains from resources such as temporary camps, which can be identified by the presence of flaked stone tools, tool-making debris, stone milling tools, shell, fire-altered rock, and sediment discoloration or carbonization.

Archival research documents the land-use history of the project site and its transitions from use in livestock grazing in the middle nineteenth century, to industrial properties in the 1890s, and primarily commercial uses by the 1940s. As part of James Thompson’s leased ranch land, the project site appears to have been used primarily for livestock grazing, most likely sheep, but potentially cattle as well. Maps created in 1870 and 1880 map show a south-flowing stream located approximately 300 m (984 feet) west of the project site. Any artifacts or features associated Native American activities that may have been present on the surface within the project site would have likely been disturbed but may have remained in place or been buried.

The record of industrial uses on the project site originated in 1890s with the discovery of the Salt Lake Oil Field and development under ownership of Arthur Gilmore. The Gilmore Oil Company constructed at least two wells in the project site, as well as three storage tanks and associated structures. The Gilmore Oil fields operation remained in this location through most of the early twentieth century, and although they continued to own the land until the 1940s, oil operations ended in the 1920s. Aerial photographs from the late 1920s show wide-spread ground disturbances to the project site resulting from the oil operation, which included the excavation of the wells and storage tanks and extensive grading for creation of the structures and vehicle travel. In the early 1940s to build the Town & Country Market commercial complex and associated parking lots. At this point any Native American objects or features on the surface or shallowly buried within the project site or API are likely to have been severely disturbed or destroyed, leaving only the possibility for deeply buried deposits.

Geotechnical boring identified 1.5 m (5.0 feet) of fill described as loose silty sand atop natural alluvial sediments extending to at least a depth of 30.6 m (100.5 feet). There were no asphaltum materials in these borings. Tribal cultural resources can occur in artificial fill or other “disturbed” (i.e., non-native) soils, though intact deposits more likely to retain their significance when they are recovered from native soils. Generally, depositional environmental composed of alluvial sediments are favorable for the preservation of tribal cultural resources, but small-scale variations in erosional patterns and historical disturbances must be considered when determining the sensitivity.

It is possible that deeply buried tribal cultural resources can occur within the alluvial sediments identified below the artificial fill. Given the increased level of sensitivity in the vicinity, based on proximity to an important asphaltum source and site with Prehistoric-period human remains at the La Brea Tar Pits, SWCA

finds the project site and API have sensitivity for containing tribal cultural resources. The sensitivity does not preclude development on the project site, and the inadvertent potential discovery of tribal cultural resources can be adequately managed with adherence to the recommended mitigation measures contained in this report.

CONCLUSION

No previously recorded tribal cultural resources have been identified within the project site. The estimated depth of excavation for the project is estimated at 30 feet below the surface, which would require excavation of the underlying alluvial sediments and removal of the overlying artificial fill. There is potential for unidentified tribal cultural resources to be present within the project site. Specifically, there is potential to encounter Prehistoric-period artifacts or features that could be deeply buried within native alluvial soils below or (less likely) intermixed with artificial fill or otherwise recently disturbed sediments. Based on the environmental setting in the vicinity, the type of Native American resources that could occur would most likely be objects and features associated with former camps and include flaked stone tools, tool-making debris, stone milling tools, shell, sediment discoloration or carbonization, and depressions or other features indicative of a former living surface.

Based on the sensitivity determination for the project site, SWCA has the following recommended measures to ensure that resources, if discovered during construction, are properly identified and preserved. With implementation of these recommended measures, potential impacts on tribal cultural resources would be less than significant.

- **TCR-1: Retain a Tribal Consultant and Qualified Archaeologist.** Prior to any ground-disturbing activities on the project site associated with the Proposed Project, the project proponent shall retain a tribal consultant and qualified archaeologist to monitor ground-disturbing activities to ensure proper implementation of the final measures related to tribal cultural resources. For the purposes of these mitigation measures, ground disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. A tribal consultant is defined as one who is on the NAHC's Tribal Contact list (contained in Appendix I in this Draft EIR). The tribal consultant will provide the services of a representative, known as a tribal monitor. The tribal monitor shall be present on-site and carry out actions described in the Tribal Cultural Resources Monitoring and Mitigation Program and any actions required to comply with mitigation measures for tribal cultural resources. The Gabrieleño Band of Mission Indians-Kizh Nation, as a consulting party for the project, shall be contacted first and given 10 days to respond with a complete scope of work for tribal monitoring. If the terms of service (consistent with industry standard terms) cannot be agreed upon, or if no response is received within 10 days of soliciting a request, the project proponent may contact another California Native American tribe included on the NAHC Tribal Contact List and request the services of a tribal consultant. The project proponent or their designee will submit to the City of Los Angeles Department of City Planning (DCP) a letter of retention from the Tribal Consultant prior to the start of demolition. Should the Gabrieleño Band of Mission Indians-Kizh not be retained, the project proponent or their designee shall also submit a letter to DCP documenting that a reasonable and good faith effort was made to retain a tribal consultant from the Gabrieleño Band of Mission Indians-Kizh Nation.

A qualified archaeologist is defined as one who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology. The qualified archaeologist shall submit a letter of retention to the project proponent and DCP no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.

- **TCR-2: Prepare an Tribal Cultural Resources Monitoring and Mitigation Program (TCRMMP).** Prior to the any ground-disturbing activities on the project site associated with the Proposed Project, a TCRMMP shall be prepared in substantial compliance with the program contained in Appendix E of this report. The TCRMMP shall include, but not be limited to, a construction worker training program (described in TCR-3), monitoring protocol for demolition and excavation activities, discovery and processing protocol for inadvertent discoveries of tribal cultural resources, and identification of a curation facility should artifacts be collected. The TCRMMP shall identify areas that require monitoring, provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving tribal cultural resources are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate. The duration and timing of the monitoring shall be determined based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, and spatial distribution of the materials identified. The TCRMMP shall also summarize the requirements for tribal coordination in the event of an inadvertent discovery of a tribal cultural resource or potential tribal cultural resource including the applicable regulatory compliance measures or conditions of approval for the inadvertent discovery of tribal cultural resources to be carried out in concert. The TCRMMP shall be prepared in compliance with Public Resources Code Section 5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The TCRMMP shall be submitted to the DCP at least 15 days prior to initiating ground-disturbing activities.
- **TCR-3: Worker Environmental Awareness Program (WEAP) Training.** Prior to any ground-disturbing activities on the project site associated with the Proposed Project, the retained qualified archaeologist and tribal consultant or their designees shall provide a WEAP training to on-site project personnel responsible for supervising ground-disturbing activities (i.e., foreman or supervisor) and machine operators. The WEAP training will be in accordance with the WEAP provided in Appendix E of this report. The WEAP training shall brief construction crews regarding the regulatory compliance requirements and applicable mitigation measures that must be adhered to during ground-disturbing activities for the protection of tribal cultural resources. As an element of the WEAP training, the qualified archaeologist and tribal consultant or their designees shall advise the construction crews on proper procedures to follow if an unanticipated tribal cultural resource is discovered during construction. The qualified archaeologist and tribal consultant or their designees shall also provide the construction workers with contact information for the qualified archaeologist and tribal consultant and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of tribal cultural resources that would require notification of the archaeologist and tribal consultant, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, tribal consultant, and project proponent or their designated project supervisor. Within 5 days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the project proponent and DCP.
- **TCR-4: Monitoring for Tribal Cultural Resources.** Prior to any ground-disturbing activities on the project site associated with the Proposed Project, an archaeological and tribal monitor shall be present during ground-disturbing activities as stipulated in the TCRMMP. The tribal monitor shall be designated by the tribal consultant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction. The monitors shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially tribal cultural resources, as determined by the qualified archaeologist in consultation with the tribal monitor. The monitors shall each complete a daily log documenting construction activities and observations. The field observations shall include assessment of the geoarchaeological setting and whether sediments are identified that are no longer capable or unlikely to contain tribal cultural

resources (i.e., sterile), which may be encountered prior to reaching the total depth of excavation expected for the project. If initial monitoring identifies low sensitivity (i.e., sterile soil strata) below a certain depth or within a certain portion of the project site, a corresponding reduction of monitoring coverage would be appropriate. The reasoning for and scale of the recommended reduction shall be communicated to the DCP in writing prior to reduction.

In the event that tribal cultural resources or potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find shall stop within a minimum of 8 meters (25 feet) or as determined by the qualified archaeologist in consultation with the tribal consultant based on the nature of the find and the potential for additional portions of the resource to remain buried in the unexcavated areas of the project site. The qualified archaeologist in consultation with the tribal consultant will evaluate the significance of the find and implement the protocol described in the TCRMMP before work can resume in the area surrounding the find that is determined to have sensitivity. Construction activities may continue in other areas in coordination with the qualified archaeologist and tribal consultant.

If human remains are encountered during construction all ground-disturbing work will be immediately diverted from the discovery as determined by the tribal consultant and qualified archaeologist based on consideration of the possibility that additional or multiple Native American human remains may be located in the project site. Upon discovery of human remains, whether or not the archaeological or Tribal monitor is present, the Los Angeles County Coroner's Office shall be notified, as prescribed in PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in Section 15064.5(e) of the State CEQA Guidelines, and as specified in the TCRMMP, which require the coroner to notify the NAHC who will appoint a Most Likely Descendent (MLD). Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated accordingly. While the coroner determines whether the remains are Native American and the MLD is designated and notified, the discovery is to remain confidential and secure to prevent any further disturbance.

Within one month of concluding the tribal cultural resources monitoring, the qualified archaeologist shall prepare a memo stating that the monitoring requirements have been fulfilled and summarize the results of any finds and actions taken by the tribal monitor to implement the final measures related to tribal cultural resources. The memo shall be submitted to the project proponent and DCP and attached to a final monitoring report prepared by the qualified archaeologist. Following submittal of the memo, the qualified archaeologist shall prepare a technical report documenting the methods and results of all work completed under the TCRMMP, including, if any, treatment of any collected materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. The format and content of the report shall follow the California Office of Historic Preservation's *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format*. Any tribal cultural resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a qualified archaeologist and submitted to DCP within one year of completing the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

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Appendix A. Report Figures

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Figure 1. Project site and vicinity within Los Angeles County.

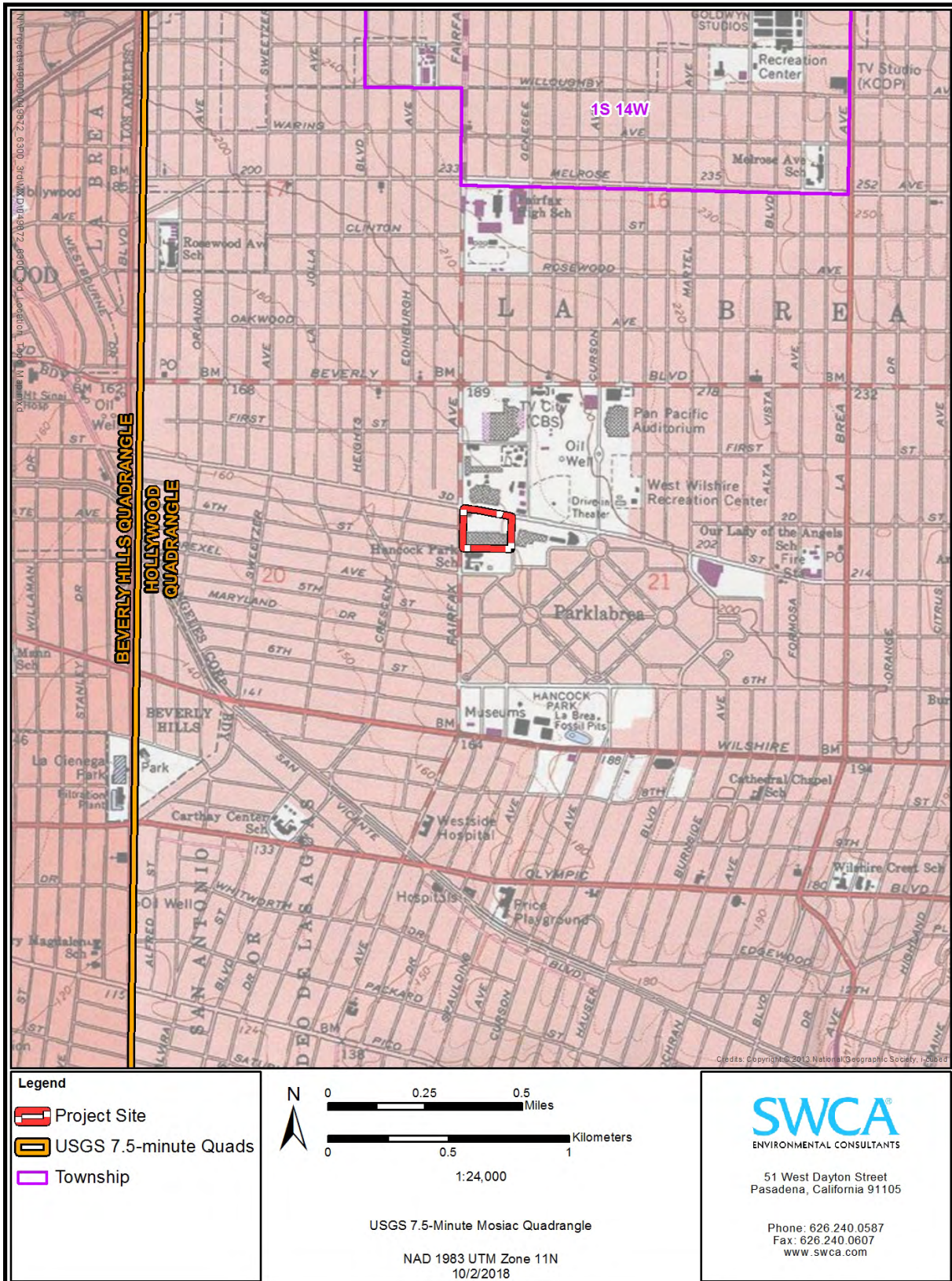


Figure 2. Project site plotted on USGS Hollywood, California, 7.5-minute topographic quadrangle.

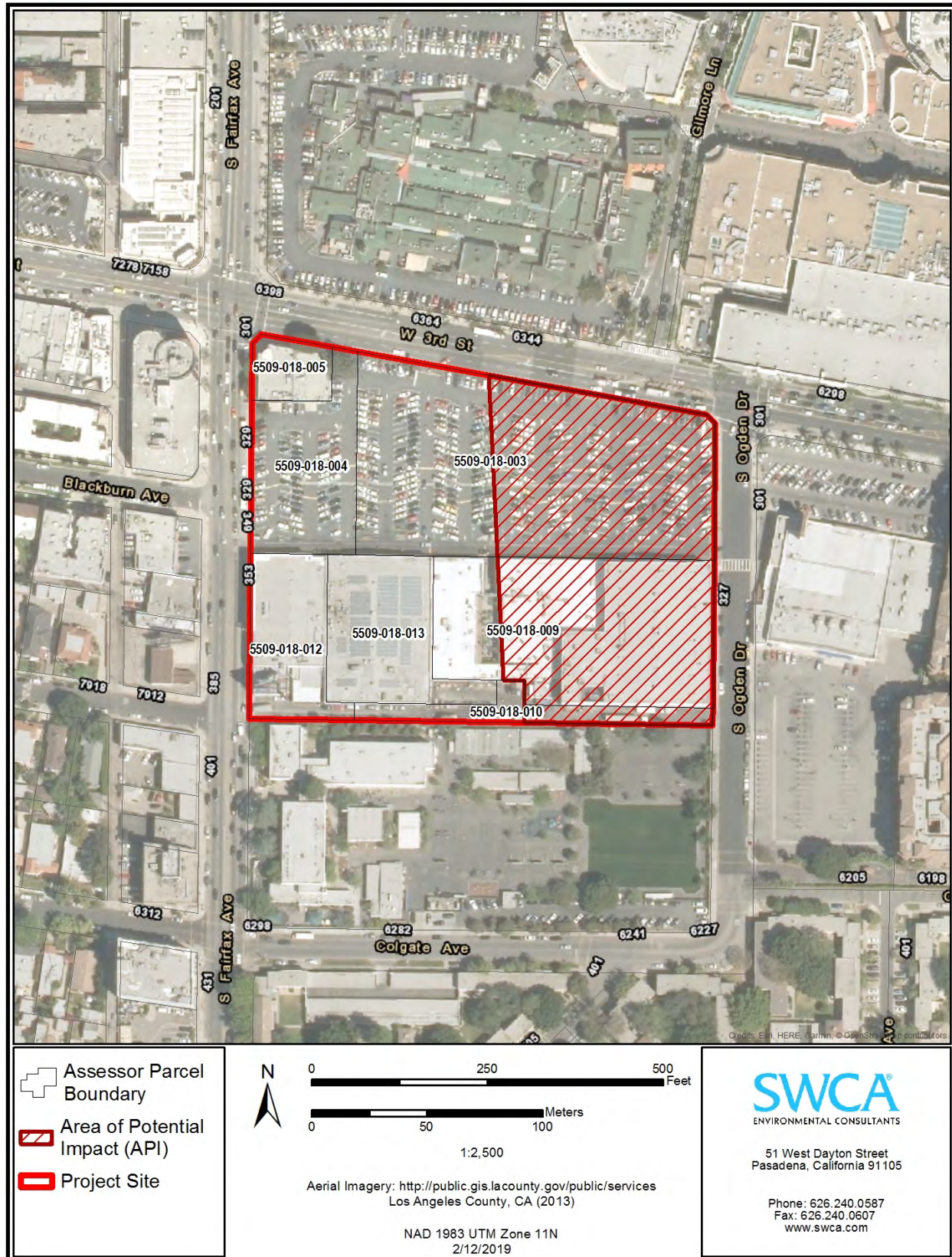


Figure 3. Project site and API (hatched area) with associated parcels on an aerial photograph and street map.

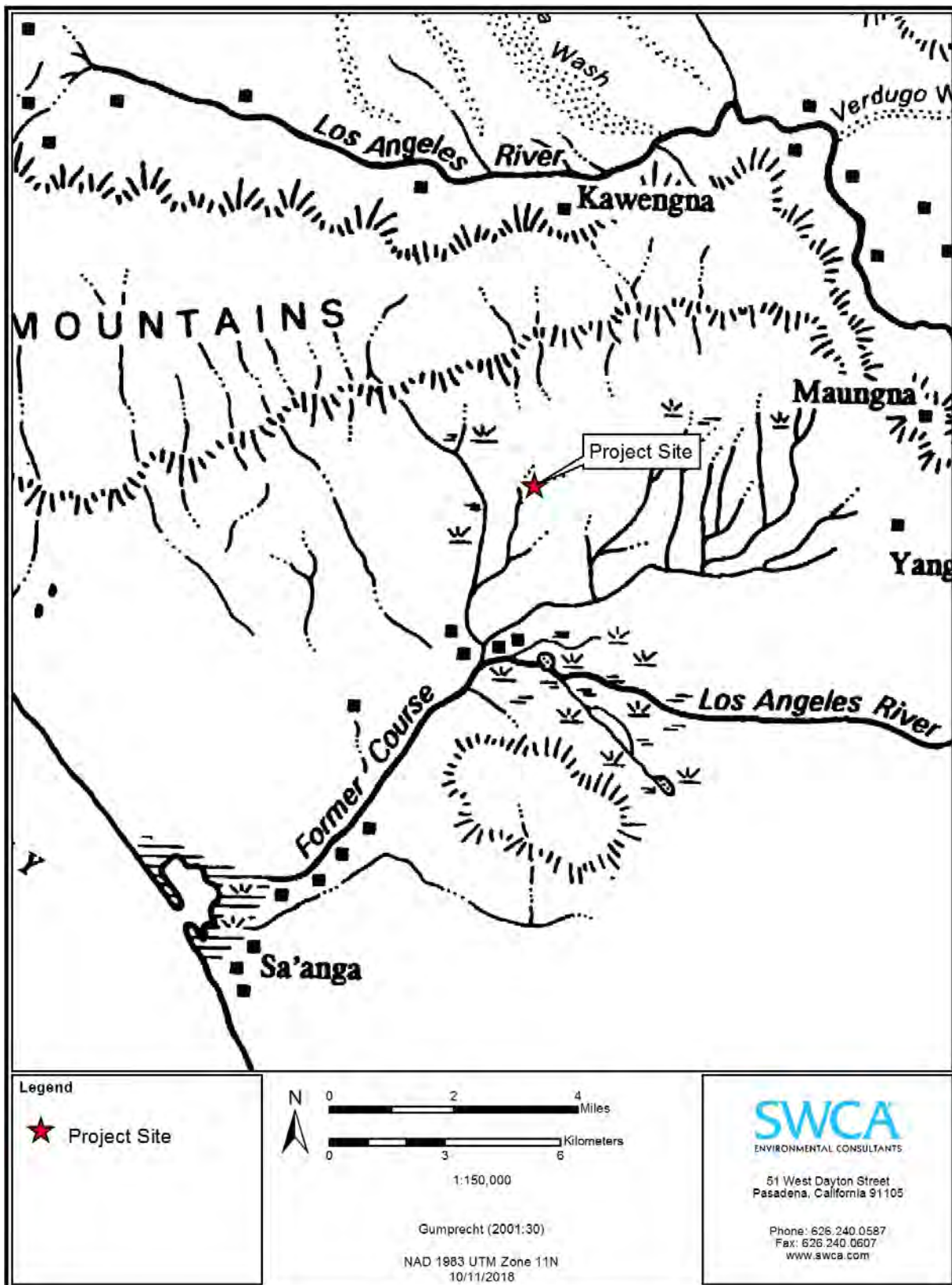


Figure 4. Project site plotted on Gumprecht's (2001:30) map showing hypothetical locations of Native American villages along the Los Angeles River and other waterways in the Los Angeles Basin.

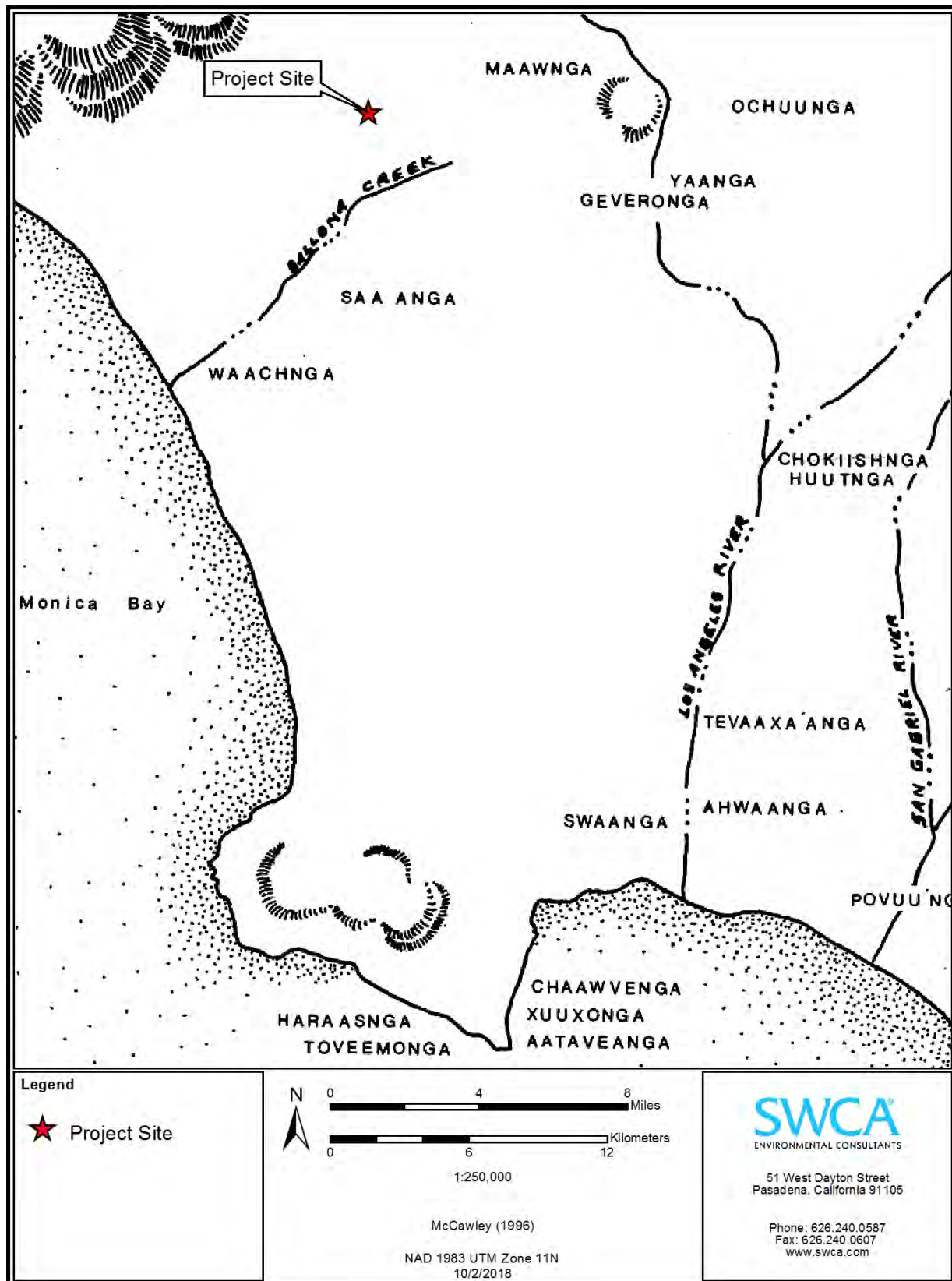


Figure 5. Project site plotted on McCawley's (1996:36) map showing the approximate location of villages cited in Gabriellino ethnographic sources.

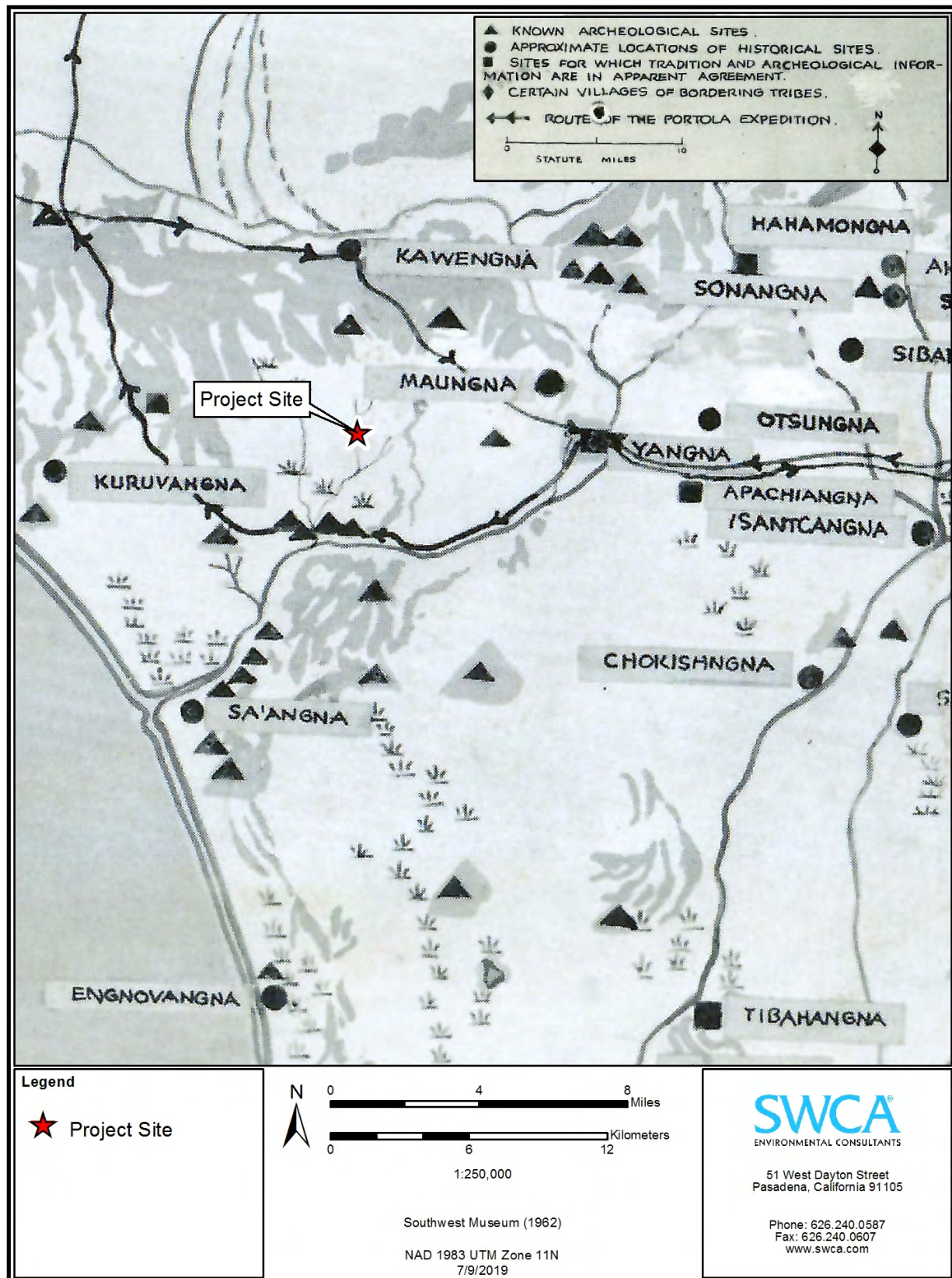


Figure 6. Project site depicted on the 1962 Southwestern Museum maps showing hypothetical locations of Gabrielino Indian Villages.

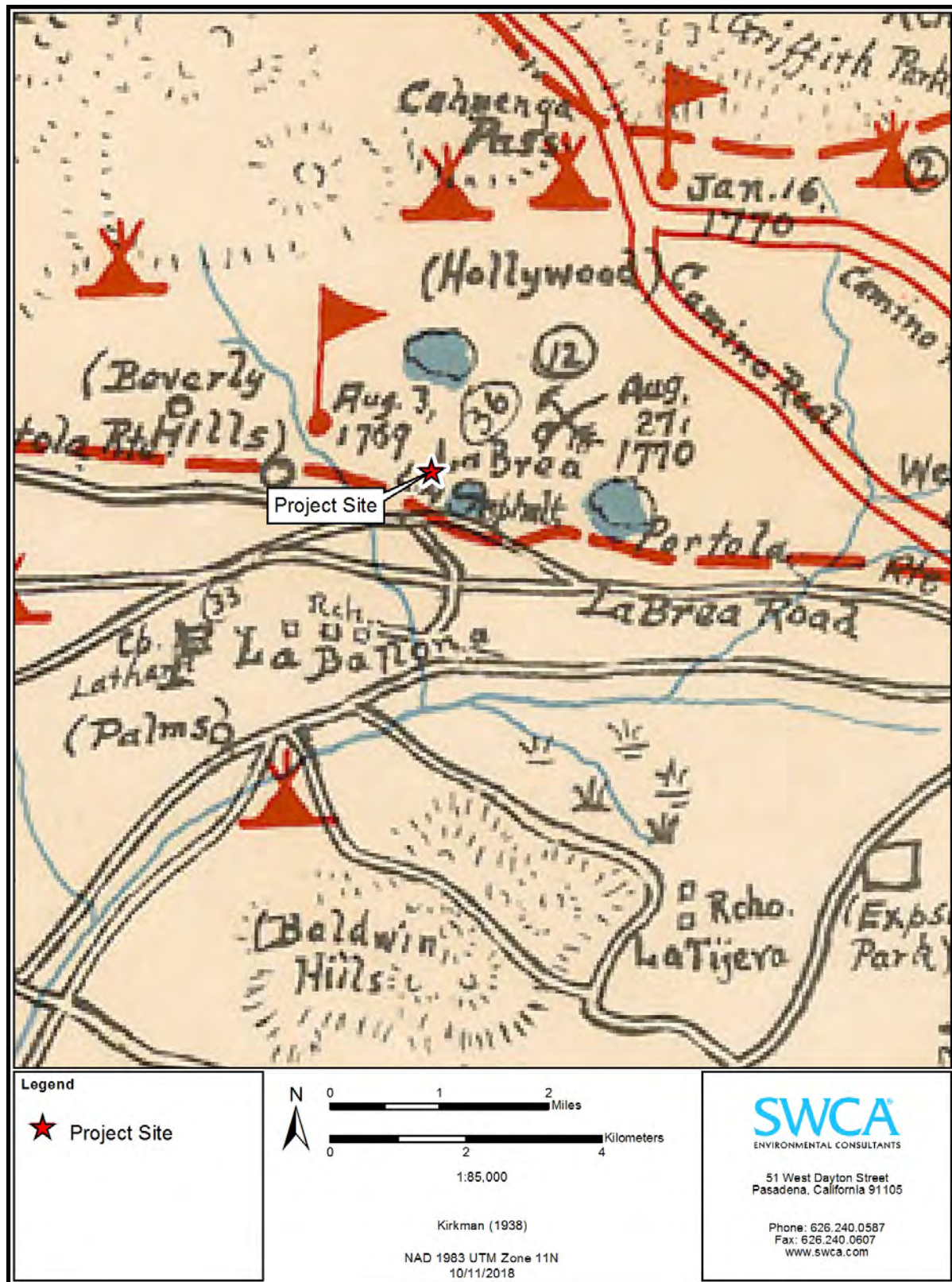


Figure 7. Kirkman-Harriman's pictorial and historical map of Los Angeles County, 1860–1937. Historical sites and features are depicted with symbols to indicate representational rather than explicit geographic locations.

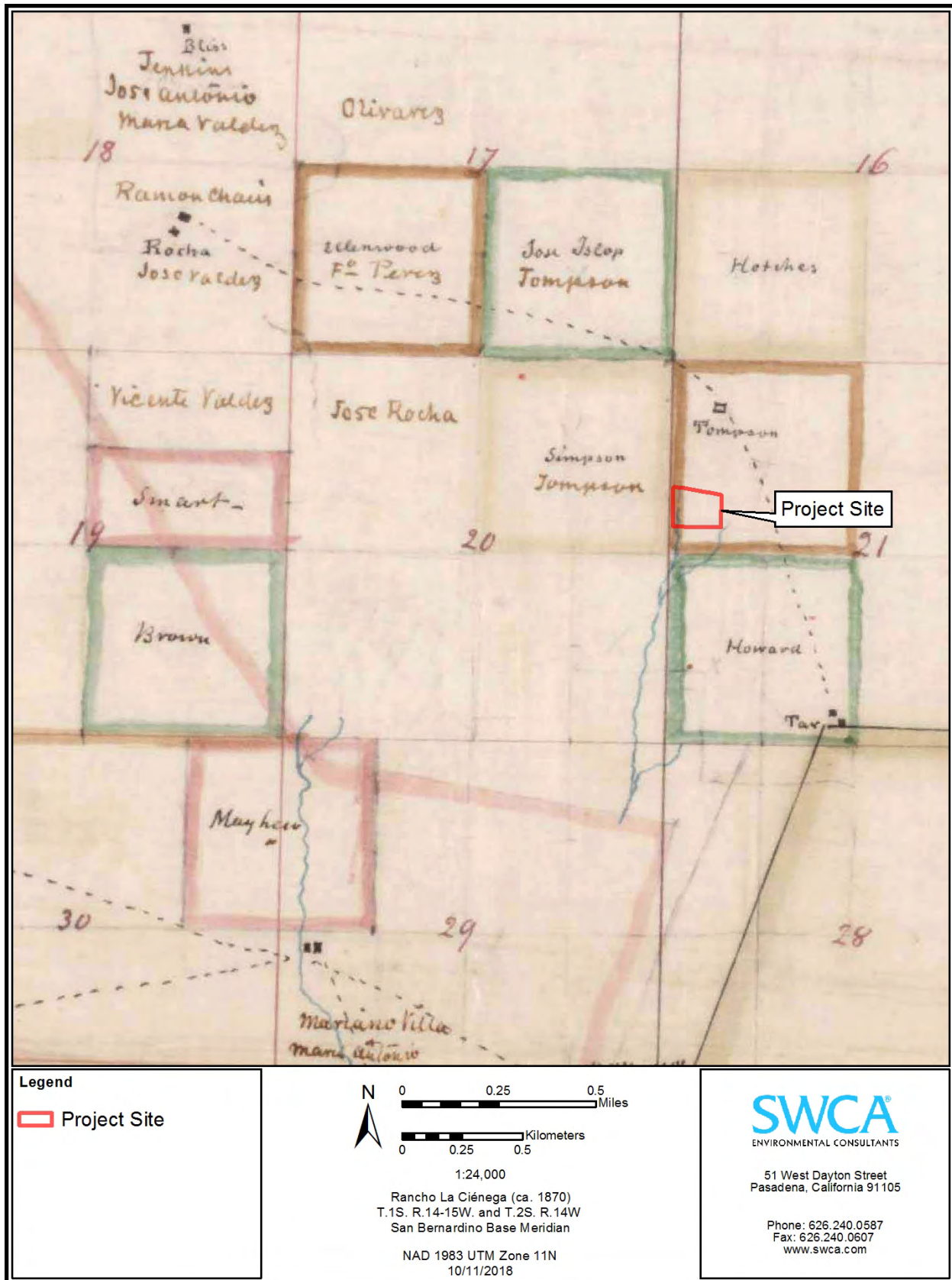


Figure 8. Project site on a ca. 1870 cadastral map.

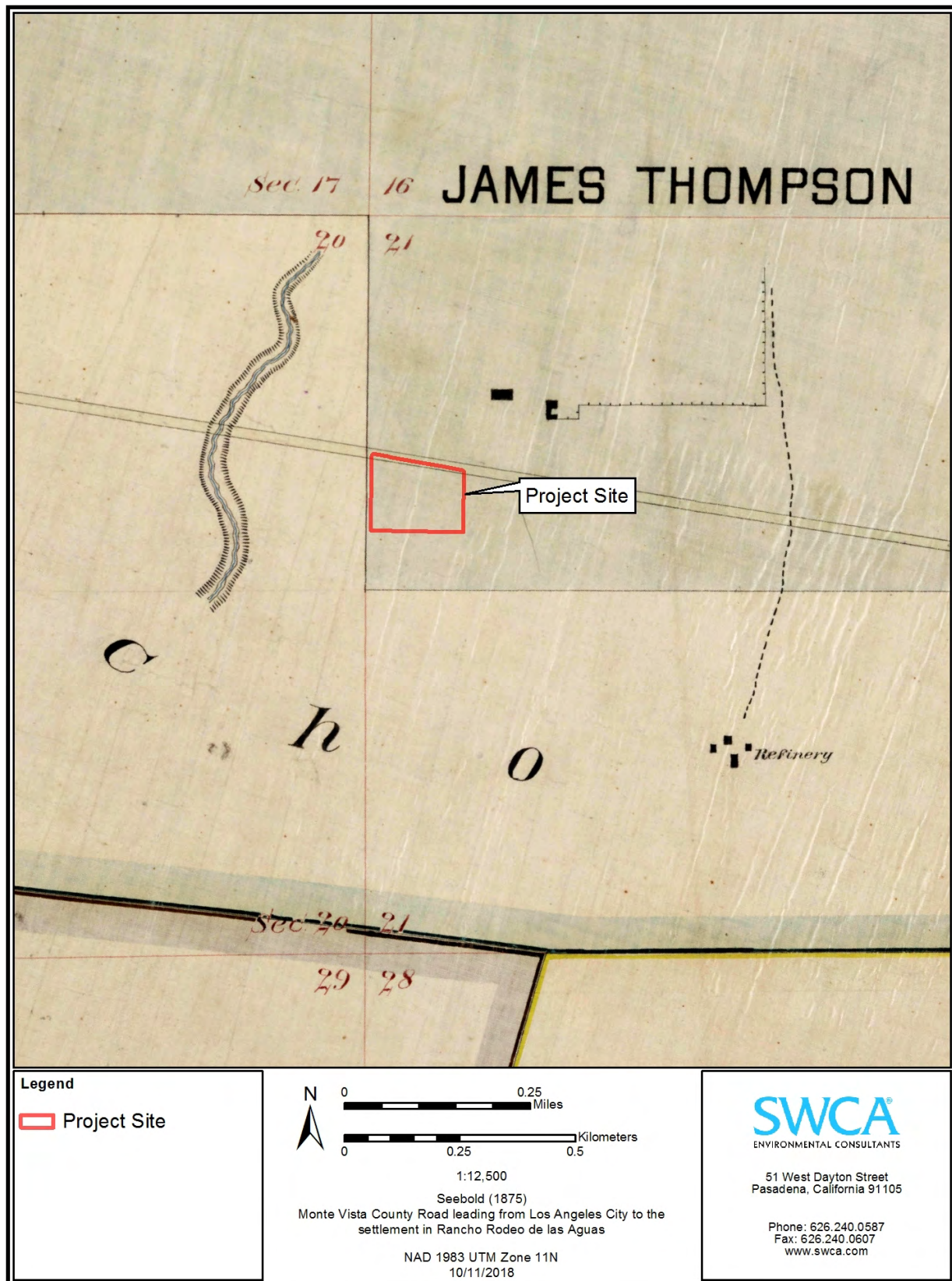


Figure 9. Project site depicted on an 1875 survey map; note the partially drawn segments of local stream courses.

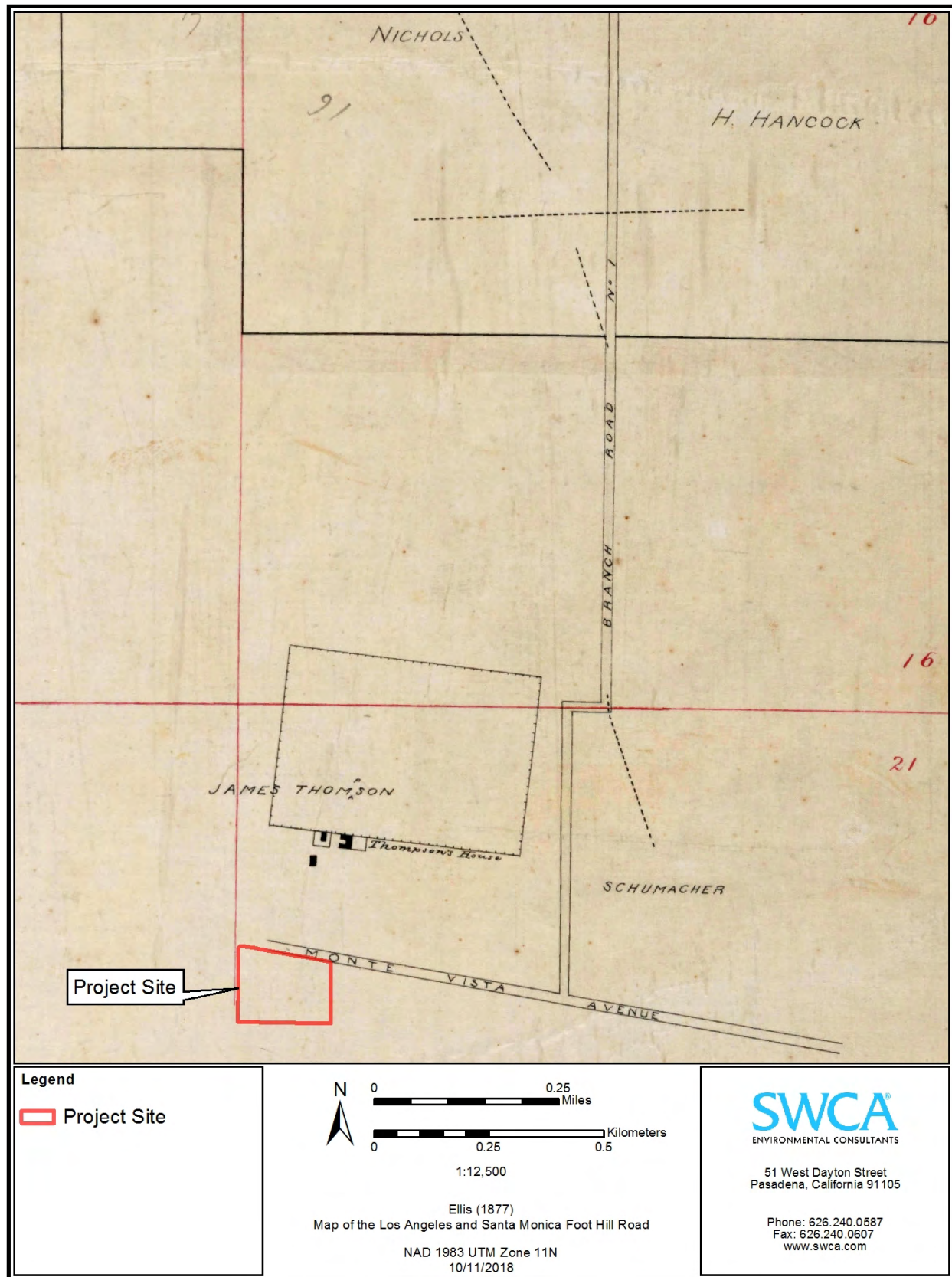


Figure 10. Project site depicted on 1877 map of Los Angeles and Santa Monica Foot Hill Road.

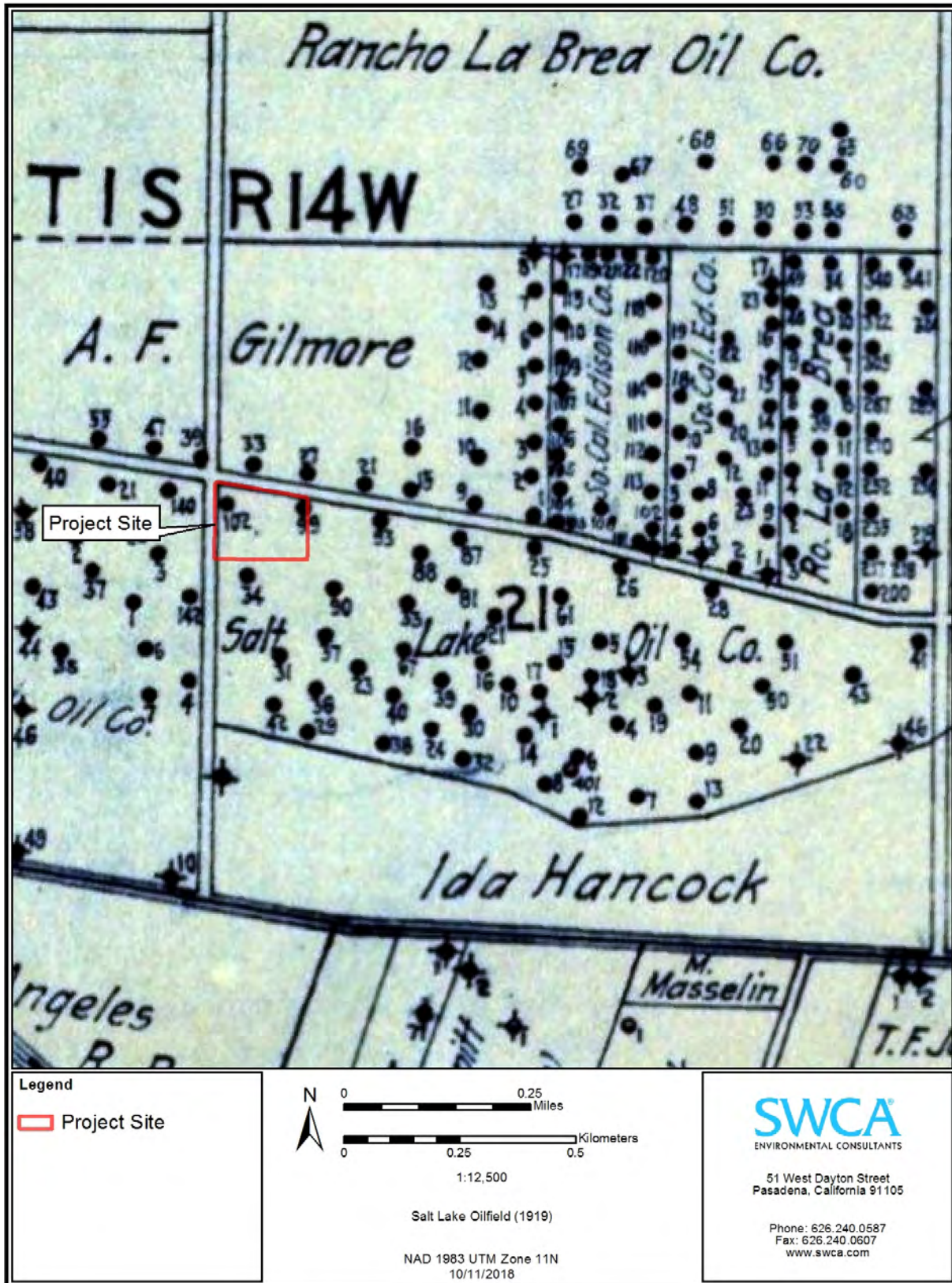


Figure 11. Project site depicted on the 1919 map of the Salt Lake Oil Field produced by the California State Mining Bureau.



Figure 12. Project site and API on a 1927 aerial photograph.

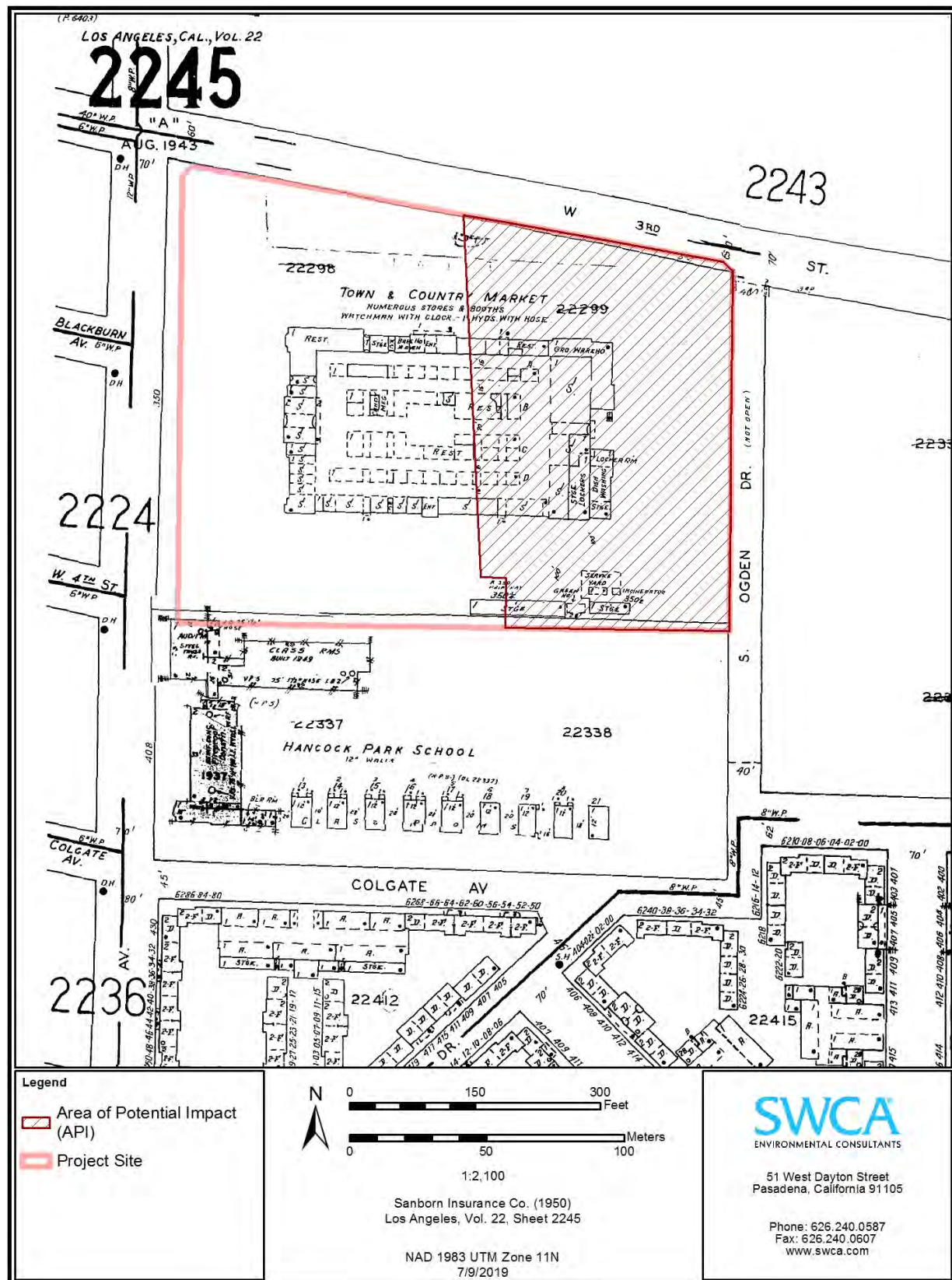


Figure 13. Project site and API plotted on a Sanborn Fire Insurance map from 1950.

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Appendix B.
Native American Heritage Commission (NAHC)
Sacred Lands File Search

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NATIVE AMERICAN HERITAGE COMMISSION

Environmental and Cultural Department
1550 Harbor Blvd., ROOM 100
West SACRAMENTO, CA 95691
(916) 373-3710
Fax (916) 373-5471



July 16, 2018

Alex Wesson

SWCA

Sent by Email: awesson@swca.com

Re: SWCA Projects: 049872, 049511, Los Angeles County

Dear Alex,

A record search of the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was completed for the information you have submitted for the above referenced project. The results were negative. However, the absence of specific site information in the SLF does not preclude the presence of cultural resources in any project area. Other sources for cultural resources should also be contacted for information regarding known and/or recorded sites.

Enclosed is a list of Native Americans tribes who may have knowledge of cultural resources in the project area. I suggest you contact all of those indicated, if they cannot supply information, they might recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe. If a response has not been received within two weeks of notification, the Commission requests that you follow-up with a telephone call to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from any of these tribes, please notify me. With your assistance we are able to assure that our lists contain current information. If you have any questions or need additional information, please contact me at 916-573-1033 or frank.lienert@nahc.ca.gov.

Sincerely,



Frank Lienert

Associate Governmental Program Analyst

**Native American Heritage Commission
Native American Contacts
July 16, 2018**

Santa Ynez Band of Chumash Indians
Kenneth Kahn. Chairperson
P.O. Box 517 Chumash
Santa Ynez , CA 93460
kkahn@santaynezchumash.org
(805) 688-7997

(805) 686-9578 Fax

Fernandeno Tataviam Band of Mission Indians
Rudy Ortega Jr., Tribal President
1019 Second Street, Suite 1 Fernandeno
San Fernando , CA 91340 Tataviam
rortega@tataviam-nsn.us
(818) 837-0794

(818) 837-0796 Fax

Barbareno/Ventureno Band of Mission Indians
Julie Lynn Tumamait-Stenslie. Chair
365 North Poli Ave Chumash
Ojai , CA 93023
itumamait@hotmail.com
(805) 646-6214

Barbareno/Ventureno Band of Mission Indians
Patrick Tumamait
992 El Camino Corto Chumash
Ojai , CA 93023
(805) 216-1253 Cell

Kitanemuk & Yowlumne Teion Indians
Delia Dominguez. Chairperson
115 Radio Street Yowlumne
Bakersfield , CA 93305 Kitanemuk
deedominguez@juno.com
(626) 339-6785

Gabrielino/Tongva San Gabriel Band of Mission Indians
Anthony Morales. Chairperson
P.O. Box 693 Gabrielino Tongva
San Gabriel , CA 91778
GTTribalcouncil@aol.com
(626) 483-3564 Cell

(626) 286-1262 Fax

Gabrielino /Tongva Nation
Sandonne Goad. Chairperson
106 1/2 Judge John Aiso St., #231 Gabrielino Tongva
Los Angeles , CA 90012
sgoad@gabrielino-tongva.com
(951) 807-0479

San Manuel Band of Mission Indians
Lee Clauss. Director-CRM Dept.
26569 Community Center Drive Serrano
Highland , CA 92346
lclauss@sanmanuel-nsn.gov
(909) 864-8933

(909) 864-3370 Fax

Kern Valley Indian Community
Robert Robinson. Chairperson
P.O. Box 1010 Tubatulabal
Lake Isabella , CA 93283 Kawaiisu
brobinson@iwvisp.com
(760) 378-2915 Cell

Gabrielino-Tongva Tribe
Linda Candelaria. Chairperson
No Current Address on File Gabrielino

This list is current only as of the date of this document and is based on the information available to the Commission on the date it was produced.

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 Resource Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed
SWCA Projects: 049872, 049511, Los Angeles County

**Native American Heritage Commission
Native American Contacts
July 16, 2018**

Soboba Band of Luiseno Indians
Joseph Ontiveros, Cultural Resource Department
P.O. BOX 487 Luiseno
San Jacinto , CA 92581 Cahuilla
iontiveros@soboba-nsn.gov
(951) 663-5279
(951) 654-5544 ext 1137
(951) 654-4198 Fax

San Manuel Band of Mission Indians
Lynn Valbuena
26569 Community Center Dr. Serrano
Highland , CA 92346
(909) 864-8933

Gabrielino Band of Mission Indians - Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393 Gabrielino
Covina , CA 91723
admin@gabrielinoindians.org
(626) 926-4131

Barbareno/Ventureno Band of Mission Indians
Eleanor Arrellanes
P.O. Box 5687 Chumash
Ventura , CA 93005
(805) 701-3246

Barbareno/Ventureno Band of Mission Indians
Raudel Joe Banuelos, Jr.
331 Mira Flores Court Chumash
Camarillo , CA 93012
(805) 427-0015

Gabrielino-Tongva Tribe
Charles Alvarez, Councilmember
23454 Vanowen St. Gabrielino
West Hills , CA 91307
roadkingcharles@aol.com
(310) 403-6048

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This list is only applicable for contacting local Native American Tribes with regard to cultural resources assessments for the proposed
SWCA Projects: 049872, 049511, Los Angeles County

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Appendix C.
Non-Confidential Assembly Bill 52 Documents

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**DEPARTMENT OF
CITY PLANNING**

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
VAHID KHORSAND

KAREN MACK

SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801

VINCENT P. BERTONI, AICP
DIRECTOR
(213) 978-1271

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

<http://planning.lacity.org>

June 26, 2018

Case Nos. DIR-2018-2770-SPR
AA-2018-2768-PMLA
ENV-2018-2271-EAF

Project Address: 370 South Fairfax Avenue
6300-6370 West 3rd Street
347 South Ogden Drive

Community Plan Area: Wilshire

Dear Tribal Representative:

This letter is to inform you that the Los Angeles Department of City Planning is reviewing the following proposed project:

The construction of a 26-story mixed-use development approximately 275 feet tall containing 381 residential units. The project includes the demolition of a one-story commercial building containing approximately 162,631 square feet of commercial floor area and the construction of up to 81,321 square feet of new commercial floor area. Approximately 65,964 square feet of existing commercial floor area is to be renovated. The project proposes 343,397 square feet of residential floor area for a total project area of 490,682 square feet. The project will provide 1,279 parking spaces located within two levels of subterranean parking garage and seven above-grade levels. The project also proposes 335 bicycle parking spaces. The proposed development will export 81,000 cubic yards of dirt. The project proposes to remove 6 street trees and 16 non-protected trees on-site.

Per AB 52, you have the right to consult on a proposed public or private project prior to the release of a negative declaration, mitigated negative declaration or environmental impact report. You have 30 calendar days from receipt of this letter to notify us in writing that you wish to consult on this project. Please provide your contact information and mail your request to:

Los Angeles Department of City Planning
Attn: Ruben C. Vasquez III
200 N. Spring Street, Room 621
Los Angeles, CA 90012
Email: ruben.c.vasquez@lacity.org
Phone No.: (213) 978-1741

Sincerely,

Ruben C. Vasquez III
Planning Assistant

TO: Planning Staff
FROM: Major Projects
SUBJECT: AB 52 Native American Heritage Commission Tribal Consultation List
as of July 11, 2017

Fernandeño Tataviam Band of Mission Indians
Kimia Fatehi, Director, Public Relations
1019 2nd Street, Ste. 1
San Fernando, CA 91340

Gabrieleño Band of Mission Indians – Kizh Nation
Andrew Salas, Chairperson
P.O. Box 393
Covina, CA 91723

Gabrielino Tongva Indians of California Tribal Council
Robert F. Dorame, Tribal Chair/Cultural Resources
P.O. Box 490
Bellflower, CA 90707

Gabrielino/Tongva Nation
Sam Dunlap, Cultural Resources Director
P.O. Box 86908
Los Angeles, CA 90086

Gabrielino/Tongva Nation
Sandonne Goad, Chairperson
106 1/2 Judge John Aiso St., #231
Los Angeles, CA 90012

Gabrielino/Tongva San Gabriel Band of Mission Indians
Anthony Morales, Chairperson
P.O. Box 693
San Gabriel, CA 91778

Gabrielino-Tongva Tribe
Charles Alvarez, Co-Chairperson
23454 Vanowen Street
West Hills, CA 91307

San Fernando Band of Mission Indians
John Valenzuela, Chairperson
P.O. Box 221838
Newhall, CA 91322

Soboba Band of Luiseño Indians
Joseph Ontiveros, Cultural Resource Director
P.O. Box 487
San Jacinto, CA 92581

Torres Martinez Desert Cahuilla Indians
Michael Mirelez, Cultural Resource Coordinator
PO Box 1160
Thermal, CA 92274

**DEPARTMENT OF
CITY PLANNING**

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ

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KAREN MACK

DANA M. PERLMAN

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AJAY RELAN

**CITY OF LOS ANGELES
CALIFORNIA**



ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES

200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
(213) 978-1271

VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

VACANT
DEPUTY DIRECTOR

January 28, 2021

Andrew Salas
Tribal Chairman
Gabrieleño Band of Mission Indians – Kizh Nation
PO Box 393
Covina, CA 91723

RE: AB 52 Completion of Consultation
3rd and Fairfax Mixed-Use Project at 300-370 S Fairfax Avenue, 6300-6370 W 3rd St.
and 347 S. Ogden Drive, Los Angeles, 90036
(Case No. ENV-2018-2771-EIR)(“Proposed Project”)

Dear Chairman Salas:

The purpose of this correspondence is to briefly summarize our combined efforts to engage in a meaningful and good faith consultation regarding the above named project's potential impacts to tribal cultural resources and to document the conclusion of the tribal consultation process, pursuant to Public Resources Code, Section 21080.3.2.

On June 26, 2018 the City mailed a project notification letter to the Gabrieleño Band of Mission Indians – Kizh Nation (Tribe). On July 6, 2018, the City received the Tribe's request for tribal consultation. On December 13, 2018, the City mailed a letter to the Tribe with updated information about the Proposed Project, including the projected depth of grading activities, and existing project site conditions, including existing on-site structures. On January 16, 2019, a conference call to discuss the Proposed Project was held between representatives of the Department of City Planning and the Tribe. Following the call, City Planning staff requested information discussed during the call via email on the same day. Also, on July 2, 2020 the City emailed the Tribe and requested that the Tribe provide any additional information regarding the potential for tribal cultural resources in the project area and/or on the project site, within 14 days of receipt of the email. The City received information from the Tribe on January 17, 2019 and on July 3, 2020 following these requests.

As a result of the information provided in the Tribal Cultural Resources report prepared for the Proposed Project, and information provided by the Tribe, the City has concluded that the Proposed Project could result in a potentially significant impact to tribal cultural resources. In order to mitigate the potentially significant impact, the City agreed to require the project applicant to comply with mitigation measures, which were provided to the Tribe on January 6, 2021. The mitigation measures incorporate several key components of the mitigation measures recommended by the Gabrieleño Band of Mission Indians – Kizh Nation for use with this project (i.e., Retain a Native American Monitor/Consultant, Unanticipated Discovery of Tribal Cultural, Unanticipated Discovery of Human Remains and Associated Funerary Objects, Resource Assessment & Continuation of Work Protocol, and Professional Standards), as provided to the

City in the Tribe's *Protection of Tribal Cultural Resources (TCRs)* document on January 16, 2019. The Tribe provided additional information, comments regarding mitigation measures, and proposed revisions to the mitigation measures on January 6 and January 7, 2021. The City has considered the Tribe's comments, along with the additional information provided and has made further modifications to the proposed mitigation measures. The City maintains that implementation of the mitigation measures is feasible and will mitigate the potential impact to tribal cultural resources to less than significant. Furthermore, the City believes that requested revisions to the mitigation measures are not warranted for the following reasons.

- 1) The mitigation measures as written are specific to tribal cultural resources.
- 2) The mitigation measures require a tribal monitor during ground-disturbing activities. The mitigation measures also include a provision for the Gabrieleño Band of Mission Indians – Kizh Nation to be contacted first to provide monitoring services.
- 3) The mitigation measures include a provision for the tribal monitor to assess the nature of any potential tribal cultural resource find and the potential for additional portions of the resource to remain buried in unexcavated areas of the project site. Further, the determination of a radius to protect any potential tribal cultural resource find will be made in consultation with the tribal monitor.
- 4) A qualified archaeologist ensures compliance with State and local regulations where it involves identification, evaluation, and treatment of tribal cultural resources. Determining whether a discovery made during construction is a tribal cultural resource includes evaluating the potential for listing on the California Register of Historical Resources (CRHR). Evaluation under Criterion 4 of the CRHR Criteria for Designation requires assessing the scientific and informational potential of a resource, and a qualified archaeologist has the necessary training and expertise to make this assessment.

Since the City has reached agreement with the Tribe as to the project's potential impacts on tribal cultural resources, and the City has agreed to impose the attached mitigation measures that the City believes will feasibly mitigate the potential impacts to tribal cultural resources to less than significant, the City believes it is now appropriate to conclude the tribal consultation process pursuant to Public Resources Code, section 21080.3.2(b)(2)., as the City is unable to reach agreement with the Tribe regarding the requirements to mitigate the potential impacts to tribal cultural resources.

Within the next month, the City is expecting to release its Draft Environmental Impact Report (EIR) for this project. The release of the Draft EIR will commence a 45-day period during which the Tribe may submit written comments on the adequacy of the EIR. The City appreciates and values the integral role of the Tribe in the AB 52 consultation process. Please feel free to contact me if you have any questions.

Respectfully,

Cesar Moreno
Planning Assistant
Department of City Planning – Major Projects

Attachment: Mitigation Measures

Attachment

Mitigation Measures

The following mitigation measures are included to reduce potential impacts on tribal cultural resources during construction.

MM-TCR-1. Retain a Tribal Consultant and Qualified Archaeologist. Prior to any ground-disturbing activities on the project site associated with the Proposed Project, the project proponent shall retain a tribal consultant and qualified archaeologist to monitor ground-disturbing activities to ensure proper implementation of the final measures related to tribal cultural resources. For the purposes of these mitigation measures, ground disturbing activities shall include excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity at the project site. A tribal consultant is defined as one who is on the NAHC's Tribal Contact list (contained in Appendix I in this Draft EIR). The tribal consultant will provide the services of a representative, known as a tribal monitor. The tribal monitor shall be present on-site and carry out actions described in the Tribal Cultural Resources Monitoring and Mitigation Program and any actions required to comply with mitigation measures for tribal cultural resources. The Gabrieleño Band of Mission Indians-Kizh Nation, as a consulting party for the project, shall be contacted first and given 10 days to respond with a complete scope of work for tribal monitoring. If the terms of service (consistent with industry standard terms) cannot be agreed upon, or if no response is received within 10 days of soliciting a request, the project proponent may contact another California Native American tribe included on the NAHC Tribal Contact List and request the services of a tribal consultant. The project proponent or their designee will submit to the City of Los Angeles Department of City Planning (DCP) a letter of retention from the Tribal Consultant prior to the start of demolition. Should the Gabrieleño Band of Mission Indians-Kizh not be retained, the project proponent or their designee shall also submit a letter to DCP documenting that a reasonable and good faith effort was made to retain a tribal consultant from the Gabrieleño Band of Mission Indians-Kizh Nation.

A qualified archaeologist is defined as one who meets the Secretary of the Interior's (SOI) Professional Qualifications Standards (PQS) for archaeology. The qualified archaeologist shall submit a letter of retention to the project proponent and DCP no fewer than 15 days before demolition or excavation activities commence. The letter shall include a resume for the qualified archaeologist that demonstrates fulfillment of the SOI PQS.

MM-TCR-2. Prepare a Tribal Cultural Resources Monitoring and Mitigation Program (TCRMMP). Prior to any ground-disturbing activities on the project site associated with the Proposed Project, a TCRMMP shall be prepared in substantial conformance with TCRMMP in Appendix E or the Tribal Cultural Resources Assessment contained in this Draft EIR. The TCRMMP shall include, but not be limited to, a construction worker training program (described in TCR-3), monitoring protocols for ground-disturbing activities, discovery and processing protocol for inadvertent discoveries of tribal cultural resources. The TCRMMP shall identify areas that require monitoring, provide a framework for assessing the geoarchaeological setting to determine whether sediments capable of preserving tribal cultural resources are present, and include a protocol for identifying the conditions under which additional or reduced levels of monitoring (e.g., spot-checking) may be appropriate. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the tribal consultant based on the rate of excavation, geoarchaeological assessment, and, if present, the quantity, type, and spatial distribution of the materials identified. The TCRMMP shall also summarize the requirements for tribal coordination during monitoring and in the event of an inadvertent discovery of a tribal cultural resource or potential tribal cultural resource including the applicable regulatory compliance measures for the inadvertent discovery of tribal cultural resources to be carried out in concert. The TCRMMP shall be prepared in compliance with Public Resources Code (PRC) Section

5024.1, Title 14 California Code of Regulations, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1. The TCRMMP shall be submitted to the DCP at least 15 days prior to initiating ground-disturbing activities.

MM-TCR-3. Worker Environmental Awareness Program (WEAP) Training. Prior to any ground-disturbing activities on the project site associated with the Proposed Project, the retained qualified archaeologist and tribal consultant or their designees shall provide a WEAP training to on-site project personnel responsible for supervising ground-disturbing activities (i.e., foreman or supervisor) and machine operators. The WEAP training will be in accordance with the WEAP provided in Appendix E or the Tribal Cultural Resources Assessment contained in this Draft EIR. The WEAP training shall brief construction crews regarding the regulatory compliance requirements and applicable mitigation measures that must be adhered to during ground-disturbing activities for the protection of tribal cultural resources. As an element of the WEAP training, the qualified archaeologist and tribal consultant or their designees shall advise the construction crews on proper procedures to follow if an unanticipated tribal cultural resource is discovered during construction. The qualified archaeologist and tribal consultant or their designees shall also provide the construction workers with contact information for the qualified archaeologist and tribal consultant and their designee(s) and protocols to follow if inadvertent discoveries are made. In addition, workers shall be shown examples of the types of tribal cultural resources that would require notification of the archaeologist and tribal consultant, if encountered. Once the ground disturbances have commenced, the need for additional or supplemental WEAP training shall be determined through consultation with the qualified archaeologist, tribal consultant and project proponent or their designated project supervisor. Within 5 days of completing a WEAP training, a list of those in attendance shall be provided by the qualified archaeologist to the project proponent and DCP.

MM-TCR-4. Monitoring for Tribal Cultural Resources. Prior to any ground-disturbing activities on the project site associated with the Proposed Project, an archaeological and tribal monitor shall be present during ground-disturbing activities as stipulated in the TCRMMP. The tribal monitor shall be designated by the tribal consultant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction. The monitors shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potential tribal cultural resources, as determined by the qualified archaeologist in consultation with the tribal monitor. The monitors shall each complete a daily log documenting construction activities and observations. The field observations shall include assessment of the geoarchaeological setting and whether sediments are identified that are no longer capable or unlikely to contain tribal cultural resources (i.e., sterile), which may be encountered prior to reaching the total depth of excavation expected for the project. If initial monitoring identifies low sensitivity (i.e., sterile soil strata) below a certain depth or within a certain portion of the project site, a corresponding reduction of monitoring coverage would be appropriate. The reasoning for and scale of the recommended reduction shall be communicated to the DCP in writing prior to reduction.

In the event that tribal cultural resources or potential tribal cultural resources are exposed during construction, work in the immediate vicinity of the find shall stop within a minimum of 8 meters [25 feet] or as determined by the qualified archaeologist in consultation with the tribal consultant based on the nature of the find and the potential for additional portions of the resource to remain buried in the unexcavated areas of the project site. The qualified archaeologist in consultation with the tribal consultant will evaluate the significance of the find and implement the protocol described in the TCRMMP before work can resume in the area surrounding the find that is determined to have sensitivity. Construction activities may continue in other areas of the project site in coordination with the qualified archaeologist and tribal consultant.

If human remains are encountered during construction all ground-disturbing work will be immediately diverted from the discovery as determined by the tribal consultant and qualified

archaeologist based on consideration of the possibility that additional or multiple Native American human remains may be located in the project site. Upon discovery of human remains, whether or not the archaeological or Tribal monitor is present, the Los Angeles County Coroner's Office shall be notified, as prescribed in PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the Coroner determines that the remains are of Native American origin, the Coroner shall proceed as directed in Section 15064.5(e) of the State CEQA Guidelines, and as specified in the TCRMMP, which require the coroner to notify the NAHC who will appoint a Most Likely Descendent (MLD). Funerary objects, called associated grave goods in PRC 5097.98, are also to be treated accordingly. While the coroner determines whether the remains are Native American and the MLD is designated and notified, the discovery is to remain confidential and secure to prevent any further disturbance.

Within one month of concluding the tribal cultural resources monitoring, the qualified archaeologist shall prepare a memo stating that the monitoring requirements have been fulfilled and summarize the results of any finds and any actions taken by the tribal monitor to implement the final measures related to tribal cultural resources. The memo shall be submitted to the project proponent and DCP and attached to a final monitoring report prepared by the qualified archaeologist. Following submittal of the memo, the qualified archaeologist shall prepare a technical report documenting the methods and results of all work completed by the tribal and archaeological monitor under the TCRMMP and incorporating input received during construction from the tribal consultant, including, if any, treatment of any collected materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the California Register of Historical Resources. The format and content of the report shall follow the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Any tribal cultural resources identified shall be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report shall be prepared under the supervision of a qualified archaeologist and submitted to DCP within one year of completing the monitoring. The final draft of the report shall be submitted to the South Central Coastal Information Center.

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Appendix D. Confidential Assembly Bill 52 Documents

[CONFIDENTIAL—NOT FOR PUBLIC DISTRIBUTION]


Archaeological and other heritage resources can be damaged or destroyed through uncontrolled public disclosure of information regarding their location. This document contains sensitive information regarding the nature and location of archaeological sites, which should not be disclosed to the general public or unauthorized persons.

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant's agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant's public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

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Appendix E.
**Tribal Cultural Resources Monitoring and Mitigation Plan and Worker
Environmental Awareness Program**

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TRIBAL CULTURAL RESOURCES MITIGATION AND MONITORING PLAN, 3RD AND FAIRFAX MIXED-USE PROJECT, LOS ANGELES, CALIFORNIA

February 2021

PREPARED FOR

Holland Partner Group
5000 E. Spring Street
Suite 500
Long Beach, CA 90815

PREPARED BY

SWCA Environmental Consultants
51 West Dayton Street
Pasadena, California 91105

Tribal Cultural Resources Mitigation and Monitoring Plan, 3rd and Fairfax Mixed-Use Project, Los Angeles, California

Prepared for

Holland Partner Group

5000 E. Spring Street
Suite 500
Long Beach, CA 90815

Prepared by

Chris Millington, M.A., RPA

SWCA Environmental Consultants

51 W. Dayton Street
Pasadena, California 91105
(626) 240-0587
www.swca.com

Contact:

Chris Millington
cmillington@swca.com

USGS 7.5-minute topographic quadrangle:
Hollywood, California

February 2021

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Figure 3. Proposed Project Area.	Error! Bookmark not defined.
Figure 4. Southwest corner of North Broadway and present-day West Cesar E. Chavez Avenue, clockwise from top left: 1929, 1951, 2014, and 1971. Source: Los Angeles Public Library Photographic Collection.	Error! Bookmark not defined.

APPENDICES

Appendix A. Worker Training Protocol and Program

INTRODUCTION

SWCA Environmental Consultants (SWCA) was retained by the Holland Partner Group to prepare a Tribal Cultural Resources Mitigation and Monitoring Plan (TCRMMP) in support of the 3rd and Fairfax Mixed-Use Project (project). This TCRMMP describes a procedural framework to identify, evaluate, and treat any tribal cultural resources that are encountered during construction.

Purpose

This TCRMMP has been prepared to guide tribal cultural resources monitoring during construction in compliance with the requirements of the California Environmental Quality Act (CEQA) and local regulations, which require the City of Los Angeles to avoid or mitigate impacts to tribal cultural resources. The proposed project includes the removal of a surface parking lot, demolition of a two-story commercial structure with a basement level, and the construction of a mixed-use residential and commercial building in an area found to have a low potential to contain previously undocumented buried tribal cultural resources (Millington et al. 2020). The TCRMMP provides a procedure for handling unanticipated discoveries during project construction, fulfilling the conditions of the Mitigation Monitoring and Reporting Program associated with the Final Environmental Impact Report for the project. Specifically, the TCRMMP includes guidance for compliance with Mitigation Measures (MM) TCR-1 through TCR-4.

In accordance with Mitigation Measure CR-2, the TCRMMP will include a review of project construction plans and geotechnical studies, and other pertinent background materials. The TCRMMP references relevant state and local laws and regulations and it will be submitted to the City of Los Angeles for review prior to the commencement of ground-disturbing construction activities. The TCRMMP describes construction methods and provide a summary of sensitivity for buried tribal cultural resources. In addition, it describes the specific field procedures to be followed for monitoring of construction activities, including contact information for key personnel, field protocols, and methods to be followed should there be a tribal cultural resource discovery. Further, the TCRMMP provides a plan for avoidance or data recovery in the event that significant cultural resources are identified during monitoring, including a discussion of artifact collection, retention/disposal, and curation policies as related to the research questions formulated in the research framework. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements is also described. Lastly, the TCRMMP includes a Worker Training Protocol and Program as Appendix A.

Qualifications

This TCRMMP was prepared by SWCA Senior Archaeologist Chris Millington, M.A., Registered Professional Archaeologist (RPA). Mr. Millington meets the Secretary of the Interior's Professional Qualifications Standards in archeology.

Project Location

The project site is at the southeast corner of Third Street and Fairfax Avenue in the city of Los Angeles, California (Figure 1–Figure 3). The project site is in the La Brea neighborhood of Los Angeles. The site is currently occupied by a two-story commercial structure with a basement level and an associated asphalt-paved parking lot. The site is bounded by Third Street to the north, Fairfax Avenue to the west, South Ogden Drive to the east, and to the south by a driveway and Hancock Park Elementary School. This location is plotted in an unsectioned portion of Township 1 South, Range 14 West as depicted on the U.S. Geological Survey (USGS) Hollywood, California, 7.5-minute topographic quadrangle.



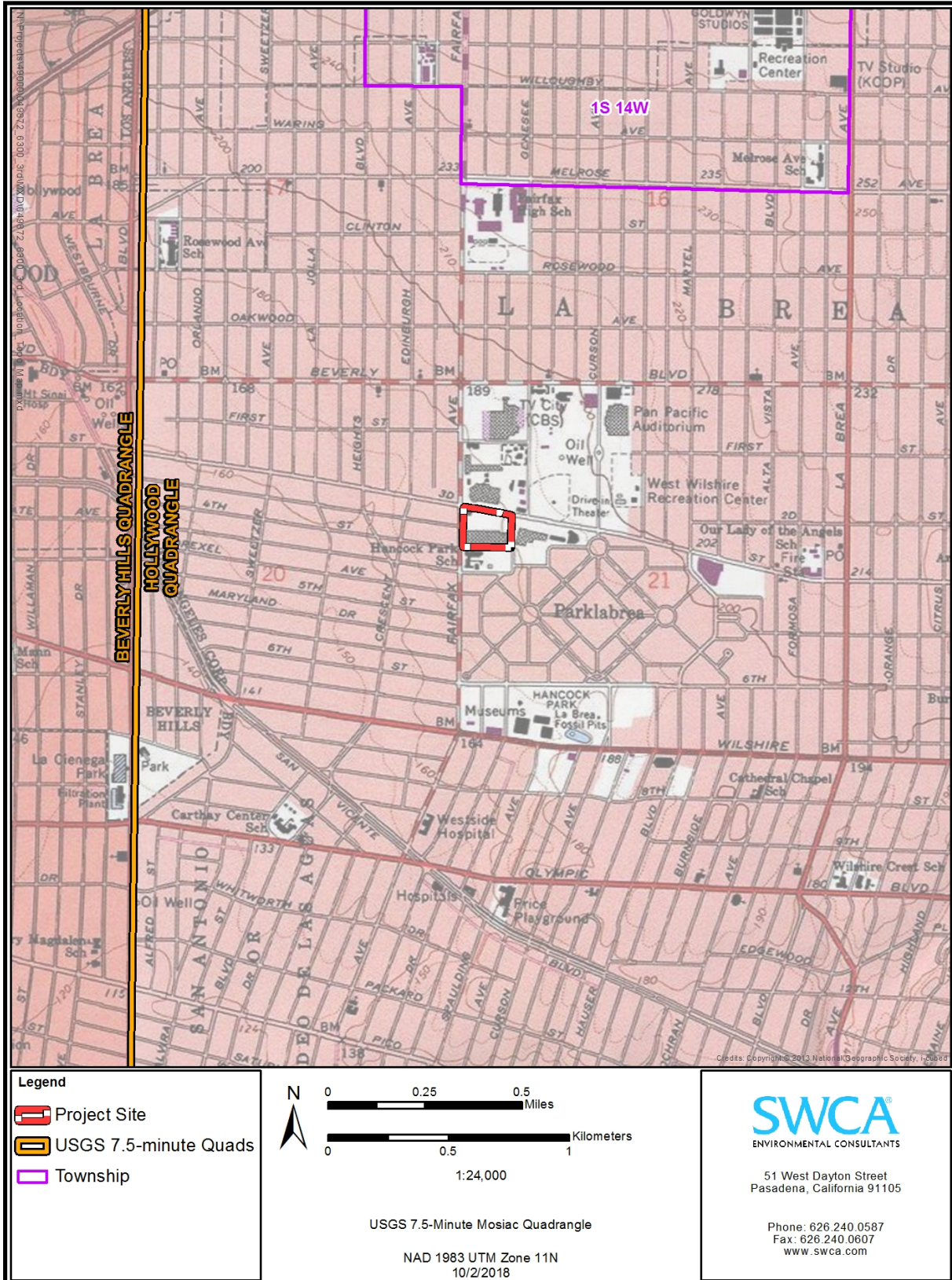


Figure 2. Project site plotted on USGS Hollywood, California, 7.5-minute topographic quadrangle.

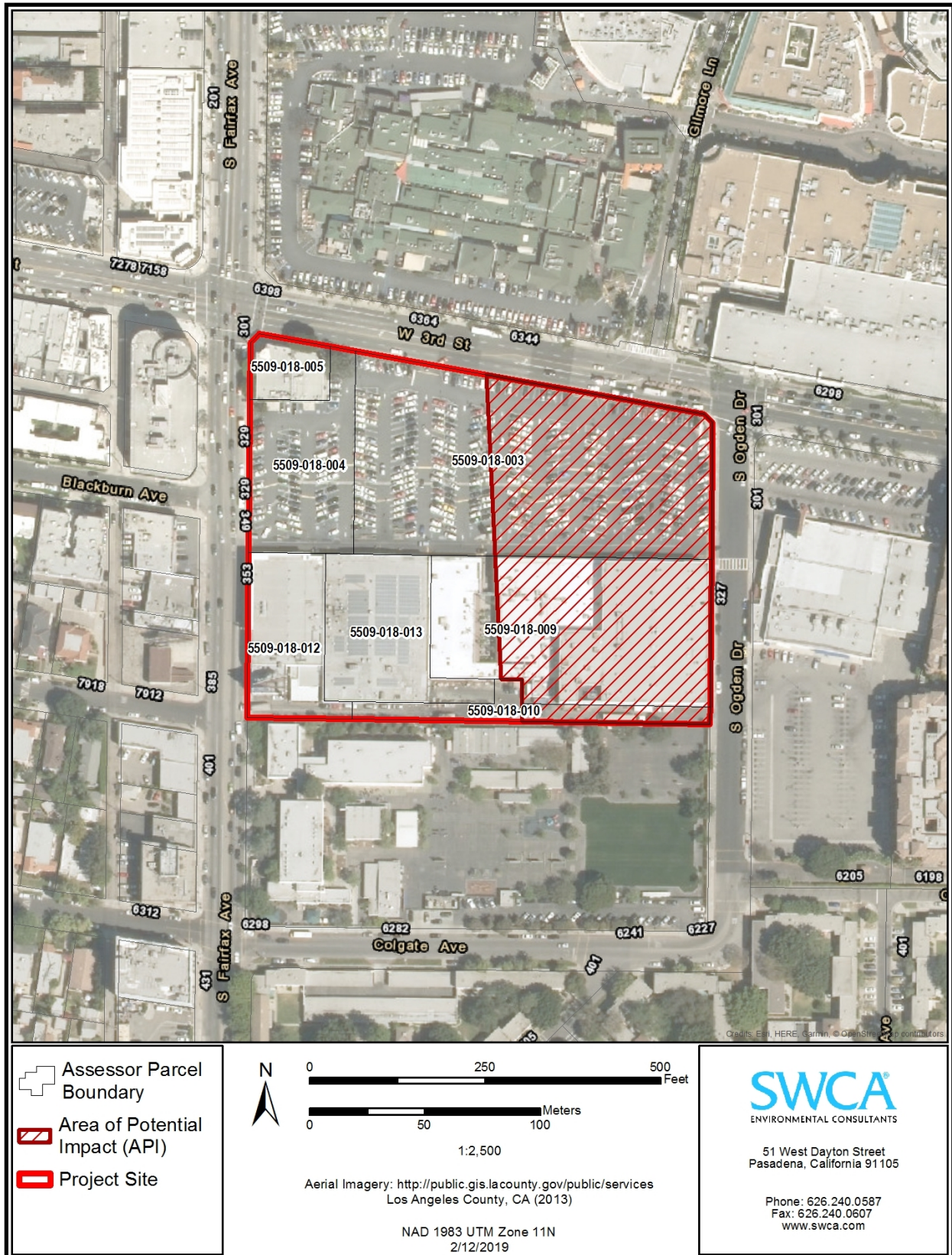


Figure 3. Project site and API (hatched area) with associated parcels on an aerial photograph and street map.

Project Description

The project applicant proposes to redevelop a portion of the existing commercial center located at the southeastern corner of Fairfax Avenue and Third Street. The eastern portion of the shopping center currently occupied by Kmart, other retail tenants, and surface parking would be demolished and replaced by new construction. The current proposed project anticipates two levels of retail with approximately 331 residential units above. Ground-disturbing construction activities would involve grading, excavation, shoring tie-backs, and drilling of soldier piles conducted using loaders, excavators, compactors, hauling trucks, and a drill. The maximum anticipated depth of excavation below the existing surface grade is estimated at approximately 30 feet. The API for the project includes all areas in which ground disturbances are proposed to occur. The API measures 3.25 acres (141,753 square feet) and occupies the eastern portion of the project site, approximately (Figure 3).

REGULATORY SETTING

This regulatory framework section identifies the state and local laws, statutes, guidelines, and regulations that govern the identification and treatment of tribal cultural resources as well as the analysis of potential impacts. The lead agency must consider the provisions and requirements of this regulatory framework when rendering decisions on projects that have the potential to affect tribal cultural resources.

State Regulations

The California Office of Historic Preservation (OHP), a division of the California Department of Parks and Recreation (DPR), is responsible for carrying out the duties described in the California PRC and maintaining the California Historic Resources Inventory and CRHR. The state-level regulatory framework also includes CEQA, which requires the identification and mitigation of substantial adverse impacts that may affect the significance of tribal cultural resources.

California Environmental Quality Act

CEQA requires a lead agency to analyze whether tribal cultural resources may be adversely affected by a proposed project. Under CEQA, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment” (PRC Section 21084.1). Answering this question is a two-part process: first, the determination must be made whether the proposed project involves tribal cultural resources. Second, if tribal cultural resources are present, the proposed project must be analyzed for a potential “substantial adverse change in the significance” of the resource.

TRIBAL CULTURAL RESOURCES

Assembly Bill 52 of 2014 (AB 52) amended PRC Section 5097.94 and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. Section 4 of AB 52 adds Sections 21074(a) and (b) to the PRC, which address tribal cultural resources and cultural landscapes. Section 21074(a) defines tribal cultural resources as one of the following:

- (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - (A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - (B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

- (2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

Section 1(a)(9) of AB 52 establishes that “a substantial adverse change to a tribal cultural resource has a significant effect on the environment.” Effects on tribal cultural resources should be considered under CEQA. Section 6 of AB 52 adds Section 21080.3.2 to the PRC, which states that parties may propose mitigation measures “capable of avoiding or substantially lessening potential significant impacts to a tribal cultural resource or alternatives that would avoid significant impacts to a tribal cultural resource.” Further, if a California Native American tribe requests consultation regarding project alternatives, mitigation measures, or significant effects to tribal cultural resources, the consultation shall include those topics (PRC Section 21080.3.2[a]). The environmental document and the mitigation monitoring and reporting program (where applicable) shall include any mitigation measures that are adopted (PRC Section 21082.3[a]).

AB 52 Tribal Consultation

California Native American tribes are defined in AB 52 as any Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission (NAHC), whether or not they are federally recognized. AB 52 specifies that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their tribal cultural resources. Once an application for a project is completed or a public agency decides to undertake a project, the lead agency has 14 days to send formal notification to Native American tribes designated by the NAHC as having traditional and cultural affiliation with a given project site and previously requested in writing to be notified by the lead agency (PRC Section 21082.3.1[b][d]). The notification shall include a brief description of the proposed project, the location, contract information for the agency contact, and notice that the tribe has 30 days to request, in writing, consultation (PRC Section 21082.3.1[d]). Consultation must be initiated by the lead agency within 30 days of receiving any California Native American tribe’s request for consultation. Furthermore, consultation must be initiated prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project (PRC Section 21082.3.1[b][e]).

Consistent with the stipulations stated in Senate Bill 18 (Government Code Section 65352.4), consultation may include discussion concerning the type of environmental review necessary, the significance of the project’s impacts on the tribal cultural resources, and, if necessary, project alternatives or the appropriate measures for preservation and mitigation that the California Native American tribe may recommend to the lead agency. The consultation shall be considered concluded when either the parties agree to measures mitigating or avoiding a significant effect, if one exists, on a tribal cultural resource; or a party, acting in good faith and after reasonable effort, concludes that agreement cannot be reached (PRC Section 21082.3.2[b]).

Pursuant to Government Code Sections 6254 and 6254.10, and PRC Section 21082.3(c), information submitted by a California Native American tribe during consultation under AB 52 shall not be included in the environmental document or otherwise disclosed to the public by the lead agency, project applicant, or the project applicant’s agent, unless written permission is given. Exemptions to the confidentiality provisions include any information already publicly available, in lawful possession of the project applicant before being provided by the tribe, independently developed by the project applicant or the applicant’s public agent, or lawfully obtained by a third party (PRC Section 21082.3[c]).

California Register of Historical Resources

Created in 1992 and implemented in 1998, the CRHR is “an authoritative guide in California to be used by state and local agencies, private groups, and citizens to identify the state’s historical resources and to

indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Sections 21083.2 and 21084.1). Certain properties, including those listed in or formally determined eligible for listing in the National Register of Historic Places (NRHP) and California Historical Landmarks numbered 770 and higher, are automatically included in the CRHR. Other properties recognized under the California Points of Historical Interest program, identified as significant in historical resources surveys, or designated by local landmarks programs, may be nominated for inclusion in the CRHR. According to PRC Section 5024.1(c), a resource, either an individual property or a contributor to a historic district, may be listed in the CRHR if the State Historical Resources Commission determines that it meets one or more of the following criteria, which are modeled on NRHP criteria:

- **Criterion 1:** It is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage.
- **Criterion 2:** It is associated with the lives of persons important in our past.
- **Criterion 3:** It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- **Criterion 4:** It has yielded, or may be likely to yield, information important in history or prehistory.

Resources nominated to the CRHR must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity does not meet NRHP criteria may still be eligible for listing in the CRHR. While all sites are evaluated according to all four of the CRHR criteria, the eligibility for tribal cultural resources of an archaeological nature are typically considered under Criterion 4. Most Native American sites are lacking identifiable or important association with specific persons or events of regional or national history (Criteria 1 and 2), or lacking the formal and structural attributes necessary to qualify as eligible under Criterion 3.

Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe may meet Criterion 4 of the CRHR if it displays one or more of the following attributes: chronologically diagnostic, functionally diagnostic, or exotic artifacts; datable materials; definable activity areas; multiple components; faunal or floral remains; archeological or architectural features; notable complexity, size, integrity, time span, or depth; or stratified deposits. Determining the period(s) of occupation at a site provides a context for the types of activities undertaken and may well supply a link with other sites and cultural processes in the region. Further, well-defined temporal parameters can help illuminate processes of culture change and continuity in relation to natural environmental factors and interactions with other cultural groups. Finally, chronological controls might provide a link to regionally important research questions and topics of more general theoretical relevance. As a result, the ability to determine the temporal parameters of a site’s occupation is critical for a finding of eligibility under Criterion 4 (information potential). Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that cannot be dated are unlikely to possess the quality of significance required for CRHR eligibility. The content of a site, object, or feature of an archaeological nature provides information regarding its cultural affiliations, temporal periods of use, functionality, and other aspects of its occupation history. The range and variability of artifacts present in the site can allow for reconstruction of changes in ethnic affiliation, diet, social structure, economics, technology, and other aspects of culture.

California Health and Safety Code Section 7050.5

This code section requires that further excavation or disturbance of land, upon discovery of human remains outside of a dedicated cemetery, cease until a county coroner makes a report. It requires a county coroner to contact the Native American Heritage Commission (NAHC) within 24 hours if the coroner determines

that the remains are not subject to his or her authority and if the coroner recognizes the remains to be those of a Native American.

California Public Resource Code Section 5097.98

The project is subject to California PRC Section 5097.98, which states that if a county coroner notifies the NAHC that human remains are Native American and outside the coroner's jurisdiction per Health and Safety Code (HSC) Section 7050.5, the NAHC must determine and notify a Most Likely Descendant (MLD). The MLD shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

PREVIOUS RESEARCH

SWCA conducted a tribal cultural resources assessment for the project in 2020 (Millington et al. 2020).

Cultural Resources Records Search

On July 5, 2018, SWCA conducted a confidential search of the CHRIS records at the SCCIC on the campus of California State University, Fullerton, to identify previously documented cultural resources within a 0.8-km (0.5-mile) radius of the project site, as well as any selectively chosen outside the radius to aid in the assessment of tribal cultural resource sensitivity. Results of the records search at the SCCIC indicate that 56 cultural resource studies have been conducted within 0.8 km (0.5 mile) of the project site. Of these, 26 explicitly address archaeological resources, whereas four are focused on historic architecture, nine were conducted as a literature search and/or management and planning reports, eight were general research, and nine were overview studies conducted for the region. None of the studies were conducted specifically within the project site; however, several studies have been conducted in areas near the project site. These include four studies (LA-1932, LA-02881, LA-07368, and LA-06444) conducted between 1988 and 2003 in association with the Park La Brea development to the east, and two studies (LA-01939 and LA-02763) conducted between 1988 and 1990 to the north as environmental reviews for the Farmer's Market and Grove commercial properties. All of the studies were conducted prior to the passage of AB 52; therefore, tribal cultural resources, as such, are not specifically addressed in these studies.

The CHRIS records search identified a total of 12 previously documented cultural resources within a 0.8-km (0.5-mile) radius of the project site. Seven of the resources are buildings, one is a building and archaeological site (P-19-003945; Gilmore adobe), three are Historic-period archaeological sites (P-19-001261, P-19-002964, and P-19-171007), and one is an archaeological site with Historic- and Prehistoric-period components (P-19-000159; La Brea Tar Pits). Site P-19-000159 is the only resource identified in the records search that includes materials associated with Native Americans and could be considered a tribal cultural resource. The site was recorded originally recorded in 1949 as a prehistoric archaeological site consisting of human remains, wooden artifacts, a stone "cog," a mano, shell beads, and various floral and faunal remains, including those of extinct mammals as well as a domesticated dog (unassociated with the human remains). The material was recovered within asphalt seeps of the La Brea Tar Pits. Originally identified in 1914, the human remains recovered from the site are now commonly referred to as those of the La Brea Woman. Since Heizer's first formal recordation of the site in 1949, various studies have been conducted with the purpose of dating the bone, most recently by Fuller et al. (2016). Fuller and his colleagues dated the remains to $9,080 \pm 15$ radiocarbon years before present (10,200-10,250 calibrated years before present). The age of the remains are generally consistent relative dates based on the shell beads and some of the extinct fauna found in association. A trash pit containing Historic-period archaeological remains were also recovered from an adjacent location in the tar pits and documented as a separate site (P-19-001261). Hancock Park and the La Brea Tar Pits are also individually recorded as a historical place (P-

19-171007), the boundary of which overlaps the two archaeological sites previously discussed, but these resources do not include Native American affiliated materials. All three of these resources are located between 0.6 and 0.9 km (0.4 and 0.6 miles) to the southeast of the project site.

Archival Research

SWCA's archival research included a review of historical maps for the project site and vicinity and focused on documenting modifications to the physical setting and identifying any potential natural or artificial features with relevance to use by Native Americans (e.g., stream courses, vegetation, historical topography, roads, habitation markers) or use of the location by non-Native American people in the Historic period. One important landmark was the *brea* ("tar") pits, now known as the La Brea Tar Pits, located 1.6 km (1.0 mile) south of the project site. Asphaltum—the naturally formed substance found in seeps—was an important resource to Native American populations, who used it as a binding and waterproofing element. The asphaltum at the La Brea Tar Pits would have been accessed via footpaths from neighboring camp and village sites, including Yaanga and Geveronga, located east of the project site. Though no reliable maps exist showing the precise location of such Native American travel routes, it is likely that many of the routes designated by the Spanish, Mexican, and American inhabitants followed some of the same alignments. The Kirkman-Harriman map (Kirkman 1938) illustrates this pattern of historically significant points connected by travel corridors composed of superimposed paths from multiple time periods. Outside the project site, Kirkman's map depicts a number of pathways including "Camino Real" 2.6 miles (4.2 km) to the north—the road connecting the nearby Spanish missions and Los Angeles Pueblo—and two parallel east-west routes—Portolá Expedition and "La Brea Road"—between 0.3 and 0.4 miles (0.5 and 0.6 km) to the south (Kirkman 1938).

Review of a Sanborn Fire Insurance map, newspaper articles, and building permits document the development of the project site as an industrial and commercial block within La Brea and its conversion to its current use as a commercial building and parking lot. Before the 1900s the property was primarily grazing land, but by 1920 topographic maps and aerial photographs show the project site heavily developed with oil wells drilling for the Salt Lake Oil Field. By 1926 most of the oil derricks had been removed and some buildings begin to appear on maps. The first Sanborn Fire Insurance maps showing the project site were published in 1926 and show the lot composing the block as undeveloped. The 1950 Sanborn maps show the existence of the Town & County Market taking up the entire block.

Sacred Lands File Search

On July 16, 2018, SWCA received the results of a Sacred Lands File (SLF) search from the NAHC. The NAHC letter indicated negative results.

AB 52 Notification and Consultation

DCP submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. One response has been received from the Gabrieleño Band of Mission Indians–Kizh Nation who stated that the project is located in a highly sensitive area and that the project site is located in the area formerly known as Rancho La Brea, which was also an important landscape for the native Gabrielino prior to the rancho era (i.e., Spanish and Mexican Periods). DCP completed consultation with the Gabrieleño Band of Mission Indians–Kizh Nation. No substantial evidence was submitted indicating that a tribal cultural resource is located within the project site.

TRIBAL CULTURAL RESOURCES SENSITIVITY

Known Resources within the Project API

There are no known tribal cultural resources within the Project API.

Potential Resources within the Project API

The tribal cultural resources study of the Project API (Millington et al. 2020) found the Project API was sensitive for the presence of tribal cultural resources, based on several lines of evidence. A CHRIS records search and archival research identified 12 previously recorded cultural resources within a 0.8-km (0.5-mile) radius of the project site. None of the resources were located directly within the project site or API. Site P-19-000159 includes Native American human remains, commonly known as the La Brea Woman, recovered in 1915 from asphalt seeps in the La Brea Tar Pits 0.7 km (0.4 miles) to the southeast of the project site. Site P-19-000159 has not been specifically assessed as a tribal cultural resource but likely meets the criteria. The NAHC's SLF results were negative. The letter notes that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area. DCP submitted notification letters to the tribal parties listed on the AB 52 Consultation Notification List. One response has been received from the Gabrieleño Band of Mission Indians–Kizh Nation who stated that the project is located in a highly sensitive area and that the project site is located in the area formerly known as Rancho La Brea, which was also an important landscape for the native Gabrielino prior to the rancho era (i.e., Spanish and Mexican Periods).

The nearest named villages to the project site are all located between 9.5 and 12 km (5.9 and 7.5 miles) of the project site. Other unnamed Native American settlements have been documented approximately 4.5 km (2.8 miles) south of the project site along the former course of the Los Angeles River (now Ballona Creek). The La Brea Tar Pits served as an important source of asphaltum for Native Americans dating back at least 10,000 years. Other water features including perennial springs and small wetlands are known to have existed along the southeast-facing toeslopes of the Santa Monica Mountains within approximately 3 to 5 km (1.9 to 3.1 miles) of the project site would have been frequented by Native Americans. Middle and late-twentieth century maps show a relatively small south-flowing stream was once located approximately 300 (984 feet) to the west. The stream appears to have been intermittent or ephemeral and only contained water during the wet season for short periods of time. The proximity to these natural resources, especially the asphaltum source, suggests an increased level of sensitivity for tribal cultural resources above background levels, especially remains from resources such as temporary camps, which can be identified by the presence of flaked stone tools, tool-making debris, stone milling tools, shell, fire-altered rock, and sediment discoloration or carbonization.

Archival research documents the land-use history of the project site and its transitions from use in livestock grazing in the middle nineteenth century, to industrial properties in the 1890s, and primarily commercial uses by the 1940s. As part of James Thompson's leased ranch land, the project site appears to have been used primarily for livestock grazing, most likely sheep, but potentially cattle as well. Maps created in 1870 and 1880 map show a south-flowing stream located approximately 300 m (984 feet) west of the project site. Any artifacts or features associated Native American activities that may have been present on the surface within the project site would have likely been disturbed but may have remained in place or been buried.

The record of industrial uses on the project site originated in 1890s with the discovery of the Salt Lake Oil Field and development under ownership of Arthur Gilmore. The Gilmore Oil Company constructed at least two wells in the project site, as well as three storage tanks and associated structures. The Gilmore Oil fields operation remained in this location through most of the early twentieth century, and although they continued to own the land until the 1940s, oil operations ended in the 1920s. Aerial photographs from the late 1920s show wide-spread ground disturbances to the project site resulting from the oil operation, which included

the excavation of the wells and storage tanks and extensive grading for creation of the structures and vehicle travel. In the early 1940s to build the Town & Country Market commercial complex and associated parking lots. At this point any Native American objects or features on the surface or shallowly buried within the project site or API are likely to have been severely disturbed or destroyed, leaving only the possibility for deeply buried deposits.

Geotechnical boring identified 1.5 m (5.0 feet) of fill described as loose silty sand atop natural alluvial sediments extending to at least a depth of 30.6 m (100.5 feet). There were no asphaltum materials in these borings. Tribal cultural resources can occur in artificial fill or other “disturbed” (i.e., non-native) soils, though intact deposits more likely to retain their significance when they are recovered from native soils. Generally, depositional environmental composed of alluvial sediments are favorable for the preservation of tribal cultural resources, but small-scale variations in erosional patterns and historical disturbances must be considered when determining the sensitivity.

It is possible that deeply buried tribal cultural resources can occur within the alluvial sediments identified below the artificial fill. Given the increased level of sensitivity in the vicinity, based on proximity to an important asphaltum source and site with Prehistoric-period human remains at the La Brea Tar Pits, SWCA found the project site and API have sensitivity for containing tribal cultural resources.

Potential Types of Tribal Cultural Resources

While not all tribal cultural resources are archaeological in nature, those most likely to occur within the Project API is an archaeological object, feature, or site affiliated with Native Americans—physical remains created by the past activities of Native American people. This includes activities from various time periods commonly referred to as prehistoric (prior to A.D. 1542), protohistoric (1542–1771), and ethnohistoric (1771–ca. 1845). These materials can occur as isolated occurrences or clusters of artifacts, features, and human burials, and include, but are not limited to the following:

- Artifacts (projectile points, ceramics, shell beads, etc.)
- Habitations (house pit depressions, midden deposits, fire-affected rock, heat-treated rock, cemeteries, etc.)
- Features (hearths, stone features, artifact caches, etc.)
- Human remains (burials, cremations, or isolated skeletal fragments)

MONITORING AND FIELD METHODS

Worker Training

Pursuant to project MM-TCR-2, prior to the commencement of project ground disturbance, a qualified archaeologist shall present a Tribal Cultural Resources Worker Environmental Awareness Training (WEAP) to project construction personnel. The training may be presented at the pre-grade meeting, and it shall include detailed procedures for the identification and assessment of tribal cultural resources. The archaeologist shall inform project personnel about the types of resources that could be encountered and procedures to follow in the event of a tribal cultural discovery (or discovery of a potential tribal cultural resource), as well as the potential penalties for failing to adhere to applicable laws and regulations.

The qualified archaeologist, which is defined as an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology, should present the tribal cultural resources worker training at the tailgate safety meeting prior to the start of excavations. The procedures outlined by the

qualified archaeologist will permit a significance evaluation and recovery, if necessary, in a manner that avoids or minimizes construction delays. The monitor will discuss and give a brief presentation with photos of the resources and definitions of what tribal cultural resources are and what protocol to follow when working with the archaeological during construction.

Monitoring Methods

Pursuant to project MM CR-4, an archaeologist working under the supervision of a principal investigator who is a qualified archaeologist, will be present to monitor all ground-disturbing construction activities in soils that are likely to contain potentially tribal cultural resources, as determined by the qualified archaeologist. The monitor will have the authority to temporarily halt or redirect construction activities if a tribal cultural resource or a something that may be a tribal cultural resource is identified. The monitor shall complete a daily log documenting construction activities and observations. The qualified archaeologist, with the consent of the City of Los Angeles, shall have the authority to reduce the level of monitoring based upon field observations.

This monitoring will consist of directly watching the excavation and earth-moving activities for the entirety of each workday. Activities to be monitored include, but not be limited to, excavation, trenching, boring, and grading. Monitoring will continue until construction involving ground disturbance is complete, or the principal investigator concludes that there is no continuing potential for encountering tribal cultural resources.

In the event that a tribal cultural resource or a potential tribal cultural resource is exposed during construction, whether or not a monitor is present, work in the immediate vicinity of the find (within 8 meters [m] [25 feet]) will stop until a qualified archaeologist can evaluate the find and assess whether the find is affiliated with Native Americans and may meet the criteria to be considered a tribal cultural resource. Construction activities may continue in other areas. If a tribal cultural resource or a suspected tribal cultural resource is discovered during monitoring, the monitor will temporarily halt or divert excavation equipment to examine the find. If the monitoring archaeologist suspects that a tribal cultural resource may have been encountered, the piece of equipment that encounters the suspected deposit shall be stopped or diverted to another work area, and the excavation inspected by the monitoring archaeologist.

Assessing Inadvertent Discoveries

Any discovery that appears to be Native American in origin will be assessed by the principal investigator as a potential tribal cultural resource. If the discovery proves significant under CEQA or otherwise appears to meet the definition of a tribal cultural resource, the City will contact a representative from a culturally affiliated California Native American tribe within 24 hours from the time that the principal investigator determines that the find is or may be a tribal cultural resource. The Gabrieleño Band of Mission Indians-Kizh Nation have requested to be notified in the event of a discovery and will be contacted first. If the Gabrieleño Band of Mission Indians-Kizh Nation do not respond within 48 no response has been received, another contact from the City's AB 52 notification list will be contacted. The consulting tribe will coordinate with the project applicant, City, and principal investigator and develop plans for testing, evaluation, preservation, treatment, curation, or mitigation, as appropriate. If resource avoidance is not possible, data recovery may be required to reduce potential impacts to less than significant. If the principal investigator determines that the discovery is non-significant or non-cultural in origin, work shall resume immediately following basic documentation.

Treatment of Human Remains

Pursuant to project MM CR-6 and in accordance with Section 7050.5 of the California HSC and Section 5097.98 of the PRC, if human remains are encountered during construction, whether or not an

archaeological monitor is present, work in the immediate vicinity of the find (within 8 m [25 feet]) shall stop and no further disturbance shall occur. If the principal investigator determines that a discovery includes human remains:

1. The Project Supervisor or his or her authorized representative (usually the principal investigator) would contact the Los Angeles County Coroner:

Los Angeles County Department of Coroner

Main Phone: 323-343-0512

After Hours Phone: 323-343-0714

1104 N. Mission Road

Los Angeles, California 90033

<http://coroner.co.la.ca.us/htm/intro.cfm>

2. The principal investigator would notify the Project Supervisor and, as a courtesy, if the discovery may be ancient, prehistoric, or historic Native American remains, would notify the NAHC:

Native American Heritage Commission

Phone: 916-653-4082

1550 Harbor Blvd., Room 100

West Sacramento, California 9569

Email: nahc@nahc.ca.gov

The Coroner would have two working days to examine the remains after being notified in accordance with HSC 7050.5. If the Coroner determines that the remains are Native American and are not subject to the Coroner's authority, the Coroner has 24 hours to notify the NAHC of the discovery.

3. The NAHC would immediately designate and notify the Native American MLD, who will have 48 hours after being granted access to the location of the remains to inspect them and make recommendations for their treatment and disposition. Work will be suspended in the area of the find until the Project Supervisor approves the proposed treatment of the human remains.

Resource Evaluation and Recordation

All potential tribal cultural resources identified during monitoring that are archaeological in nature would be evaluated for listing on the CRHR. If such a potential tribal cultural resource is identified and the data potential and significance of a newly identified resource is unclear and will benefit from the systematic collection and analysis of data, a plan for subsurface testing would be instituted by the principal investigator in consultation with a culturally affiliated California Native American tribe. The proposed testing plan may include systematic placement of appropriate excavation units (e.g., controlled shovel test pits, 1 × 1-meter test units, etc.) depending on the nature and extent of the deposit. The need for a tribal representative to monitor the evaluation and recording will also be determined based on tribal input.

Fieldwork, which would be conducted by archaeological field technicians under the supervision of the archaeological field director, would include establishment of a site datum, recordation of surface artifacts within the site, and excavation following the testing plan. Depending on the nature and content of the site, it may be appropriate to collect and analyze special samples for laboratory analysis (e.g., pollen, protein residue, radiocarbon dating, obsidian sourcing). Artifacts from the excavation would be collected for laboratory analysis and cataloged. Significant and/or diagnostic artifacts will be collected for analysis and eventual curation. The results of the evaluation program would be presented in a detailed technical report following Archaeological Resource Management Report (ARMR) guidelines (OHP 1990) that addresses research questions and assesses the CRHR-eligibility of the site. Photographs would be taken to document

the site condition and any features, and a handheld global positioning system (GPS) receiver with submeter accuracy would be used to record the locational data of the site, excavation units, surface artifacts, and features.

All tribal cultural resources (as defined above) that are encountered in the course of the monitoring will be recorded by field technicians under the supervision of the field director and principal investigator. These resources will be appropriately recorded on California Department of Parks and Recreation (DPR) series 523 primary and detail forms, mapped, and photographed. This minimal level of documentation is required for all tribal cultural resources that are archaeological in nature, including those that do not appear to be eligible for CRHR listing. The mapping of any sites, features, or artifacts that are encountered during monitoring would be accomplished using a handheld GPS receiver with submeter accuracy, or a more precise mapping tool. Any tribal cultural resources that are encountered would be photographically documented using a digital camera.

Resource Avoidance or Data Recovery

Any tribal cultural resource as defined by CEQA should be avoided by project design where possible. Avoidance measures might include using flagging and/or fencing under the guidance of archaeological and possibly tribal monitors to clearly demarcate resource boundaries and restrict construction equipment access, as well as stronger measures such as relocating project components or capping buried resources with a protective layer of soil.

Significant resources that cannot be avoided by access restriction or project design would be subject to mitigative treatment to reduce project-related impacts to a less than significant level. Such mitigative treatment (e.g., data recovery) would require the preparation of a research design by the principal investigator based upon the findings of the site evaluation. Although such a research design must be tailored to the particular resource type that is encountered, a basic data recovery research framework is presented here. The data recovery effort for significant discoveries would be conducted by field technicians under the supervision of the field director. This effort would, at minimum, include the following components:

1. Defining the horizontal and vertical boundaries of the deposit through intensive surface mapping and subsurface testing.
2. Defining the stratigraphic relationships and depth of the deposit through subsurface testing.
3. Investigating the content of the deposit, particularly the date range and information potential, by means of subsurface testing.
4. Exposure and collection of a representative sample of the resource's constituent features and artifacts.
5. Analysis of recovered artifacts, ecofacts, and other samples by qualified specialists. These analyses may include, but are not limited to, the following studies: radiocarbon dating, obsidian sourcing, obsidian hydration dating, flaked stone analysis, ground stone analysis, ceramic sourcing studies, faunal analysis, paleobotanical analysis, and pollen analysis.

Artifact Collection, Retention/Disposal, and Curation

Collection of tribal cultural resources may be collected for analysis pursuant to a research design created to mitigate a significant discovery. The research design will govern the retention or disposal of archaeological materials as well as related curation policies. As identified in the research design, significant and/or

diagnostic artifacts would be collected for analysis and curated. Any such collection protocol would be subject to review by the consulting tribal party.

All material retained as a result of the investigations (e.g., survey, testing, data recovery) pursuant to the research design would be cataloged, subjected to appropriate analyses by laboratory technicians under the supervision of the principal investigator, and significant and/or diagnostic artifacts prepared for eventual curation in accordance with the State of California Resources Agency *Guidelines for the Curation of Archaeological Collections* (OHP 1993).

Reporting

Pursuant to project MM CR-4, the results of the monitoring, including any tribal cultural resources evaluation and data recovery that has been undertaken, shall be documented in a monitoring report that shall be submitted to the City of Los Angeles within 180 days of the last day of archaeological fieldwork. Recovered cultural materials that are considered to be significant by the qualified archaeologist, in consultation with a culturally affiliated California Native American tribe, shall be curated at an appropriate facility that will ensure their long-term preservation and will allow access to interested scholars or other interested parties. All recommended measures shall be undertaken under the direction of a qualified archaeologist. A qualified archaeologist is defined as an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology.

The technical report of the study's findings will be prepared by the project's archaeologists under the direction of a qualified principal investigator. The report will incorporate a discussion of the scope, location, methodology, and results of the tribal cultural resources monitoring. The technical report will follow the State of California Office of Historic Preservation's *Archaeological Resource Management Reports (ARMR): Recommended Contents and Format* (OHP 1990). This report will contain any required DPR forms in an appendix and will be submitted to the County for approval. A final version of this report will be provided to the South Central Coastal Information Center (SCCIC) for its permanent record.

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Appendix A

Worker Training Protocol and Program



3RD AND FAIRFAX MIXED-USE PROJECT

Archaeological and Tribal Cultural Resources Worker Training

PREPARED FOR

Holland Partner Group

PREPARED BY

SWCA ENVIRONMENTAL CONSULTANTS



ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES

What Are Archaeological Resources?

Archaeological resources, also known as cultural resources, are the physical evidence of past human activities, including prehistoric and historic archaeological sites, architectural buildings or structures, and objects of traditional cultural or religious importance to cultural groups. These items can be relatively recent (from the last century) or very old (thousands of years old). Some archaeological resources can also be a tribal cultural resource.

What Are Tribal Cultural Resources?

Tribal cultural resources are defined by law as: sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a tribe that are listed, or determined to be eligible for listing, in the national or state register of historical resources, or listed in a local register of historic resources. A tribal cultural resource could be an archaeological resource if it is affiliated with Native Americans, but some are non-archaeological in nature, and identifying whether something is a tribal cultural resource may require consultation with a Native American tribal member.

Why is Preserving and Documenting Archaeological and Tribal Cultural Resources Important?

- History is written by individuals with their own inherent biases, perspectives, and agendas, archaeology can be used to confirm or contradict or otherwise enhance the historical record.
- Every archaeological site is a piece in the great puzzle to reconstruct, interpret, and learn from the past. Once an archaeological site is destroyed, that information is gone forever!

Applicable Laws and Regulations Protecting Archaeological and Tribal Cultural Resources

CEQA and California Public Resources Code

Sections 5024.1, 5097.5, 5097.9, 5097.99, 21083.2, and 21084.1

California Health and Safety Code

Section 7050.5 - The discovery of human remains must be properly reported.

ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES

Monitoring Protocol

Archaeological Monitors will be on site during excavations in sediments not previously disturbed by construction associated with this project.

- If a monitor observes an artifact or feature, they will signal the operator to cease work in the immediate area (temporary work stoppage).
- Generally, work outside of a 25' buffer can continue.
- The monitor will mark the area with flagging while he or she evaluates and salvages the find as quickly as possible in order to minimize construction delays.
- Should archaeological or a potential tribal cultural resource be encountered on the project and a monitor is not present, notify the construction supervisor, and Principal Investigator immediately.
- When evaluation of the find is complete, the monitor or the Principal Investigator will inform construction personnel that work can resume.
- If a find is considered significant, a stop work order may be issued by the Principal Investigator and additional investigation may be needed.
- If a find is considered to be a possible tribal cultural resource, a stop work order may be issued by the Principal Investigator and consultation with a culturally affiliated California Native American tribe will be assessed.

Archaeological Mitigation Measures

- Prepare **Archaeological Resources Mitigation and Monitoring Plan** to guide the archaeological monitoring
- Archaeological Resources **worker training** prior to construction
- **Archaeological monitoring** during ground-disturbing activities in areas likely to contain potentially significant archaeological resources
- In the **event of archaeological discovery**, work will cease within 25 feet of the find until a qualified archaeologist can evaluate the find.
- **Discovery of human remains** will be immediately reported and the county coroner will be contacted and all appropriate state and local laws will be followed.

Tribal Cultural Resources Mitigation Measures

- Prepare **Tribal Cultural Resources Mitigation and Monitoring Plan** to guide the monitoring
- Tribal cultural resources **worker training** prior to construction
- **Tribal cultural resource monitoring** during ground-disturbing activities in areas likely to contain potentially significant archaeological resources
- In the **event of a tribal cultural resources discovery**, work will cease within 25 feet of the find until a qualified archaeologist can assess the find, which may require consultation with a culturally affiliated California Native American tribe.

PREHISTORIC ARCHAEOLOGICAL SITES AND TRIBAL CULTURAL RESOURCES

Artifacts

- Arrowheads
- Stone flakes
- Manos and metates, mortars and pestles

Features

- Bone awls
- Shell beads
- Pottery
- Hearths (fire affected rock)
- Bed rock mortars
- Rock art

ARROWHEAD



HEARTH



BED ROCK MORTARS



STONE FLAKES



GROUNDSTONE ARTIFACTS



SHELL BEADS



BONE AWL



NATIVE AMERICAN POTTERY



MANO AND METATE



HISTORIC ARCHAEOLOGICAL SITES

Artifacts

- Household pottery
- Building materials such as bricks, tiles, window glass, and wood
- Consumer items such as glass bottles and jars, and metal cans
- Clothing parts such as buckles, buttons, and clasps
- Hardware such as wire, machine parts, light bulbs, nails, screws, and railroad spikes
- Horse tack such as horseshoes and bridle parts
- Tools and automobile parts
- Food remains, including animal bones

Historic features may also be present within the Project Area

- Cobble footings, concrete foundations, masonry features, old plank roads.
- Also watch for concentrations of historic-era artifacts

BUTTONS, CERAMIC, & SHELL BUTTONS



HOUSEHOLD POTTERY



BOTTLES, INSULATOR, & BRICK



ANIMAL BONES



HORSE BRIDLE PARTS



STRUCTURAL REMAINS





ARCHAEOLOGICAL AND TRIBAL CULTURAL RESOURCES DISCOVERY

There Are Four Steps You Should Take If You Find An Archaeological Resource Or Tribal Cultural Resource, Including Something You Suspect Could Be One:

1. Stop Work

Stop work in the immediate area.

2. Do Not Touch

Do not touch, move, or disturb it in any way. The object's position in the ground provides data vitally important to archaeologists.

3. Mark the Area with Flagging

Mark the area with flagging to make sure no one else working in the area disturbs the find.

4. Immediately Contact an Archaeological Resources Monitor or Supervisor

Immediately contact an archaeological resources monitor or supervisor. The monitor will examine the find, document and evaluate, and inform your supervisor when to resume work in the area.

Things To Remember

- You are part of our compliance team and we need your help in protecting California's cultural heritage.
- Show respect for any Native American Tribal members and their rich cultural heritage.
- If you think you see an artifact or a feature, let your supervisor and the archaeological resources monitor know.
- Do not inspect, pick up, or pocket any artifacts; doing so will be considered an illegal act and penalties may include fines and or jail time.
- Once a prehistoric or historic object, structure, or place has been destroyed, it can never be replaced.

Contacts

ARCHAEOLOGICAL RESOURCES PRINCIPAL INVESTIGATOR

Chris Millington

626.489.3673

Contact cards with contact information for Archaeological Resources Monitors will be provided during construction and updated as necessary.