

The Jeff Hotel Project, Culver City, California

Cultural Resources Assessment

Prepared for

Sandstone Properties, Inc.
14724 Ventura Boulevard, Penthouse
Sherman Oaks, CA 91403

June 2019



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Prepared by:

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Project Location:

Venice (CA) USGS 7.5-minute Topographic Quad
Township 2 South, Range 15 West, Unsectioned portion

Acreage: Approx. 0.78 acres

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EXECUTIVE SUMMARY

The Jeff Hotel Project Cultural Resources Assessment

Environmental Science Associates (ESA) has been retained by Sandstone Properties, Inc. (Applicant) to prepare a cultural resources assessment report for the proposed Jeff Hotel Project (Project) to support an Initial Study/Mitigated Negative Declaration for the purpose of complying with the California Environmental Quality Act (CEQA). The Project proposes to develop a five-story, 175-room boutique hotel at 11469 Jefferson Boulevard in Culver City. The Project would include a below-ground parking garage. Maximum depth of excavation is anticipated to be 35 feet below existing ground surface. The City of Culver City (City) is the lead agency responsible for compliance with CEQA.

A records search was conducted on January 10, 2019 at the California Historical Resources Information System – South Central Coastal Information Center housed at California State University, Fullerton, and included a review of all recorded archaeological resources and previous studies within the Project Site and a 1-mile radius, and historic architectural resources within or adjacent to (within approximately 50 feet of) the Project Site. The records search results indicate that approximately 50 percent of the 1-mile radius has been included in previous cultural resources assessments; however, the Project Site does not appear to have been previously surveyed. A total of eight cultural resources have been recorded within the 1-mile radius, including six prehistoric archaeological sites (¹LAN-57, LAN-59, LAN-60, LAN-67, LAN-194, and LAN-216) and two multicomponent archaeological sites with both prehistoric and historic-period archaeological elements (LAN-193/H and LAN-2768/H). None of these resources are located within or in close proximity to the Project Site. No historic architectural resources have been previously recorded adjacent to the Project Site.

A Sacred Lands File (SLF) search conducted by the California Native American Heritage Commission (NAHC) on January 11, 2019 yielded positive results. The NAHC did not provide specific information regarding the nature or location of the resource on file; however, the NAHC recommended contacting the Gabrielino Tongva Indians of California Tribal Council for additional information. The NAHC also provided a list of other Native American tribes to contact as these tribes may also have knowledge of cultural resources in the Project Site.

¹ The prefix “CA” has been omitted from the in-text discussion of recorded archaeological sites.

A cultural resources survey of the Project Site was conducted on January 16, 2019. The Project Site is developed with two commercial buildings (retail stores and restaurants), a paved parking lot, concrete sidewalks, storm water drain grates, sprinklers, landscaping, and several monitoring wells. Ground surface visibility for the entire Project Site was less than 5 percent. No cultural resources were observed.

No known cultural resources (historical, archaeological, paleontological, or human remains) were identified within or immediately adjacent to the Project Site. The archaeological sensitivity assessment concluded that the majority of the Project Site has a moderate-to-low sensitivity for intact archaeological resources due to past and current development and associated ground disturbance. However, there are some areas of the Project Site that appear to have been subject to less ground disturbance, and these areas may contain potentially significant intact prehistoric or Native American archaeological resources. Additionally, based on a review of geologic maps and fossil discoveries in the vicinity of the Project Site, there is a potential to encounter significant paleontological resources below a depth of 10 feet.

Since the proposed Project includes ground disturbance up to 35 feet in depth, recommended mitigation measures are provided in the *Conclusions and Recommendations* section of this report in order to reduce potential impacts to previously unknown archaeological resources, paleontological resources, and human remains to less than significant levels under CEQA. ESA also recommends that the City contact the Gabrielino Tongva Indians of California Tribal Council regarding the positive SLF search results in accordance with recommendations provided by the NAHC.

THE JEFF HOTEL PROJECT

Cultural Resources Assessment

Introduction

Environmental Science Associates (ESA) has been retained by Sandstone Properties, Inc. (Applicant) to conduct a cultural resources assessment for the proposed Jeff Hotel Project (Project) to support an Initial Study/Mitigated Negative Declaration for the purpose of complying with the California Environmental Quality Act (CEQA). The Project proposes to develop a five-story, 175-room boutique hotel at 11469 Jefferson Boulevard. The City of Culver City (City) is the lead agency for the Project.

ESA personnel involved in the preparation of this study include: Monica Strauss, M.A., RPA, Project Director; Candace Ehringer, M.A., RPA, Project Manager; Fatima Clark, B.A., archaeologist and report author; Alyssa Bell, Ph.D., paleontologist and report contributor; and Jessie Lee, GIS Specialist. Resumes of key personnel are provided in **Appendix A**.

Project Location

The Project Site is located within the City's limits (**Figure 1**). The Project Site is located at the northern corner of the intersection of Jefferson Boulevard and Slauson Avenue (**Figure 2**). More specifically, the Project Site is located in an unsectioned portion of Township 2 South, Range 15 West, of the Venice, CA U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map (**Figure 3**).

Project Description

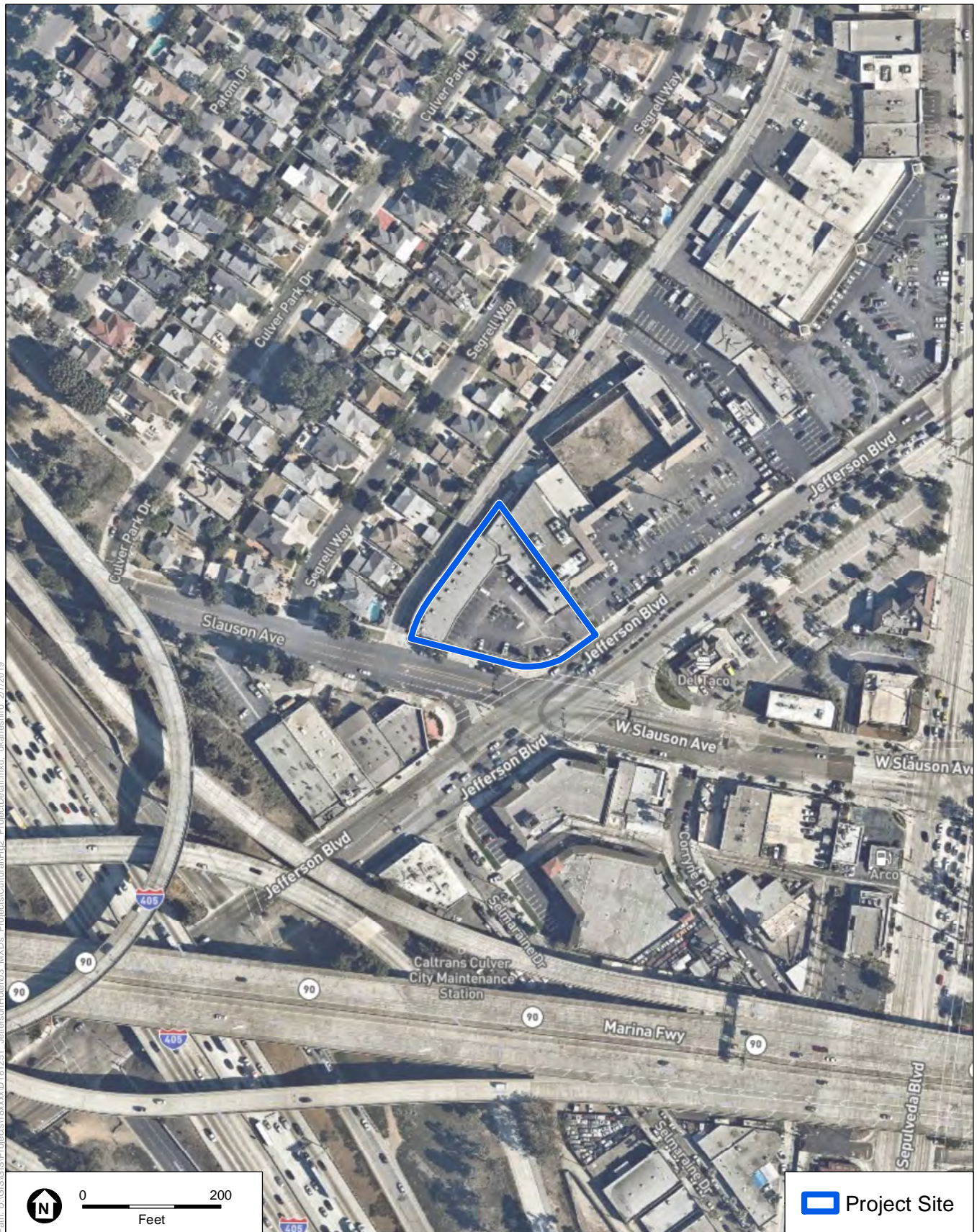
The Applicant proposes to develop a five-story, 175-room boutique hotel at 11469 Jefferson Boulevard. Development of the Project would require the demolition of the existing low-rise commercial buildings and surface parking lot. The hotel would comprise a total building area of approximately 111,000 gross square feet within a 0.78-acre (33,800-square-foot) parcel. The Project would be designed to accommodate the guest rooms and ground level amenities around a central open-to-the-sky atrium (oculus), podium level courtyard (Level 2), and additional rooftop amenities. Level 1 would include restaurant/commercial uses, service/administrative/housekeeping/kitchen uses, a meeting room, a lobby, a lounge, and oculus. Level 2 would include guestrooms, housekeeping, meeting rooms, a courtyard, and rear terrace. Level 3 would include guestrooms, housekeeping, a fitness room, and a courtyard. Level 4 would include guestrooms and housekeeping. Level 5 would include guestrooms, housekeeping, and a pool deck. Rooftop amenities would include a rooftop bar and open space/lounge areas. Parking would be provided in a below-grade parking garage. Maximum depth of excavation is anticipated to be 35 feet below existing ground surface.



SOURCE: ESRI

The Jeff Hotel

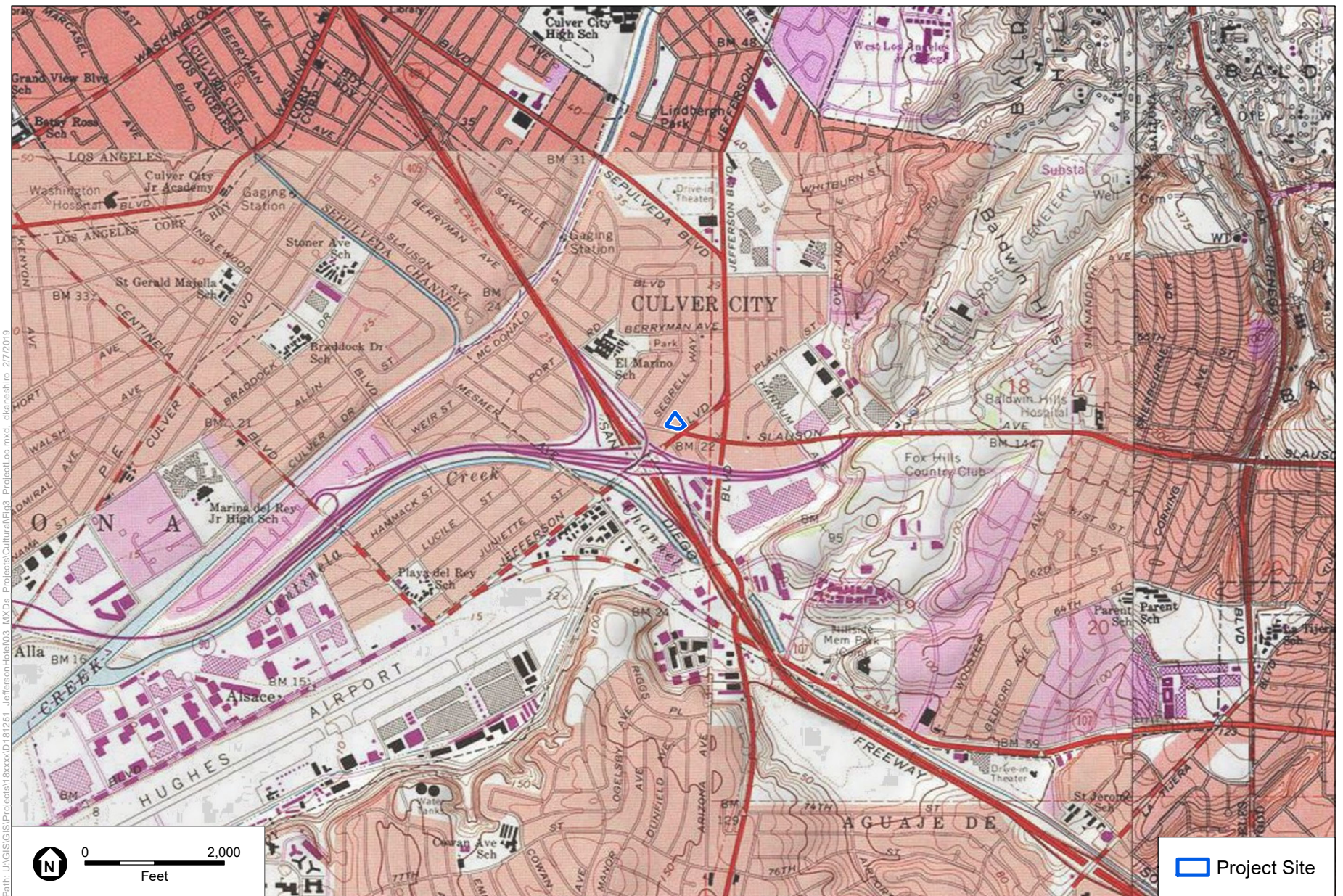
Figure 1
Regional Location



SOURCE: Digital Globe 2017

The Jeff Hotel

Figure 2
Project Detail



SOURCE: USGS 7.5' Topo Quad Venice 1978, 1982; Beverly Hills 1978, 1981

The Jeff Hotel
Figure 3
 Project Location

Setting

Environmental Setting

The Project Site is situated 28 feet above mean sea level (amsl) on relatively flat topography. The area is a mix of commercial and residential uses. The immediate surrounding properties to the Project Site are residences to the northwest, retail stores to the northeast, a restaurant and a storage facility to the southeast, and a tire depot to the southwest.

The Project Site is underlain by soils of the Yolo association, which occur on alluvial fans with elevations of up to 1,200 feet amsl and are over 60 inches deep. Yolo soils have a grayish-brown, slightly to medium acidic, loam surface layers about 18 inches thick underlain by a grayish-brown neutral loam, near silt loam subsoil about 18 inches thick. The substratum is light yellowish brown, neutral loam near silt loam (AEI Consultants, 2007c).

Geologic Setting

The Project Site is located in the Los Angeles Basin, a structural depression approximately 50 miles long and 20 miles wide in the northernmost Peninsular Ranges Geomorphic Province (Ingersoll and Rumelhart, 1999). The Los Angeles basin developed as a result of tectonic forces and the San Andreas fault zone, with subsidence occurring 18 to 3 million years ago (Mya) (Critelli et al., 1995). While sediments dating back to the Cretaceous (66 Mya) are preserved in the basin, continuous sedimentation began in the middle Miocene (around 13 Mya) (Yerkes et al., 1965). Since that time, sediments have been eroded into the basin from the surrounding highlands, resulting in thousands of feet of accumulation (Yerkes et al., 1965). Most of these sediments are marine, until sea level dropped in the Pleistocene (2.588 Mya to 11,700 years ago) and deposition of the alluvial sediments that compose the uppermost units in the Los Angeles Basin began.

Prehistoric Setting

Based on recent research in the region (Douglass et al., 2016), the following prehistoric chronology has been divided into four general time periods: the Paleocoastal Period (12,000 to 8,500 Before Present [B.P.]), the Millingstone Period (8,500 to 3,000 B.P.), the Intermediate Period (3,000 to 1,000 B.P.), and the Late Period (1,000 B.P. to A.D. 1542). This chronology is manifested in the archaeological record by particular artifacts and burial practices that indicate specific technologies, economic systems, trade networks, and other aspects of culture.

Paleocoastal Period (12,000–8,500 B.P.)

While it is not certain when humans first came to California, their presence in southern California by about 9,600 cal B.C. has been well documented. At Daisy Cave, on San Miguel Island, cultural remains have been radiocarbon dated to between 11,100 and 10,950 B.P. (Byrd and Raab, 2007). During this time period, the climate of southern California became warmer and more arid and the human population, residing mainly in coastal or inland desert areas, began exploiting a wider range of plant and animal resources (Byrd and Raab, 2007).

In the Project vicinity, evidence of Paleocoastal occupation is sparse, and none has been confirmed by scientific dating methods (such as radiocarbon dating) (Douglass et al., 2016)

Millingstone Period (8,500–3,000 B.P.)

During this time period, there is evidence for the processing of acorns for food and a shift toward a more generalized economy. The first evidence of human occupation in the Los Angeles area dates to at least 9,000 years B.P. and is associated with the Millingstone cultures (Wallace, 1955; Warren, 1968). Millingstone cultures were characterized by the collection and processing of plant foods, particularly acorns, and the hunting of a wider variety of game animals (Byrd and Raab, 2007; Wallace, 1955). Millingstone cultures also established more permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating later than 5,000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region. Cogged stones (cog-shaped stones) and disocidals (stone discs) are also indicative of the Millingstone Period.

In the Project vicinity, sites that date to this time period appear to have been small settlements or campsites reflecting resource gathering groups exploiting nearby lagoon or marshland (inland swamp) resources and specialized resource processing (such as shellfish). There is a gap in the archaeological record between 6,000 and 5,000 B.P., which suggests that the Project vicinity was sparsely occupied or abandoned during this time frame (Douglass et al., 2016).

Intermediate Period (3,000–1,000 B.P.)

During this time period, many aspects of Millingstone culture persisted, but a number of socioeconomic changes occurred (Erlandson, 1994; Wallace 1955; Warren, 1968). The native populations of southern California were becoming less mobile and populations began to gather in small sedentary villages with satellite resource-gathering camps. Increasing population size necessitated the intensified use of existing terrestrial and marine resources (Erlandson, 1994). Evidence indicates that the overexploitation of larger, high-ranked food resources may have led to a shift in subsistence, towards a focus on acquiring greater amounts of smaller resources, such as shellfish and small-seeded plants (Byrd and Raab, 2007). This period is characterized by increased labor specialization, expanded trading networks for both utilitarian and non-utilitarian materials, and extensive travel routes. Trade increased dramatically during this period, with asphaltum (tar), seashells, and steatite being traded from southern California to the Great Basin. Use of the bow and arrow spread to the coast around 1,500 B.P, largely replacing the dart and atlatl (Homburg et al., 2014). Increasing population densities, with ensuing territoriality and resource intensification, may have given rise to increased disease and violence between 3,300 and 1,650 B.P. (Raab et al. 1995).

The Intermediate Period is characterized by a lack of manos, metates, and core tools, an increase in the use of mortars and pestles, and the introduction of stone-lined earthen ovens. There is a wider variety and increased numbers of projectile points, and flexed burials are common (Douglass et al., 2016).

In the Project vicinity, the population density increased, possibly as a result of the migration of eastern desert Takic peoples into the Los Angeles Basin, which is postulated to have begun by the end of the late Millingstone period and to have continued into the late Intermediate period. The Takic incursion

resulted in the introduction of new material culture and mortuary practices, and an increase in genetic variation, population, number of sites, and focus on terrestrial resources. Changes in climate may also have contributed to the increased occupation of the area, as a wetter environment led to increased biological diversity. During this time, the Ballona wetlands shifted from an open embayment to a more closed, brackish environment. Lowland sites were likely occupied on a seasonal or semipermanent basis as resource processing camps, with semipermanent settlements on the bluff tops. Other important local developments during this time period include organized site structure with designated areas for different types of activities, and the rise of the mourning ceremony with the ritual destruction and burial of ground stone and the deceased's personal possessions. Local settlement patterns reflect functional rather than social differentiation (Douglass et al., 2016).

Late Period (1,000 B.P.–A.D. 1542)

The Late Period is associated with the florescence of the Gabrielino, who are estimated to have had a population numbering around 5,000 in the pre-contact period. The Gabrielino occupied what is presently Los Angeles County and northern Orange County, along with the southern Channel Islands, including Santa Catalina, San Nicholas, and San Clemente (Kroeber, 1925). This period saw the development of elaborate trade networks and use of shell-bead currency. Fishing became an increasingly significant part of subsistence strategies at this time, and investment in fishing technologies, including the plank canoe, are reflected in the archaeological record (Erlandson, 1994; Raab et al., 1995). Settlement at this time is believed to have consisted of dispersed family groups that revolved around a relatively limited number of permanent village settlements that were located centrally with respect to a variety of resources (Koerper et al., 2002).

In contrast to other parts of southern California, occupation of sites in the Project vicinity appears to decrease during the early Late period, probably due to changing climate that resulted in an overall decline in precipitation, and episodic drought and flooding (the onset of the Late Period coincided with the medieval climatic anomaly [or MCA], a period of extended drought that occurred between A.D. 800-1350) (Douglass et al., 2016).

Ethnographic Setting

The Project Site is located in a region traditionally occupied by the Gabrielino Indians. The term “Gabrielino” is a general term that refers to those Native Americans who were administered by the Spanish at the Mission San Gabriel Arcángel. Their neighbors included the Chumash and Tataviam to the north, the Juañeno to the south, and the Serrano and Cahuilla to the east. The Gabrielino are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith, 1978). The Gabrielino language is part of the Takic branch of the Uto-Aztecan language family.

Prior to European colonization, the Gabrielino occupied a diverse area that included: the watersheds of the Los Angeles, San Gabriel, and Santa Ana rivers; the Los Angeles basin; and the islands of San Clemente, San Nicolas, and Santa Catalina (Kroeber, 1925). The Gabrielino subsisted on a variety of resources in several ecological zones. Acorns, sage, and yucca were gathered throughout the inland areas whereas shellfish, fish, as well as a variety of plants and

animals were exploited within the marshes and along the coast. Deer and various kinds of small mammals were hunted on an opportunistic basis. Their material culture reflected the subsistence technology. Lithic tools such as arrow points and modified flakes were used to hunt and process animals. A variety of ground stone grinding implements, such as the mortar, pestle, mano, and metate, were used to process both plant and animal remains for food (Bean and Smith, 1978).

The settlement patterns of the Gabrielino, and other nearby groups, such as the Juaneño and Luiseño, were similar and they often interacted through marriage, trade and warfare. The seasonal availability of water and floral and faunal resources dictated seasonal migration rounds with more permanent villages and base camps being occupied primarily during winter and spring months. In the summer months, the village populations divided into smaller units that occupied seasonal food procurement areas. The more permanent settlements tended to be near major waterways and food sources and various secular and sacred activities, such as food production and storage and tool manufacturing, were conducted at these areas (Bean and Smith, 1978).

Coming ashore on Santa Catalina Island in October of 1542, Juan Rodriguez Cabrillo was the first European to make contact with the Gabrielino; the 1769 expedition of Portolá also passed through Gabrielino territory (Bean and Smith, 1978). At the time of Spanish contact, many Gabrielino practiced a religion that was centered around the mythological figure *Chinigchinich* (Bean and Smith, 1978). This religion may have been relatively new when the Spanish arrived, and was spreading at that time to other neighboring Takic groups. The Gabrielino practiced both cremation and inhumation of their dead. A wide variety of grave offerings, such as stone tools, baskets, shell beads, projectile points, bone and shell ornaments, and otter skins, were interred with the deceased. Native Americans suffered severe depopulation and their traditional culture was radically altered after Spanish contact. Nonetheless, Gabrielino descendants still reside in the greater Los Angeles and Orange County areas and maintain an active interest in their heritage.

The closest named settlements to the Project Site are *Saa'anga* and *Waachnga*. Review of a map titled *Gabrielino Communities Located on the Los Angeles-Santa Ana Plain* by William McCawley (1996) indicates that the settlement of *Saa'anga* was located approximately 0.55 miles from the Project Site. A map titled *The Gabrielino Indians at the Time of the Portola Expedition* by Bernice Johnston (1962) depicts *Saa'anga* as further away.

The McCawley map indicates that the settlement of *Waachnga* (also known variously as *Guasna*, *Guashna*, *Guaspet*, *Guachpet*, and *Guashpet*) was located approximately 3 miles from the Project Site. Based on mission baptism records, this “village” (or “rancheria” as it was known) appears to have been occupied from about 1790 to 1820 (Reddy, 2015). At least 193 people are known to have lived at the rancheria and were baptized there. Records suggest that recruitment into the Mission system did not occur until native populations closer to Mission San Gabriel had been assimilated, and after grazing expanded into the area, bringing native inhabitants into closer contact with Spanish-era ranchers (Stoll et al., 2009). Two archaeological sites with components dating to the Spanish-era (²LAN-62 and LAN-211) may be the location of this village/rancheria, although this has not been confirmed in the historical record (Reddy, 2015).

² The prefix “CA” has been omitted from the in-text discussion of recorded archaeological sites.

Three settlements are depicted in the vicinity of the Project Site on a map titled *Kirkman-Harriman Pictorial and Historical Map of Los Angeles County* (**Figure 4**). *Gaucha* (*Waachnga*) is depicted approximately 2.6 miles from the Project Site. An unnamed settlement is depicted approximately 2.5 miles from the Project Site. A second unnamed settlement is depicted approximately 2 miles from the Project Site (Kirkman, 1937). The location of the second unnamed settlement roughly corresponds to the location of the Los Angeles Man site (see description in the *Archaeological Setting* section).

Historic Setting

Spanish Period (A.D. 1542–1821)

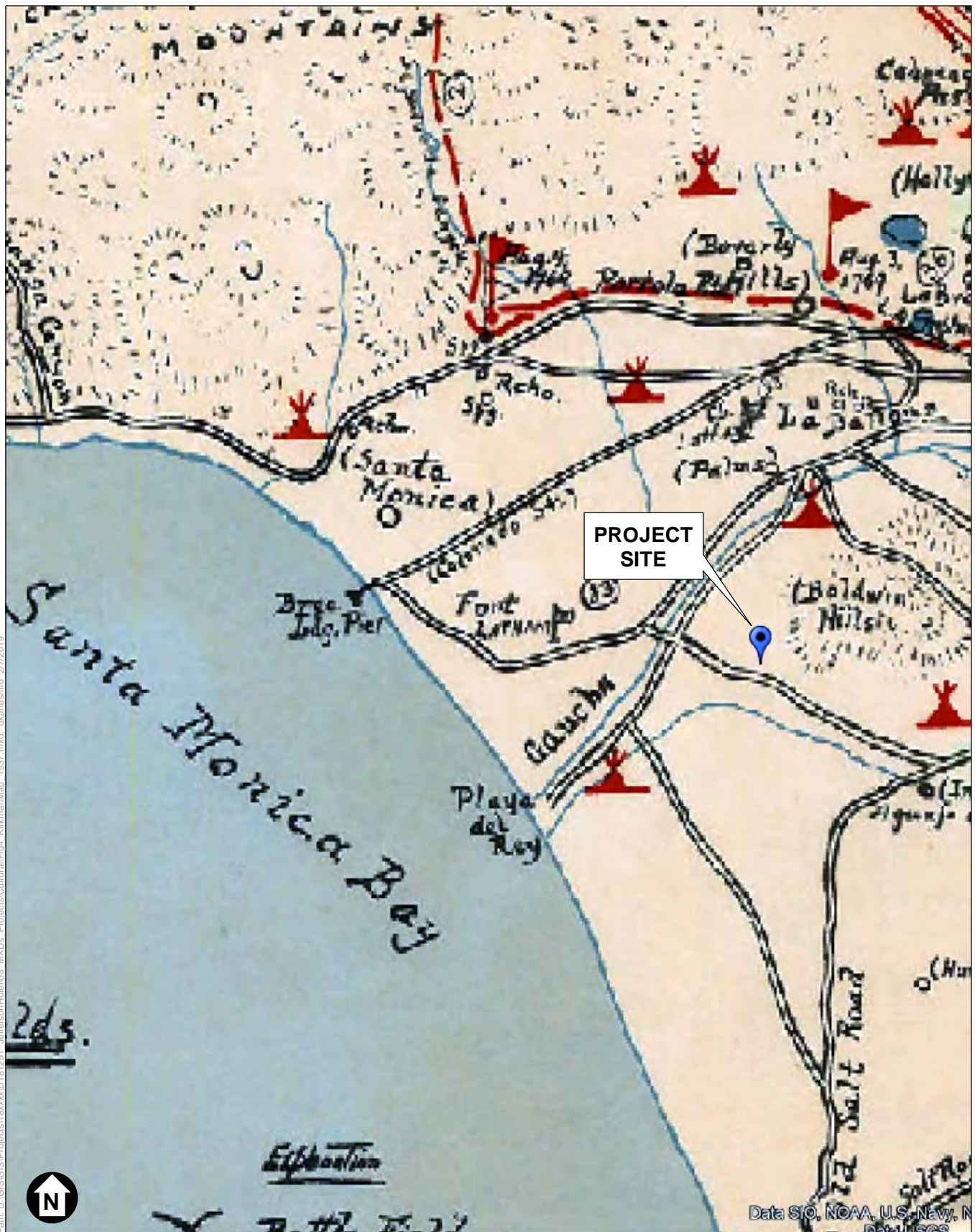
Although Spanish explorers made brief visits the region in 1542 and 1602, sustained contact with Europeans did not commence until the onset of the Spanish Period. In 1769 Gaspar de Portolá led an expedition from San Diego, passing through the Los Angeles Basin and the San Fernando Valley, on its way to the San Francisco Bay (McCawley, 1996). Father Juan Crespi, who accompanied the 1769 expedition, noted the suitability of the Los Angeles area for supporting a large settlement. This was followed in 1776 by the expedition of Father Francisco Garcés (Johnson and Earle, 1990).

In the late 18th century, the Spanish began establishing missions in California and forcibly relocating and converting native peoples. Mission San Gabriel Arcángel was founded on September 8, 1771 and Mission San Fernando Rey de España on September 8, 1797. By the early 1800s, the majority of the surviving Gabrielino population had entered the mission system, either at San Gabriel or San Fernando. Mission life offered some degree of security in a time when traditional trade and political alliances were failing and epidemics and subsistence instabilities were increasing (Jackson, 1999). This lifestyle change also brought with it significant negative consequences for Gabrielino health and cultural integrity.

On September 4, 1781, El Pueblo de la Reina de los Angeles was established not far from the site where Portolá and his men camped during their 1769 excursion, with a land grant of 28 acres issued to California Governor Felipe de Neve in 1781 (Gumprecht, 2001). The pueblo was first established in response to the increasing agricultural needs of Spanish missions and presidios in Alta California. The original pueblo consisted of a central square surrounded by 12 houses and a series of agricultural fields. Thirty-six fields occupied 250 acres between the town and the river to the east (Gumprecht, 2001).

By 1786, the flourishing pueblo attained self-sufficiency and funding by the Spanish government ceased. Fed by a steady supply of water and an expanding irrigation system, agriculture and ranching grew, and by the early 1800s the pueblo produced surplus wheat, corn, barley, and beans for export. A large number of livestock, including cattle and sheep, grazed in the surrounding lands (Gumprecht, 2001).

The Protohistoric Period (A.D. 1540-1770) and the Mission Period (A.D. 1769-1830) largely fall within this period, and are the terms often used in the archaeological record to refer to sites occupied during these two timeframes.



SOURCE: 1937 Kirkman Map

The Jeff Hotel

Figure 4
1937 Kirkman Map

Mexican Period (A.D. 1821–1848)

Mexico gained its independence from Spain in 1821 (Gumprecht, 2001). Mexico promoted the settlement of California with the issuance of land grants. In 1833, Mexico began the process of secularizing the missions, reclaiming the majority of mission lands and redistributing them as land grants. According to the terms of the Secularization Law of 1833 and Regulations of 1834, at least a portion of the lands would be returned to the Native populations, but this did not always occur (Milliken et al., 2009).

Many ranchos continued to be used for cattle grazing by settlers during the Mexican Period. Hides and tallow from cattle became a major export for Californios³, many of whom became wealthy and prominent members of society. The Californios led generally easy lives, leaving the hard work to vaqueros⁴ and Indian laborers (Pitt, 1994; Starr, 2007).

The Rancho Period (A.D. 1834-1848) falls within this period, and is often used in the archaeological record to refer to sites occupied during this timeframe.

American Period (A.D. 1848–present)

Mexico ceded California to the United States as part of the Treaty of Guadalupe Hidalgo in 1848. California officially became one of the United States in 1850. While the treaty recognized right of Mexican citizens to retain ownership of land granted to them by Spanish or Mexican authorities, the claimant was required to prove their right to the land before a patent was given. The process was lengthy and generally resulted in the claimant losing at least a portion of their land to attorney's fees and other costs associated with proving ownership (Starr, 2007).

When the discovery of gold in northern California was announced in 1848, a huge influx of people from other parts of North America flooded into California and the population of Los Angeles tripled between 1850 and 1860. The increased population provided an additional outlet for the Californios' cattle. As demand increased, the price of beef skyrocketed and Californios reaped the benefits. However, a devastating flood in 1861, followed by droughts in 1862 and 1864, led to a rapid decline of the cattle industry; over 70 percent of cattle perished during these droughts (McWilliams, 1946; Dinkelspiel, 2008). These natural disasters, coupled with the burden of proving ownership, caused many Californios to lose their lands during this period. Former ranchos were subsequently subdivided and sold for agriculture and residential settlement (Gumprecht, 2001; McWilliams, 1946).

Los Angeles was connected to the transcontinental railroad via San Francisco on September 5, 1876 and the population again exploded. The city would experience its greatest growth in the 1880s when two more direct rail connections to the East Coast were constructed. The Southern Pacific completed its second transcontinental railway, the Sunset Route from Los Angeles to New Orleans, in 1883 (Orsi, 2005). In 1885, the Santa Fe Railroad completed a competing transcontinental railway to San Diego, with connecting service to Los Angeles (Mullaly and Petty, 2002). The resulting fare wars led to an unprecedented real estate boom. Despite a

³ Spanish speaking, Catholic persons of Latin American descent born in Alta California between 1769 and 1848

⁴ Horsemen and cattle herders of Spanish Mexico and Alta California

subsequent collapse of the real estate market, the population of Los Angeles increased 350 percent from 1880 to 1890 (Dinkelspiel, 2008). Los Angeles continued on its upward trajectory in the first few decades of the 20th century with the rise of tourism, automobile travel, and the movie industry (McWilliams, 1946).

Development and Incorporation of Culver City

Harry H. Culver (1880 -1946), the founder of Culver City, was born in Milford, Nebraska on January 22, 1880. The middle child of five, Culver was raised on a farm along with three brothers and a sister. His father, Jacob Hazel Culver, was a brigadier general in the National Guard and a strict disciplinarian. Culver followed in his father's footsteps, enlisting in the military during the Spanish-American War. He studied at Doane College before spending three years at the University of Nebraska. In 1901, Culver traveled to the Philippines where he began working in the mercantile business, worked as a reporter for the Manila Times, and served as a special agent for the customs department. After more than three years in the Philippines, Culver returned to the United States, performing his customs duties in Detroit and Saint Louis. He resigned from the customs department in 1910 when he moved to California and began working for real estate giant I.N. Van Nuys. "As the story goes, after Van Nuys offered to make him a manager because of his exemplary work, Culver decided to venture out on his own. After intense study, Harry Culver pinpointed the area between Los Angeles and Abbot Kinney's resort of Venice for his city" (Cerra, 2013).

At the California Club in 1913, Harry Culver announced his plans to develop a city west of downtown Los Angeles. Culver saw an opportunity to capitalize on the excitement generated by Abbot Kinney's Venice of America development along the California coast south of Santa Monica. Between Venice and Los Angeles sat open land, originally part of Rancho La Ballona, and as the relationship between Los Angeles and Venice took shape, Culver saw a spot in between that was ideal for a new town site. "If you draw a line from the Story Building to the Ocean Front at Venice, at the halfway mark you will find three intersection electric lines—the logical center for what we propose to develop a town-site." Soon after Culver's speech, the city of Culver City was established. Culver promoted his new community by holding special events like "prettiest baby contests" and an annual marathon race. Newspaper advertisements exclaimed "All Roads Lead to Culver City!"

Culver City continued to grow and finally incorporated in 1917 (Cerra, 2013). The City grew outward from the downtown commercial area and adjacent film studios. This area saw commercial development along Culver Boulevard in the 1920s and 1930s, and spread to Washington Boulevard in the 1940s and 1950s, and was surrounded by residential neighborhoods.

At the heart of Screenland, the economic health of the City has always been strongly tied to the movie industry. Following the closure of MGM Studios, the City was looking for ways to spur economic development. To spur development and create a new flow of money, the City created the Redevelopment Agency (Sony Pictures, 2017). One of the first projects undertaken by the newly formed agency was the Fox Hills redevelopment. This development would open up more than 300 acres of land just southwest of the City to residential, commercial, and industrial growth.

Archaeological Setting

Culver City is located in an area with a rich archaeological history. In particular, research and data recovery excavations conducted as part of the Playa Vista Project, documented extensive cultural deposits dating from the Millingstone Period to the Mission Period (8,500 B.P. to A.D. 1830) and is summarized in the following section. **Table 1** provides an overview of prehistoric/Native American archaeological sites in the Project vicinity.

TABLE 1
PREHISTORIC ARCHAEOLOGICAL SITES IN THE VICINITY OF CULVER CITY

Permanent Trinomial (CA-LAN-)	Description	Landform	Period(s) of Occupation
47	Admiralty Site. Constituents include burials, stone-bowl fragments, projectile points, debitage, choppers, hammerstones, scrapers, a pestle, ground stone fragments, bone tools, antler harpoons, shell beads, and abundant shellfish and vertebrate-faunal remains	Lowlands	Late Period
54	Deane's Broken Mortar Site. Constituents include burials, ground stone (manos, metates, pestles, and possible mortar fragments), hammerstones, cores, flakes, flaked stone tools, dart-sized projectile points, worked-bone tools, shellfish remains, and fish, bird, and marine/terrestrial mammal bone.	Lowlands	Millingstone Intermediate
55	Camp site with midden. Constituents include a burial, ground stone (mortar and bowl fragments, manos, metate fragments,), flaked stone, projectile points, stone disc, and shellfish remains.	Lowlands	Unknown
57	Camp site with midden with shell fragments, projectile points, burials, and ground stone (mortars, pestles, bowls, possible <i>comales</i>).	Lowlands	Unknown
59	Hughes Site. Constituents include crescent-shaped stone tools, projectile points, flakes, caches of abalone shell bowls, tarring pebbles, steatite fragments, ground stone (mortar fragments, manos, pestles), hammerstones, and scrapers.	Bluffs	Millingstone Intermediate
60	Centinela Site. Constituents include a hearth, stone beads, flaked and ground stone tools, shellfish remains, and fish, bird, and mammal bone	Lowlands	Intermediate
61	Comprised of three loci that appear to have been occupied on a seasonal basis. Constituents include hearths, tarring pebbles and asphaltum, burials/human remains, ground stone, steatite bowls, <i>comales</i> , projectile points, faunal remains of birds, deer, and rabbit, fish bone, obsidian, glass trade beads, seeds (incl. wheat and barley)	Bluffs	Millingstone Intermediate Late Period Protohistoric/ Mission Period
62	Peck Site (or Mar Vista Site). Constituents include cremations and inhumations, obsidian, soapstone bowls, ground stone (manos, metates, mortars, and pestles), and fish/shellfish remains. Nearly 600 features, including 370 burials, were recovered during excavations.	Lowlands	Millingstone Intermediate Late Period Protohistoric/ Mission Period
63	Del Rey Site. Constituents include burials, flake stone debitage and tools (drills, reamers, shoppers, scrapers, crescents, cog stones, knives, projectile points), ground stone tools, digging-stick weights, net weights, hammerstones, tarring pebbles, stone anvils, bone tools (awls, spatulas, gorges, hooks, atlatl spurs), shellfish remains, fish and terrestrial animal bones, shell and stone beads, and glass trade beads.	Bluffs	Millingstone Intermediate Late Period
64	Bluff Site. Constituents include burials, hearths, shell dumps, clogged stones, discoidals, and shellfish remains	Bluffs	Millingstone Intermediate
67	Malcolm Farmer's Baldwin Hills Site No. 1. Possible camp site with midden and a small amount of shell	Lowlands	Unknown

Permanent Trinomial (CA-LAN-)	Description	Landform	Period(s) of Occupation
68	Malcolm Farmer's Baldwin Hills Site No.2. Possible seasonal village site with ground stone fragments (manos, metates, pestles, mortars), flaked stone tools, projectile points, stone bowls, and bone.	Lowlands	Unknown
69	Malcolm Farmer's Baldwin Hills Site No.3. Possible seasonal village site with midden, ground stone fragments (mortar, metate) and flaked stone.	Lowlands	Unknown
74	Malcolm Farmer's Baldwin Hills Site No.8. Possible seasonal village or camp site with ground stone (metates, mortars, manos)	Lowlands	Unknown
159	La Brea Tar Pits Site. Remains of a single individual.	Lowlands	-
171	Haverty Site. Remains of at least eight individuals.	Lowlands	-
172	Los Angeles Man Site. Remains of one individual.	Lowlands	-
193/H	Plant and faunal processing site with burials and one ritual feature. Site includes 55 features (hearths, animal burial, domestic discard area, activity area, cairn, human burials).	Lowlands	Millingstone Intermediate
194	Hammock Street Site. Constituents include European items (glassware, metal), horse/cattle bone, native ceramics, stone tools, projectile points, shellfish remains, and fish bone.	Lowlands	Rancho Period
206 and 206A	Berger Site. Constituents include coggled stones, ground stone (manos and metates), flaked stone tools (abraders, discoidal, cores, choppers, scrapers, drills, projectile point), debitage, hammerstones, ocher, asphaltum, shellfish remains, fish, bird, reptile, and terrestrial mammal bone, and a partial burial.	Bluffs	Millingstone Intermediate
211	Constituents include human and animal burials, flaked and ground stone artifacts, faunal bone, worked bone, shell, ceramics, stone and shell beads, botanical materials, glass trade beads, flaked bottle glass, possible European and Chinese ceramics, metal, and domesticated cattle bone.	Lowlands	Intermediate Protohistoric /Mission Period
212	Sparse midden with ground and flaked stone tools.	Bluffs	Millingstone
216	Prehistoric mortars	Lowlands	Unknown
2768/H	Constituents include domestic discard areas, thermal cooking features, rock cairns, possible pit house, lithic debitage, large amounts of fire-affected rock, shellfish remains, ground stone artifacts (manos, metates, pestles, mortars, and bowl fragments), and glass beads.	Lowlands	Intermediate Rancho Period
2966	Isolated ground stone, shell fragments, and fire-affected rock discovered during monitoring of construction grading	Hills	Unknown
2968	Lithic scatter with stone tools, burned bone, fire-affected rock, and shell	Hills	Unknown

SOURCE: Douglass et al., 2016; SCCIC, 2019

Early discoveries in the vicinity of the city include the La Brea Tar Pits site (LAN-159), the Haverty, or Angeles Mesa, site (LAN-171), and the Los Angeles Man site (LAN-172). The La Brea Tar Pits site was discovered in 1914 and consisted of the remains of a single individual. Originally thought to date as far back as 34,000 year ago, modern dating techniques have narrowed the window to between 9,000 and 4,450 B.P (Douglass et al., 2016). The Haverty site was discovered in 1924 by construction workers during excavation of a major sewer outfall line and consisted of the deeply buried remains of at least eight individuals, including males, females, adults and adolescents. Given that the remains were partially mineralized and recovered at a

depth of approximately 20 feet below the ground surface, it was inferred that they could date to the late Pleistocene. Scientific dating has produced a wide range of potential ages, suggesting they could be as old as 50,000 years, or as young as about 3,800 to 16,000 years, and their exact age remains unresolved (Brooks et al., 1990; Douglass et al., 2016). The Los Angeles Man site was discovered in 1936 and consisted of the remains (skull) of one individual in the same stratum as mammoth bones that were later found about 1,200 feet away. Los Angeles Man was discovered in a context similar to the Haverty site during excavation for a storm drain. Similar to the Haverty site, the remains were mineralized. Scientific dating indicated an age of about 23,600 years; however, the sample was too small to consider this date conclusive (Brooks et al., 1990; Douglass et al., 2016; Pollard and Heron, 2008).

Evidence of Paleocostal occupation in the Ballona area to the west of the city comes from two sites: LAN-61 and LAN-63. A crescent-shaped flaked stone tool (which typically date prior to 7,000 B.P) and several stemmed points (indicative of the Paleocoastal Period) were recovered from LAN-61 in the 1980s. Stemmed points were also recovered from LAN-63 in the 1980s, but subsequent excavations and radiocarbon dating failed to establish Paleocostal occupation of the site (Douglass et al., 2016).

Data from archaeological sites LAN-54, LAN-61, LAN-62, LAN-63, LAN-64, and LAN-206 (including LAN-206A) indicates that they were all occupied during the Millingstone Period. During this time, settlement was concentrated at the two lowland sites: LAN-54, located on what was a sandy island, and LAN-62, located on an alluvial fan. Both sites yielded radiocarbon dates that indicated Millingstone components within the sites (Douglass et al., 2016). LAN-54 appears to have been a specialized shellfish-processing area while the assemblage at LAN-62 was dominated by mammal bone. LAN-62 also contained evidence of one or two temporary camps where cooking, food (shellfish, mammal) processing, and temporary shelters occurred (Douglass et al., 2016). There is also evidence of Millingstone occupations near the Baldwin Hills where campsites were focused around an inland swamp (or *ciénega*).

Bluff top sites with Millingstone components include LAN-61, LAN-63, LAN-64, LAN-206, and LAN-206A. LAN-64 has been firmly dated to prior to 8,000 years ago and is the oldest site in the Ballona area. The earliest component of this site consists of discrete pit features containing shellfish remains and lithics that was interpreted to represent campsites of small resource gathering groups exploiting nearby lagoon resources. Artifacts recovered from LAN-64 include cogged stones (cog-shaped stones of unknown purpose) and discoidals (stone discs), but not from the Millingstone component, suggesting they had been saved for later use (Douglass et al., 2016). LAN-206 yielded a single radiocarbon date that indicated a Millingstone component, while LAN-206A contained cogged stones and discoidals, which are indicative of the Millingstone Period. LAN-63 also contained cogged stones and discoidals, as well as stemmed projectile points, but could not be scientifically dated to the Millingstone Period. LAN-61 yielded a radiocarbon that indicated a Millingstone component, and also contained cogged stones and discoidals. During this time, LAN-61, LAN-64, and LAN-206 appear to have been small settlements based on the sparse middens and isolated features (Douglass et al., 2016).

Sites in the vicinity of the city with Intermediate Period components include LAN-54, LAN-59, LAN-60, LAN-61, LAN -62, LAN-63, LAN -64, LAN-193, LAN-206, and LAN-2768, and it appears that sites on the bluff tops and in lowland areas were occupied at the same time. During the Intermediate Period, the embayment was closed off from Santa Monica Bay, forming the Ballona Lagoon and surrounding wetlands/marshlands, and there was also a 200-year period of peak rainfall. These environmental conditions, possibly coupled with the posited Takic expansion from the desert to the coast, resulted in extensive, long-term native occupation of this area, which is in contrast to other areas along the southern part of the Southern California Bight where most coastal sites were abandoned during this time. Occupation of sites may have rotated between lowland areas during periods of drought and bluff top areas during periods of high inundation/flooding/rainfall. The more permanent bluff top settlements (such as LAN-61, LAN-63, and LAN-64) coincide with the period of peak rainfall, suggesting they were established to optimize access to wetland and prairie resources (Douglass et al., 2016).

Lowland sites occupied during the Intermediate Period include LAN-54, LAN-60, LAN-62, LAN-193, and LAN-2768. LAN-54, LAN-193, and LAN-2768 appear to have been periodically occupied over a 2,000-year span, perhaps on a seasonal or somewhat semipermanent basis. The occurrence of isolated, widely dispersed burials suggests that people were buried near where they died without formalized mortuary practices. LAN-54 appears to have continued as a resource procurement/processing area. Hearth features and the presence of flaked and ground stone at LAN-2768 and LAN-193 suggests they were also resource processing areas (perhaps plants, or also mammals at LAN-193). Portions of LAN-62 and LAN-211 appear to have been used primarily for hunting and processing mammals. Other portions of LAN-62 appear to have also included procurement and processing of shellfish and fish (Douglass et al., 2016).

Bluff top sites occupied during the Intermediate Period include LAN-59, LAN-61, LAN-63, LAN-64, and LAN-206, which are all large midden sites with dense artifact deposits. Data from LAN-61, LAN-63, LAN-64, and LAN-206A indicates a highly diverse set of activities suggesting more permanent occupation, with settlements occupied on a semipermanent or multiseasonal basis, although none exhibit the characteristics of a primary village site. Spatial patterns indicate separate areas for refuse disposal, burials, ritual activities, communal activities, resource procurement, and resource processing. Burial patterns suggested distinct areas for different groups, and, in contrast to the lowland sites occupied during this time, bluff top sites exhibit associated mourning features. Data from LAN-63 indicates that during this time the site was well organized, with specific designated areas for garbage disposal, cooking, communal activities, and burials. A large number of broken ground stone was recovered in association with human remains, including a pestle that appears to have been created solely for ritualistic distribution as it did not exhibit indicators of use. Excavations at LAN-62 and LAN-63 also uncovered stone-lined earthen ovens, which were first utilized during this time period. At LAN-63, it appears that some of these features were used for communal ceremonies, while others were used as large roasting pits (Douglass et al., 2016). Recovery of numerous microblades from LAN-61, and the prevalence of stone beads with a decrease in shell beads, appears to support the migration of Takic desert (or non-maritime) groups into the area (Homburg et al. 2014), or it may be indicative of trade with these other groups (Douglass et al., 2016).

Sites in the vicinity of the city with evidence of Late Period components include LAN-47, -61, -62, -63, and -211. Bluff top and upland sites were abandoned as settlements centered on the lagoon edge to exploit wetland resources. Excavations from LAN-47 indicate that the site was seasonally occupied from about A.D. 1050 to 1150, and it may have been the only settlement occupied in this area at the beginning of the Late Period. Faunal evidence indicates a reliance on shellfish, waterfowl, small mammals, and fish, and while evidence of the use of offshore resources, such as pelagic fish, appears in other sites in southern California dating to this period, evidence of offshore resources is absent at LAN-47. Contrary to previous suggestions, LAN-47 does not appear to have been a village site, although it was a substantial campsite. Occupation of sites increased toward the end of the Late Period, and was concentrated at LAN-62 and LAN-211. LAN-62 appears to have functioned as a mortuary-ritual complex, with an established formal or dedicated cemetery (Homburg et al. 2014). LAN-211 may have been a permanent residential settlement as evidenced by possible house features, hearths, and thermal features (and is the best candidate for the location of *Guaspet*) (Douglass et al., 2016).

Mission Period settlement in the area appears to have consisted of small, intensively used residential loci with a large isolated burial ground and a widely dispersed, ephemeral use area. This pattern does not indicate a village-centric hierarchical or socially stratified settlement pattern during this period. Evidence from nearby sites (such as LAN-211) does not support a large centralized population, and the numerous individuals interred at LAN-62 (more than 180) likely represents a centralized cemetery that was populated from a much larger surrounding area (Douglass et al., 2016).

In summary, it appears that the Project vicinity was for the most part periodically/seasonally occupied by small, mobile groups exploiting local resources over a long period of time (thousands of years), except for a brief time during the Intermediate Period when the population flourished and more substantial, semipermanent settlements were customary due to optimal climatic conditions. The area appears to have been largely abandoned during the early Late Period, but people appear to have returned during the latter part of the Late Period, and beyond, to bury their dead. Sites reflect a dispersed settlement system, instead of a centralized village site, and suggest that ties to the area were probably more social than residential (Douglass et al., 2016).

Regulatory Framework

State

California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the state and is codified at *Public Resources Code (PRC) Section 21000 et seq.* CEQA requires lead agencies to determine if a proposed project would have a significant effect on the environment, including significant effects on historical or unique archaeological resources. Under CEQA (Section 21084.1), a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment.

The *CEQA Guidelines* (Title 14 California Code of Regulations [CCR] Section 15064.5) recognize that historical resources include: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (California Register); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record. The fact that a resource does not meet the three criteria outlined above does not preclude the lead agency from determining that the resource may be an historical resource as defined in PRC Sections 5020.1(j) or 5024.1.

If a lead agency determines that an archaeological site is a historical resource, the provisions of Section 21084.1 of CEQA and Section 15064.5 of the *CEQA Guidelines* apply. If an archaeological site does not meet the criteria for a historical resource contained in the *CEQA Guidelines*, then the site may be treated in accordance with the provisions of Section 21083, which is as a unique archaeological resource. As defined in Section 21083.2 of CEQA a "unique" archaeological resource is 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:

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

If an archaeological site meets the criteria for a unique archaeological resource as defined in Section 21083.2, then the site is to be treated in accordance with the provisions of Section 21083.2, which state that if the lead agency determines that a project would have a significant effect on unique archaeological resources, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place (Section 21083.1(a)). If preservation in place is not feasible, mitigation measures shall be required. The *CEQA Guidelines* note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment (*CEQA Guidelines* Section 15064.5(c)(4)).

A significant effect under CEQA would occur if a project results in a substantial adverse change in the significance of a historical resource as defined in *CEQA Guidelines* Section 15064.5(a). Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired" (*CEQA Guidelines* Section 15064.5(b)(1)). According to

CEQA Guidelines Section 15064.5(b)(2), the significance of a historical resource is materially impaired when a project demolishes or materially alters in an adverse manner those physical characteristics that:

- A. Convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register; or
- B. Account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the Public Resources Code or its identification in a historical resources survey meeting the requirements of section 5024.1(g) of the Public Resources Code, unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- C. 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.

In general, a project that complies with the *Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings* (Grimmer, 2017) is considered to have mitigated its impacts to historical resources to a less-than-significant level (CEQA Guidelines Section 15064.5(b)(3)).

Paleontological resources are afforded protection by environmental legislation set forth under CEQA. Appendix G of the State CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that “a project will normally result in a significant impact on the environment if it will ...disrupt or adversely affect a paleontological resource or site or unique geologic feature.” The Guidelines do not define “directly or indirectly destroy,” but it can be reasonably interpreted as the physical damage, alteration, disturbance, or destruction of a paleontological resource. The Guidelines also do not define the criteria or process to determine whether a paleontological resource is significant or “unique.” Recent changes by the Governor’s Office of Planning and Research (OPR) moved the paleontological checklist question listed in Appendix G to the Geology and Soils Section (Part VII).

California Register of Historical Resources

The California Register is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1[a]). The criteria for eligibility for the California Register are based upon National Register of Historic Places (National Register) criteria (PRC Section 5024.1[b]). Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register.

To be eligible for the California Register, a prehistoric or historic-period property must be significant at the local, state, and/or federal level under one or more of the following four 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; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above, and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally determined eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; and,
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources that may be nominated to the California Register include:

- Historical resources with a significance rating of Category 3 through 5 (those properties identified as eligible for listing in the National Register, the California Register, and/or a local jurisdiction register);
- Individual historical resources;
- Historical resources contributing to historic districts; and,
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

California Health and Safety Code Section 7050.5

California Health and Safety Code Section 7050.5 requires that in the event human remains are discovered, the County Coroner be contacted to determine the nature of the remains. In the event the remains are determined to be Native American in origin, the Coroner is required to contact the NAHC within 24 hours to relinquish jurisdiction.

California Public Resources Code Section 5097.98

California PRC Section 5097.98, as amended by Assembly Bill 2641, provides procedures in the event human remains of Native American origin are discovered during project implementation. PRC Section 5097.98 requires that no further disturbances occur in the immediate vicinity of the discovery, that the discovery is adequately protected according to generally accepted cultural and archaeological standards, and that further activities take into account the possibility of multiple burials. PRC Section 5097.98 further requires the NAHC, upon notification by a County Coroner, designate and notify a Most Likely Descendant (MLD) regarding the discovery of Native American human remains. Once the MLD has been granted access to the site by the landowner and inspected the discovery, the MLD then has 48 hours to provide recommendations to the landowner for the treatment of the human remains and any associated grave goods.

In the event that no descendant is identified, or the descendant fails to make a recommendation for disposition, or if the land owner rejects the recommendation of the descendant, the landowner may, with appropriate dignity, reinter the remains and burial items on the property in a location that will not be subject to further disturbance.

Assembly Bill 52

Assembly Bill (AB) 52 was approved by California State Governor Edmund Gerry “Jerry” Brown, Jr. on September 25, 2014. The act amended California 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 applies specifically to projects for which a Notice of Preparation (NOP) or a Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration (MND) will be filed on or after July 1, 2015. The primary intent of AB 52 was to include California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as tribal cultural resources. PRC Section 21074(a)(1) and (2) defines tribal cultural resources as “sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe” that are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources, or a resource that is determined to be a tribal cultural resource by a lead agency, in its discretion and supported by substantial evidence. On July 30, 2016, the California Natural Resources Agency adopted the final text for tribal cultural resources update to Appendix G of the CEQA Guidelines, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21080.3.1 requires that within 14 days of a lead agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the lead agency provide formal notification to the designated contact, or a tribal representative, of California Native American Tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the lead agency (PRC Section 21080.3.1(b)). Tribes interested in consultation must respond in writing within 30 days from receipt of the lead agency’s formal notification and the lead agency must begin consultation within 30 days of receiving the tribe’s request for consultation (PRC Sections 21080.3.1(d) and 21080.3.1(e)).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either: (1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2(b)).

If a California Native American tribe has requested consultation pursuant to Section 21080.3.1 and has failed to provide comments to the lead agency, or otherwise failed to engage in the consultation process, or if the lead agency has complied with Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the lead agency may certify an EIR or adopt an MND (PRC Section 21082.3(d)(2) and (3)).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the lead agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

California Public Resources Code Sections 5097.5 and 30244

California PRC Sections 5097.5 and 30244 provide additional state requirements for paleontological resource management. These statutes prohibit the removal of any paleontological site or feature from public lands without permission of the jurisdictional agency, define the removal of paleontological sites or features as a misdemeanor, and require reasonable mitigation of adverse impacts to paleontological resources from developments on public (state, county, city, district) lands.

California Code of Regulations Section 4307

California Code of Regulations, Title 14, Division 3, Chapter 1, Section 4307 states, part that “no person shall destroy, disturb, mutilate or remove . . . paleontological features.”

Local

City of Culver City

The City enacted a Historic Preservation Ordinance in 1991 which defines Cultural Resources. The Historic Preservation Ordinance (Chapter 15.05 of the City's Municipal Code) is administered through the City's Community Development Department by Cultural Affairs (City of Culver City, 2015). The Ordinance outlines a designation process, criteria, and procedures for

altering or modifying designated Cultural Resources. Pursuant to the City's Ordinance, a Cultural Resource is a property that has aesthetic, cultural, architectural or historical significance to the city, state, or nation, and may have been designated as a Landmark Structure, Significant Structure, or Recognized Structure. After satisfying at least one of the threshold criteria, classification is based on a ranking system, currently outlined in Resolution No. 91-R015.

City of Culver City General Plan

The City's General Plan does not include policies, goals, and objectives for cultural resources.

Professional Standards

Society for Vertebrate Paleontology

The SVP has established standard guidelines (SVP, 1995, 2010) that outline professional protocols and practices for conducting paleontological resource assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, and specimen preparation, identification, analysis, and curation. Most practicing professional vertebrate paleontologists adhere closely to the SVP's assessment, mitigation, and monitoring requirements as specifically provided in its standard guidelines. Most state regulatory agencies with paleontological laws, ordinances, regulations, and standards accept and use the professional standards set forth by the SVP.

As defined by the SVP (2010:11), significant nonrenewable paleontological resources are:

fossils and fossiliferous deposits, here defined as consisting of identifiable vertebrate fossils, large or small, uncommon invertebrate, plant, and trace fossils, and other data that provide taphonomic, taxonomic, phylogenetic, paleoecologic, stratigraphic, and/or biochronologic information. Paleontological resources are considered to be older than recorded human history and/or older than middle Holocene (i.e., older than about 5,000 radiocarbon years).

As defined by the SVP (1995:26), significant fossiliferous deposits are:

A rock unit or formation which contains significant nonrenewable paleontologic resources, here defined as comprising one or more identifiable vertebrate fossils, large or small, and any associated invertebrate and plant fossils, traces, and other data that provide taphonomic, taxonomic, phylogenetic, ecologic, and stratigraphic information (ichnites and trace fossils generated by vertebrate animals, e.g., trackways, or nests and middens which provide datable material and climatic information). Paleontologic resources are considered to be older than recorded history and/or older than 5,000 years B.P.

Based on the significance definitions of the SVP (1995, 2010), all identifiable vertebrate fossils are considered to have significant scientific value. This position is adhered to because vertebrate fossils are relatively uncommon, and only rarely will a fossil locality yield a statistically significant number of specimens of the same genus. Therefore, every vertebrate fossil found has the potential to provide significant new information on the taxon it represents, its paleoenvironment, and/or its distribution. Furthermore, all geologic units in which vertebrate

fossils have previously been found are considered to have high sensitivity. Identifiable plant and invertebrate fossils are considered significant if found in association with vertebrate fossils or if defined as significant by project paleontologists, specialists, or local government agencies.

A geologic unit known to contain significant fossils is considered to be “sensitive” to adverse impacts if there is a high probability that earth-moving or ground-disturbing activities in that rock unit will either directly or indirectly disturb or destroy fossil remains. Paleontological sites indicate that the containing sedimentary rock unit or formation is fossiliferous. The limits of the entire rock formation, both areal and stratigraphic, therefore define the scope of the paleontological potential in each case (SVP, 1995).

Fossils are contained within surficial sediments or bedrock, and are therefore not observable or detectable unless exposed by erosion or human activity. In summary, paleontologists cannot know either the quality or quantity of fossils prior to natural erosion or human-caused exposure. As a result, even in the absence of surface fossils, it is necessary to assess the sensitivity of rock units based on their known potential to produce significant fossils elsewhere within the same geologic unit (both within and outside of the study area), a similar geologic unit, or based on whether the unit in question was deposited in a type of environment that is known to be favorable for fossil preservation. Monitoring by experienced paleontologists greatly increases the probability that fossils will be discovered during ground-disturbing activities and that, if these remains are significant, successful mitigation and salvage efforts may be undertaken in order to prevent adverse impacts to these resources.

Paleontological Sensitivity

Paleontological sensitivity is defined as the potential for a geologic unit to produce scientifically significant fossils. This is determined by rock type, past history of the geologic unit in producing significant fossils, and fossil localities recorded from that unit. Paleontological sensitivity is derived from the known fossil data collected from the entire geologic unit, not just from a specific survey. In its “Standard Guidelines for the Assessment and Mitigation of Adverse Impacts to Non-renewable Paleontologic Resources,” the SVP (2010:1-2) defines four categories of paleontological sensitivity (potential) for rock units: high, low, undetermined, and no potential:

- **High Potential.** Rock units from which vertebrate or significant invertebrate, plant, or trace fossils have been recovered are considered to have a high potential for containing additional significant paleontological resources. Rocks units classified as having high potential for producing paleontological resources include, but are not limited to, sedimentary formations and some volcanoclastic formations (e. g., ashes or tephra), and some low-grade metamorphic rocks which contain significant paleontological resources anywhere within their geographical extent, and sedimentary rock units temporally or lithologically suitable for the preservation of fossils (e. g., middle Holocene and older, fine-grained fluvial sandstones, argillaceous and carbonate-rich paleosols, cross-bedded point bar sandstones, fine-grained marine sandstones, etc.).
- **Low Potential.** Reports in the paleontological literature or field surveys by a qualified professional paleontologist may allow determination that some rock units have low potential for yielding significant fossils. Such rock units will be poorly represented by fossil specimens in institutional collections, or based on general scientific consensus only preserve fossils in

rare circumstances and the presence of fossils is the exception not the rule, e. g. basalt flows or Recent colluvium. Rock units with low potential typically will not require impact mitigation measures to protect fossils.

- **Undetermined Potential.** Rock units for which little information is available concerning their paleontological content, geologic age, and depositional environment are considered to have undetermined potential. Further study is necessary to determine if these rock units have high or low potential to contain significant paleontological resources. A field survey by a qualified professional paleontologist to specifically determine the paleontological resource potential of these rock units is required before a paleontological resource impact mitigation program can be developed. In cases where no subsurface data are available,
- Paleontological potential can sometimes be determined by strategically located excavations into subsurface stratigraphy.
- **No Potential.** Some rock units have no potential to contain significant paleontological resources, for instance high-grade metamorphic rocks (such as gneisses and schists) and plutonic igneous rocks (such as granites and diorites). Rock units with no potential require no protection nor impact mitigation measures relative to paleontological resources.

For geologic units with high potential, full-time monitoring is generally recommended during any project-related ground disturbance. For geologic units with low potential, protection or salvage efforts will not generally be required. For geologic units with undetermined potential, field surveys by a qualified vertebrate paleontologist should be conducted to specifically determine the paleontologic potential of the rock units present within the study area.

Paleontological Resources Significance Criteria

Fossils are considered to be significant if one or more of the following criteria apply:

1. The fossils provide information on the evolutionary relationships and developmental trends among organisms, living or extinct;
2. The fossils provide data useful in determining the age(s) of the rock unit or sedimentary stratum, including data important in determining the depositional history of the region and the timing of geologic events therein;
3. The fossils provide data regarding the development of biological communities or interaction between paleobotanical and paleozoological biotas;
4. The fossils demonstrate unusual or spectacular circumstances in the history of life; or
5. The fossils are in short supply and/or in danger of being depleted or destroyed by the elements, vandalism, or commercial exploitation, and are not found in other geographic locations.

Significant paleontological resources are determined to be fossils or assemblages of fossils that are unique, unusual, rare, uncommon, or diagnostically important. Significant fossils can include remains of large to very small aquatic and terrestrial vertebrates or remains of plants and animals previously not represented in certain portions of the stratigraphy. Assemblages of fossils that might aid stratigraphic correlation, particularly those offering data for the interpretation of tectonic events, geomorphologic evolution, and paleoclimatology are also critically important (Scott and Springer 2003, Scott et al. 2004).

Archival Research

SCCIC Records Search

A records search for the Project was conducted on January 10, 2019, at the California Historical Resources Information System (CHRIS) South Central Coastal Information Center (SCCIC) housed at California State University, Fullerton. The records search included a review of all recorded archaeological resources and previous studies within the Project Site and a 1-mile radius, and historic architectural resources within or immediately adjacent to (within approximately 50 feet of) the Project Site. The records search also included a review of California Points of Historical Interest, the California Historical Landmarks, the California Register, the National Register, the Archaeological Determinations of Eligibility, and the California State Historic Resources Inventory.

Previous Cultural Resources Investigations

The records search results indicate that 49 cultural resources studies have been previously conducted within a 1-mile radius of the Project Site (**Appendix B**). Approximately 50 percent of the 1-mile records search radius has been included in previous cultural resources assessments. Of the 49 previous studies, none have included the Project Site and it does not appear to have been previously surveyed.

Previously Recorded Cultural Resources

The records search results indicate that eight archaeological resources have been recorded within the 1-mile radius (**Table 2**). These include six prehistoric archaeological sites (⁵LAN-57, LAN-59, LAN-60, LAN-67, LAN-194, and LAN-216) and two multicomponent archaeological sites (LAN-193/H and LAN-2768/H). Sites LAN-57, LAN-60, LAN-67, LAN-193/H, LAN-194, LAN-216, and LAN-2768/H occur on relatively flat landforms, such as in lowland areas, at the base of bluffs or hills, on the bank of a creek or lagoon, or on alluvial fans (referred to “lowlands” in the report). Site LAN-59 occurs on an elevated landform. None of these resources are located within or adjacent to (within 50 feet of) the Project Site. No historic architectural resources have been previously recorded within the Project Site or adjacent parcels.

Sacred Lands File Search

The NAHC maintains a confidential Sacred Lands File (SLF) which contains sites of traditional, cultural, or religious value to the Native American community. The NAHC was contacted on January 9, 2019 to request a search of the SLF. The NAHC responded to the request in a letter dated January 11, 2019 and indicated that the SLF results were positive. The NAHC did not provide specific information regarding the nature or location of the resource on file; however, the NAHC recommended contacting the Gabrielino Tongva Indians of California Tribal Council. The NAHC also provided a list of Native American tribes to contact as these tribes may have knowledge of cultural resources in the Project Site. The results of SLF search are provided in **Appendix C** of this report.

⁵ The prefix “CA” has been omitted from the in-text discussion of recorded archaeological sites.

TABLE 2
PREVIOUSLY RECORDED ARCHAEOLOGICAL RESOURCES WITHIN A 1-MILE RADIUS OF THE PROJECT SITE

Primary Number (P-19-)	Permanent Trinomial (CA-LAN-)	Description	Date Recorded/ Updated	Eligibility
000057	57	Prehistoric archaeological site: camp site with midden, shell fragments, projectile points, burials, and ground stone (mortars, pestles, bowls, possible <i>comales</i>).	1950	Unknown
000059	59	Prehistoric archaeological site: Hughes Site. Constituents include crescent-shaped stone tools, projectile points, flakes, caches of abalone shell bowls, tarring pebbles, steatite fragments, ground stone (mortar fragments, manos, pestles), hammerstones, and scrapers.	1950	Unknown
000060	60	Prehistoric archaeological site: Centinela Site. Constituents include a hearth, stone beads, flaked and ground stone tools, shellfish remains, and fish, bird, and mammal bone.	1950	Unknown
000067	67	Prehistoric archaeological site: Malcolm Farmer's Baldwin Hills Site No. 1. Possible camp site with midden and a small amount of shell.	1950	Unknown
000193	193/H	Multicomponent archaeological site: prehistoric archaeological component consists of 55 features (hearths, animal burial, domestic discard area, activity area, cairn, human burials; historic-period component consists of a historic trash deposit.	1952; 2001; 2009	Determined eligible for the NRHP; listed in the CRHR
000194	194	Prehistoric archaeological site: Hammock Street Site. Constituents include European items (glassware, metal), horse/cattle bone, native ceramics, stone tools, projectile points, shellfish remains, and fish bone.	1965	Unknown
000216	216	Prehistoric archaeological site: described as consisting of mortars	1953	Unknown
002768	2768/H	Multicomponent archaeological site: prehistoric midden with 78 features, including domestic features, as well as three burials, 11 late historic/modern features and artifacts. Artifacts consist of lithic materials, fire-affected rock, manuports, ground stone artifacts (manos, metates, pestles, mortars and bowl fragments), chipped stone tools, debris (core, flakes, flaked stone tools)	1999; 2000- 2007; 2013; 2014	Determined eligible for the NRHP; listed in the CRHR

NRHP = National Register of Historic Places

CRHR = California Register of Historical Resources

Historic Map and Aerial Photograph Review

Historic maps and aerial photographs were examined to provide historical information about the Project Site and to contribute to an assessment of the Project Site's archaeological sensitivity. Maps reviewed include the 1894 Los Angeles and 1896 Redondo USGS 15-minute topographic quadrangles, the 1901 Southern California Sheet No. 1 USGS 1 x 2-degree topographic quadrangle, and the 1924 Inglewood USGS 7.5-minute topographic quadrangle (TopoView, 2019). Historic aerial photographs were available for the years 1927, 1938, 1947 (AEI Consultants, 2007a), 1948, 1952, 1953, 1963, 1972, 1980, 1994, 2003, 2004, 2005, 2009, 2010, 2012, and 2014 (www.historicaerials.com, 2019). Aerial imagery for the year 2019 was available on Bing Maps. Sanborn Fire Insurance Map coverage is not available for the Project Site.

Review of the 1896 historic topographic map shows that the Project Site is undeveloped (**Figure 5**). However, an approximate 0.65-mile-long portion of Jefferson Boulevard adjacent to the Project Site is already in existence by this time. The nearest historical water sources to the

Project Site shown on the 1896 map are Centinela Creek (a tributary of Ballona Creek), located about 0.3 miles south, and Ballona Creek, located about 0.55 miles west. The 1896 map depicts the Santa Monica Branch of the Atchison Topeka and Santa Fe Railroad approximately 0.5 miles to the south of the Project Site. On the 1896 map, the edge of the Ballona Lagoon is shown about 2.25 miles to the west of the Project Site (see Figure 5). The 1894 historic topographic map depicts an inland swamp (*ciénegas*) approximately 2.8 miles northeast of the Project Site, separated from the Project Site by the Baldwin Hills (see Figure 5).

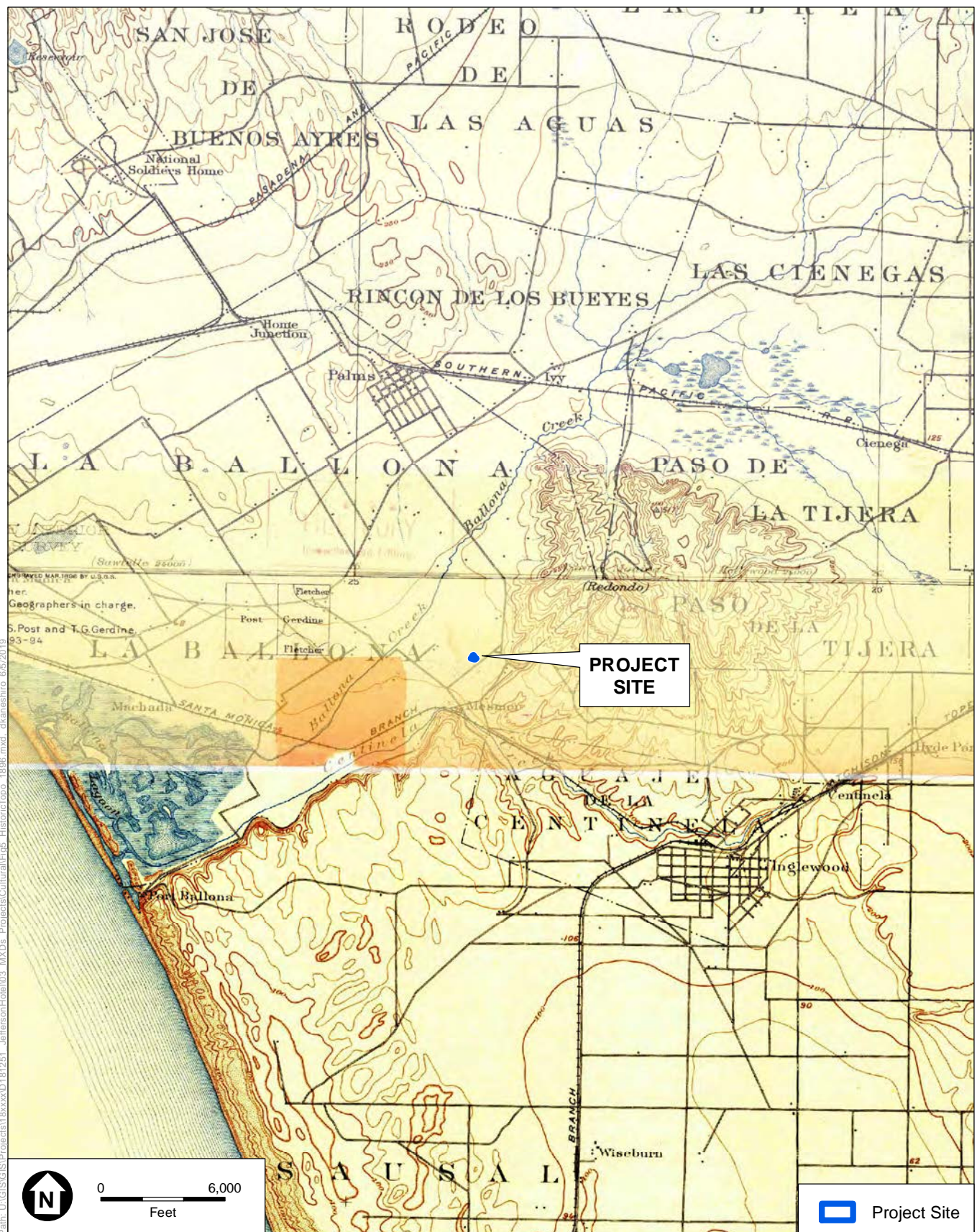
The 1901 topographic map continues showing the Project Site as it is depicted in the 1896 topographic map. The 1924 topographic map depicts the Project Site as it was observed in the 1896 and 1901 topographic maps; however, by this time, three unnamed roads are shown as following south and perpendicular to the Project Site (**Figure 6**). Centinela Avenue is also depicted approximately 0.5 miles south of the Project Site.

Review of the 1927, 1938, 1947, 1948, and 1952 aerial photographs indicate that the Project Site was undeveloped/vacant land. The 1953 and 1963 aerial photographs show a small structure located within the middle portion of the Project Site. The 1963 aerial photograph also depicts a rectangular building in the west portion of the Project Site (on a north-south alignment) (**Figure 7**). The 1972 and 1980 aerial photographs depict the same conditions as present in 1963. The small structure located within the middle portion of the Project Site is no longer present in 1994, and the existing structures had been constructed by this time. No additional improvements or substantial changes have occurred to the Project Site since 1994.

Environmental and Geotechnical Reports Review

In order to garner information on the past land uses and level of previous development and disturbances that may have occurred within the Project Site, ESA reviewed the following five documents: *Phase I Environmental Site Assessment* (Phase I ESA) (AEI Consultants, 2007a); *Phase II Environmental Site Assessment* (Phase II ESA) (AEI Consultants, 2007b); *Phase III Subsurface Investigation Report* (Phase III) (AEI Consultants, 2007c); *Limited Phase II Investigation Report* (Limited Phase II) (Waterstone Environmental, Inc., 2007); and *Geotechnical Engineering Investigation Report* (Geotechnical Investigation) (Geotechnologies, Inc., 2017).

The Phase I ESA, conducted in June 2007, included property use research conducted at the Culver City Building Department and the County of Los Angeles Department of Public Works (LACDPW), and a search of historic city directories at the Sherman Public Library and Haines & Company. The Phase II ESA, conducted in July 2007, included a geophysical survey and eight soil borings (AEI-B1 through AEI-B8) advanced to various depths between 4 and 25 feet below ground surface. The Phase III, conducted in September 2007, included eight soil borings (AEI-B9 through AEI-B-16) advanced to various depths between 19 and 27 feet below ground surface. The Limited Phase II, conducted in October 2007, included four soil borings (SB-1, SB-2, SB-3, and SB-4) advanced to 22 feet below ground surface. The Geotechnical Investigation, conducted in September 2017, included two soil borings (B1 and B2) advanced to 70 feet below ground surface. **Table 3** describes the previous soil borings and **Figure 8** depicts the locations of previous soil boring locations.



SOURCE: Topo View

The Jeff Hotel

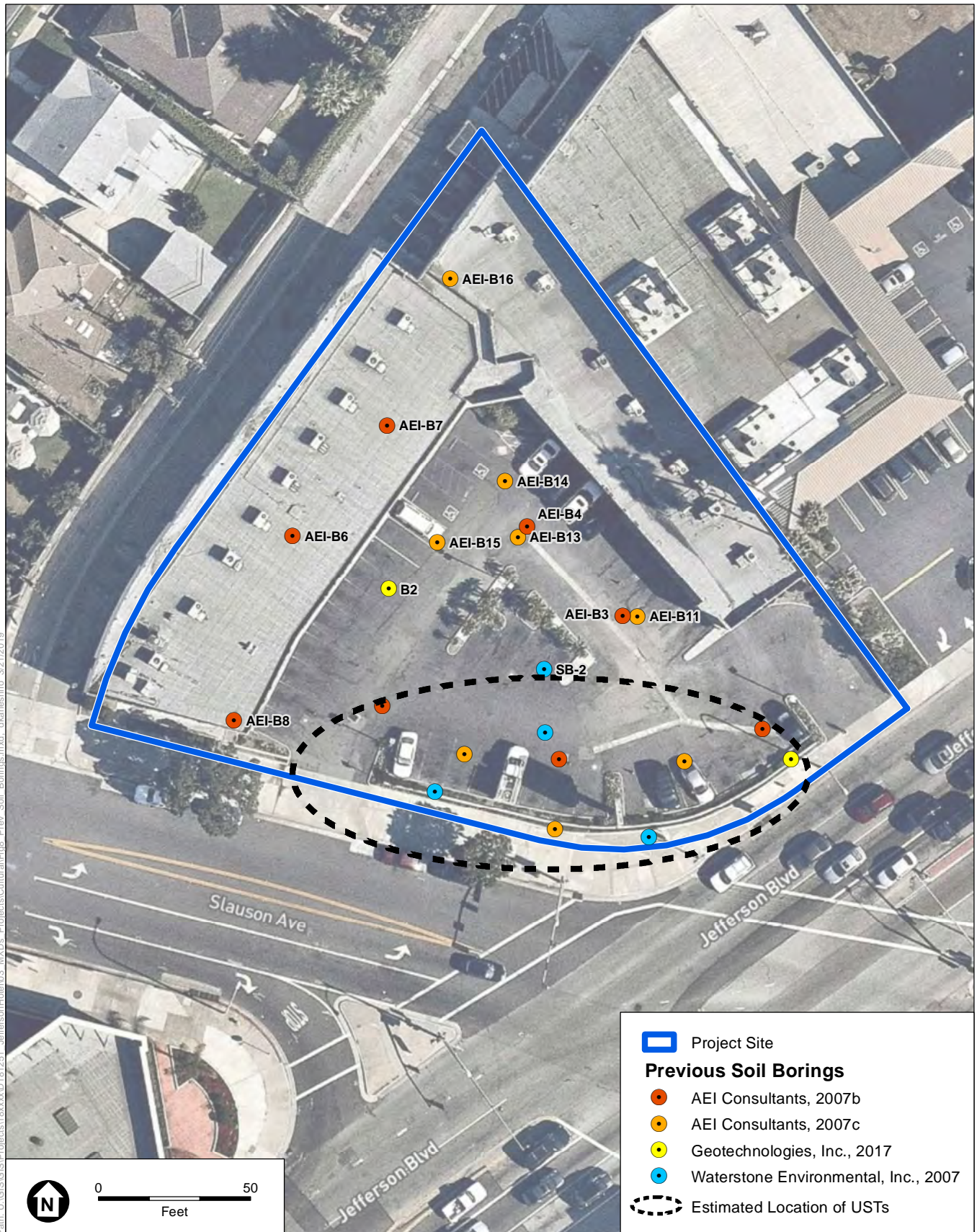
Figure 5
1894 and 1896 Topographic Maps



SOURCE: NETR Online

The Jeff Hotel

Figure 7
1963 Aerial Photograph



SOURCE: Digital Globe 2017

The Jeff Hotel

Figure 8
Previous Soil Borings

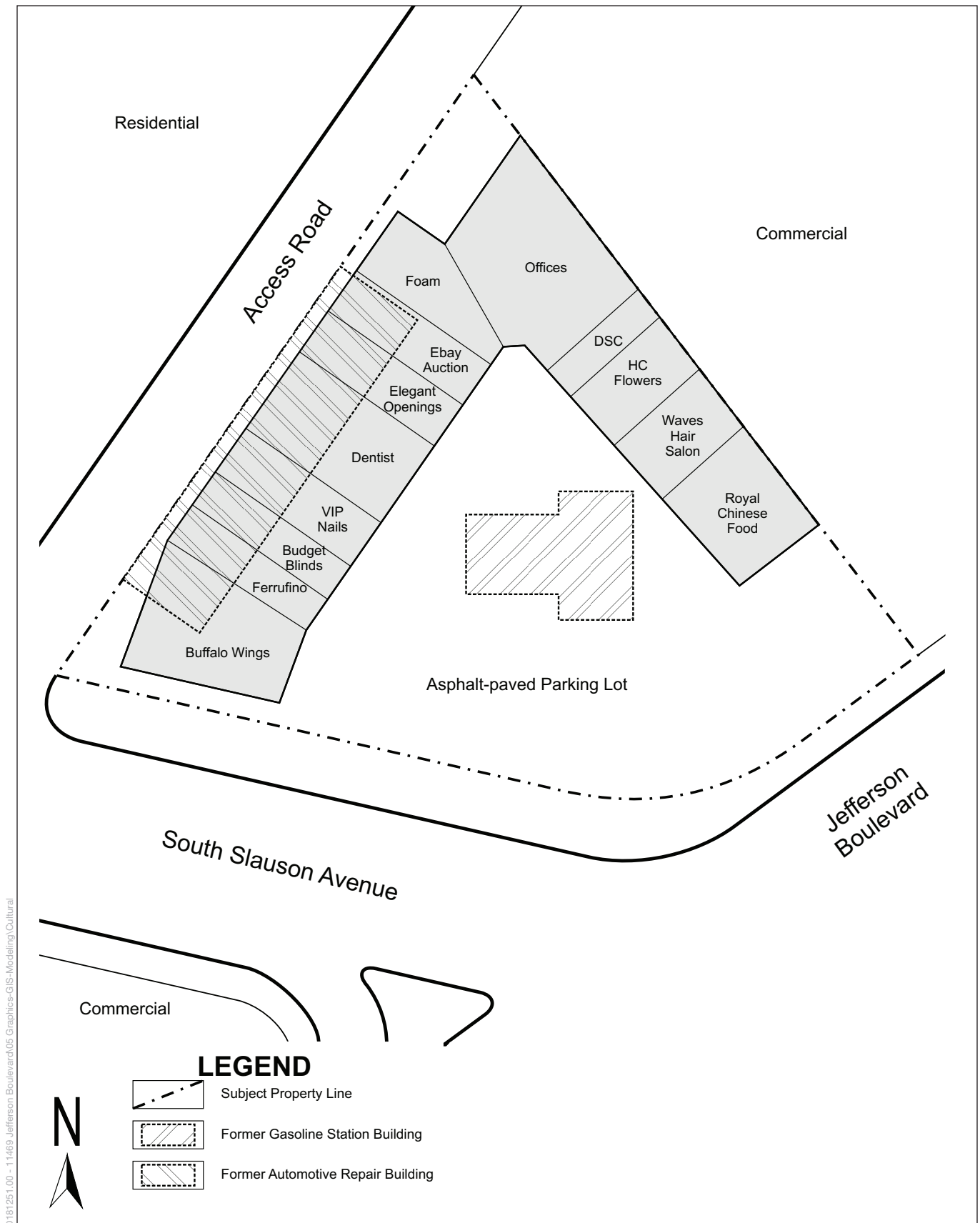
TABLE 3
PREVIOUS SOIL BORINGS WITHIN THE PROJECT SITE

Boring No.	Location	Diameter/Type	Terminal Depth (feet bgs)	Notes	Date	Source
AEI-B1	Former gasoline station: southern corner of parking lot	Geoprobe 6600, direct push	20	Strong odor and soil discoloration. Groundwater encountered at 20 ft bgs	7/27/2007	AEI Consultants, 2007b
AEI-B2	Former gasoline station: southwest corner of parking lot	Geoprobe 6600, direct push	25	No to slight odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B3	Former gasoline station: central portion of parking lot	Geoprobe 6600, direct push	25	No to strong odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B4	Former gasoline station: northern corner of parking lot	Geoprobe 6600, direct push	25	No to strong odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B5	Former gasoline station: southeast corner of parking lot	Geoprobe 6600, direct push	25	No to slight odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B6	Vicinity of former automotive repair facility	Limited-access Geoprobe rig, direct push	4	Refusal encountered due to inaccessibility of the tenant unit.	7/27/2007	AEI Consultants, 2007b
AEI-B7	Vicinity of former automotive repair facility	Limited-access Geoprobe rig, direct push	15	No to slight odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B8	Vicinity of former automotive repair facility	Limited-access Geoprobe rig, direct push	15	No to slight odor and soil discoloration. Groundwater not encountered.	7/27/2007	AEI Consultants, 2007b
AEI-B9	23 ft south of AEI-B1	Geoprobe 6600, direct push	23	Strong odor and soil discoloration. Groundwater encountered at 23 ft bgs.	8/24/2007	AEI Consultants, 2007c
AEI-B10	32 ft west of AEI-B1	Geoprobe 6600, direct push	27	No to slight odor and discoloration. Groundwater encountered at 27 ft bgs.	8/24/2007	AEI Consultants, 2007c
AEI-B11	Adjacent to AEI-B3	Geoprobe 6600, direct push	25	Odor and discoloration not noted. Groundwater encountered at 25 ft bgs.	8/24/2007	AEI Consultants, 2007c
AEI-B12	43 ft east of AEI-B1	Geoprobe 6600, direct push	23	No to strong odor. Some soil discoloration. Groundwater encountered at 23 ft bgs.	8/24/2007	AEI Consultants, 2007c
AEI-B13	Adjacent to AEI-B4	Geoprobe 6600, direct push	23	Slight odor and soil discoloration. Groundwater encountered at 23 ft bgs.	8/28/2007	AEI Consultants, 2007c
AEI-B14	31 ft north of AEI-B4	Geoprobe 6600, direct push	23	No odor. No to some soil discoloration. Groundwater encountered at 23 ft bgs.	8/28/2007	AEI Consultants, 2007c
AEI-B15	28 ft west of AEI-B4	Geoprobe 6600, direct push	23	No odor. No to some soil discoloration. Groundwater encountered at 23 ft bgs.	8/28/2007	AEI Consultants, 2007c
AEI-B16	Northern corner of Project Site	Geoprobe 6600, direct push	19	No odor. No to some soil discoloration. Groundwater encountered at 19 ft bgs.	8/28/2007	AEI Consultants, 2007c

Boring No.	Location	Diameter/Type	Terminal Depth (feet bgs)	Notes	Date	Source
SB-1	South of former gasoline station between AEI-B1 and AEI-B9	Geoprobe 6600, direct push, macro core	22	No to slight odor. Groundwater encountered at 22 ft bgs.	10/12/2017	Waterstone Environmental, Inc., 2007
SB-2	South of former gasoline station, north of SB-1	Geoprobe 6600, direct push, macro core	22	No to slight odor. No to slight odor. Groundwater encountered at 22 ft bgs.	10/12/2017	Waterstone Environmental, Inc., 2007
SB-3	Southwest of former gasoline station	Geoprobe 6600, direct push, macro core	22	No to strong odor. No to slight odor. Groundwater encountered at 22 ft bgs.	10/11/2017	Waterstone Environmental, Inc., 2007
SB-4	Southeast of former gasoline station	Geoprobe 6600, direct push, macro core	22	No to strong odor. No to slight odor. Groundwater encountered at 22 ft bgs.	10/11/2017	Waterstone Environmental, Inc., 2007
B1	Southeastern area	8-inch hollow stem auger	70	Fill to 3 ft bgs. Groundwater encountered at 24 ft bgs.	9/18/2017	Geotechnologies, Inc., 2017
B2	Northwestern area	8-inch hollow stem auger	70	Fill to 3 ft bgs. Groundwater encountered at 24.5 ft bgs.	9/15/2017	Geotechnologies, Inc., 2017

The results of the Phase I ESA indicate that the Project Site was undeveloped land from 1927 (date of earliest aerial photograph) to 1953. From 1953 to circa 1985, the property was developed with an auto repair facility, a car wash, and a gasoline station (**Figure 9**). Between 1966 and 1970, two 4,000-gallon underground storage tanks (USTs), one 2,000-gallon gasoline UST, one 280-gallon waste oil UST, one 6,000-gallon gasoline UST, and one 550-gallon waste oil UST were removed, and two 9,960-gallon gasoline USTs and one 280-gallon waste oil UST were installed. By 1979, all of the USTs had been removed and the gasoline station and auto repair buildings were demolished (AEI Consultants, 2007a). The results of the Phase II and Limited Phase II borings indicate that the USTs were located in the southern portion of the Project Site, based on the levels of containments detected during testing of the soil samples and the locations of fill materials associated with backfilling USTs (AEI Consultants, 2007b; Waterstone Environmental, Inc., 2007). This area is approximated by a red circle on Figure 8.

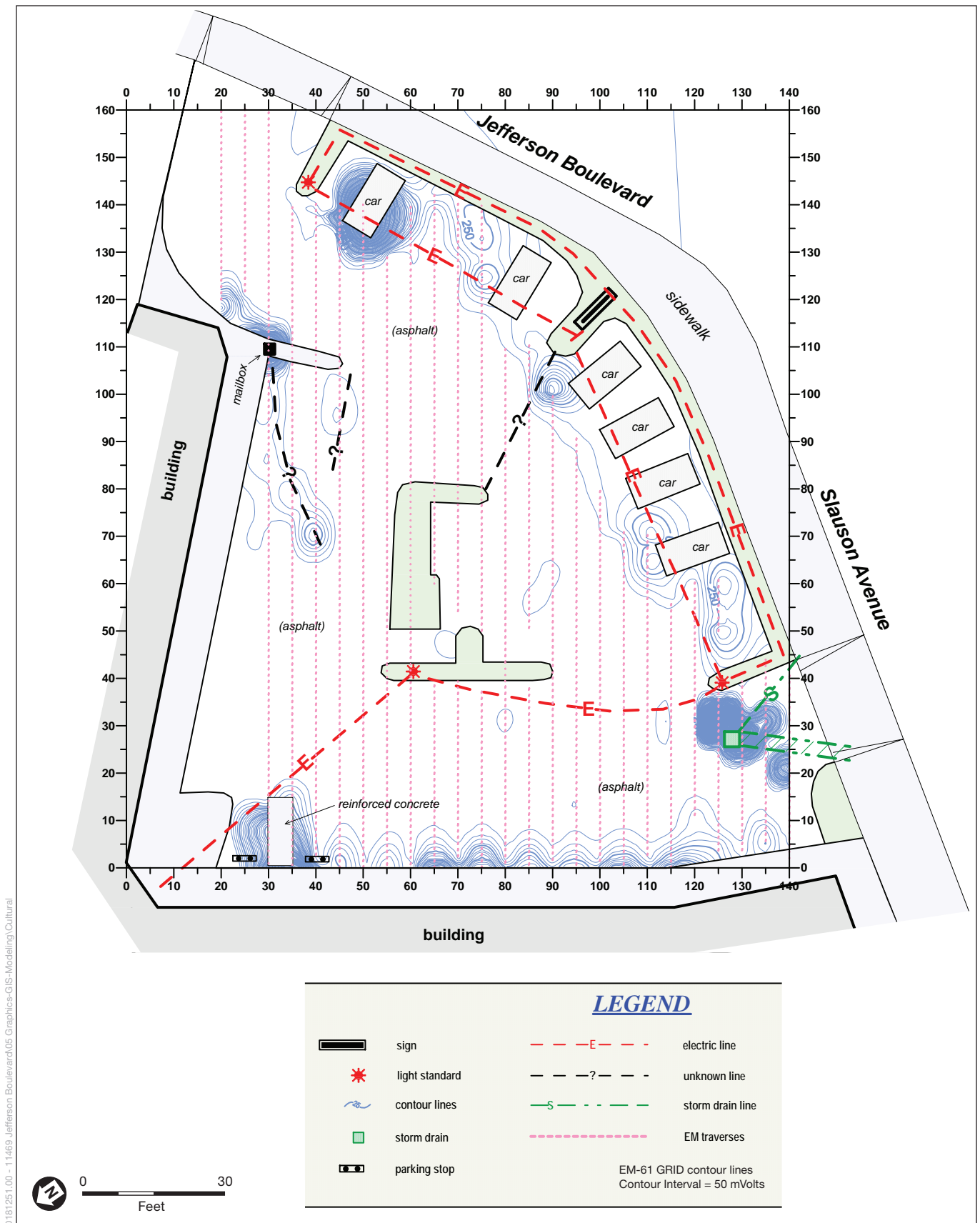
A geophysical survey conducted as part of the Phase II ESA did not detect any anomalies that indicated the presence of existing USTs; however, the nature of the soil and materials covering the survey areas resulted in radar penetration of only 1.5 to 2 feet below ground surface. The geophysical survey did detect linear features associated with electrical, storm drain, and unknown utilities were encountered in the southern, central, and northeastern portions of the Project Site (**Figure 10**). Two unknown linear utility lines were encountered in the western portion of the Project Site (AEI Consultants, 2007b).



SOURCE: AEI Consultants, 2007a

The Jeff Hotel

Figure 9
Project Site with Historic and Modern Uses



SOURCE: AEI Consultants, 2007b

The Jeff Hotel

Figure 10
Geophysical Survey Results

Boring logs indicate that the Project Site is at least partially underlain by fill materials (sandy to silty clays) up to 3 feet below ground surface, younger alluvial deposits deposited by river and stream movement (sandy to silty clays and occasionally thin layers of silty and clayey sands, and sands from 3 to 30-35 feet below ground surface, and older alluvial deposits (gravelly sands and sands with cobbles) below 35 feet (Geotechnologies, Inc., 2017). Soils within the top 25 feet generally consist of medium to dark brown, olive brown, and gray-green silty clay with strings of fine- to coarse-grained sand at approximately 19 feet below ground surface (AEI Consultants, 2007c). Fill soils associated with USTs are present in the southern portion of the Project Site from surface to 12 feet below ground surface (Waterstone Environmental, Inc., 2007). Groundwater was encountered at various depths between 19 and 27 feet below ground surface.

A review of building permits conducted as part of the Phase I ESA indicates that the property's original address was 11467 Jefferson Boulevard. In 1953, Tidewater Associated Oil and Texas Oil Company applied for permits to construct a service station. In 1954, Ferdy Sant applied for a permit to construct an auto service building. In 1957, The Texas Company applied for a permit for an addition to the service station. In 1967, Maurice Wolfe applied for permits to erect a chain link fence and a block wall. **Table 4** provides a list of permits related to the historical uses of the property, and permits that illustrate previous ground disturbance.

A review of city directories conducted as part of the Phase I ESA indicates that the gas station was listed as "Texaco Service Station/Wolfe's Automotive" in the 1959, 1964, 1967, and 1972 city directories. The property was not listed in the 1931, 1946, 1949, 1976, 1981, and 1985 directories (AEI Consultants, 2007). Other names associated with the gas station include variants of "Bill Roby's Texaco" (Los Angeles Times, Classified Ads, 1954, 1957, 1958, 1961, and 1962; City Directory for Culver City, 1963); Maurie Wolfe Texaco Station (Los Angeles Times, Classified Ads, 1966); and Lou's Texaco (Los Angeles Times, Classified Ads, 1966).

Historical Archives Review

Additional archives were reviewed to establish any significant events or persons that might be associated with the gas station, remnants of which could be located subsurface in the Project Site. This included a review of the Los Angeles Public Library digital archives, Newspapers.com, and Ancestry.com. Individuals known to be associated with the gas station include Ferdy Sant, Bill Roby, Luke Sanford, and Maurie Wolfe. Lou, of "Lou's Texaco," could not be tied to a specific individual since no last name was provided, and research could not be conducted for this individual.

Ferdy Sant was a prominent Arizona pharmacist, businessman, and local politician. He was born Ferdinand Santibanez on March 4, 1913 in Lerdo, Durango, Mexico to parents Fernando Santibanez and Vicenta E. Gutierrez. He immigrated to the United States in November 1913 with his parents. In 1930, he was living with his widowed mother in Phoenix, Arizona. He wed Mary Margaret Foster, age 19, in 1939 and the couple had moved to Yuma, Arizona by 1940 where Sant was employed as a druggist with "R. Pharmacy" (Ancestry.com, 2019).

TABLE 4
PERMITS FOR 11469 JEFFERSON BOULEVARD

Issued	Tract, lot and block	Address	Permit #	Owner	Owner's Address	Contractor	Contractor's Address	Description
1-29-1953	Tract 17531, Lots 31 & 32	11467 Jefferson	A-4161	Tidewater Assoc. Oil	610 Pacific Elect Blvd.	Cal Steel	3833 Medford St.	Construct service station
8-31-1953	Tract 17531, Lots 30-32	11467 Jefferson	A-1692	Texas Oil Company	LA	Cal Steel & Const. Co.	3833 Medford St.	Construct service station
2-17-54	Tract 17531, Lots 30-32	11467 Jefferson Blvd.	A-5042	Ferdy Sant	Yuma, Arizona	CALCOR	1600 N. Spring	Construct auto service
8-22-57	Tract 17531, Lots 30-32	11467 Jefferson Blvd.	A-7896	The Texas Co.	929 S. Broadway	Madison Iron	1900 E. 64	Construct service station addition
7-1-1960	Tract 17531, Lots 30-32	11467 W. Jefferson	A-10206	Texaco	Texas Oil Bldg., 3350 Wilshire Blvd.	Madison Bldrs. Inc.	1900 E. 64th	Repair service station
3-7-1966	-	11467 W. Jefferson	A-14418	Texaco Oil Co.	-	Prime Inc.	7810 Calif. Ave., Huntington Park	Remove 2-4,000 gas tanks, 1-2,000 gas tank, and 1-280 waste oil tank. Install 2-9,960 gas tanks and 1-280 waste oil tank
8-4-1967	-	11467 W. Jefferson	A-15306	Maurie Wolfe	Same	Culver Fence & Lumber Co.	5625 Corryne Pl.	Erect chain link fence
6-22-1967	-	11467 W. Jefferson	A-15235	Maurie Wolfe	4505 Overland, Apt. 1	Same	-	Construct block wall fence
8-12-1970	Tract 17531, Lot 31	11467 Jefferson	A-17143	Texaco	11467 Jefferson	Morganhupher Co.	1901 W. 8th St.	Install gas tank, submersible pump, gas dispenser, vent line
12-24-1974	-	11467 Jefferson Blvd.	19656	Texaco	Los Angeles	Spencer & Jones	247 N. Covina, City of Industry?	Vapor recovery systems for gasoline pumps
11-7-1979	-	11467 Jefferson	A-23702	Texaco	-	O.S.T. Builder	P.O. Box Westminster	Remove 2-10,000, 1-6,000, and 1-550 W.O. U.G. storage tanks
9-30-1983	-	11467 Jefferson	02222	Texaco, Inc.	3350 Wilshire Blvd.	Fred Fielder & Assoc.	-	Install 10,000-gallon U.G. tank
6-5-1984	-	11467 W. Jefferson Blvd.	04105	Texaco Oil Co.	3050 Wilshire Blvd.	REF & Associates	8980 Glenoaks Blvd., Sun Valley	Remove 550-gallon waste oil tank
9-30-1985	Tract 17531, Lots 30-32	11467 Jefferson Blvd.	08455	Jefferson Plaza Associates	16100 Ventrua Blvd. Suite 10, Encino	Owner	Same	Grading permit: 900 CU. YD.

In January 1941, the Sants moved to Honolulu, Hawaii, where Ferdy had accepted a position as the floor manager for Benson Smith & Co., one of the largest drug stores in Honolulu (Ancestyr.com, 2019). The couple were in Honolulu during the Japanese attack on Pearl Harbor, but left aboard the S.S. Matsonia on December 26, 1941 as evacuees bound for San Francisco (Ancestry.com, 2019; The Salt Lake Tribune, January 1, 1942).

From about 1942 to 1944, Sant worked at International Pharmacy in Phoenix. In 1944, he purchased Minor's Drug Store at 419 Eighth Street, which had been in business since 1913, and re-named it Sant Drug Store (The Yuma Weekly Sun and the Yuma Examiner, August 11, 1944). In 1946, Sant constructed a brick adobe home at 777 Eight Avenue in Yuma on land that he had purchased in 1944 (The Yuma Weekly Sun and The Yuma Examiner, January 21, 1944; The Yuma Weekly Sun and the Yuma Examiner, August 30, 1946). Sant and his wife welcomed their first child, Ferdy Jr., in 1947, and then later son Robert and daughter Jaqueline (Ancestry.com, 2019; Arizona Republic, July 5, 1998).

In 1956, Sant purchased the former Farmers Marketing Corp. property at the corner of Fourth Avenue and Eighth Street for \$85,000. He demolished the existing building, and developed a white porcelain and polished aluminum service station at a cost of \$50,000 and a "V" shaped commercial building on the back of the lot to house a nationally known dress shop and shoe store. Lewis Conner of Conner Oil Co. said that his company would lease the gas station (Arizona Republic, May 23, 1956; The Yuma Daily Sun, May 23, 1961).

Sometime between 1953 and 1960, the Sant family moved to a new home at 603 East Palo Verde in Yuma. Around this time, Sant became active in local and state politics. In 1960, he began service on the Arizona State Board of Pharmacy after being appointed by then Governor Paul Fannin, and he was elected president of the board in 1961. He served as president of the board until 1976. He was also elected to the Yuma City Council in 1962. In 1960, the Sants hosted a community gathering with the Governor Fannin and his wife at their home, and later hosted a party for gubernatorial candidate Raul Casto during his run for office in 1974 (Arizona Daily Star, July 15, 1961; Arizona Republic, January 1, 1976; Arizona Republic, July 4, 1968; The Yuma Daily Sun, June 19, 1960; The Yuma Daily Sun, March 19, 1961; The Yuma Daily Sun, October 11, 1968; The Yuma Daily Sun, October 18, 1974).

Sant's relationship with Texaco is unclear, but he was asked by Texaco and Standard Oil to protest a proposed gas tax hike in Arizona in 1962 (The Yuma Daily Sun, October 8, 1962). In 1968, Sant constructed a Texaco Station at the corner of Fourth Avenue and Eighth Street in Yuma (The Yuma Sun, April 28, 1968). No information was found regarding his involvement of the development of the Texaco gas station at 11469 Jefferson Boulevard.

In 1975, Sant constructed a medical office building on the parking lot of his drug store (The Daily Yuma Sun, June 1, 1975). Sant passed away in 1993 and his wife in 1998 (Ancestry.com, 2019). The family business was run by their son Robert until it closed its doors permanently in July 2017 (PressReader – Yuma Sun, July 19, 2017).

Bill Roby appears to have been the owner or leasee of the gas station from 1954 until at least 1963 (Los Angeles Times, July 18, 1954; City Directory for Culver City, 1963). A search of

historical databases identified several individuals with a similar name (search terms “Bill Roby” and “William Roby”). He may have been William W. Roby, a service station owner for 22 years in Palm Springs, who passed away at the age of 60 in 1988. He was born in Maysville West Virginia. His wife was named Betty, and the couple had two sons, Richard Roby of Oceanside and William Gary Roby of Carlsbad (The Desert Sun, June 29, 1988). However, given the number of individuals with the same or similar name, it is possible that it could be another individual.

Research on the names Luke Sanford and Maurie Wolfe were also unsuccessful in identifying a detailed history of these individuals. Luke Sanford was the manager of the gas station in 1962-1963 (Los Angeles Times, September 27, 1962). There was a Horace Luke Sanford, Jr. who resided in Ventura County, California in 1963, but there was no information that conclusively tied this individual to Luke Sanford. Searches on the name Horace Luke Sanford, Jr. also did not reveal much information about this person, other than that he was born in Alabama in 1932, served in the military from 1950-1953, resided in Ventura County for most of his life (from at least 1963 until his death in 2002), and married Donna Cooper in 1960 (Ancestry.com, 2019). Maurie Wolfe may have been Maurice L. Wolfe, who was born in Mississippi in 1942 and lived in Long Beach in 1970, but that would make him 17 years old when his name first appears associated with the property in city directories (according to the Phase I ESA) (Ancestry.com, 2019). Little information was found during searches of a Maurie Wolfe or Maurice L. Wolfe living in southern California.

Based on a review of historical archives, it appears that one significant individual was associated with this property: Ferdy Sant. However, Sant appears to have been important in local Arizona history as a pharmacist and business owner, but not in relation to this property or other properties in California. Nothing in the record indicates that Bill Roby, Luke Sanford, or Maurie Wolfe were important persons.

Archival research did not reveal that significant events have occurred at this location. There were no newspaper accounts of historical events or trends that have made a significant contribution to the history or development of Culver City, California, or the United States associated with the gas or service station.

LACM Records Search

A paleontological resources records search was conducted by the Natural History Museum of Los Angeles County (LACM) on January 23, 2019 (McLeod, 2019). The records search results indicate that no vertebrate fossil localities have been documented within the Project Site, but that localities do occur nearby in sedimentary deposits similar to those found within the Project Site.

The closest fossil localities from older alluvial sediments are LACM 4232, 3368, and 4250. LACM 4232 (also known as P-19-000172, or Los Angeles Man) yielded the remains of a fossil human at a depth of 12 to 13 feet below ground surface. LACM 3368 produced a fossil horse at an unknown depth. LACM 4250 yielded remains of a fossil mammoth at an unknown depth (McLeod, 2019).

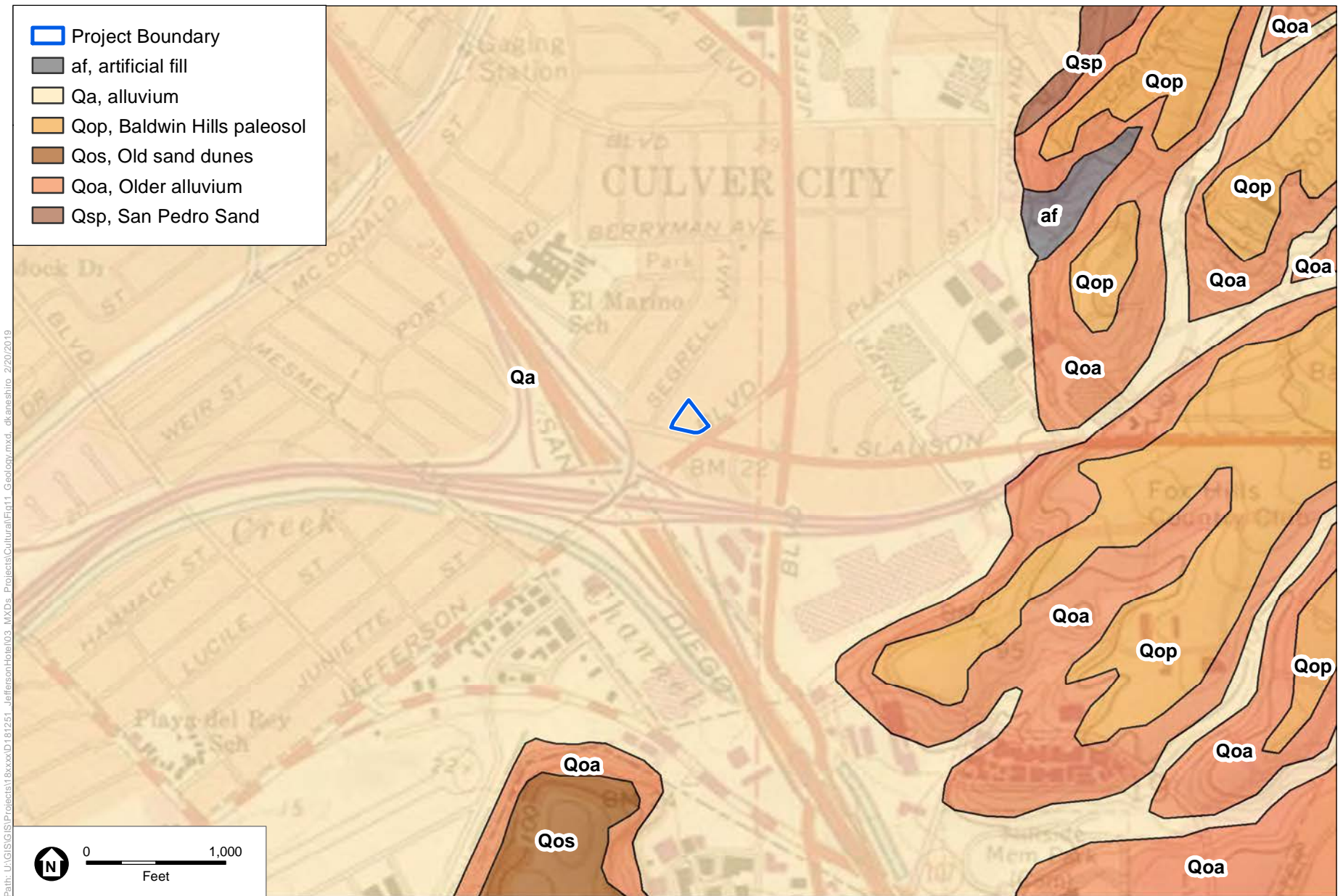
Additional fossil localities (LACM 1159, 3366, 3367, 3369, and 3370) were collected during excavations for the Outfall Sewer area in the 1920s. Most of these fossil localities, such as LACM 3366 (fossil camel), 3367 (fossil mastodon), and 3370 (sabretooth cat), did not record the depth at which the specimens were recovered. LACM 1159 yielded a fossil human at a depth of 19 to 23 feet below ground surface, while LACM 3369 yielded a fossil horse at a depth of 6 feet below ground surface (McLeod, 2019).

Geologic Map and Literature Review

Review of geologic mapping by Dibblee and Minch (2007) indicates that Holocene-aged younger alluvial sediments occur at the surface across the Project Site (mapped as Qa in **Figure 11**). Geotechnical analysis identified up to 3 feet of artificial fill present across the site, which is underlain by younger alluvium to depths of 35 feet below ground surface, which is in turn underlain by older alluvial sediments (Geotechnologies, Inc., 2017).

Younger alluvial sediments consist of silt, clay, and sand eroded from the nearby Baldwin Hills and other uplands (Dibblee and Minch, 2007). Due to the young age of these deposits, they are unlikely to preserve fossil resources at the surface and have low paleontological sensitivity; however, these sediments increase in age with depth, such that the deeper layers of this unit are of an age to preserve fossil resources (i.e., over 5,000 years old, as per the SVP [2010]).

Alluvial sediments that date to the middle Holocene or beyond have a rich fossil history in southern California and particularly the Los Angeles Basin (Hudson and Brattstrom, 1977; Jefferson 1991a and b; McDonald and Jefferson, 2008; Miller 1941, 1971; Roth, 1984; Scott, 2010; Scott and Cox, 2008). The most common fossils include the bones of mammoth, bison, deer, and small mammals, but other taxa, including horse, lion, cheetah, wolf, camel, antelope, peccary, mastodon, capybara, and giant ground sloth, have been reported (Graham and Lundelius, 1994), as well as reptiles such as frogs, salamanders, and snakes (Hudson and Brattstrom, 1977). In addition to illuminating the striking differences between southern California in the past and today, this abundant fossil record has been vital in studies of extinction (e.g. Sandom, et al., 2014; Barnosky et al., 2004), ecology (e.g. Connin et al., 1998), and climate change (e.g. Roy et al., 1996).



SOURCE: NGMDB; USGS 7.5' Topo Quad Venice 1978, 1982; Beverly Hills 1978, 1981

The Jeff Hotel
Figure 11
 Geology

Cultural Resources Survey

A cultural resources survey of the Project Site was conducted by ESA archaeologist Fatima Clark, B.A., on January 16, 2019. The survey was aimed at identifying surface evidence of archaeological resources within the Project Site. Approximately 10 percent of the Project Site was subject to an opportunistic survey that targeted areas with exposed ground surface, such as planters and landscaped areas. The remaining 95 percent of the Project Site was not surveyed as it is currently developed with two commercial buildings (retail stores and restaurants), a paved parking lot, concrete sidewalks, storm water drain grates, sprinklers, and several monitoring wells with no ground surface visibility (**Figure 12**). Planter areas (landscaping) along the southern, middle, and northern portion of the Project Site were inspected (**Figure 13**). No archaeological resources or other indicators of cultural resources (such as midden soils or shell) were observed. No historic architectural resources are located within the Project Site. Ground surface visibility for the entire Project Site was less than 5 percent.



SOURCE: ESA

Figure 12
Overview of Project Site (View SE)



SOURCE: ESA

Figure 13
Landscaped in Central Portion of Project Site (View N)

Subsurface Sensitivity Assessments

Archaeological Resources

Prehistoric Archaeological Analysis

The potential for prehistoric archaeological deposits is predicated on: 1) age of the underlying soil contemporaneous with period of human occupation of the area; 2) proximity to permanent or semi-permanent water sources capable of supporting long-term or seasonal occupation of the area; and 3) flat or gently sloped topography conducive to human habitation. Previous research conducted elsewhere in California has indicated that the presence of buried archaeological sites is positively correlated with proximity to water, as well as flat to gently sloped landforms (Meyer et al., 2010). Further evidence is provided by ethnographic and archaeological data that indicate presence of known Native American settlements or known archaeological sites in the vicinity of an area in the same kind of environment.

Environmental, geotechnical, and geological studies conducted of the Project Site indicate that Holocene-aged alluvial sediments underlie the Project Site and extend up to 35 feet in depth. These deposits date to the late Pleistocene and Holocene (11,700 years ago to present) – the period for which there is widely accepted evidence for human occupation of southern

California (Byrd and Raab, 2007), including regional occupation in the Project vicinity (Douglass et al., 2016).

Several water resources were also historically located within the vicinity of the Project Site. An 1896 topographic map indicates that two waterways were located within approximately 0.5 miles of the Project Site: Centinela Creek, located about 0.3 miles south, and Ballona Creek, located about 0.55 miles west. The inland swamps (*cienegas*) north of the Baldwin Hills, as depicted on an 1894 topographic map, were about 2.8 miles northeast of the Project Site, although separated from the Project Site by the hills themselves. Ballona Lagoon is shown on an 1896 map about 2.25 miles to the west of the Project Site.

Based on a reconstruction of the evolution of the Ballona provided in Douglass et al., 2016, the Project Site would have been located within marshlands during the Millingstone Period (8,500-3,000 B.P.). During the Intermediate Period (3,000 B.P.-1,000 B.P.), it would have been located about 0.5 miles from the edge of the marshlands. During the Late Period (1,000 B.P.-A.D. 1542), the Project Site would have been located about 1 mile from the edge of the marshlands on a coastal plain. From the Protohistoric Period through the Mission Period (A.D. 1540-1830), the Project Site would have been located about 2 miles from the edge of the marshlands on a coastal plain.

There are 24 known prehistoric or Native American sites within a 3-mile radius of the Project Site, four of which are within a 0.5-mile radius of the Project Site (see Table 1) (Douglass et al., 2016; SCCIC, 2019). The archaeological sites within the vicinity of the Project Site range from small, temporary campsites to large semipermanent residential areas to burial grounds. The Project vicinity was occupied as early as the Millingstone Period (8,500 years B.P.), or possibly earlier, to historic times, with settlements in both lowland areas and elevated areas (Douglass et al., 2016). In the immediate Project vicinity, of the four sites within a 0.5-mile radius, three (LAN-60, LAN-194, and LAN-2768/H) occur on relatively flat landforms, such as in lowland areas, at the base of bluffs or hills, on the bank of a creek or lagoon, or on alluvial fans – similar to the topography of the Project Site.

At least four ethnographic Native American settlements are known to have been located within a 3-mile radius of the Project Site: *Saa'anga*, *Waachnga*, and two unnamed settlements.

In addition to the preceding information, the NAHC indicated that the SLF search results were positive for Native American cultural resources in the vicinity of the Project Site. Based on all of these factors, the Project Site appears to have the potential to contain prehistoric archaeological resources.

Historical Archaeological Analysis

The Project Site was subject to historic-period land uses dating back to the early 1950s, including a gasoline station and automotive repair shop. This suggests that the Project Site could also have some potential to contain historic-period archaeological resources. However, based on historical research that failed to identify a significant association with important events or individuals, it is unlikely that remnants of these previous uses would be eligible as historical or unique archaeological resources since they are unlikely to yield information important in history.

Previous Disturbances

Portions of the Project Site have been subject to substantial previous disturbances, including the installation and removal of USTs in the southern portion of the Project Site. USTs ranging in size from 280, 550, 2,000, 4,000, 6,000 and 9,960 gallons were once located within the southern portion of the Project Site. According to National Board Standards, the dimensions of a 550-gallon tank are about 4 feet in diameter and 6 feet in length, while the dimensions of a 10,000-gallon tank range from about 8-10 feet in diameter and about 17-26 feet in length.

The central and northern portions of the Project Site are known to have been developed with a gasoline station and auto repair facility from circa 1953 to 1980. The existing onsite buildings were constructed in the northern and eastern portions of the Project Site circa 1985/1986. The northern onsite building was constructed in the same location as the auto repair shop, the eastern onsite building was constructed on vacant land, and the remainder of the Project Site (including the location of the former gasoline station) was paved or landscaped.

Subsurface Archaeological Potential

Areas within the Project Site that appear to have been subject to fewer disturbances include an area west and south of the existing onsite buildings. This area is currently a paved parking lot. Parking lots have the potential to cap and preserve archaeological resources below the surface as excavations for parking lots are typically shallow and would therefore not disturb or displace deeper archaeological resources, and the asphalt pavement could have served as a barrier that could have prevented further impacts to any such resources. There is a high to moderate potential to encounter potentially significant intact subsurface prehistoric or Native American archaeological resources or human remains during ground-disturbing activities in this area.

It is possible that the previous and current development in the Project Site may have disturbed any archaeological resources that once existed other portions of the Project Site (such as the southern, northern, and eastern extents). While the potential to encounter intact archaeological deposits or human remains is considered lower in these areas, there is still a potential to encounter remnants of archaeological resources or human remains and these areas are considered to have a moderate to low potential for subsurface prehistoric or Native American archaeological resources.

Paleontological Resources

The review of the scientific literature and geologic mapping, as well as the records search from the LACM, was used to assign paleontological sensitivities following the guidelines of the SVP (1995, 2010) to the geologic units that are present at the Project Site and that will be impacted by ground-disturbing activities associated with the project:

- **Younger Alluvium (Qa)** – Surficial sediments; **low-to-high sensitivity**, increasing with depth. While the shallow layers of this unit are too young to preserve fossil resources (i.e., <5,000 years old), these sediments increase in age with depth and may preserve fossils in deeper layers. These potential fossils include a wide variety of Ice Age animals, as reviewed above. While the exact depth to the high sensitivity sediments is not known at the Project Site, the discovery of fossils at depths of 12 feet below ground surface within the vicinity of the Project Site (McLeod, 2019) indicates a depth of 10 feet below ground surface is a reasonable estimate.

Conclusions and Recommendations

No known cultural resources (historical, archaeological, paleontological, or human remains) were identified within or immediately adjacent to the Project Site. The archaeological sensitivity assessment concluded that the majority of the Project Site has a moderate-to-low sensitivity for intact archaeological resources due to past and current development and associated ground disturbance. However, there are some areas of the Project Site that appear to have been subject to less ground disturbance, and these areas may contain potentially significant intact prehistoric or Native American archaeological resources. Additionally, based on a review of geologic maps and fossil discoveries in the vicinity of the Project Site, there is a potential to encounter significant paleontological resources below a depth of 10 feet.

Since the proposed Project includes ground disturbance up to 35 feet in depth, the following mitigation measures are recommended in order to reduce potential impacts to previously unknown archaeological resources, paleontological resources, and human remains to less than significant levels under CEQA. ESA also recommends that the City contact the Gabriellino Tongva Indians of California Tribal Council regarding the positive SLF search results in accordance with recommendations provided by the NAHC.

- **Mitigation Measure ARCHAEO-1:** Prior to issuance of demolition permit, the Applicant shall retain an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology (Qualified Archaeologist) to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. Full-time monitoring shall be conducted in areas of high to moderate potential to a depth of 10 feet (depth at which archaeological sensitivity decreases). Full-time monitoring of initial ground disturbance in areas of moderate to low sensitivity shall be conducted to determine if full-time or periodic monitoring is warranted in these areas, as determined by the Qualified Archaeologist. Full-time monitoring in any area can be reduced to part-time inspections or ceased entirely if determined appropriate by the Qualified Archaeologist, based on field observations. Prior to commencement of excavation activities, an Archaeological and Cultural Resources Sensitivity Training shall be given for construction personnel. The training session shall be carried out by the Qualified Archaeologist and shall focus on how to identify archaeological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event.
- **Mitigation Measure ARCHAEO-2:** In the event that archaeological resources (e.g., Native American artifacts or features, etc.) are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the Qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All prehistoric or Native American archaeological resources unearthed by Project construction activities shall be evaluated by the Qualified Archaeologist and a Gabriellino Tribe. If the resources are Native American in origin, the Gabriellino Tribe shall consult with the City and Qualified Archaeologist regarding the treatment and curation of any prehistoric archaeological resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered. If a resource is determined by the Qualified

Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to Public Resources Code Section 21083.2(g), the Qualified Archaeologist, preservation in place (i.e., avoidance) shall be the preferred manner of treatment. If preservation in place is not feasible, the Qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources and that provides for or the adequate recovery of the scientifically consequential information contained in the resources along with subsequent laboratory processing, analysis, evaluation, and reporting. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Sections 21083.2(b) for unique archaeological resources, and shall incorporate the Gabrielino Tribe’s treatment and curation recommendations. The treatment plan shall include measures regarding the curation of the recovered resources that may include curation at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material, and/or the Gabrielino Tribe. If no institution nor the Gabrielino Tribe accept the resources, they may be donated to a local school or historical society in the area (such as the Culver City Historical Society) for educational purposes.

- **Mitigation Measure ARCHAEO-3:** Prior to the release of the grading bond, the Qualified Archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.
- **Mitigation Measure HR-4:** If human remains are encountered unexpectedly during implementation of the Project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. 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 shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the

possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify an MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

- **Mitigation Measure PALEO-1:** Prior to issuance of a demolition permit, the Applicant shall retain a Qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that exceed 10 feet in depth. A Qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology (SVP) (SVP, 2010). The Qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Qualified Paleontologist during construction excavations exceeding 10 feet in depth. Paleontological resources monitoring shall be conducted for all ground disturbing activities that exceed 10 feet in depth in previously undisturbed sediments, and are therefore likely to impact high sensitivity alluvial sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the Qualified Paleontologist and shall be based on the rate of excavation and grading activities, proximity to known paleontological resources or fossiliferous geologic formations (i.e., older alluvium deposits), the materials being excavated (i.e., native sediments versus artificial fill), and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the Qualified Paleontologist.
- **Mitigation Measure PALEO-2:** Prior to commencement of demolition or excavation activities, the Qualified Paleontologist shall attend a pre-grade/construction meeting to conduct construction worker paleontological resources sensitivity training for construction personnel. The training session, shall be carried out by the Qualified Paleontologist and shall focus on how to identify paleontological resources that may be encountered during earthmoving activities and the procedures to be followed in such an event. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. Documentation shall be retained demonstrating that construction personnel attended the training.
- **Mitigation Measure PALEO-3:** If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area (usually 50 feet) shall be established around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the Qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If the fossil is determined to be significant, the Qualified Paleontologist shall implement a paleontological salvage program to remove the resources from their location, following the guidelines of the SVP (SVP, 2010). Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their

final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the material and with retrievable storage, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

If construction personnel discover any potential fossils during construction while the paleontological monitor is not present, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and recommended and implemented appropriate treatment as described earlier in this measure.

- **Mitigation Measure PALEO-4:** Prior to the release of the grading bond, the Qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

References

- AEI Consultants. 2007a. Phase I Environmental Site Assessment for 11469 Jefferson Boulevard, Culver City, California 90230.
- . 2007b. Phase III Subsurface Investigation. Jefferson Plaza, 11469 Jefferson Boulevard, Culver City, California 90230.
- Barnosky, A., C. Bell, S. Emslie, H. T. Goodwin, J. Mead, C. Repenning, E. Scott, and A. Shabel. 2004. Exceptional record of mid-Pleistocene vertebrates helps differentiate climatic from anthropogenic ecosystem perturbations. *Proceedings of the National Academy of Sciences* 101: 9297-9302.
- Bean, Lowell J., and Charles R. Smith. 1978. Gabrielino, in *California*, edited by R.F. Heizer, pp. 538-549 *Handbook of North American Indians*, Vol. 8, W. C. Sturtevant, general editor, Smithsonian Institution, Washington, D.C.
- Brooks, Sheilaigh, Richard H. Brooks, G.E. Kennedy, J. Austin, James R. Firby, Louis A. Payen, Peter J. Slota, Jr., Christine A. Prior, and R.E. Taylor. 1990. The Haverty Human Skeletons: Morphological, Depositional, and Geochronological Characteristics, *Journal of Great Basin Anthropology* 12(1): 60-83.
- Byrd, Brian F., and Mark L. Raab. 2007. Prehistory of the Southern Bight: Models for a New Millennium. In *California Prehistory: Colonization, Culture, and Complexity*, edited by Terry L. Jones and Kathryn A. Klar, pp 215-227.
- Cerra, Julie Lugo. 2013. *Culver City Chronicles*. Charleston, History Press.
- Chartkoff, J. L. and K. K. Chartkoff. 1984. *The Archaeology of California*. Menlo Park: Stanford University Press.

- City of Culver City. 2015. Culver City Historic Preservation Ordinance, www.culvercity.org/~media/Files/Culture/Ordinance2004%20004%20pdf.ashx, accessed February 12, 2015.
- Connin, S., J. Betancourt, and J. Quade. 1998. Late Pleistocene C4 plant dominance and summer rainfall in the Southwestern United States from isotopic study of herbivore teeth. *Quaternary Research* 50: 179-193.
- Critelli, S. P. Rumelhart, and R. Ingersoll. 1995. Petrofacies and provenance of the Puente Formation (middle to upper Miocene), Los Angeles Basin, southern California: implications for rapid uplift and accumulation rates. *Journal of Sedimentary Research* A65: 656-667.
- Dibblee, T.W., and J.A. Minch. 2007. Geologic map of the Venice and Inglewood quadrangles, Los Angeles County, California. Dibblee Geological Foundation. Accessed at https://ngmdb.usgs.gov/Prodesc/proddesc_81611.htm, on January, 2019.
- Dinkelspiel, Frances. 2008. *Towers of Gold*, St. Martin's Press, New York.
- Douglass, John G., Seetha N. Reddy, Richard Ciolek-Torello, and Donn R. Grenda, editors, *People in a Changing Land: The Archaeology and History of the Ballona in Los Angeles, California*, Statistical Research, Inc., Technical Series 94, Tucson, Arizona and Redlands, California.
- Erlandson, Jon M. 1994. *Early Hunter-Gatherers of the California Coast*, Plenum Press, New York.
- Geotechnologies, Inc. Geotechnical Engineering Investigation, Proposed Hotel Development, 11469 Jefferson Boulevard, Culver City, California.
- Graham, R.W., and E.L. Lundelius. 1994. FAUNMAP: A database documenting the late Quaternary distributions of mammal species in the United States. *Illinois State Museum Scientific Papers* XXV(1).
- Grimmer, E. Anne. 2017. *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings*. Washington, D.C.: U.S. Department of the Interior National Park Services: Technical Preservation Services.
- Gumprecht, Blake. 2001. *Los Angeles River: Its Life, and Possible Rebirth*, The Johns Hopkins University Press, Baltimore, 1999, Reprinted 2001.
- Historicaerials.com. 2018. Historic aerial photographs for the years of 1954, 1963, 1972, 1980, 1994, 2003, 2004, and 2005. <https://www.historicaerials.com/viewer>, accessed on August 3, 2018.
- Historicaerials.com, historic aerial photographs for the years 1948, 1952, 1953, 1963, 1972, 1980, and 1994, accessed at <https://www.historicaerials.com/viewer> on January 10, 2019.

- Hudson, D. and B. Brattstrom. 1977. A small herpetofauna from the Late Pleistocene of Newport Beach Mesa, Orange County, California. *Bulletin of the Southern California Academy of Sciences* 76: 16-20.
- Ingersoll, R. V. and P. E. Rumelhart. 1999. Three-stage basin evolution of the Los Angeles basin, southern California. *Geology* 27: 593-596.
- Jackson, Robert H., Agriculture. 1999. Drought & Chumash Congregation in the California Missions (1782-1834), Articles, California Mission Studies Association Newsletter, 1999.
- Jefferson, G.T. 1991b. A catalogue of Late Quaternary Vertebrates from California: Part Two, Mammals. Natural History Museum of Los Angeles County Technical Reports No. 7.
- Johnson, J. R., and D. D. Earle. 1990. Tataviam Geography and Ethnohistory. *Journal of California and Great Basin Anthropology*, Vol. 12, No. 2, pp. 191-214.
- Johnston, Bernice. 1962. *The Gabrielino Indians at the Time of the Portola Expedition*, Southwest Museum, Los Angeles, California.
- Jones, Terry L., Gary M. Brown, L. Mark Raab, Janet L. McVickar, W. Geoffrey Spaulding, Douglas J. Kennett, Andrew York, and Phillip L. Walker. 1999. Environmental Imperatives Reconsidered: Demographic Crises in Western North America during the Medieval Climactic Anomaly. *Current Anthropology*, 40(2): 137-70.
- Kirkman, George W. The Kirkman-Harriman Pictorial and Historical Map of Los Angeles County; 1860 A.D. -1937 A.D. Copyright 1938.
- Koerper, H.C., R.D. Mason, and M.L. Peterson. 2002. Complexity, Demography, and Change in Late Holocene Orange County. In *Catalysts to Complexity: Late Holocene Societies of the California Coast*, edited by J.M. Erlandson and T.L. Jones, pp. 63-81. Perspectives in California Archaeology Volume 6. University of California, Los Angeles.
- Kroeber, A. L. 1925. *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78. Smithsonian Institution, Washington, D.C.
- Los Angeles County Assessor Portal (Portal Assessor), information for AIN: 4216-028-023, 11469 Jefferson Boulevard, Culver City. Accessed at <https://portal.assessor.lacounty.gov/parceldetail/4216028023> on January 22, 2019.
- McCawley, William. 1996. *The First Angelinos: The Gabrielino Indians of Los Angeles*, Malki Museum Press, Banning, California.
- McDonald, H. G. and G. T. Jefferson. 2008. Distribution of Pleistocene Nothrotheriops (Xenartha, Nothrotheridae) in North America. In: Wang, X. and L. Barnes, eds., *Geology and Vertebrate Paleontology of Western and Southern North America*. Natural History Museum of Los Angeles County Science Series 41: 313-331.
- McLeod, Samuel A. 2019. Paleontological Resources for the Proposed Jefferson Hotel Project. Results letter from the Natural History Museum of Los Angeles County to ESA. Results on file at ESA.

- McWilliams, Carey. 1946. *Southern California: An Island on the Land*. Gibbs Smith, Layton, Utah.
- Meyer, Jack, D. Craig Young, and Jeffrey S. Rosenthal. 2010. *Volume I: A Geoarchaeological Overview and Assessment of Caltrans Districts 6 and 9. Cultural Resources Inventory of Caltrans District 6/9 Rural Conventional Highways*, EA 06-0A7408 TEA Grant, prepared by Far Western Anthropological Research Group, Inc., Davis, California.
- Miller, W. E. 1941. A new fossil bird locality. *Condor* 44:283-284.
- Miller, W. E. 1971. Pleistocene Vertebrates of the Los Angeles Basin and Vicinity: exclusive of Rancho La Brea. Los Angeles County Museum of Natural History, No. 10.
- Milliken, Randall, Laurence H. Shoup, and Beverly R. Ortiz. 2009. *Ohlone/Costanoan Indians of the San Francisco Peninsula and their Neighbors, Yesterday and Today*, prepared by Archaeological and Historical Consultants, Oakland, California, prepared for National Park Service Golden Gate National Recreation Area, San Francisco, California, June 2009.
- Pitt, Leonard. 1994. *The Decline of the Californios: A Social History of the Spanish-speaking Californians, 1846-1890*. University of California Press, Berkeley.
- Mullaly, Larry and Bruce Petty. 2002. *The Southern Pacific in Los Angeles, 1873-1996*, Golden West Books and the Los Angeles Railroad Heritage Foundation, San Marino, California.
- Orsi, Richard J. 2005. *Sunset Limited: The Southern Pacific Railroad and the Development of the American West, 1850-1930*, University of California Press, Berkeley and Los Angeles.
- Pollard, A. Mark, and Carl Heron. 2008. *Archaeological Chemistry*, The Royal Society of Chemistry, Cambridge, United Kingdom.
- Raab, L. Mark, Judith F. Porcasi, Katherine Bradford, and Andrew Yatsko. 1995. Debating Cultural Evolution: Regional Implications of Fishing Intensification at Eel Point, San Clemente Island. *Pacific Coast Archaeological Society Quarterly* 31(3):3-27.
- Roth, V. L. 1984. How elephants grow: heterochrony and the calibration of developmental Stages in some living and fossil species. *Journal of Vertebrate Paleontology* 4:126-145.
- Roy, K., J. Valentine, D. Jablonski, and S. Kidwell. 1996. Scales of climatic variability and time averaging in Pleistocene biotas: implications for ecology and evolution. *Trends in Ecology and Evolution* 11: 458-463.
- Sandom, C., S. Faurby, B. Sandel, and J.-C. Svenning. 2014. Global Late Quaternary Megafauna Extinctions Linked to Humans, Not Climate Change. *Proceedings of the Royal Society B* 281: 9.
- Scott, E. 2010. Extinctions, Scenarios, and Assumptions: Changes in Latest Pleistocene Large Herbivore Abundance and Distribution in Western North America. *Quaternary International* 217: 225-239.

- Scott, E. and S. Cox. 2008. Late Pleistocene distribution of Bison (Mammalia; Artiodactyla) in the Mojave Desert of Southern California and Nevada. In Wang, X. and L. Barnes, eds. *Geology and Vertebrate Paleontology of Western and Southern North America*. Natural History Museum of Los Angeles County, Science Series 41: 359-382.
- Scott, E. and K. Springer. 2003. CEQA and Fossil Preservation in California. *The Environmental Monitor*.
- Scott, E., K. Springer, and J. C. Sagebiel. 2004. Vertebrate paleontology in the Mojave Desert: the continuing importance of “follow-through” in preserving paleontologic resources. In *The human journey and ancient life in California’s deserts: Proceedings from the 2001 Millennium Conference*. Ridgecrest: Maturango Museum Publication 15: 65-70.
- Society of Vertebrate Paleontology (SVP). 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontologic resources: standard guidelines. Society of Vertebrate Paleontology News Bulletin 163:22-27.
- Society for Vertebrate Paleontology. 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology, Impact Mitigation Guideline Revision Committee. Available online at http://vertpaleo.org/Membership/Member-Ethics/SVP_Impact_Mitigation_Guidelines.aspx. 2010. Accessed September 29, 2017.
- Starr, Kevin. 2007. *California: A History*. Modern Library, New York.
- TopoView, historic topographic maps for the years 1896, 1901, and 1924, accessed at <https://ngmdb.usgs.gov/topoview/> on January 10, 2019.
- Wallace, William J. 1955. A Suggested Chronology for Southern California Coastal Archaeology. *Southwestern Journal of Anthropology* 11:214-230.
- Warren, Claude N. 1968. Cultural Tradition and Ecological Adaptation on the Southern California Coast. In *Archaic Prehistory in the Western United States*, C. Irwin-Williams, ed, pp. 1-4. *Eastern New Mexico University Contributions in Anthropology*. Portales.
- Waterstone Environmental, Inc. Limited Phase II Investigation. Jefferson Plaza, 11469 Jefferson Boulevard, Culver City, California. November 7, 2007.
- Yerkes, R. F., T. H. McCulloh, J. E. Schoellhamer, and J. G. Vedder. 1965. *Geology of the Los Angeles Basin – An Introduction*. U.S. Geological Survey Professional paper 420-A. 64 pp.

Appendix A

Personnel



Monica Strauss, RPA

Director, Southern California
Cultural Resources Group

EDUCATION

M.A., Archaeology,
California State
University, Northridge

B.A., Anthropology,
California State
University, Northridge

AA, Humanities, Los
Angeles Pierce College

23 YEARS EXPERIENCE

QUALIFICATIONS

Register of Professional
Archaeologists, No.
12805

Meets Secretary of the
Interior's PQS for
Archaeology and
History

Meets Caltrans PQS for
Principal Investigator

Orange County
Certified Archaeologist

CA State BLM
Permitted

PROFESSIONAL AFFILIATIONS

Society for California
Archaeology

Society for American
Archaeology

SPECIALIZED EXPERIENCE

Traditional Cultural
Properties

AB 52

Treatment of Historic
and Prehistoric Human
Remains

Complex Coastal Shell
Midden Sites

Monica provides senior oversight to a multi-disciplinary team of cultural resources specialists throughout Southern California, including archaeologists, architectural historians, historians, and paleontologists. During her 23 years of practice, Monica has successfully directed hundreds of cultural resources projects meeting local, state, and/or federal regulatory requirements. Monica's strength lies in assisting clients in navigating complex cultural resources issues in the contexts of the California Environmental Quality Act (CEQA), the National Environmental Policy Act (NEPA), and Section 106 of the National Historic Preservation Act (NHPA). Monica's experience ranges from large infrastructure projects that are controversial and multi-jurisdictional to smaller development projects that are important to local agencies and stakeholders. She has excellent experience working with agencies to develop creative mitigation to address challenging cultural resources impacts. She directs a staff who conduct Phase 1 archaeological/ paleontological and historic architectural surveys, construction monitoring, Native American outreach, archaeological testing and treatment, historic resource significance evaluations, and large-scale data recovery programs. Monica is expert in the area of Assembly Bill 52 and routinely provides training to her clients as well as being a workshop content author and session presenter for the Association of Environmental Professionals on the topic.

Relevant Experience

Ballona Wetlands Restoration EIR, Los Angeles County, CA. *Cultural Resources Project Director.* Monica assisted the State Coastal Conservancy in fulfilling U.S. Army Corps of Engineers requirements under Section 106 of the National Historic Preservation Act. In addition, she coordinated with Tribal members and oversaw a team of resource specialists who conducted cultural resources technical studies in preparation of the EIR's Cultural Resources section. As part of the development of the restoration plan for the Ballona Wetlands, the ESA project team characterized existing conditions that included water and sediment sampling and analysis. The water and sediment quality sampling was performed to develop and evaluate potential restoration alternatives, and to develop a conceptual plan. The ESA project team compiled existing data on and conducted additional sampling for water and sediment to assess potential effects on the proposed wetland restoration habitat from the use of urban runoff and tidal in-flow from Ballona Creek. These data were used to complete a baseline report and restoration alternatives assessment.

Hellman Ranch Archaeological Resources Monitoring and Data Recovery, Seal Beach, CA. *Field Director.* John Laing Homes constructed the Heron Point housing development in Seal Beach. Monica directed a large-scale excavation and monitoring program under the terms of a Mitigation Plan approved by the California Coastal Commission. She coordinated the daily excavation and monitoring activities of over 20 archaeological field personnel over 2-year period. She worked closely with a staff of eight Native American monitors and assisted in the preparation of remains artifacts for reburial. She also oversaw

identification and cataloging activities that took place simultaneously on the job site in a field laboratory. On-site activities included hand excavation at four archaeological sites, construction monitoring, wet and dry-screening, and laboratory analysis, and also involved the evaluation of complex shell midden deposits and appropriate treatment of human remains.

Los Cerritos Wetlands Restoration Program EIR, Los Angeles and Orange Counties, CA. *Cultural Resources Project Director* Monica is providing cultural resources support for the project, including assistance with Native American consultation and assessment of impacts to cultural resources. The Los Cerritos Wetlands Authority is proposing to implement the Los Cerritos Wetlands Restoration Plan. The Los Cerritos Wetlands Restoration Plan is a planning document that identifies conceptual restoration designs for 484 acres of salt marsh and related habitats located on the border of Los Angeles and Orange Counties in the cities of Long Beach and Seal Beach. The program area is within an area of great cultural significance to local Native American tribes.

Los Cerritos Wetlands and Oil Production Project EIR, Los Angeles County, CA. *Cultural Resources Specialist.* Candace provided peer review of archaeological, historical, and paleontological resources technical reports. ESA prepared an EIR for the Los Cerritos Wetlands and Oil Production project in the City of Long Beach. The project includes a comprehensive wetlands restoration that will restore a privately owned oil field in the City of Long Beach through the creation of a wetlands mitigation bank. The project will occur on four properties and will relocate and modernize existing oil production facilities. In addition, the project will include the construction of facilities to support oil production and will include a visitor's center and pedestrian paths on the newly restored wetlands.

Mission Creek Lagoon and Laguna Channel Restoration Project, Santa Barbara County, CA. *Cultural Resources Project Director.* Monica provided senior oversight of the cultural resources study, which identified several cultural resources that could pose a regulatory constraint on the project, including 18 historic built resources. The area was also identified as sensitive for archaeological resources. ESA is currently assisting the City of Santa Barbara to identify a design alternative within the project area that is economically feasible and meets the multiple objectives of flood control, water quality improvement, public safety and access, and habitat restoration.

Morro Bay Cayucos Wastewater Treatment Plant, San Luis Obispo County, CA. *Cultural Resources Principal Investigator.* ESA prepared an EIR for the Morro Bay-Wastewater Treatment Plant upgrade. Monica directed a Phase I Cultural Resources Assessment to identify cultural resources that might be impacted by the project. The assessment included archival research, pedestrian survey, the relocation of a number of archaeological sites, coordination with interested Native American parties in the area, and the preparation of a Phase I Cultural Resources Technical Report. Monica facilitated in meeting with Native American tribal members and City representatives to address concerns about buried resources.

Santa Susana Field Laboratory, Ventura County, CA. *Cultural Resources Project Director.* Monica is overseeing a team of specialists who are conducting geoarchaeological and archaeological district studies for use in addressing impacts to archaeological resources in the Program EIR. Monica provides strategic guidance to the California Department of Toxic Substances Control (DTSC) on cultural resources-related issues, including Tribal outreach,

approach to the Traditional Cultural Property, resource evaluations, and treatment of cultural resources on a project and program level. The Santa Susana Field Laboratory is a former rocket engine test, nuclear, and liquid metals research facility located on a 2,849- acre portion of the Simi Hills in Simi Valley, California. The uses of hazardous substances such as trichloroethylene and other solvents, heavy metals, and radioactive material at the field laboratory have resulted in soil and/or groundwater contamination. The field laboratory is currently the focus of a comprehensive environmental investigation and cleanup program conducted by Boeing, the U.S. Department of Energy, and the National Aeronautics and Space Administration, and overseen by DTSC. ESA is preparing the Program EIR that will evaluate soil and groundwater remediation activities.

Topock Compressor Station Remediation CEQA Services. Mohave County, AZ and San Bernardino County, CA. *Cultural Resources Project Director:* Monica oversaw the preparation of cultural resources EIR sections and provided project support to DTSC, including facilitating Native American involvement with five federally-recognized tribes. DTSC provides oversight of the site investigation and cleanup activities for the Pacific Gas and Electric Company (PG&E) Topock Gas Compressor Station, located in San Bernardino County, 15 miles southeast of Needles, California. Groundwater samples taken under and near the Station were found to be contaminated with hexavalent chromium and other chemicals as result of past disposal activities. Soils contamination is also present at the site, requiring investigation and cleanup. These activities are highly scrutinized by the regional Native American Tribes because the area has important cultural and religious significance and is a recognized Traditional Cultural Property. ESA prepared an EIR for soil investigations and conducted CEQA evaluations that tiered off of the Program EIR for the Groundwater Remedy.

City of Los Angeles Department of Water and Power On-Call Environmental Consulting Services, Various Locations, CA and NV. *Project Director:* Monica has overseen various cultural resources projects for this contract. ESA has initiated over 32 task orders of varying responsibilities, ranging from construction monitoring, biological and cultural surveys, and CEQA compliance documentation. Monica provides general oversight of projects and leads coordination with local municipalities. Projects completed under this contract include Path 46 Clearance Surveys, Foothill Trunk Line Phase I Survey, La Kretz Innovation Campus Archaeological Monitoring and Data Recovery, Lone Pine Landfill Paleontological Resources Recovery, Scattergood Olympic Transmission Line Monitoring, Rose Valley Well V817 Extended Phase I, Emergency Repairs to Victorville-Century Transmission Line #2 Tower 211.1 and Access Road Archaeological Monitoring, Century Trunk Line Phase I Study, Manhattan Wellfield On-Site Hypochlorite Generation Station Cultural Resources Assessment, and Mission Wells Chloramination Facility Cultural Resources Assessment.



Candace R. Ehringer, RPA

Senior Cultural Resources Specialist

EDUCATION

MA, Anthropology,
California State
University, Northridge

BA, Anthropology, East
Carolina University

20 YEARS OF EXPERIENCE

QUALIFICATIONS

Register of Professional
Archaeologists, No.
15146

Meets Secretary of the
Interior's PQS for
Archaeology and
History

Meets Caltrans PQS for
Co-Principal
Investigator

Orange County
Certified Archaeologist

CA State BLM
Permitted

HAZWOPER Certified

PROFESSIONAL AFFILIATIONS

Society for California
Archaeology

Society for Historical
Archaeology

California Preservation
Foundation

Association of
Environmental
Professionals

CONTINUING EDUCATION

AEP AB 52 Tribal
Perspective Training
presented by the San
Manuel Band of
Mission Indians and
Morongo Band of
Mission Indians, 2017

Candace is a cultural resources project manager with 20 years of experience in California. She provides technical and compliance oversight for archaeological survey, evaluation, and treatment; built environment studies, including the documentation and evaluation of buildings, structures, and districts; Tribal resources consultations; and paleontological resources survey and sensitivity assessments. Candace also has experience working with agencies and Tribes to identify Traditional Cultural Properties and tribal cultural resources. She is skilled in the evaluation, analysis of effects, and development of measures to avoid, minimize, or mitigate adverse effects for archaeological, historic, tribal, and paleontological resources under Section 106 and CEQA.

Candace manages multi-disciplinary cultural resources projects and is adept at building teams of specialists that are uniquely qualified for the project at hand. Her project work includes experience in every county in Southern California, as well as many in the Central Coast, Central Valley, and Northern California regions. She is proficient in the areas of CEQA, NEPA, Section 106, and AB 52 compliance, and routinely provides planning and strategic guidance to clients on complex projects within the larger scope of state and federal regulations.

Relevant Experience

Ballona Wetlands Restoration Project, Los Angeles, CA. *Archaeologist.* Candace provided support for the cultural resources component of the project, which involved field survey and excavation, archival research, geoarchaeological assessment, outreach, and reporting to document cultural resources in the area. The area is considered exceptionally sensitive to local Native American groups and extensive consultation and coordination with local tribes and the California Department of Parks and Recreation was essential. The historical Ballona Wetlands, which is now reduced to 577 acres, once occupied a 2,000-acre expanse of critical coastal habitat and included some of the most diverse wetland habitat types in the Los Angeles Basin due to the presence of both freshwater and saltwater environments. The Ballona Wetlands Restoration EIR/EIS evaluates four alternatives that include the following key elements: ecosystem restoration, flood and stormwater management (by allowing a naturalized, rather than concrete-lined, Ballona Creek), public access improvements, infrastructure and utility modifications (including abandonment and relocation of Southern California Gas Company monitoring wells and pipelines), a full-scale implementation and restoration program, a state-of-the-art monitoring and adaptive management program, and ongoing operations and maintenance activities.

Hellman Ranch Monitoring and Data Recovery, Orange County, CA. *Archaeologist.* Candace supervised a team of archaeologists charged with monitoring construction activities, archaeological testing, and excavation of over 30 Native

Caltrans Introduction to Cultural Resources Compliance, UC Davis Extension, 2017

Consulting with SHPO under Section 106, Society for California Archaeology, 2017

AEP Advanced CEQA Workshop, 2011

ACHP Section 106 Essentials training course, 2010

Riverside County certification course, 2009 and 2011

American burials and associated features at Hellman Ranch in Seal Beach, California. The Hellman Ranch area (Landing Hill) was occupied by the Gabrielino for over 6,000 years. Excavation revealed an extensive mortuary complex, including large amounts of cremated human remains and broken, or “killed,” ground stone. Candace was responsible for implementing and overseeing work delegated by field directors.

Los Cerritos Wetlands and Oil Production Project EIR, Los Angeles County, CA. *Cultural Resources Specialist.* Candace provided peer review of archaeological, historical, and paleontological resources technical reports. ESA prepared an EIR for the Los Cerritos Wetlands and Oil Production project in the City of Long Beach. The project includes a comprehensive wetlands restoration that will restore a privately owned oil field in the City of Long Beach through the creation of a wetlands mitigation bank. The project will occur on four properties and will relocate and modernize existing oil production facilities. In addition, the project will include the construction of facilities to support oil production and will include a visitor’s center and pedestrian paths on the newly restored wetlands.

Los Cerritos Wetlands Restoration Program EIR, Los Angeles and Orange Counties, CA. *Cultural Resources Specialist.* Candace is providing cultural resources support for the project, including assistance with Native American consultation and assessment of impacts to cultural resources. The Los Cerritos Wetlands Authority is proposing to implement the Los Cerritos Wetlands Restoration Plan. The Los Cerritos Wetlands Restoration Plan is a planning document that identifies conceptual restoration designs for 484 acres of salt marsh and related habitats located on the border of Los Angeles and Orange Counties in the cities of Long Beach and Seal Beach. The program area is within an area of great cultural significance to local Native American tribes.

Big Canyon Restoration Wetlands Project, Orange County, CA. *Cultural Resources Specialist.* Candace managed the preparation of cultural resources studies for the project. The proposed project consists of the design, permitting and implementation of a treatment wetland in the Big Canyon Preserve off of Jamboree Drive in Newport Beach. ESA is supporting project partner Burns & McDonald on the preparation of this project, including the development of the restoration plan, CEQA approval, and permitting approval for the City of Newport Beach. The treatment wetlands will be designed to treat dry weather flows for selenium and storm water runoff from the roadway for metals.

Topock Compressor Station Remediation CEQA Services, Mohave County, AZ and San Bernardino County, CA. *Cultural Resources Project Manager.* Candace managed the preparation of cultural resources EIR sections and provided project support to California Department of Toxic Substances (DTSC), including facilitating Native American involvement with five federally-recognized tribes. DTSC provides oversight of the site investigation and cleanup activities for the Pacific Gas and Electric Company (PG&E) Topock Gas Compressor Station, located in San Bernardino County, 15 miles southeast of Needles, California. Groundwater samples taken under and near the Station were found to be contaminated with hexavalent chromium and other chemicals as result of past disposal activities. Soils contamination is also present at the site, requiring investigation and cleanup. These activities are highly scrutinized by the regional Native American Tribes because the area has important cultural and religious significance and is a recognized Traditional Cultural Property. ESA prepared an EIR for soil investigations and conducted CEQA evaluations that tiered off of the Program EIR for the Groundwater Remedy.

Rancho Malibu Phase II Testing and Evaluation, Malibu, CA. *Project Manager.* ESA was retained by Green Acres, LLC, to provide cultural resources services in support of the Memorial Park Project. The project proposes to construct a Memorial Park that would contain approximately 17,500 gross square feet of floor area and would include the construction of a 8,500-square-foot main chapel facility, 8,500-square-foot subterranean parking/service structure, 48 free-standing mausoleum structures totaling approximately 9,000 square feet (186 square feet each), ability to accommodate approximately 36,000 crypts and 16,000 individual cremation burial sites, as well as surface parking for 157 vehicles. The project would impact archaeological sites CA-LAN-266 and -1715. Candace authored the Phase II Research Design and participated in the field effort. As the project manager, she managed budgets, schedules, and field staff, and oversaw lab analysis and preparation of deliverables.

Pajaro Valley Water Management Agency Basin Management Plan College Lake Integrated Resources Management Plan EIR, Watsonville, CA. *Cultural Resources Project Manager.* Candace managed the preparation of cultural resources studies in support of the project, which included archival research, Native American outreach, geoarchaeological study, and survey. She led the field survey and authored the technical report in compliance with Section 106 and CEQA. Five cultural resources were documented and evaluated as ineligible for the National Register and California Register. The project would consist of a new weir structure and intake pump station, a water treatment plant, and a 5.5-mile-long pipeline to convey treated water to agricultural uses in the Pajaro Valley. The project is in a culturally sensitive area that contains numerous prehistoric and Native American resources, including burial sites.

Altair Specific Plan EIR, Archaeological Services, Temecula, CA. *Principal Investigator.* Candace managed the cultural resources study, which included geoarchaeological review, a research design, and subsurface exploration of impact areas with higher sensitivity for archaeological resources. She analyzed impacts to the National Register-listed Luiseño Ancestral Origin Landscape Traditional Cultural Property and determined that the project would not result in a significant adverse impact. The project consists of the construction of pedestrian-oriented residential community with up to 1,750 mixed density residential units within walking or cycling distance of Old Town Temecula. ESA prepared the EIR for the project.

Fire Station 48 Archaeological Monitoring and Mitigation, Seal Beach, CA. *Project Archaeologist.* The project consists of the demolition of a 40-year-old facility and the construction of a new 12,987-square-foot fire station. The project is located in an area known to have once been inhabited by prehistoric peoples, and as such requires sensitivity to Native American concerns, as well as consultation with Native American interested parties. Candace coordinated required archaeological and Native American monitoring and conducted in-field assessments of archaeological features.

Hellman Ranch Tank Farm Replacement Archaeological Monitoring and Mitigation, Seal Beach, CA. *Project Manager.* The project consists of replacing an existing 60-year-old tank farm facility on a 0.53-acre parcel. Candace conducted consultation with Native American monitors and archaeological monitoring of all construction grading pursuant to CEQA requirements.



Alyssa Bell, PhD

Paleontologist

EDUCATION

Ph.D., Vertebrate Paleontology; University of Southern California

M.S., Environmental Microbiology; University of Tennessee

B.A. with honors, Ecology and Systematics; William Jewell College & Homerton College, Cambridge University

15 YEARS EXPERIENCE

Dr. Alyssa Bell serves as ESA's Paleontological Principal Investigator. Over the past 15 years, Dr. Bell has performed and supervised paleontological resources studies and fossil identification and recovery throughout the Western United States for research institutions as well as public agency and private development clients. Her experience includes pipeline, energy, restoration, and a variety of other development projects. She provides oversight of paleontological resources assessments, paleontological monitoring, fossil identification and recovery. Dr. Bell has conducted paleontological resources assessments meeting the requirements of the Bureau of Land Management (BLM) and has also conducted technical and compliance adequacy of consultant technical reports on behalf of the BLM. Dr. Bell is a Postdoctoral Fellow at the NHMLA, where she supervises field work and studies the evolution of early birds.

Relevant Experience

Irvine Ranch Water District, Peters Canyon Channel Reuse Pipeline Project, Irvine, CA. Paleontological Principal Investigator. ESA conducted a cultural resources study for the project that included archival research, Native American consultation, a geoarchaeological review, paleontological assessment, and a pedestrian survey of the project area. Dr. Bell drafted the Paleontological Resources Final Monitoring Report.

Big Canyon Wetland Treatment and Creek Restoration - Phases 1 and 2 Newport Beach, CA. Paleontological Principal Investigator. Cultural resources tasks for Phases I and 2 have included records searches and background studies, outreach with the Native American Heritage Commission, geo-archaeological and paleontological sensitivity studies, field surveys, and preparation of cultural resources technical reports meeting CEQA and Section 106 standards, and providing mitigation recommendations pursuant to CEQA guidelines. Dr. Bell conducted the paleontological sensitivity assessment for the project.

County of Los Angeles, Rancho Los Amigos South Campus EIR, Los Angeles, CA. Principal Investigator. The County of Los Angeles Department of Public Works (County) proposes redevelopment of a portion of the Rancho Los Amigos (RLA) South Campus, which is located in the City of Downey. ESA is preparing a Historic District Evaluation, archaeological surveys, and all other CEQA-required topics. ESA is also serving in an Executive Consultant role to the County, to advise on other potential future projects at the RLA Campus. Dr. Bell conducted the paleontological sensitivity assessment and authored the Paleontological Resources Assessment Report.

El Camino Real Bridge Replacement Environmental Services, Atascadero, CA. Paleontological Principal Investigator. Dr. Bell conducted the paleontological sensitivity assessment for the replacement of the El Camino Real Bridge over Santa Margarita Creek in Atascadero. Caltrans was the lead agency on the project and all

reporting was prepared in accordance with the Caltrans Standard Environmental Reference.

Valentine EIR, Kern County, CA. *Paleontological Principal Investigator.* Dr. Bell provided paleontological resources support for a 2,000-acre solar PV project in the Mojave Desert. Deliverables included comprehensive technical reports and supplemental reports, GIS impact analysis, strategic and permitting support, a paleontological field survey, and developed monitoring and mitigation guidelines in the preparation of an EIR and other permitting requirements.

ICHA Area 10 (PA 10-2 & 10-4) Archaeological and Paleontological Monitoring, Irvine, CA. *Principal Investigator & Project Paleontologist.* Dr. Bell managed the curatorial process for fossils collected during monitoring of pre-construction activities at the University of California, Irvine, and authored the final report.

Suncrest Reactive Power Support Project, San Diego County, CA. *Principal Investigator.* Dr. Bell authored the paleontological assessment for the Proponent's Environmental Assessment (PEA) in support for a dynamic reactive power support facility and associated 230-kilovolt (kV) transmission line near Alpine, California. The application for Certificate of Public Convenience and Necessary was filed in summer 2015 and the PEA was deemed complete in

Sixth & Bixel Paleontological Monitoring Services Project, Los Angeles, CA. *Principal Investigator & Project Paleontologist.* Dr. Bell assisted with oversight for paleontological monitoring of preconstruction activities in support of a development project encompassing two parcels in downtown Los Angeles. During these activities, monitors identified and recovered numerous significant vertebrate fossils. Dr. Bell supervised the excavation of fossilized whale remains discovered on-site, and oversaw the collection and curation of all fossil specimens, and drafted the final paleontological monitoring report.

Natural and Cultural Support for the Gordon Mull Subdivision EIR, Glendora, CA. *Principal Investigator.* Dr. Bell collected the necessary data to prepare the technical sections and mitigation recommendations to support an EIR prepared by another firm to address the Gordon Mull Subdivision in the city of Glendora. The project proposes to redevelop a 71-acre, 19-lot located in the San Gabriel Foothills.

Lake Elsinore Lakeshore Town Center Permitting, Riverside County, CA. *Principal Investigator.* Dr. Bell provided paleontological studies and developed monitoring and mitigation recommendations for the Lake Elsinore Town Center project in Riverside County.

San Pedro Plaza Park - Phase III Archaeological Monitor, Los Angeles, CA. *Principal Investigator.* Dr. Bell identified fossils during the mitigation measurement-required archaeological monitoring of earthmoving activities in San Pedro Park Plaza. She is also responsible for curation of the fossil material and authorship of the paleontological section of the final report.

City of Hope Specific Plan and EIR, Duarte, CA. *Principal Investigator.* Dr. Bell provided paleontological resource studies for the City of Hope Specific Plan Project.

Blythe Solar Power Project, Units 1 & 2, Riverside County, CA. *Project Paleontologist.* Dr. Bell supervised paleontological monitoring of preconstruction activities for a solar photo-voltaic cell power-generating facility outside the city of

Blythe. As a part of her role, she provided oversight and management of paleontological monitors and development of the final monitoring report.

Industrial Project Environmental Impact Report, Colton, CA. *Principal Investigator.* Dr. Bell provided a paleontological resources study for a six-acre industrial project site at the southwest corner of Agua Mansa Road and Rancho Avenue in the city of Colton.

Mojave Solar Project Paleontological Reporting, San Bernardino County, CA. *Principal Investigator.* Dr. Bell managed curation of fossil materials and authored the final report of paleontological monitoring services provided for construction activities in support of a solar field development project in San Bernardino County.

Publications

Bell, A. and L. Chiappe, 2015. Identification of a new Hesperornithiform from the Cretaceous Niobrara Chalk and implications for ecologic diversity among early diving birds. *PLOS One* 10: e0141690.

Bell, A. and L. Chiappe, 2015. A species-level phylogeny of the Cretaceous Hesperornithiformes (Aves: Ornithuromorpha): implications for body size evolution among the earliest diving birds. *Journal of Systematic Palaeontology* 14: 239-251.

Liu, D., L. Chiappe, Y. Zhang, A. Bell, Q. Meng, Q. Ji, and X. Wang, 2014. An advanced, new long-legged bird from the Early Cretaceous of the Jehol Group (northeastern China): insights into the temporal divergence of modern birds. *Zootaxa* 3884: 253-266.

Bell, A. and L. Chiappe, 2011. Statistical approach for inferring the ecology of Mesozoic birds. *Journal of Systematic Paleontology* 9: 119-133.

Bell, A. and M.J. Everhart, 2011. Remains of small avians from a Late Cretaceous (Cenomanian) microsite in north central Kansas. *Transactions of the Kansas Academy of Science* 114: 115-123

O'Connor, J., L. Chiappe, and A. Bell, 2011. Pre-modern birds: avian divergences in the Mesozoic in Kaiser, G. and G. Dyke, *Living Dinosaurs*. Oxford: Wiley-Blackwell Publishing. pp. 39-114.

Bell, A., L.M. Chiappe, G.M. Erickson, S. Suzuki, M. Watabe, R. Barsbold, and K. Tsogtbaatar, 2010. Description and ecologic analysis of *Hollandia luceria*, a Late Cretaceous bird from the Gobi Desert (Mongolia). *Cretaceous Research* 31: 16-26.

Bell, A., L. McKay, A. Layton, and D. Williams, 2009. Factors influencing the persistence of fecal *Bacteroides* in stream water. *Journal of Environmental Quality* 38: 1224-1232.

Bell, A. and M.J. Everhart, 2009. A new specimen of *Parahesperornis* (Aves: Hesperornithiformes) from the Smoky Hill Chalk (Early Campanian) of western Kansas. *Transactions of the Kansas Academy of Science* 112: 7-14.

Everhart, M.J. and A. Bell, 2009. A hesperornithiform limb bone from the basal Greenhorn Formation (Late Cretaceous; Middle Cenomanian) of north central Kansas. *Journal of Vertebrate Paleontology* 29: 952-956.



Fatima Clark

Archaeologist

EDUCATION

B.A., Anthropology,
California State
University, Fullerton

10 YEARS EXPERIENCE

PROFESSIONAL AFFILIATIONS

Society for California
Archaeology

SPECIALIZED TRAINING

Workshop: The Art and
Science of Flintknapping,
California Desert Studies
Center, 2013

Successful CEQA,
Compliance-Southern
California Edison,
Environmental Training,
2011

Cultural Resources
Protection under CEQA
and Other Legislative
Mandates, UCLA
Extension, 2010

PROFESSIONAL AFFILIATIONS

Society for California
Archaeology

Fatima Clark has 10 years of hands-on archaeological experience and is practiced in project management and client and agency coordination. Her field experience is complimented by the course study and participation in numerous archaeological excavations in California, Arizona, and Peru. Fatima has written California Environmental Quality Act (CEQA)-level technical reports, Environmental Impact Report (EIR) sections, Initial Study sections, archaeological peer reviews, archaeological monitoring reports, and reports pursuant to Caltrans requirements. She is also experienced in performing archaeological testing, site recordation, laboratory analysis, pedestrian surveys, records searches through several California Historical Resources Information Systems-Information Centers, and monitoring for a wide variety of projects, including mixed-use, residential, and energy, water, and road infrastructure projects. In addition to her archaeology background, Fatima has been cross-trained in conducting paleontological surveys and monitoring and has co-authored and managed associated reports.

Representative Experience

Real Estate Development. Fatima has provided a full range of archaeological services to numerous projects throughout Southern California. Her role in these projects have consisted of conducting coordination management between construction personnel managers and archaeological monitors, writing Phase I and monitoring reports, conducting pedestrian surveys, monitoring, and performing records searches and laboratory work of recovered artifacts during monitoring and Phase II archaeological testing. Recent project experience includes the Uptown Newport Village Project in Newport Beach, the Shriners Hospital for Children in Pasadena, the San Juan Medical Office Building in San Juan Capistrano, the Isla Verde Residential Project in Moreno Valley, the Frontier Chino Project, and the 220-acre Aidlin Property Residential Project in the Stevenson Ranch community of unincorporated Los Angeles County.

Infrastructure. Fatima has served a number of clients and lead agencies in the provision of a variety of archaeological services, including municipalities, water agencies, Caltrans, large engineering firms, and energy providers. She served as an in-house consultant to Southern California Edison (SCE) for nearly six years, during which time she worked on a wide variety of environmental compliance projects. Fatima also served as the Project Manager for the I-10 Freeway/Pepper Avenue Interchange Project in Colton, and is currently the La Costa Chevron Drainage Improvements Project in Encinitas. Other projects include the Badlands Landfill stockpile project for Riverside County, the Palos Verdes pipeline project and Crenshaw Reservoir project for the California Water Service Company, and the San Clemente Recycled Water project.

Paleontology. Fatima's experience in paleontological resources has included projects throughout Southern California. Because of her cross-training, she is often called to perform monitoring and surveys on a variety of project types. Her monitoring projects are diverse in nature and include everything from residential to petroleum-related projects. Fatima's paleontology projects include the 7.5 acre Highgrove community library site in Riverside County and the proposed San Clemente Recycled Water Project study areas associated with the installation, transmission, distribution of pipelines, and expansion of facilities at water treatment plants.

Construction Monitoring. Fatima's monitoring projects are diverse in nature and encompass everything from residential to petroleum-related projects. Her archaeological monitoring includes a number of projects for the City of San Juan Capistrano, Burbank Water & Power, as well as work at the Orange County Great Park (on the former El Toro MCAS), with the city of Mission Viejo, for the Cascade Solar Project, the Willow Heights project in Diamond Bar, and various Lennar Homes and John Laing Homes Housing development projects.

Her paleontological monitoring projects include monitoring and fossil salvage at a proposed school site off of Mulholland that dated back to the Miocene era. She also performed construction monitoring for paleontological resources during the grading of three large basins for the installation of storm drains at the Lytle Creek North Water Quality Basin Relocation project site. Additional experience includes monitoring at the Brio Residential Development in La Habra, monitoring for resources in contaminated soils at the Orange County Great Park (Heritage Fields) project site (formerly the El Toro Marine Corps Air Station), and at the Arroyo Grande Oil Field Project in San Luis Obispo, where she also performed sediment sampling.

Appendix B

SCCIC Report Bibliography

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-00034		1974	Foster, John M.	Assessment of the Archaeological Impact of 07-la-405 24.3/25.9 La Tijera Blvd. to Jefferson Blvd. 07220 - 217601	Northridge Archaeological Research Center, CSUN	
LA-00069		1974	Rosen, Martin D.	Evaluation of the Archaeological Resources in Playa Del Rey Area, Leighton and Associates	University of California, Los Angeles	19-000047, 19-000053, 19-000054, 19-000057, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000066, 19-000136, 19-000194, 19-000203, 19-000204, 19-000206, 19-000211, 19-000212, 19-000213, 19-000216, 19-000356
LA-00340		1978	Robinson, R. W.	Field check and examination of property located near the intersection of Sepulveda Blvd. and the San Diego freeway	Summa Corporation	19-000213, 19-000216
LA-00436		1979	Pence, Robert L.	Archaeological Assessment of the Summa Corporation Property, Culver City, Los Angeles County		19-000054, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000193, 19-000203, 19-000204, 19-000206, 19-000211, 19-000212, 19-000213, 19-000216, 19-001018
LA-00724		1967	King, Chester	Archaeological Investigations of the Hammack Street Site, LAN-194	UCLA	19-000194
LA-00750		1953	Marlys, Thiel	Recording by Pictures the Collection of William Deane of the Hughes Aircraft Site		19-000054, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000067, 19-000206, 19-000211
LA-00751		1950	Belous, Russell E. and Charles E. Rozaire	Preliminary Report on the Archaeology of the La Ballona Creek Area, Los Angeles County		19-000053, 19-000055, 19-000056, 19-000057, 19-000058, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000066, 19-000067, 19-000068, 19-000069, 19-000070, 19-000071, 19-000072, 19-000073, 19-000074, 19-000171, 19-000172
LA-00839		1936	Farmer, Malcolm F.	Preliminary Notes of an Archaeological Reconnaissance of Indian Camp Sites in the Baldwin Hills-ballona Creek Region of Los Angeles County, California		19-000059, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000066, 19-000067, 19-000068, 19-000069, 19-000070, 19-000071, 19-000072, 19-000073, 19-000074

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-00876		1980	Huey, Gene	Extended Survey Report on LAN-216 for the Proposed Sepulveda Boulevard Ramp Relocation	Caltrans	19-000216
LA-01321		1984	Van Horn, David M.	Mitigation of Impacts to Cultural Resources: Salvage Excavations at the Hughes Site (LAN-59)	Archaeological Associates, Ltd.	19-000059
LA-02372		1991	Homburg, Jeffrey A.	Late Prehistoric Change in the Ballona Wetland.	Statistical Research, Inc.	19-000047, 19-000054, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000194, 19-000206, 19-000211, 19-000356
LA-02990		1994	Grenda, Donn R., Jeffrey A. Homburg, and Jeffrey H. Altschul	The Cantilena Site (CA-LAN-60): Data Recovery at a Middle Period, Creek-edge Site in the Ballona Wetlands, Los Angeles County, California	Statistical Research, Inc.	19-000060
LA-03289		1990	Davis, Gene	Mobil M-70 Pipeline Replacement Project Cultural Resource Survey Report for Mobil Corporation	Dames & Moore	19-000034, 19-000059, 19-000060, 19-000067, 19-000077, 19-000095, 19-000169, 19-000194, 19-000213, 19-000216, 19-000248, 19-000408, 19-000409, 19-000410, 19-000411, 19-000412, 19-000441, 19-000444, 19-000475, 19-000490, 19-000491, 19-000492, 19-000493, 19-000634, 19-000643, 19-000644, 19-000645, 19-000646, 19-000823, 19-000903, 19-000925, 19-000926, 19-000927, 19-000938, 19-000960, 19-000962, 19-000990, 19-000991, 19-000992, 19-001015, 19-001305, 19-001834, 19-001835
LA-03501		1990	Dillon, Brian D.	Archaeological Record Search and Impact Evaluation for the Los Angeles Wastewater Program Management (nos-ncos) Project Los Angeles, California		19-000007, 19-000053, 19-000055, 19-000056, 19-000057, 19-000067, 19-000068, 19-000069, 19-000070, 19-000071, 19-000072, 19-000073, 19-000074, 19-000080, 19-000097, 19-000132, 19-000159, 19-000171, 19-000172, 19-000181, 19-000887, 19-001112, 19-001261, 19-001336, 19-001399, 19-001595
LA-03556		1969	King, Thomas F.	Ucas-319 Highway Extension of Stocker Drive: La Cienega to Overland Avenue, Baldwin Hills, Los Angeles County	UCAS	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-03583		1974	Bucknam, Bonnie M.	The Los Angeles Basin and Vicinity: a Gazetteer and Compilation of Archaeological Site Information	Archaeological Research, Inc.	19-000001, 19-000002, 19-000003, 19-000004, 19-000005, 19-000007, 19-000009, 19-000010, 19-000011, 19-000012, 19-000013, 19-000015, 19-000016, 19-000017, 19-000018, 19-000019, 19-000023, 19-000024, 19-000027, 19-000028, 19-000029, 19-000030, 19-000031, 19-000033, 19-000037, 19-000038, 19-000039, 19-000040, 19-000044, 19-000045, 19-000046, 19-000047, 19-000048, 19-000049, 19-000050, 19-000051, 19-000052, 19-000053, 19-000054, 19-000055, 19-000056, 19-000057, 19-000058, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000066, 19-000067, 19-000068, 19-000069, 19-000070, 19-000071, 19-000072, 19-000073, 19-000074, 19-000078, 19-000080, 19-000088, 19-000090, 19-000091, 19-000092, 19-000094, 19-000096, 19-000097, 19-000098, 19-000099, 19-000100, 19-000101, 19-000102, 19-000103, 19-000104, 19-000105, 19-000106, 19-000107, 19-000108, 19-000109, 19-000110, 19-000112, 19-000113, 19-000114, 19-000115, 19-000116, 19-000117, 19-000118, 19-000119, 19-000120, 19-000121, 19-000122, 19-000123, 19-000124, 19-000125, 19-000126, 19-000127, 19-000131, 19-000133, 19-000134, 19-000135, 19-000136, 19-000137, 19-000138, 19-000139, 19-000140, 19-000141, 19-000142, 19-000143, 19-000144, 19-000145, 19-000146, 19-000147, 19-000148, 19-000149, 19-000150, 19-000151, 19-000152, 19-000153, 19-000154, 19-000155, 19-000156, 19-000159, 19-000161, 19-000162, 19-000170, 19-000171, 19-000172, 19-000174, 19-000175, 19-000178, 19-000179, 19-000180, 19-000181, 19-000182, 19-000183, 19-000184, 19-000185,

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
						19-000187, 19-000189, 19-000190, 19-000191, 19-000193, 19-000194, 19-000195, 19-000196, 19-000197, 19-000198, 19-000199, 19-000200, 19-000201, 19-000202, 19-000203, 19-000204, 19-000205, 19-000206, 19-000207, 19-000210, 19-000211, 19-000212, 19-000213, 19-000214, 19-000215, 19-000216, 19-000217, 19-000219, 19-000220, 19-000222, 19-000224, 19-000225, 19-000226, 19-000227, 19-000229, 19-000231, 19-000232, 19-000233, 19-000234, 19-000235, 19-000236, 19-000245, 19-000255, 19-000263, 19-000264, 19-000265, 19-000266, 19-000267, 19-000268, 19-000269, 19-000270, 19-000271, 19-000272, 19-000273, 19-000274, 19-000275, 19-000276, 19-000277, 19-000278, 19-000279, 19-000280, 19-000281, 19-000282, 19-000283, 19-000284, 19-000285, 19-000286, 19-000287, 19-000288, 19-000289, 19-000291, 19-000292, 19-000303, 19-000306, 19-000307, 19-000308, 19-000309, 19-000310, 19-000311, 19-000316, 19-000317, 19-000319, 19-000322, 19-000330, 19-000331, 19-000332, 19-000333, 19-000335, 19-000340, 19-000341, 19-000344, 19-000350, 19-000352, 19-000353, 19-000354, 19-000356, 19-000382, 19-000383, 19-000385, 19-000386, 19-000387, 19-000388, 19-000389, 19-000390, 19-000398, 19-000400, 19-000401, 19-000403, 19-000404, 19-000406, 19-000415, 19-000423, 19-000424, 19-000425, 19-000448, 19-000454, 19-000468, 19-000469, 19-000470, 19-000472, 19-000478, 19-000483, 19-000484, 19-000494, 19-000495, 19-000496, 19-000497, 19-000499, 19-000500, 19-000501, 19-000505, 19-000506, 19-000512, 19-000513, 19-000514, 19-000515, 19-000516, 19-000517,

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
						19-000519, 19-000520, 19-000523, 19-000525, 19-000526, 19-000527, 19-000528, 19-167019, 19-179270
LA-03673		1987	Anonymous	Historic Property Survey Report North Outfall Relief Sewer (nors)	Myra L. Frank & Associates	19-150439, 19-150440, 19-150441, 19-150442, 19-150443, 19-150444, 19-150445
LA-03861		1998	Wlodarski, Robert J.	A Phase 1 Archaeological Study for the New Studio Project Subsequent Eir, Culver City, County of Los Angeles, California		
LA-03898			Anonymous	Proposal for Archaeological Investigations in the Area of Hammock Street and Port Drive (vii-I.a.-90,405; Lincoln Blvd. to Slauson Avenue)	Unknown	
LA-04100		1991	Greenwood, Roberta S., De Vries, David, Rasson, Judith R., and Slawson, Dana n.	Playa Vista Archaeological and Historical Project, Technical Report 5. Historic American Engineering Record, Hughes Aircraft Company, Howard Hughes Industrial Complex.	Greenwood and Associates	19-180602, 19-180603, 19-180604, 19-180605, 19-180606, 19-180607, 19-180608, 19-180609, 19-180610, 19-180611, 19-180612, 19-180613, 19-187548, 19-188208, 19-188209, 19-188210, 19-188211, 19-188212, 19-188213, 19-188214, 19-188215, 19-188216, 19-188217, 19-188407
LA-04864		2001	Wallock, Nicole	Cultural Resource Assessment Cingular Wireless Facility No. Sm 002-04, Los Angeles County, California	LSA Associates, Inc.	
LA-04891		2000	Sylvia, Barbara	A Proposed High Occupancy Vehicle Lane Between I-105 and Sr-90 on I-405 in the City of Los Angeles, Los Angeles County California	Caltrans District 7	19-000213, 19-000216
LA-04908		1999	Kane, Diane	Historic Property Survey Report	Caltrans District 7	
LA-05565		1980	Huey, Gene and John Romani	Extended Survey Report on LAN-216 for the Proposed Sepulveda Boulevard Ramp Relocation 07-Ia-405 P.m. 24.3/25.9 07218-217601	Caltrans District 7	19-000054, 19-000059, 19-000060, 19-000061, 19-000062, 19-000063, 19-000064, 19-000065, 19-000193, 19-000203, 19-000204, 19-000206, 19-000211, 19-000212, 19-000213, 19-000216, 19-001018
LA-05711		2002	Sylvia, Barbara	Negative Archaeological Survey Report: to Widen Jefferson Boulevard On-ramp to South Bound Route 405 Within Existing State-owned Right-of-way.	Caltrans District 7	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-06237		1984	Robinson, R. W.	Historic Property Survey Report Addendum Regarding Westchester Center Freeway Facilities	Robinson, R. W.	
LA-06238		1984	Broughton, Gregory J.	Historic Property Survey Report Regarding Westchester Center Freeway Facilities Los Angeles County	R. W. Robinson	19-000213, 19-000216
LA-06245		2002	Duke, Curt and Marvin, Judith	Cultural Resource Assessment Cingular Wireless Facility No. Sm 225-02 Los Angeles County, California	LSA Associates, Inc.	
LA-06497		2002	McKenna, Jeanette A.	A Phase I Cultural Resources Investigation for the Proposed Expansion of the W. Los Angeles College Campus in the City of Culver City, Los Angeles County, California	McKenna et al.	
LA-06750		1999	Harbert, Claudia	Historic Property Survey Report for Proposed Ramp Improvements for Sr-134 at Hollywood Way in Burbank, Los Angeles County	Caltrans District 7	
LA-06904		2003	Altschul, Jeffrey H., Stoll, Anne Q., Grenda, Donn R., and Ciolek-Torrello, Richard	Playa Vista Monograph Series Test Excavation Report 4. Playa Vista Archaeological and Historical Project at the Base of the Bluff. Archaeological Inventory and Evaluation Along Lower Centinela Creek, Marina Del Rey, California.	Statistical Research, Inc.	19-000060, 19-000062, 19-000064, 19-000193, 19-000211, 19-001932, 19-001934, 19-002676, 19-002768, 19-002769
LA-06905		1998	Unknown	Hughes Industrial Historic District Historic Resource Treatment Plan Volume One	Historic Resource Group	19-188217, 19-188407
LA-07224		2003	Bartoy, K.	Glenwood Dad's Club Camp Glenwood (Special Use Permit LAR301601). Angeles National Forest, Los Angeles County, California.	Pacific Legacy, Inc.	
LA-07725		2001	Altschul, Jeffrey H.	Playa Vista: Archaeological Treatment Plan for CA-LAN-54	Statistical Research, Inc.	19-000054
LA-08661		2003	Allen, Kathleen C.	Records Search for Bechtel Project #951004138c, Rhythm and Hughes, Los Angeles, California	Archaeological Resource Management Corp.	
LA-08883		2007	Anonymous	New Tower ("nt") Submission Packet Fcc Form 620, Blockbuster 5359, La-2125b	EarthTouch, Inc.	

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-09333		1995	Unknown	Determination of Eligibility Report Hughes Industrial Historic District	Historic Resources Group	19-180602, 19-180603, 19-180604, 19-180605, 19-180606, 19-180607, 19-180608, 19-180609, 19-180610, 19-180611, 19-180612, 19-180613, 19-187548, 19-188208, 19-188209, 19-188210, 19-188211, 19-188212, 19-188213, 19-188214, 19-188215, 19-188216, 19-188217
LA-09468		1991	Anonymous	Playa Vista Archaeological and Historical Project, Technical Report 4. Historic Property Survey Report for the Hughes Aircraft Site at Playa Vista.	Statistical Research, Inc.	19-180602, 19-180603, 19-180604, 19-180605, 19-180606, 19-180607, 19-180608, 19-180609, 19-180610, 19-180611, 19-180612, 19-180613, 19-187548, 19-188208, 19-188209, 19-188210, 19-188211, 19-188212, 19-188213, 19-188214, 19-188215, 19-188217, 19-188407
LA-09479		1999	Grenda, Donn R., Angela H. Keller, David Maxwell, E. Jane Rosenthal, Paul Souders, Ayse Taskiran, Jeffrey H. Altschul, Su Benaron, and Christopher J. Doolittle	Playa Vista Archaeological and Historical Project, Test Excavation Report 2. At the Head of the Marsh, Middle Period Settlement along Upper Centinela Creek, Archaeological Treatment Plan on CA-LAN-60, CA-LAN-193, and CA-LAN-2768, Marina del Rey, Ca.	Statistical Research, Inc.	19-000060, 19-000193, 19-002768
LA-09481		1991	Altschul, Jeffrey H., Richard S. Ciolek-Torrello, Jeffrey A. Homburg, and Mark T. Swanson	Playa Vista Archaeological and Historical Project Research Design. Statistical Research Technical Series No. 29, Pt. 1.	Statistical Research, Inc	19-000029, 19-000054, 19-000060, 19-000062, 19-000078, 19-000193, 19-000211, 19-001698
LA-09992		2008	Anonymous	Notice of Availability, Baldwin Hills Community Standards District Draft Environmental Impact Report	Plains Exploration and Production Company	
LA-10152		2007	anonymous	Playa Vista Archaeological and Historical Project (PVAHP). Programmatic Agreement, Playa Vista Project, Annual Reports, September 1996 through 2007.	Statistical Research, Inc.	19-000054, 19-000060, 19-000062, 19-000193, 19-000211, 19-001932, 19-002676, 19-002768, 19-187548
LA-10482		2009	Turner, Robin D.	Cultural Resource Monitoring and Mitigation Report for the Symantec Fox Hills Corporate Pointe Campus Project, City of Culver City, County of Los Angeles, California	ArchaeoPaleo Resource Management, Inc.	19-000067
LA-10489		2000	Kane, Diane	Historic Property Survey Report for Route 405 HOV Lane Between I-105 and SR-90 in Los Angeles County, California	Caltrans	19-000213, 19-000216

Report List

Report No.	Other IDs	Year	Author(s)	Title	Affiliation	Resources
LA-10879		2007	Unknown	Building 1 at Playa Vista Hughes Aircraft Administration Building, Los Angeles, California, Historical Assessment and Treatment Recommendations	Architectural Resources Group	19-180602
LA-10974		2010	Bonner, Wayne	Cultural Resources Records Search and Site Visit Results for T-Mobile USA Candidate LA13014-G (Studio Village Tower), 11046 Jefferson Boulevard, Culver City, Los Angeles County, California	Michael Brandman Associates	19-000067
LA-11482	Other - Racer's sites	1939	Racer, F.H.	Camp Sites in Harbor District - F.H. Racer		19-000057, 19-000060, 19-000088, 19-000091, 19-000094, 19-000096, 19-000097, 19-000098, 19-000099, 19-000100, 19-000101, 19-000103, 19-000104, 19-000105, 19-000106, 19-000107, 19-000138, 19-000276, 19-000279, 19-000285, 19-000288
LA-12458		2013	Castanon, David	Renovation plans for Building #1 at the Hercules Campus	Los Angeles District Corps of Engineers	19-180602
LA-12506		2012	Perez, Don	Castle MCB1/Ensite #12079 (123046), 6382 Arizona Circle, Los Angeles, Los Angeles County, CA	EBI Consulting	

Appendix C

Sacred Lands File Search



2121 Alton Parkway, Suite 100
Irvine, CA 92606
949.753.7001
949.753.7002 fax

www.esassoc.com

January 9, 2019

Native American Heritage Commission
1550 Harbor Boulevard, Suite 100
West Sacramento, CA 95691
FAX- 916-373-5471

Subject: SLF search request for the Proposed Jefferson Hotel Project, Culver City, California (D181251.00)

To whom it may concern:

Sandstone Properties, Inc. is proposing to develop a five-story, boutique hotel at 11469 Jefferson Boulevard (Project Site) in Culver City, California. The Project would require the demolition of the existing low-rise commercial buildings and surface parking lot.

The attached map (Figure 1) shows the Project Site on the Venice, CA USGS 7.5' Quad, unsectioned portion of Township 2 South, Range 15 West.

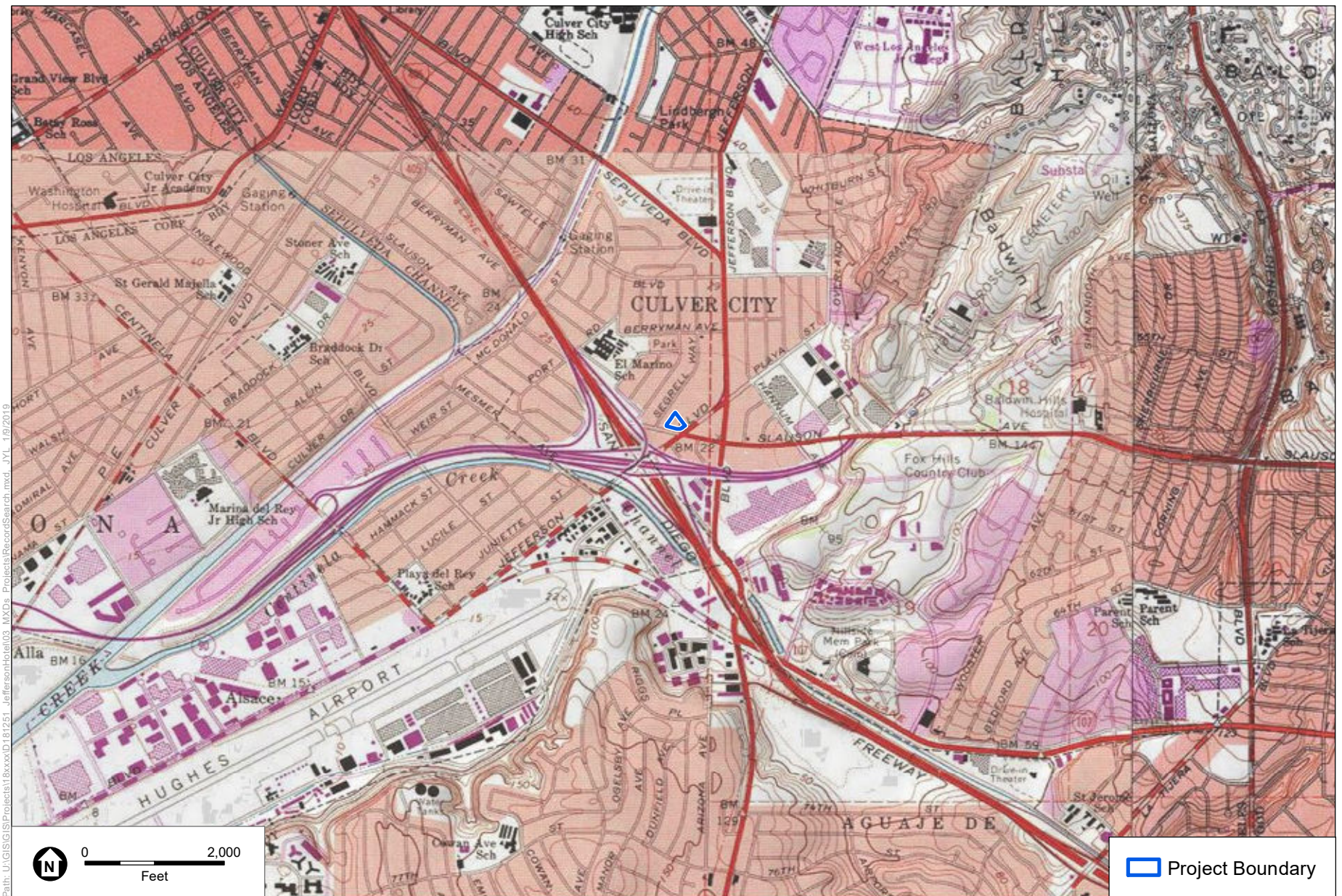
In an effort to provide an adequate appraisal of all potential impacts that may result from the proposed Project, ESA is requesting that a Sacred Lands File search be conducted for sacred lands or tribal cultural resources that may exist within the Project Site.

Thank you for your time and assistance regarding this matter. To expedite the delivery of search results, please e-mail them to fclark@esassoc.com. Please contact me at 949.753.7001 or via e-mail me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Fatima Clark", written in a cursive, flowing style.

Fatima Clark
Archaeologist



SOURCE: USGS 7.5' Topo Quad Venice 1978, 1982; Beverly Hills 1978, 1981

11469 Jefferson Boulevard

Figure 1
Record Search

NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691



Phone: (916) 373-3710

Email: nahc@nahc.ca.gov

Website: <http://www.nahc.ca.gov>

Twitter: @CA_NAHC

January 11, 2019

Fatima Clark
ESA

VIA Email to: fcclark@esassoc.com

RE: Proposed Jefferson Hotel Project, Los Angeles County

Dear Ms. Clark:

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 positive. Please contact the Gabrieliño Tongva Indians of California Tribal Council. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

Attached is a list of Native American tribes who may also have knowledge of cultural resources in the project area. This list should provide a starting place in locating areas of potential adverse impact within the proposed 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 or email to ensure that the project information has been received.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our lists contain current information. If you have any questions or need additional information, please contact me at my email address: steven.quinn@nahc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Steven Quinn".

Steven Quinn
Associate Governmental Program Analyst

Attachment

**Native American Heritage Commission
Native American Contact List
Los Angeles County
1/11/2019**

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

This list is only applicable for contacting local Native Americans with regard to cultural resources assessment for the proposed Proposed Jefferson Hotel Project, Los Angeles County.