

Archaeological Resources Report

November 17, 2020

Eyestone Environmental 2121 Rosecrans Avenue, Suite 3355 El Segundo, California 90245 Contact: Stephanie Eyestone-Jones

Subject: Archaeological Resources Report for the Angels Landing Project, Los Angeles City, Los Angeles County, California – Negative Findings

Dear Ms. Eyestone-Jones:

This report documents the negative findings associated with the archeological resources inventory conducted by Dudek for the Angels Landing Project (proposed Project), located in Downtown Los Angeles. The City of Los Angeles (City) is the lead agency responsible for compliance with the California Environmental Quality Act (CEQA) for environmental review of the Project. All archaeological resource fieldwork and reporting for the proposed Project has been conducted by archaeologists meeting the Secretary of the Interior's Professional Qualifications Standards. A Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search did not suggest the presence of any Native American cultural resources. A California Historical Resources Information System (CHRIS) records search completed at the South Central Coastal Information Center (SCCIC) indicated that no archaeological and built-environment resources have been recorded within the proposed Project site. No archaeological resources were identified as a result of the pedestrian survey of the proposed Project site.

## **PROJECT LOCATION**

The proposed Project site is located in the Central City Community Plan Area of the City of Los Angeles, approximately 13 miles east of the Pacific Ocean in Section 28 of public land survey system (PLSS) Township 1 South, Range 13 West as shown on the *Los Angeles*, CA 7.5-minute USGS Quadrangle (Attachment A, Figure 1). The proposed Project site is located at 332, 350, and 358 South Olive Street, 351 and 361 South Hill Street, and 417 and 425 West 4th Street. The proposed Project is approximately 97,631 square feet of lot area (2.24 acres) and includes Assessor's Parcel Number (APN) 5149-010-951. The proposed Project site is situated within a commercial zone and is bound on the east by South Hill Street, on the south by West 4th Street,

on the west by South Olive Street, and the Angels Flight Railway on the north (Attachment A, Figure 2).

#### PROJECT DESCRIPTION

The Project would involve a two-tower mixed-use development consisting of: 180 residential for-sale condominium units; 252 residential apartments (including a mix of market rate and affordable units); two hotels with a combined total of 515 guest rooms, restaurants, ballrooms, meeting rooms, and amenities (fitness/spa); and 72,091 square feet of general commercial (retail/restaurant) uses. The proposed uses would be distributed through a series of terraced levels in a podium structure and two towers (Tower A and Tower B) that would be constructed above a three-level subterranean parking garage. The Project would also provide public and private open space areas totaling 56,881 square feet. The Project would result in up to 1,269,150 square feet of floor area or a floor area ratio (FAR) of approximately 13:1.

Tower A would include 63 floors with a building height of up to 854 feet. Tower B would include 42 floors with a building height of up to 494 feet. Tower A and Tower B would be built on a podium structure over a three-level subterranean parking garage to a depth of approximately 70 feet below ground surface as measured from the elevation of Hill Street adjacent to the Project site. The existing Los Angeles County Metropolitan Transportation Authority (Metro) Red/Purple Lines Pershing Square Station portal would be maintained on-site. The Project would require the removal of existing landscaping and the excavation and export of approximately 334,000 cubic yards of soil.

## REGULATORY CONTEXT

This section includes a discussion of the applicable state laws, ordinances, regulations, and standards governing cultural resources, which must be adhered to before and during construction of the proposed Project.

## **State**

## The California Register of Historical Resources (CRHR)

In California, the term "historical resource" includes, but is not limited to, "any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California" (California Public Resources Code (PRC), Section 5020.1(j)). In 1992, the California legislature established the California Register of Historical Resources (CRHR) "to be used by state and local agencies, private

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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 Section 5024.1(a)). The criteria for listing resources on the CRHR were expressly developed to be in accordance with previously established criteria developed for listing in the National Register of Historic Places (NRHP), enumerated below. According to PRC Section 5024.1(c)(1–4), a resource is considered historically significant if it (i) retains "substantial integrity," and (ii) meets at least one of the following criteria:

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

In order to understand the historic importance of a resource, sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource. A resource less than 50 years old may be considered for listing in the CRHR if it can be demonstrated that sufficient time has passed to understand its historical importance (see 14 California Code of Regulations [CCR] 4852(d)(2)).

The CRHR protects cultural resources by requiring evaluations of the significance of prehistoric and historic resources. The criteria for the CRHR are nearly identical to those for the NRHP, and properties listed or formally designated as eligible for listing in the NRHP are automatically listed in the CRHR, as are the state landmarks and points of interest. The CRHR also includes properties designated under local ordinances or identified through local historical resource surveys.

# California Environmental Quality Act

As described further, the following CEQA statutes (PRC Section 21000 et seq.) and CEQA Guidelines (14 CCR 15000 et seq.) are of relevance to the analysis of archaeological, historic, and tribal cultural resources (TCRs):

- PRC Section 21083.2(g) defines "unique archaeological resource."
- PRC Section 21084.1 and CEQA Guidelines Section 15064.5(a) defines "historical resources." In addition, CEQA Guidelines Section 15064.5(b) defines the phrase "substantial adverse change in the significance of an historical resource"; it also defines

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the circumstances when a project would materially impair the significance of a historical resource.

- PRC Section 21074(a) defines "tribal cultural resources."
- PRC Section 5097.98 and CEQA Guidelines Section 15064.5(e) set forth standards and steps to be employed following the accidental discovery of human remains in any location other than a dedicated ceremony.
- PRC Sections 21083.2(b) and 21083.2(c) and CEQA Guidelines Section 15126.4 provide information regarding the mitigation framework for archaeological and historic resources, including examples of preservation-in-place mitigation measures. Preservation in place is the preferred manner of mitigating impacts to significant archaeological sites because it maintains the relationship between artifacts and the archaeological context, and may also help avoid conflict with religious or cultural values of groups associated with the archaeological site(s).

More specifically, under CEQA, a project may have a significant effect on the environment if it may cause "a substantial adverse change in the significance of an historical resource" (PRC Section 21084.1; CEQA Guidelines Section 15064.5(b)). If a site is listed or eligible for listing in the CRHR, or included in a local register of historic resources, or identified as significant in a historical resources survey (meeting the requirements of PRC Section 5024.1(q)), it is an "historical resource" and is presumed to be historically or culturally significant for purposes of CEQA (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)). The lead agency is not precluded from determining that a resource is a historical resource even if it does not fall within this presumption (PRC Section 21084.1; CEQA Guidelines Section 15064.5(a)).

A "substantial adverse change in the significance of an historical resource" reflecting a significant effect under CEQA means "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (CEQA Guidelines Section 15064.5(b)(1); PRC Section 5020.1(q)). In turn, the significance of a historical resource is materially impaired when a project does any of the following:

- (1) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- (2) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to Section 5020.1(k) of the PRC or its identification in an historical resources survey meeting the

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(3) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register as determined by a lead agency for purposes of CEQA (CEQA Guidelines Section 15064.5(b)(2)).

Pursuant to these sections, the CEQA inquiry begins with evaluating whether a project site contains any "historical resources," then evaluates whether that project will cause a substantial adverse change in the significance of a historical resource such that the resource's historical significance is materially impaired.

If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that they cannot be left undisturbed, mitigation measures are required (PRC Sections 21083.2(a)–(c)).

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

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person (PRC Section 21083.2(g)).

Impacts on non-unique archaeological resources are generally not considered a significant environmental impact (PRC Section 21083.2(a); CEQA Guidelines Section 15064.5(c)(4)). However, if a non-unique archaeological resource qualifies as a TCR (PRC Sections 21074(c) and 21083.2(h)), further consideration of significant impacts is required.

CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. As described below, these procedures are detailed in PRC Section 5097.98.

# California State Assembly Bill 52 (AB 52)

AB 52 of 2014 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. AB 52 established that TCRs must be considered under CEQA and also provided for additional Native American consultation requirements for the lead agency. Section 21074 describes a TCR as a site, feature, place, cultural landscape, sacred place, or object that is considered of cultural value to a California Native American Tribe and that is either:

- On or determined to be eligible for the California Register of Historical Resources or a local historic register; or
- 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.

AB 52 formalizes the lead agency–tribal consultation process, requiring the lead agency to initiate consultation with California Native American groups that are traditionally and culturally affiliated with the project site, including tribes that may not be federally recognized. Lead agencies are required to begin consultation prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report.

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 TCRs 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]).

# California Health and Safety Code Section 7050.5

California law protects Native American burials, skeletal remains, and associated grave goods, regardless of their antiquity, and provides for the sensitive treatment and disposition of those remains. California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner has examined the remains (Section 7050.5(b)). PRC Section 5097.98 also outlines the process to be followed in the event that remains are discovered. If the coroner determines or has reason to believe the remains are those of a Native American, the coroner must contact NAHC

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within 24 hours (Section 7050.5(c)). NAHC will notify the "most likely descendant." With the permission of the landowner, the most likely descendant may inspect the site of discovery. The inspection must be completed within 48 hours of notification of the most likely descendant by NAHC. The most likely descendant may recommend means of treating or disposing of, with appropriate dignity, the human remains and items associated with Native Americans.

# **Local Regulations**

# Los Angeles Historic-Cultural Monuments

Local landmarks in the City of Los Angeles are known as Historic-Cultural Monument (HCMs) and are under the aegis of the Planning Department, Office of Historic Resources. They are defined in the Cultural Heritage Ordinance as follows (Los Angeles Municipal Code Section 22.171.7, added by Ordinance No. 178,402, effective April 2, 2007):

Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age.

This definition has been broken down into four HCM designation criteria that closely parallel the existing NRHP and CRHR criteria – the HCM:

- 1. Is identified with important events in the main currents of national, State or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or
- 2. Is associated with the lives of Historic Personages important to national, state, city, or local history; or
- 3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values; or

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4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

# Permits for Historical and Cultural Buildings

Regarding effects on federal and locally significant properties, the Los Angeles Municipal Code states the following (Section 91.106.4.5, Permits for Historical and Cultural Buildings):

The department shall not issue a permit to demolish, alter or remove a building or structure of historical, archaeological or architectural consequence if such building or structure has been officially designated, or has been determined by state or federal action to be eligible for designation, on the National Register of Historic Places, or has been included on the City of Los Angeles list of historic cultural monuments, without the department having first determined whether the demolition, alteration or removal may result in the loss of or serious damage to a significant historical or cultural asset. If the department determines that such loss or damage may occur, the applicant shall file an application and pay all fees for the California Environmental Quality Act Initial Study and Check List, as specified in Section 19.05 of the Los Angeles Municipal Code. If the Initial Study and Check List identifies the historical or cultural asset as significant, the permit shall not be issued without the department first finding that specific economic, social or other considerations make infeasible the preservation of the building or structure.

## **BACKGROUND RESEARCH**

### **SCCIC Records Search**

On April 30, 2018, Dudek completed a CHRIS search at the SCCIC, located on the campus of California State University, Fullerton of the proposed Project site and a 0.5 mile records search area. This search included mapped prehistoric, historical, and built-environment resources; Department of Parks and Recreation (DPR) site records; technical reports; archival resources; and ethnographic references. The confidential records search results are also provided in Attachment B.

# Previously Conducted Cultural Resource Studies

Results of the cultural resources records search indicated that 90 previous cultural resources studies have been conducted within 0.5-mile of the proposed Project site between 1992 and 2017 (Table 1). Of these, six intersect or overlap the proposed Project site and one is adjacent. Table 1, below,

summarizes all 90 previous studies followed by a brief summary of each study that overlaps or intersects the proposed Project site.

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-00361	Stickel, Gary E.	1976	Environmental Impact Assessment Shell Oil Company Pipeline Pier E, Berth 118 to Wilmington Refinery	Outside
LA-00449	Desautels, Roger J.	1978	Archaeological Survey Report on Tentative Tract # 35190 Located in the Pacific Palisades Area of the County of Los Angeles	Outside
LA-00483	Greenwood, Roberta S.	1978	Archaeological Resources Survey the Proposed Downtown People Mover Project Corridor Area	Intersecting
LA-01162	Van Horn, David M.	1980	Archaeological Survey Report: the Site of the New Southern Regional Library Compact Shelving Facility at UCLA	Outside
LA-01471	Love, Bruce	1985	Barrel Springs Site on the California Aqueduct	Outside
LA-01577	Anonymous	1985	Identification Study for Cultural Resources Within Proposed Metro Rail Subway Station Locations in Metropolitan Los Angeles, Ca	Outside
LA-01578	Anonymous	1983	Technical Report Archaeological Resources Los Angeles Rapid Rail Transit Project Draft Environmental Impact Statement and Environmental Impact Report	Outside
LA-01642	Costello, Julia G.	1980	Los Angeles Downtown People Mover Program Archaeological Resources Survey: Phase II Evaluation of Significance and Recommendations for Future Actions	Intersecting
LA-01643	Costello, Julia G.	1981	Los Angeles Downtown People Mover Program Archaeological Resources Survey Phase 3	Intersecting
LA-01741	Dillon, Brian D.	1989	Archaeological and Paleontological Reconnaissance and Impact Evaluation of the Central City West Study Area Los Angeles, California	Outside
LA-01834	Foster, John M.	1989	Cultural Resource Investigation Tentative Minor Land Division Map No. 21243, Los Angeles County	Outside
LA-03103	Greenwood, Roberta S.	1993	Cultural Resources Impact Mitigation Program Angeles Metro Red Line Segment 1	Intersecting
LA-03496	Anonymous		Draft Environmental Impact Report Transit Corridor Specific Plan Park Mile Specific Plan Amendments	Outside
LA-03668	Dillon, Brian D.	1997	St. Vibiana's Cathedral Los Angeles, California	Outside
LA-03818	Conkling, Steven and Sturm, Brad	1997	Final Report, National Register of Historic Places, Evaluation for the Proposed Mount San Antonio Historic Mining District, Angeles National Forest, La County, Ca.	Outside
LA-03910	Frierman, Jay D.	1983	Monitoring the Restoration and Rehabilitation of the Sepulveda Block 622-624 North Main Street El Pueblo De Los Angeles State Historic Park	Outside

SCCIC Report	Authors	Date	Title	Proximity to
No.				Project Site
LA-04106	McIntyre, Michael J.	1996	Bouquet Fire Suppression and Rehab, Los Angeles County	Outside
LA-04214	Conkling, Steven W.	1998	Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R106, Near West Fourth Street and South Hill Street, City and County of Los Angeles	Adjacent
LA-04215	Conkling, Steven W.	1998	Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R104, Near West Third Street and South Grand Avenue, City and County of Los Angeles	Outside
LA-04237	Conkling, Steven W.	1998	Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R105, at the Intersection of West Third Street and South Spring Street, City and County of Los Angeles	Outside
LA-04238	Conkling, Steven W.	1998	Results of Cultural Resources Monitoring, L.A. Cellular Cell Site R107, at the Intersection of West First Street and South Hill Street, City and County of Los Angeles	Outside
LA-04448	Richard Starzak	1994	Section 106 Documentation for the Metro Rail Red Line East Extension in the City and County of Los Angeles, California	Outside
LA-04742	Lapin, Philippe	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 263-01, County of Los Angeles, California	Outside
LA-04834	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Anaheim, Los Angeles and Orange Counties	Outside
LA-04835	Ashkar, Shahira	1999	Cultural Resources Inventory Report for Williams Communications, Inc. Proposed Fiber Optic Cable System Installation Project, Los Angeles to Riverside, Los Angeles and Riverside Counties	Outside
LA-04836	Anonymous	2000	Phase I Archaeological Survey Along Onshore Portions of the Global West Fiber Optic Cable Project	Outside
LA-05093	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 679-11, County of Los Angeles, Ca	Outside
LA-05098	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 226-01, County of Los Angeles, Ca	Outside
LA-05181	Duke, Curt	2000	Cultural Resource Assessment for AT&T Wireless Services Facility T998, County of Los Angeles, California	Outside

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SCCIC Report No.	Authors	Date	Title	Proximity to Project Site	
LA-05200	Warren, Keith M, Hamilton, Colleen, and Robinson, Mark	2001	Assessment of Archaeological and Paleontological Sensitivity on the Proposed California Department of Transportation District 7 Headquarters Replacement Project	Outside	
LA-05413	Lapin, Philippe	2000	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La 263-02, County of Los Angeles, Ca	Outside	
LA-05448	Duke, Curt	2000	Cultural Resource Assessment for AT&T Wireless Services Facility Number R299.1, County of Los Angeles, Ca	Outside	
LA-06396	Anonymous	2001	An Archaeological Assessment of the Proposed Verizon Wireless Grand Avenue, East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles County, California 90071	Outside	
LA-06415	Duke, Curt	2001	Cultural Resource Assessment Cingular Wireless Facility No. Sm 104-04	Outside	
LA-06424	Duke, Curt	2002	Cultural Resource Assessment Cingular Wireless Facility No. Sm 140-01 Los Angeles County, California	Outside	
LA-06435	Duke, Curt	1999	Cultural Resource Assessment for Pacific Bell Mobile Services Facility La679-11, County of Los Angeles, California	Outside	
LA-06440	Mason, Roger D.	2001	Proposed Verizon Wireless Facility: Pershing Square (99800089) in the City and County of Los Angeles, California	Outside	
LA-06446	Mason, Roger D.	2000	Proposed AT&T Wireless Services Facility: 7th Hill (r282) in the City of Los Angeles, Los Angeles County, California	Outside	
LA-06463	Anonymous	2002	A Section 106 Historic Preservation Review of the Proposed Verizon Wireless Grand Avenue East Los Angeles Unmanned Cellular Telecommunications Site to Be Located at 601 West 5th Street, Los Angeles, Ca 90071	Outside	
LA-06920	Duke, Curt and Judith Marvin	2003	Cultural Resource Assessment Cingular Wireless Facility No. Sm 104-08 City and County of Los Angeles, California	Outside	
LA-07178	Unknown	2001	Report on Cultural Resources Mitigation and Monitoring Activities Fluor/level (3) Los Angeles Local Loops	Outside	

	Table 1. Previous Technical Studies Within 0.5-mile of the Proposed Project Site					
SCCIC Report No.	Authors	Date	Title	Proximity to Project Site		
LA-07527	Feldman, Jessica B., Lemon, David, and Hope, Andrew	2006	Caltrans Statewide Historic Bridge Inventory Update Tunnels	Outside		
LA-07556	Slawson, Dana N.	2006	Archaeological Monitoring Report Earthquake repair and Replacement Sewer Unit 338 (w.o. E2003260) El Pueblo De Los Angeles and Environs Los Angeles, California	Outside		
LA-07735	Billat, Lorna	2004	Puerto Rico/CA-8236c, 10601 Firestone Blvd, Norwalk, Ca, Los Angeles County	Outside		
LA-07774	Bonner, Wayne H.	2005	Cultural Resources Records Search Results and Site Visit for Cingular Wireless El-038-01 (sbc Switch-downtown La), 433 South Olive Street & 434 Grand Avenue (aka 420 South Grand Avenue), Los Angeles, Los Angeles County, California	Outside		
LA-07888	Strauss, Monica	2004	Archaeological Resources Assessment for the Proposed Public Safety Facilities Master Plan Project, City of Los Angeles, California	Outside		
LA-07986	Harper, Caprice D.	2006	Cultural Resources Assessment for the Castaic Lake Water Agency Recycled Water Master Plan and the Northwest Spur Pipeline, Santa Clarita, Los Angeles County, California	Outside		
LA-08026	Carrico, Richard L.	1985	Treatment Plan for Potential Cultural Resources Within Proposed Metro Rail Subway Station Locations in Metropolitan Los Angeles, California	Outside		
LA-08283	Bonner, Wayne H.	2007	Cultural Resources Record Search and Site Visit Results for Royal Street Communications, LLC Candidate La0021a (holy Shepard Lutheran Church), 10347 Mason Avenue, Chatsworth, Los Angeles County, California	Outside		
LA-08514	Gregory, Carrie and Margarita Wuellner	2004	Historical Assessment and Technical Report for the Proposed Public Safety Facilities Master Plan, Los Angeles, California	Outside		
LA-08750	Bonner, Wayne H.	2006	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate La03080a (numero Uno Market), 1335 South Alvarado Street, Los Angeles, Los Angeles County, California	Outside		
LA-09429	McKenna, Jeanette	2008	An Architectural Evaluation of the three buildings located at 217-221 West 4th St., 350-354 S. Broadway, and 356-364 S. Broadway, in the City of Los Angeles, Los Angeles County, California	Outside		
LA-09640	Maki, Mary K.	2008	Alameda Seniors Housing Project, Huntington Park	Outside		

SCCIC Studies Within 0.5-mile of the Proposed Project Site					
Report No.	Authors	Date	Title	Proximity to Project Site	
LA-09662	Warren, Keith and M. Colleen Hamilton	2006	Cultural Resources Monitoring of Demolition of the Former California Department of Transportation District 7 Offices	Outside	
LA-09663	Warren, Keith	2004	Herbalists and Horsemen: Cultural Diversity Along Los Angeles Street. Archaeology of the New Caltrans District 7 Headquarters Site (CA-LAN-3097)	Outside	
LA-09744	Romani, Gwendolyn R.	1999	Results of Archaeological Survey: Big Tujunga Arundo Removal (ARR No. 05-01-00569)	Outside	
LA-09809	Dana E. Supernowic z	2009	Cultural Resources Study of the LA Self Storage Project, Royal Street Communications Site No. LA3833A, 1000 W. 6th Street, Los Angeles, CA	Outside	
LA-10507	Anonymous	1983	Technical Report - Historical/Architectural Resources - Los Angeles Rail Rapid Transit Project "Metro Rail" Draft Environmental Impact Statement and Environmental Impact Report	Outside	
LA-10542	Grimes, Teresa	1998	Historical Architectural Survey and Evaluation Report and Finding of no Adverse Effect	Outside	
LA-10605	Dietler, Sara and Monica Strauss	2009	Archaeological Evaluation for the Main Street Parking Facility and motor transportation division project, City of Los Angeles, California	Outside	
LA-10772	Hatheway, Roger	1979	Historic Building Survey - Los Angeles Downtown People Mover Program Report for Determination of Eligibility	Intersecting	
LA-10826	unknown	2008	Section 106 Consultation for Three-Hole Expansion and Two-Hole Course modification, Westchester Golf Course and Los Angeles International Airport, Los Angeles, CA	Outside	
LA-10860	Robinson, Mark	2007	Exposition Corridor Light Rail Transit Project Construction Phase Cultural Resources Monitoring and Treatment Plan	Outside	
LA-11165	Carnevale, Mike	2001	Draft - Environmental Impact Statement, United States General Services Administration, GSA Document Number: ZCA81642/1999 Los Angeles U.S. Courthouse, Los Angeles, California	Outside	
LA-11407	Swope, Karen K.	1997	Historical Study Report for the Alameda Corridor Project North End Improvements, Los Angeles County, California	Outside	
LA-11649	Kaplan, David and O'Connor, Pam	2004	Evaluation of Proposed Demolition of Stationers Building, 525 South Spring Street, Stationers Annex, 523 South Spring Street on the Spring Street Financial Historic District	Outside	
LA-11679	Loftus, Shannon	2011	Cultural Resource Records Search and Site Survey, AT&T Site LAC301, Downtown 404 1/2 West 7th Street, Los Angeles, Los Angeles County, California 90014	Outside	

Table 1. Previous Technical Studies Within 0.5-mile of the Proposed Project Site					
SCCIC Report No.	Authors	Date	Title	Proximity to Project Site	
LA-11710	Unknown	2011	Regional Connector Transit Corridor Draft Environmental Impact Statement/ Draft Environmental Impact Report, Appendix Y Cultural Resources-Archaeology	Outside	
LA-11865	Bischoff, Wayne	2011	Cultural Resources Survey Letter Report for the CT- 29 Access Road Variance Request, Segment 5, Tehachapi Renewable Transmission Project, Los Angeles County, CA	Outside	
LA-11954	Bonner, Wayne	2012	Cultural Resources Records Search and Site Visit Results for Sprint Nextel Candidate LA03XC041 (Angels Flight) 242 South Broadway, Los Angeles, Los Angeles County, California	Outside	
LA-12294	McKenna, Jeannette	2013	Historic American Building Survey: The Trustee Building 340-344 South Broadway, Los Angeles, California 90013	Outside	
LA-12392	Bonner, Wayne	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate EL0038 (SBC Building), 433 Olive Street and 434 South Grand Avenue, Los Angeles, Los Angeles County, California	Outside	
LA-12393	Bonner, Wayne and Crawford, Kathleen	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02731A (LA424-AT&T (Madison MSC), 633 South Olive Street, Los Angeles, Los Angeles County, California	Outside	
LA-12442	Fulton, Phil	2013	Cultural Resource Assessment Class I Inventory Verizon Wireless Services Utopia Facility, City of Gardena, Los Angeles County, California	Outside	
LA-12443	McKenna, Jeanette	2013	Archaeological Survey Report: Pacific Coast Highway (SR-1) at Tuna Canyon Infrastructure Installation Project, Malibu, Los Angeles County, California	Outside	
LA-12493	Fulton, Phil and McLean, Roderick	2012	Cultural Resource Assessment Verizon Wireless Services Grand Avenue ELA Facility City of Los Angeles, Los Angeles County, California	Outside	
LA-12584	Rogers, Leslie	2013	Restoration of Historic Streetcar Service in Downtown Los Angeles	Intersecting	
LA-12648	Wiley, Nancy, Colocho, Connie, and Garrison, Andrew	2014	Archaeological Monitoring Results: The Los Angeles US Courthouse Los Angeles CA	Outside	

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SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-12768	Ballester, Daniel	2012	Historical/Archaeological and Paleontological Monitoring Program, Three Valley Water District Fulton Reservoir Project, Three Valleys Municipal Water District, City of Claremont, Los Angeles County, California	Outside
LA-12784	Bonner, Wayne and Crawford, Kathleen	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate SV11069C (Abe Building RT) 533 South Los Angeles Street, Los Angeles, Los Angeles County, California	Outside
LA-12866	Dietler, john, Samantha Murray, Heather Gibson, Sara Dietler, Steven Treffers, and Benjamin Vargas	2015	Los Angeles Plaza Church Cemetery Technical Report for the LA Plaza de Cultura y Artes Project, Los Angeles, California	Outside
LA-12867	Dietler, John and Sara C. Ferland	2015	Testing to Protect Historic Cemetery Resources for the LA Plaza de Cultura y Artes Project, Los Angeles, California	Outside
LA-12965	Green, Alexis	2016	Submission Packet, FCC Form 621, for proposed Collocation Project, 808 South Flower Street, Los Angeles, Los Angeles County, California 90017 DLA104, EBI Project Number: 6115005143	Outside
LA-13105	Bonner, Diane F., Carrie D. Wills, and Kathleen A. Crawford	2014	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LA0741/CLU5712 (LA Self Storage), 1000 6th Street, Los Angeles, Los Angeles County, California. CASPR No. 3551656508	Outside
LA-13134	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate CLU2377 (Standard Aero Building), 6201 West Imperial Highway, Los Angeles, Los Angeles County, California, CASPR No. 3551316006	Outside
LA-13141	Brunzell, David	2014	Cultural Resources Assessment of the Pershing Square Project, Los Angeles, Los Angeles County, California (BCR Consulting Project No. TRF1412)	Outside
LA-13143	Bonner, Wayne H. and Kathleen A. Crawford	2013	Cultural Resources Records Search and Site Visit Results for AT&T Mobility, LLC Candidate LAR091 (Figueroa and 5th Street), 545 South Figueroa Street, Los Angeles, Los Angeles County, California. CASPR:f# 3551015017	Outside

SCCIC Report No.	Authors	Date	Title	Proximity to Project Site
LA-13143	Bonner, Wayne H. and Kathleen A. Crawford	2013	Direct APE Historic Architectural Assessment for ABeT Mobility, LLC Candidate LAR091 (Figueroa and 5th St), 545 Figueroa Street, Los Angeles, Los Angeles County, California, CASPR No. 3551015017	Outside
LA-13180	Howell- Ardila, Debi, Steven Treffers, John Dietler, and Chris Millington	2014	Cultural Resources Technical Report for the LA Plaza Cultural Village Project, City and County of Los Angeles, California	Outside
LA-13218	Roland, Jennifer	2017	Phase I Investigation for the Crown Castle Wireless T-Mobile LA Market Project Antenna Installation Project, Los Angeles, Los Angeles County, California	Outside

### LA-00483

Greenwood & Associates was contracted by the City of Los Angeles to perform a cultural resources study for the People Mover Project. The project involved extensive historical research of the project area to determine locations with the highest potential for subsurface cultural resources. Greenwood & Associates concluded that where the alignment is closest to main access roads, the chance of significant resources were less likely. The west side of South Hill Street from West 2nd Street to West 5th Street, which borders the proposed Project site, was determined to be sensitive for significant archaeological resources, though no archaeological sites have been recorded in the area

## LA-1642 & 1643

Science Applications was contracted by the City of Los Angeles to perform a Phase 2 and Phase 3 cultural resource assessment for the People Mover Project. Phase 2 involved intensive historical research of potentially sensitive areas identified in Greenwood & Associates report. The study resulted in the identification of thirteen potentially significant archaeological remains along the proposed route. Phase 3 involved geotechnical investigations of soil conditions of areas identified during Phase 2. These investigations were monitored by archaeologists to determine the presence of buried cultural deposits. No archaeological deposits were identified near or within the current proposed Project site.

## LA-3103

Greenwood & Associates was contracted by Los Angeles County Metropolitan Transportation Authority to perform cultural resources services in support of the construction of the Metro Rail Red Line Project including background research, monitoring, surface collection, excavation, and analysis. The most important field work occurred near present day Union Station where the original Chinatown of Los Angeles was located. Much of the report is devoted to describing this resource and the results of the excavation. No archaeological resources were identified within the current proposed Project site as a result of that project.

#### LA-10772

Roger Hatheway was contracted to perform a Historic Building Survey in support of the Los Angeles Downton People Mover Project in 1979. The project consisted of expanding the physical description, statement of significance, and documenting buildings that were presented in a previous survey. No landscape or street furniture was discussed or researched. No buildings within the current proposed Project site, if any were present during that study, were evaluated.

#### LA-12584

The U.S. Department of Transportation Federal Transit Administration (FTA) initiated consultation, in compliance with Section 106 of the National Historic Preservation Act, for the Restoration of the Historic Streetcar Service Project APE, located in Downtown Los Angeles, with the State Historic Preservation Office (SHPO) in 2013. The project proposed to construct and implement streetcar services along a one-way loop that would run from West 1st Street on the north, through downtown Los Angeles, to East 11th Street on the south. The proposed project included two build alternatives (Locally Preferred Alternative, or LPA, and 9th Street Alternative) and a no-build alternative that would be part of phase I and phase II studies for the identification of Historic Properties. SHPO accepted the phased effort for the identification of historic properties and continued consultation with the FTA. No historic properties were identified within the current proposed Project site as a result of the 2013 study.

# Previously Recorded Cultural Resources

SCCIC records indicate that a total of 181 previously recorded cultural resources fall within 0.5-mile of the proposed Project site. Of these 181 resources, 172 are historic-era buildings and/or structures, 61 of which are districts and/or elements of a district; and the remaining nine resources are archaeological sites. Eight historic-era sites and one prehistoric site are located within a 0.5-mile of the proposed Project site. Table 2, below, summarizes the nine archaeological resources

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identified within the records. None of these nine archaeological resources intersect or overlap the proposed Project site.

Important to note is that the single prehistoric site consists of a prehistoric burial (P-19-120015). SCCIC records indicate that the prehistoric burial was previously recorded approximately 0.5-mile northeast of the proposed Project site. This resource includes documented human remains identified as Native American in origin that was encountered in 1957 during trenching activities, approximately 11 feet below the street surface. The burial is briefly mentioned in report LA-0483, though no further details of the burial was discussed beyond what is mentioned here.

Table 2. Previously Recorded Archaeological Resources Within 0.5-mile of the Proposed Project Site

Primary (P-19-)	Trinomial (CA-LAN-)	Age	NRHP Eligibility	Resource	Recorded By/Year	Proximity to APE
002741	002741H	Historic	Not evaluated	Buried mortared red- brick footing	1998 (Jay Michalsky, LSA Associates, Inc.)	Outside
003097	003097H	Historic	Not evaluated	Brick and concrete structural foundations	2002; 2003 (Warren, K., Applied Earthworks); 2004 (Warren, K., Applied Earthworks)	Outside
003129	003129H	Historic	Not evaluated	1018 Grand Avenue	2003 (Robin Turner, Cogstone)	Outside
003337	003337H	Historic	Not evaluated	234 East First Street	2000 (Frank Humphries, William Self Associates)	Outside
003347	003347H	Historic	Not evaluated	Werdin Place Granite-Block Pavement	2004 (Monica Strauss, EDAW, Inc.); 2008 (Frank Humphries and Sara Dietler, EDAW, Inc.)	Outside
003767	003767H	Historic	Not evaluated	San Pedro Apartments	2007 (Laurie Solis, URS Corp)	Outside
004114	004114H	Historic	Not evaluated	Brick and concrete structural foundations	2008 (Frank Humphries and Sara Dietler, EDAW, Inc.)	Outside
004451	-	Historic	Not evaluated	Los Angeles Federal Courthouse Site	2014 (Andrew Garrison, SRS)	Outside
120015	-	Prehistoric	Not evaluated	Burial	1996 (SCC Information Center Staff)	Outside

# Review of the Zanja System

The zanja network was Los Angeles' original irrigation system, and the network is thought to have run throughout the City in various branches, predominantly along major roads. The water conveyance system consisted of interconnected ditches known as "zanjas" and was established in 1781 at the same time that El Pueblo de la Reyna de Los Angeles (The Town of Los Angeles) was founded. The first segment of the system was known as the Zanja Madre, and is thought to have run from a point on the Los Angeles River north of the City, south near present-day Main Street, terminating near the Plaza close to present-day Union Station (Gumprecht 2001: 58). Though researchers and the public often use the term "Zanja Madre" to refer to the larger water conveyance network, this term more accurately describes just the initial component established during the Spanish Period. The segments that were added on later were numbered and grouped based on what part of the City they reached and from where on the Los Angeles River they drew water. The size of Los Angeles did not necessitate an expansive system for the first half of the nineteenth century, and there were only three additional segments by 1849. As the City rapidly grew, water became a growing concern particularly because much of the land was agricultural and irrigation was crucial to farmers' success. As a result, several new zanja segments were constructed post-1855 (Gumprecht 2001: 58-61). By 1870, the Zanja Madre, being the most important canal in the system, was maintained at a width of ten feet along its entire length, and eight other zanja segments had also been built within the City (Gumprecht 2001: 61). By the late nineteenth century, there were a total of 19 zanja segments. The segments had been lined with brick, enclosed by concrete piping, or converted to wooden flumes, which was more efficient and safer than open ditches (Gumprecht 2001: 72, 88).

Dudek reviewed technical reports for information detailing the original zanja network and subsequently constructed segments, including William Hall's 1888 study of irrigation in Southern California (Hall 1888), and Blake Gumprecht's work on the History of the Los Angeles River (Gumprecht 2001). The review suggests that a portion of the zanja network may be present near, but outside of, the proposed Project site. A series of maps prepared by Cogstone Environmental (Attachment C: Confidential Report LA-13239) for the Downtown Los Angeles area depicts one unconfirmed segment of the zanja network mapped to the east and south (Zanja No. 8) of the proposed Project site, with the segment running northeast to southwest, then east to west, before rerouting to northeast to southwest. The nearest zanja segment has been mapped more than 600 feet away, running southwest through the block to the south.

As described in Hall's 1888 work, Zanja No. 8 was the western branch of the low-service system, so named because this group of canals distributed water that was taken from a lower elevation of the Los Angeles River, while the high-system distributed water that was taken from a higher

elevation on the river. The low-system contained the Zanja Madre and the majority of the zanja segments that irrigated the central downtown area. According to this research, Zanja No. 8 ran from the end of the Zanja Madre, at the intersection of Main Street and 1st Street, south down Main Street until 8<sup>th</sup> Street where it turned roughly west until reaching Olive Street. There it turned and ran generally southwest until eventually meeting another zanja segment, Zanja No. 8-R, at the intersection of 18<sup>th</sup> Street and Figueroa Street (Gumprecht 2001: 77; Hall 1888: 543-551). By the time Hall conducted his 1888 survey of irrigation in Los Angeles, it had apparently been extended to connect to Zanja No. 8-R, which ran south along Figueroa Street. Additionally, that same year, the entirety of Zanja No. 8, which constituted 8,300 feet, was documented as cement pipe or open concrete conduit (Gumprecht 2001: 76; Hall 1888: 546). Zanja No. 8 is thought to have been dug by hand in 1857 by Orzo W. Childs, who was paid for his work with 200-acres of land and later became a wealthy investor and philanthropist (Gumprecht 2001: 60). Notably, Childs was one of the three men, along with John G. Downey and Isaias W. Hellman, who made the original gift of land to establish the University of Southern California.

Results of the SCCIC records search indicated that 90 previous cultural resource studies have been conducted within the records search area of the proposed Project site between 1992 and 2017. The proposed Project site more than 600 feet away from the Zanja No. 8, and none of the previous monitoring projects or other studies have resulted in the recordation of any extant segment Zanja No. 8 within the records search area. Given that the mapped location of Zanja No. 8 is outside of the Project site and that it has not been identified through previous monitoring efforts, the greatest likelihood is that this zanja segment has been destroyed. Additionally, the proposed Project site has been extensively developed throughout the twentieth century. The potential of encountering segments of the zanja network during ground disturbing activities associated with the Project is considered low.

### **NAHC Sacred Lands File Search**

Dudek contacted the NAHC on June 5, 2018 and requested a review of the SLF for the proposed Project site. The NAHC replied via email on June 6, 2018 stating that the SLF search was completed with negative results. Documents related to the NAHC SLF search are included in Confidential Attachment C.

#### **Historic Aerial Review**

Dudek consulted historic topographic maps and aerial photographs to understand the development of the proposed Project site and surrounding properties. Topographic maps are available from 1894 to the present and aerial images are available from 1952 to the present (NETR 2018a, 2018b).

Topographic maps indicate that the proposed Project site and vicinity was already extensively developed by the late nineteenth century. By 1928, topographic maps indicated that the proposed Project site and vicinity had reached maximum development. Aside from understanding a general level of development, topographic maps are not helpful in understanding minute changes within the proposed Project site and surrounding blocks.

Historic aerials from 1948 show that the proposed Project site was developed with several buildings, and a parking lot. At this time, Angels Flight Railway had not been relocated to its current location north of the proposed Project site and the surrounding area appears to be devoted to commercial and residential uses. No significant changes are visible until 1964, when aerials show that several of the buildings in the proposed Project site and the general area had been demolished and replaced with parking lots. Between 1964 and 1972, the entirety of the proposed Project site as well as the entire block directly to the west, had been razed and appeared to have been used to hold spoils pile from nearby construction. By 1980, some large commercial buildings had been built in the area, though the proposed Project site was still under construction and was devoid of any development. By 1994, it appears that Pershing Square station and Angels Knoll Park had been built. Aside from landscaping throughout the park, there have been no significant changes to the proposed Project site since then.

## **CULTURAL RESOURCE PEDESTRIAN SURVEY**

## Field Methodology

A qualified Dudek archaeologist conducted a pedestrian survey of the proposed Project site on June 5, 2018. The survey was conducted to identify and record any archaeological resources that may occur in the proposed Project site. Because of the developed/disturbed nature of the site, reconnaissance-level survey methods were used to spot-check areas with ground surface visibility for archaeological resources. The archaeologist examined the ground surface for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historical artifacts (e.g., metal, glass, ceramics), sediment discolorations that might indicate the presence of a cultural midden, and depressions and other features that might indicate the former presence of structures or buildings.

## Survey Results

The proposed Project site is made up of three tiers of a hillside sloping east towards 4<sup>th</sup> Street. The lowest tier is the easternmost section of the proposed Project site and is flat, primarily paved with concrete, and contains the entrance to Metro's Pershing Square station at the corner of 4<sup>th</sup> Street and Hill Street. This tier contains landscaped planter boxes which have become overgrown. No

cultural resources were observed within the exposed ground surface of the planter boxes. The middle tier is steeply sloped and is primarily characterized by overgrown, dead grasses and weeds with some palm trees and bougainvillea shrubs. Small brick fragments are scattered throughout this tier. Additionally, one piece of ceramic and one ceramic pipe fragment, both of unknown age, were observed. The top tier is also characterized by overgrown, dead grasses and weeds and several trees are present as well. There is a north-south path running along the western border of this tier. There are also several benches located throughout this tier and two memorial concrete signs that are located in the northwestern corner of the proposed Project site. Some brick fragments were observed throughout the upper tier. Irrigation lines are present throughout the middle and upper tier; additionally two large concrete and metal Los Angeles Department of Water and Power vaults are located at the southeastern corner of the middle tier. Modern refuse was observed throughout the site, including what appears to be modern trails within the middle tier that were likely made by individuals traversing the property. Ground visibility throughout the unpaved area of the site was generally poor, around 50-60%. No historic-age or prehistoric cultural resources were identified during the cultural resources survey. Figures 3 through 8 in Attachment A show overviews of the proposed Project site.

## SUMMARY AND MANAGEMENT CONSIDERATIONS

No archaeological resources have been identified within the proposed Project site through the CHRIS records search, NAHC SLF review, or pedestrian survey. As noted above, SCCIC records indicate that a prehistoric burial (P-19-120015) had been previously recorded approximately 0.5mile northeast of the proposed Project site. This occurrence is well outside the limits of the Project site or any related construction activities that would occur in connection with the Project. In addition, the Project site was substantially disturbed by grading and development mainly during the 1960s and 1970s. These activities reduce the likelihood that known archeological resources remain are on the Project site. Additionally, the SCCIC records did not identify any previous studies that have documented remnants of the zanja network within the proposed Project site. The Project site is located more than 600 feet away from the nearest mapped segment of Zanja No. 8, and none of the previous monitoring projects or other studies completed in this area have resulted in the recordation of any extant segment Zanja No. 8. Additionally, the proposed Project site has been extensively developed throughout the twentieth century. For these reasons, the potential of encountering segments of the zanja network during ground disturbing activities associated with the Project is considered low. Based on the records searches, field reconnaissance, and analysis of historical era activity in the surrounding area, the sensitivity for this project site indicates that the project would not reasonably result in a foreseeable direct or indirect impact to an archeological resource. Accordingly, no site specific mitigation is required and impacts to archeological resources are considered less than significant.

Notwithstanding, deep excavations on the Project site could encounter unknown and unanticipated archaeological resources and human remains. In that case, the City (acting as Lead Agency under CEQA) could apply its standard conditions of approval regarding inadvertent discovery of a resource.

## **RECOMMENDATIONS**

No archaeological resources are anticipated to be affected by the proposed Project. Therefore, no site specific mitigation is required. The possibility exists that archaeological resources that were not recovered during prior construction or other human activity may be present and could be inadvertently encountered. Therefore, although not required, the City could consider applying standards conditions of approval for inadvertent discoveries. In addition, the City should include the following condition of approval regarding inadvertent discovery of human remains. Unanticipated Human Remains

In accordance with Section 7050.5 of the California Health and Safety Code, if human remains are found, the county coroner shall be immediately notified of the discovery. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the county coroner has determined, within 2 working days of notification of the discovery, whether the remains are potentially human in origin. If the county coroner determines that the remains are, or are believed to be, Native American, he or she shall notify the NAHC in Sacramento within 24 hours. In accordance with California Public Resources Code, Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendant from the deceased Native American. The most likely descendant shall complete his/her inspection within 48 hours of being granted access to the site. The designated Native American representative would then determine, in consultation with the property owner, the disposition of the human remains.

Please do not hesitate to contact me if you have any questions about this report. I may be reached via email lkry@dudek.com or via phone at (626) 590-1739 or Adam Giacinto via email at agiacinto@dudek.com or via phone at (530) 863-4653.

Respectfully Submitted,

**DUDEK** 

Archaeologist

cc: Adam Giacinto, Adriane Gusick, Dudek

Att: Attachment A: Figures

Attachment B: CONFIDENTIAL SCCIC Records Search Information

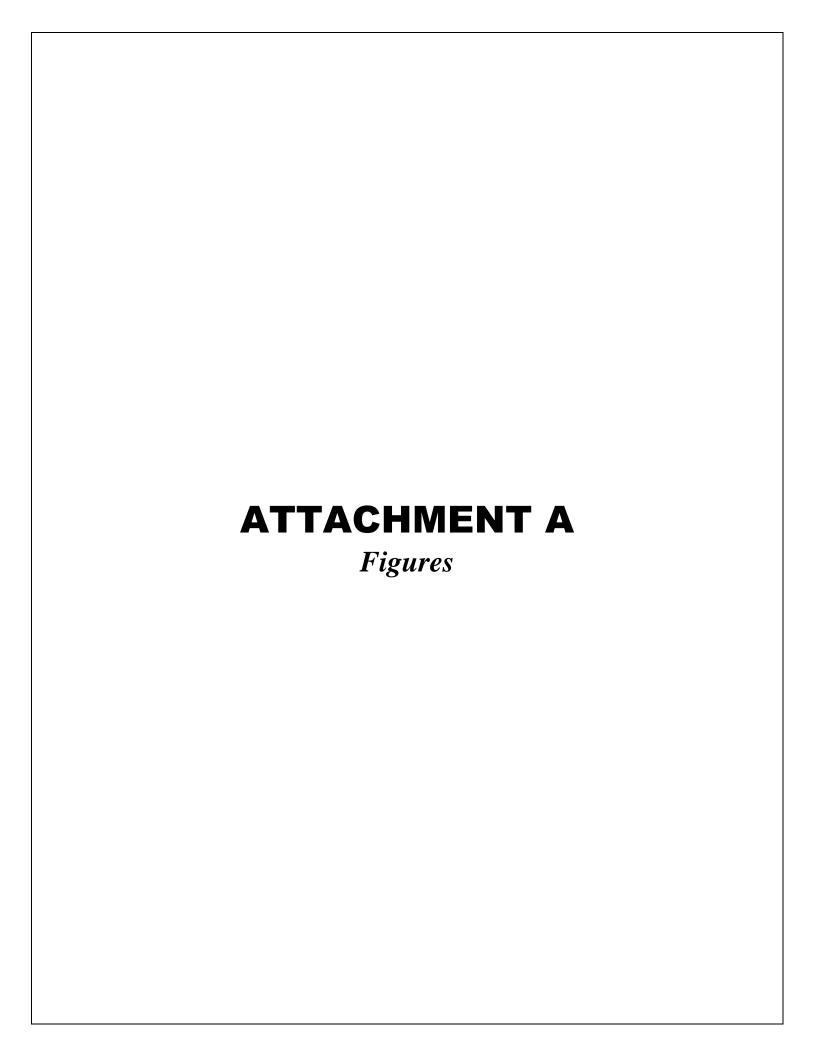
Attachment C: CONFIDENTIAL NAHC SLF Search Results

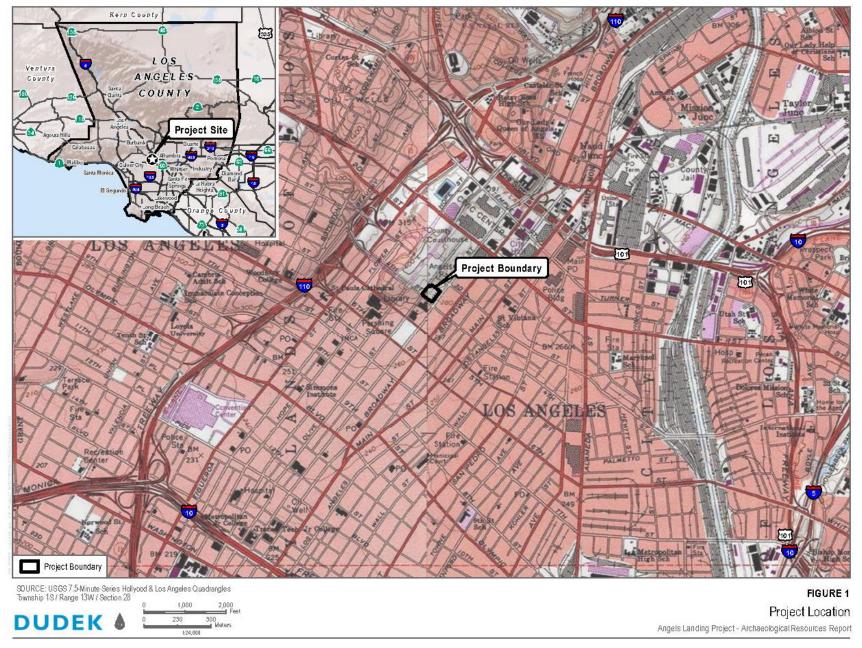
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- NETR (Nationwide Environmental Title Research LLC). 2018a. Historic Aerial Photographs of Los Angeles. Accessed June 7, 2018. https://www.historicaerials.com/viewer.
- NETR. 2018b. Historic Topographical Maps of Los Angeles. Accessed June 7, 2018. https://www.historicaerials.com/viewer.

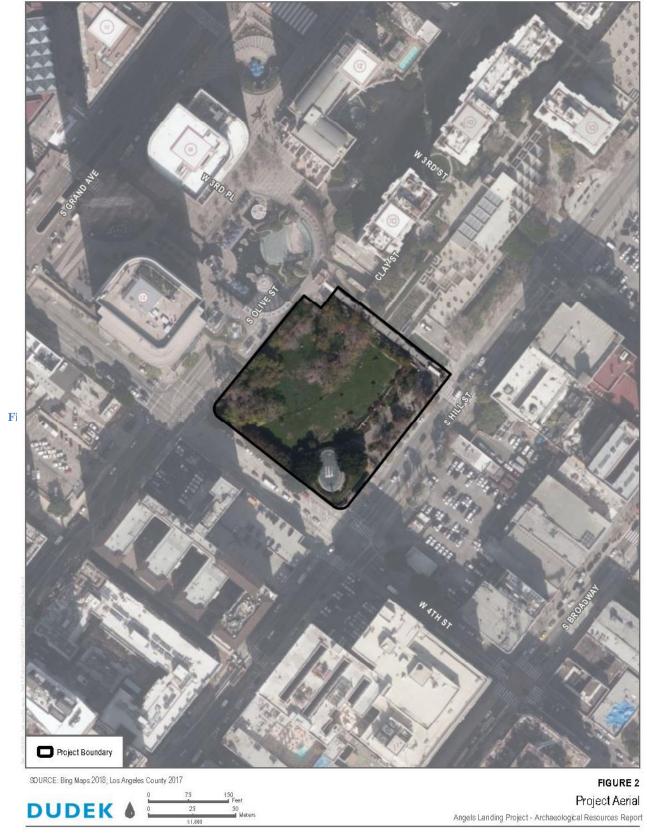
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**DUDEK** 



Figure 2. Overview of uppermost Tier; View facing south.



Figure 3. Overview of uppermost Tier; View facing north.



Figure 4. Overview of middle tier; View facing north.



Figure 5. Overview of middle tier; View facing south.

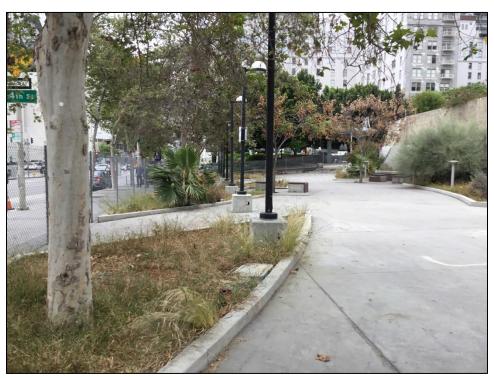
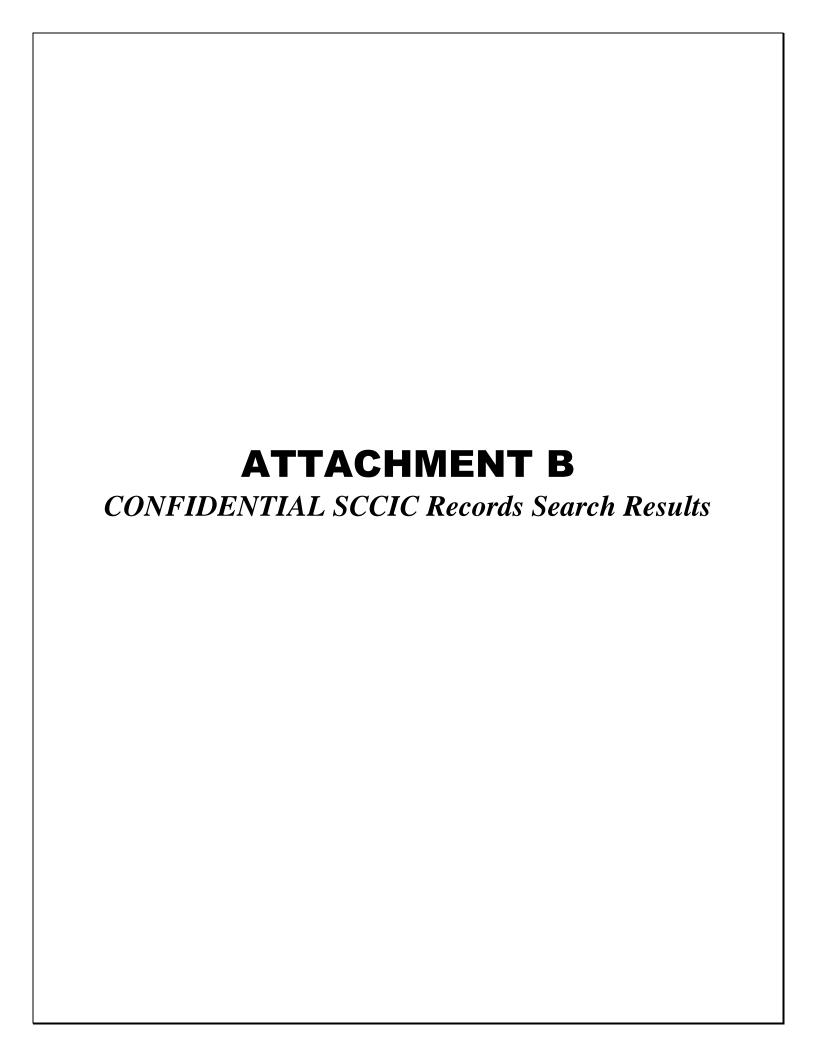


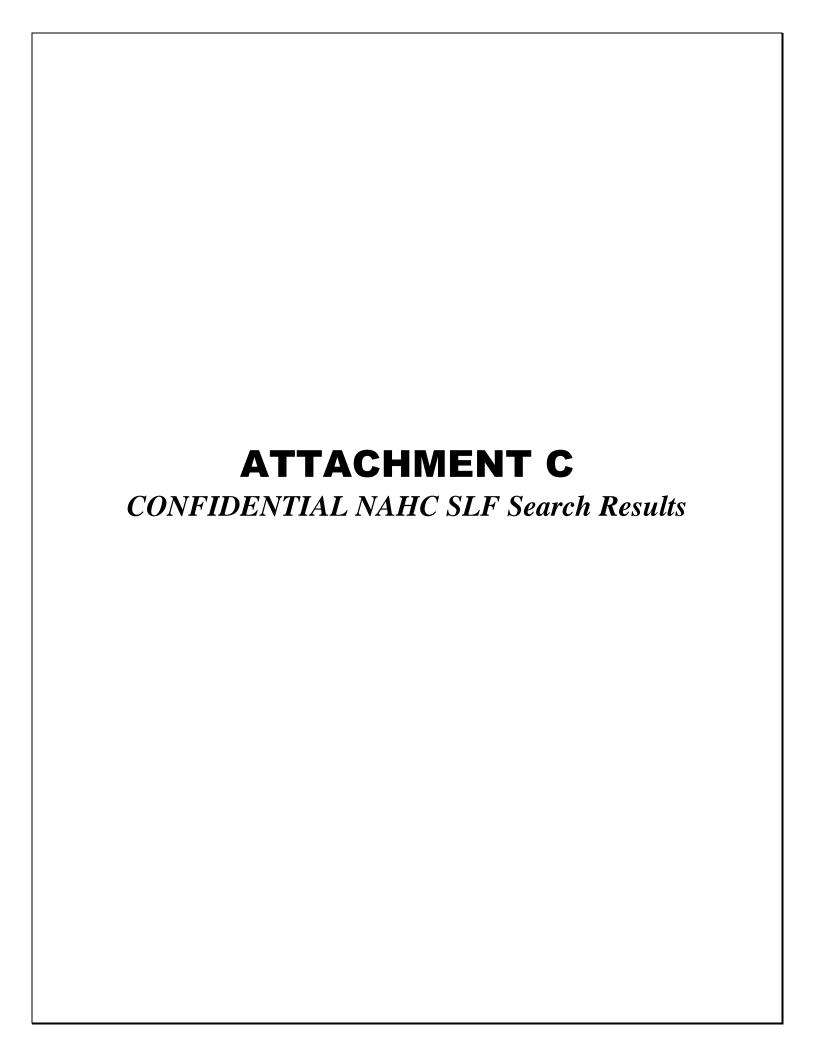
Figure 6. Overview of lower tier; View facing south.



Figure 7. Overview of lower tier; View facing west.



# Cultural Resources confidential information: On file with City.



# Tribal Cultural Resources confidential information: On file with City.