

## Technical Memorandum

**To:** Lauren Rhodes and Jan Green Rebstock, Environmental Management Group, Bureau of Engineering, Department of Public Works, City of Los Angeles; Kari Derderian and Clare Lahey, Bureau of Transit Services, Los Angeles Department of Transportation, City of Los Angeles

**From:** Alex Kirkish, Ph.D., RPA, Senior Archaeologist/Principal Investigator, Parsons

**Date:** August 2, 2022

**Re:** LADOT Electric Bus Maintenance Facility  
Archaeological Resources Assessment

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### 1.0 PURPOSE AND ORGANIZATION OF THIS MEMO

The purpose of this memorandum is to document the results of the archaeological resources assessment as it relates to the potential environmental impacts associated with the construction and operation of the Los Angeles Department of Transportation's (LADOT) Electric Bus Maintenance Facility (EBMF or project). This technical memo is prepared in support of the Initial Study to be prepared in compliance with the California Environmental Quality Act (CEQA) and the State CEQA Guidelines and the Environmental Assessment to be prepared in compliance with the National Environmental Policy Act (NEPA).

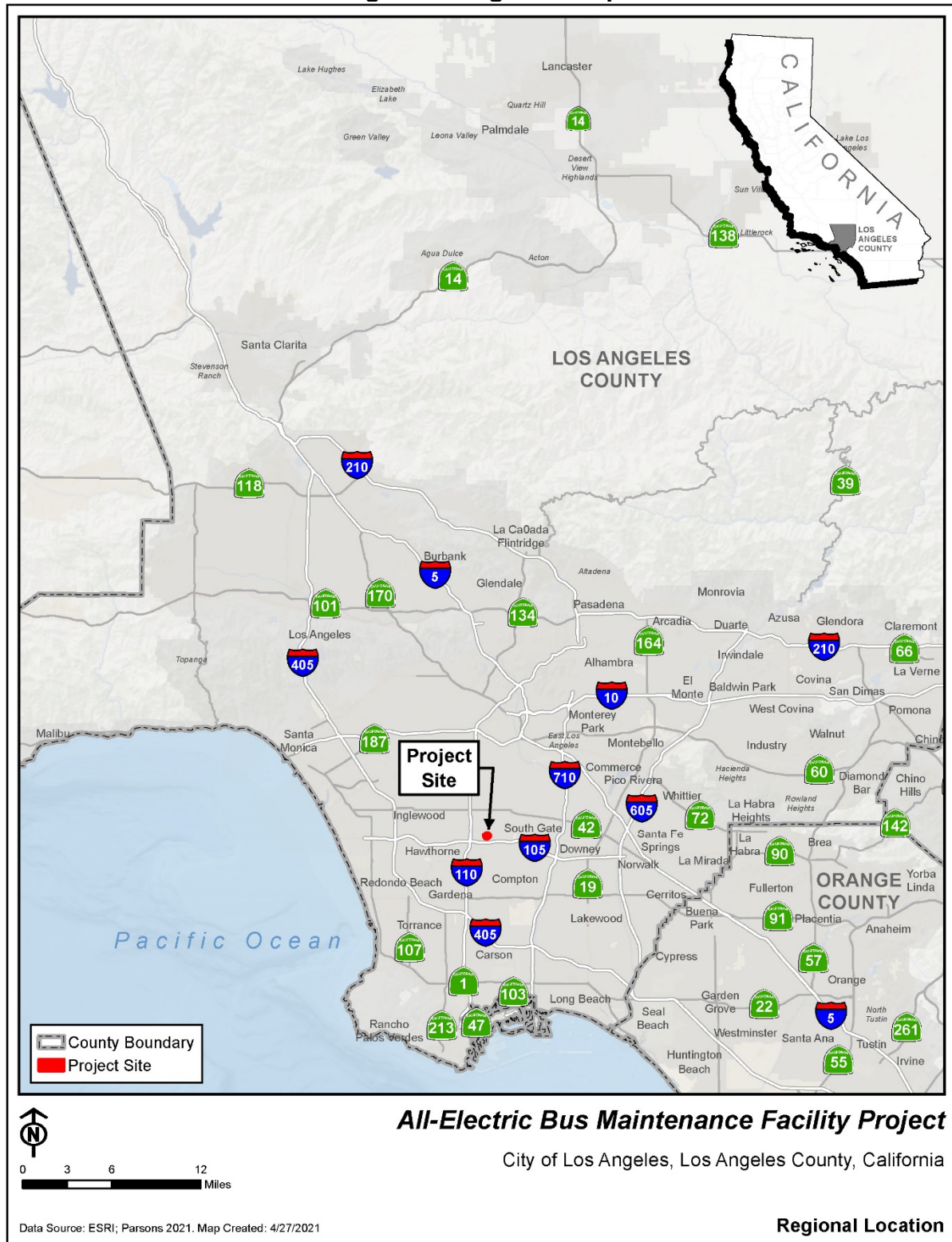
The archeological resources assessment includes a review of cultural resource records, a cultural resource field survey, and on-going Native American coordination as part of Assembly Bill (AB) 52. An assessment of impacts to historical resources is provided in a separate Historical Resources Evaluation Report.

### 2.0 PROJECT DESCRIPTION

#### 2.1 Project Location and Setting

The City of Los Angeles (the City) is proposing to construct the EBMF on the 5.5 acre land located at 740 and 800 East 111<sup>th</sup> Place in South Los Angeles (Assessor's Parcel Numbers [APNs] 6071-022-009 and 6071-022-013). The project site is located on land zoned light industrial and has most recently been utilized as a logistics warehouse for solar panels. The site is within Council District 8's jurisdiction in the Southeast Los Angeles Community Planning Area of the City (Figures 1 and 2). The proposed project will be operated by the Los Angeles Department of Transportation (LADOT). Figure 3 presents an aerial view of the project site and its general vicinity.

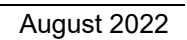
**Figure 1. Regional Map**





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The project site is located between East 111<sup>th</sup> Place and East Lanzit Avenue, east of South Avalon Boulevard, and has a relatively flat topography. Small clusters of light-industry land uses can be found in the immediate vicinity of the project site, with adjacent land uses surrounding the project site comprised mostly of multi-family and single-family residences but also encompassing land supporting other activities, including commercial and community-oriented social services, such as education and health facilities. The area is largely urbanized and nearly built-out with little or no remaining vacant land. There are no natural features or major land formations, surface water bodies, or waterways near the project site.

The site is bounded by East 111<sup>th</sup> Place to the northwest, with single family residences across the street and by the Union Pacific Railroad (UPRR) tracks and East Lanzit Avenue to the south, with single family residences beyond the tracks and street. Two buildings exist on the site: a 32,000-square-foot warehouse built in 1957 at the eastern section and a 118,800-square-foot warehouse built in 1956 at the central and western sections. The buildings sit back to back and the eastern and western ends of the site are paved as internal driveways and parking areas. The Animo James B. Taylor Charter Middle School is immediately to the east and the Kedren Health Community Center (which provides primary care, mental health care, and a Headstart/State preschool) is immediately to the west.

The project site is designated as Limited Industrial in the Southeast Los Angeles Community Plan and is zoned M1-1-CPIO (Limited Industrial Zone, Height District 1, Community Plan Implementation Overlay District). This site is in Section 5, Township 3 South, Range 13 West and specifically at the following latitude/longitude: 33 56' 4.65"N 118 15' 35.9"W.

Access to the site is provided by two driveways off East 111<sup>th</sup> Place, a street that is designated as a local collector with one lane in each direction and allows daytime on-street parking on each side. The UPRR rail line runs parallel to East Lanzit Avenue south of the project site. Imperial Highway and Interstate 105 (I-105) are located approximately three and seven blocks south of the project site, respectively.



**Figure 3. Aerial View of Project Site and its Immediate Vicinity**

## 2.2 Proposed Project Description

LADOT operates and maintains its existing bus fleet from its South Los Angeles Bus Maintenance Facility, located at 14011 South Central Avenue in Compton. This current facility is not owned by the City and is leased through LADOT's operations services contractor. The existing facility does not have sufficient capacity to accommodate the additional maintenance and storage requirements of the proposed transition to electric buses and expanded charging needs of an all-electric bus fleet.

LADOT proposes to build a bus maintenance facility at the project site to serve its future electric bus fleet. The proposed EBMF is planned as a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet, consisting of 130 all-electric battery bus vehicles for the DASH and Commuter Express services provided by LADOT. The EBMF would be used to store and dispatch electric buses for daily service and would provide repair and maintenance services, parking, charging, and inspection functions. The proposed facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility).

After demolition of the existing buildings on the site, the City proposes to construct several buildings and structures, including a two-story operations building to provide dispatch and administrative functions, a maintenance building with 10 bus maintenance bays, a service building, a bus wash building, Battery-Electric Bus (BEB) parking/charging area, and a second-story parking deck for up to 360 employee/visitor vehicles, with the canopy above the parking deck topped with a 2,000-kilowatt photovoltaic (PV) system. Electrification equipment, including electrical transformers, switch cabinets, and bus chargers, is also proposed.

The EBMF would provide preventive maintenance inspections, BEB charging, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It would also accommodate administrative and operations functions and be used as a report base for bus operators. It would include space for employee parking, conference meeting rooms, operations and maintenance staff offices, dispatcher workstations, employee report and recreation rooms, and areas with lockers, showers, and restrooms for operations and maintenance personnel.

The proposed facility would accommodate as many as 70 of the 30-foot-long DASH buses and 60 of the 45-foot-long Commuter Express buses, comprising a total of 130 BEBs that would be assigned to the new South Los Angeles EBMF. The facility would include surface parking spaces for 130 BEBs in an area located east of the Maintenance Building. The BEBs running easterly from Avalon Boulevard would enter the site through the west entrance driveway on East 111<sup>th</sup> Place, check in with the onsite security guard, and proceed into the site to the southern section for service and washing. Otherwise, BEBs requiring repairs would park at the bus bays along the western section. Other BEBs may directly run in a counterclockwise direction and park at the central area for charging. The BEBs would leave the site through the east exit driveway and run westerly on East 111<sup>th</sup> Place to Avalon Boulevard. Vehicles driven by bus operators, proposed project staff, other employees, and visitors would enter and exit through the center driveway that connects to a ramp leading to the second-level parking deck.

The construction schedule for the proposed project has not been determined. For environmental analysis purposes, it is assumed construction would be completed in 24 months following the final engineering design and bidding process in 2023. Any required remediation would be completed prior to the start of construction activities. Assuming no or limited remediation is necessary, project construction is tentatively scheduled to begin in mid-2024 and would be completed by mid-2026. Construction activities at the proposed project site would include mobilization and staging; building demolition; site clearing, grading and paving; new structure construction, equipment installation, and minor landscaping and finishing.

Approximately 312 employees would be working onsite, and the facility is planned to be open 24 hours per day, 7 days per week. Staff would be onsite on two or three shifts, which would be staggered depending on their work responsibilities.

## **3.0 REGULATORY SETTING**

### **3.1 Federal**

#### **National Historic Preservation Act**

The National Historic Preservation Act (NHPA) established the National Register of Historic Places (NRHP) in 1966 to recognize resources associated with the country's history and heritage. Criteria for listing on the NRHP pursuant to Title 26, Part 63 of the Code of Federal Regulations are significant in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are either:

- (A) Associated with events that have made a significant contribution to the broad patterns of our history;
- (B) Associated with the lives of persons significant in our past;
- (C) Embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or
- (D) Have yielded, or may be likely to yield, information important to history or prehistory.

Criterion D is usually reserved for archaeological resources. Properties eligible for the NRHP must be of sufficient age, be proven through scholarship to meet at least one of the significance criteria, and exhibit integrity of the features, elements, and/or informational value that provides the property its documented historical or archaeological significance.

#### **California Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (California Health and Safety Code Division 7, Part 2, Chapter 5, Sections 8010–8030) includes broad provisions for the protection of Native American cultural resources. The Act ensures that all California Native American human remains and cultural items are treated with due respect and dignity. It provides the mechanism for the disclosure and return of human remains and cultural items held by publicly funded agencies and museums in California.



## 3.2 State

### California Register of Historical Resources Criteria of Evaluation

The California Register of Historical Resources (CRHR) was created to identify historical resources deemed worthy of preservation on a State level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing, on the NRHP. The State Historic Preservation Office (SHPO) maintains the CRHR, which may also include properties designated under local ordinance or identified through local historical resources surveys that meet CRHR eligibility criteria.

A cultural resource is considered "historically significant" under CEQA if the resource meets the criteria for listing on the CRHR. The CRHR was designed to be used by State and local agencies, private groups, and citizens to identify existing historical resources within the State and to indicate which of those resources should be protected, to the extent prudent and feasible, from substantial adverse change. The following criteria have been established for the CRHR (Public Resources Code [PRC] §§5024.1, Title 14 California Code of Regulations [CCR], Section 4852).

A resource is considered significant if it:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or
- (2) Is associated with the lives of persons important in our past; or
- (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.

Even if a property meets one of the criteria for eligibility, it must also retain sufficient integrity to convey its significance within the historic context to be eligible for listing in the CRHR or the NRHP. The National Park Service (NPS) defines integrity as "the ability of a property to convey its significance," stating that integrity "must always be grounded in an understanding of a property's physical features and how they relate to its significance" (NPS 1997). Integrity comprises seven aspects: location, design, setting, materials, workmanship, feeling, and association.

The CRHR criteria are similar to NRHP criteria, and they are tied to CEQA, as any resource that meets one of the above criteria and has retained integrity is considered an historical resource under CEQA.

## **California Environmental Quality Act**

An archaeological resource is defined in Section 15064.5(c) of the CEQA Guidelines as (1) a site, area, or place determined to be historically significant, as defined in Section 15064(a) of the CEQA Guidelines, or as (2) a unique archaeological resource defined in Section 21083.2 of the PRC as an artifact, object, or site that (a) contains information needed to answer important scientific research questions of public interest, or (b) that has a special and particular quality such as being the oldest or best example of its type, or (c) that is directly associated with a scientifically recognized important prehistoric or historic event or person.

### **CEQA Thresholds**

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment pertaining to archeological resources if the project would:

- Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5
- Disturb any human remains, including those interred outside of dedicated cemeteries
- Cause a substantial adverse change in the significance of a tribal cultural resource (TCR) as defined in PRC Section 21074

## **Assembly Bill 52 – Tribal Cultural Resources**

Assembly Bill (AB) 52 of 2014 addresses TCRs and cultural landscapes. PRC Section 21074(a) defines TCRs as one of the following:

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

AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a project if they have requested to be notified of projects subject to AB 52. Consultation, as defined under AB 52 includes, but is not limited to, discussing the type of environmental review necessary, the significance of TCRs, the significance of project impacts on the TCRs, and alternatives and mitigation measures

recommended by the tribe. Parties must consult in good faith and consultation is deemed concluded when (1) the parties agree to measures to avoid or reduce a significant impact on a TCR (if such a significant impact exists) or (2) when a party concludes that mutual agreement cannot be reached. Further, under AB 52, mitigation measures agreed upon during consultation must be included in the environmental document and, if no formal agreement on the appropriate mitigation has been established, mitigation measures that avoid or substantially lessen potential significant impacts should be implemented.

## **State of California Public Resources Code**

### **California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097**

California Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during development and other projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate “the manner and cause of any death” and make recommendations concerning treatment of the human remains. The County Coroner must make their determination within 2 working days of being notified. If the human remains are determined to be Native American, the County Coroner shall contact the California Native American Heritage Commission (NAHC). The Commission would in turn “...immediately notify those persons it believes to be most likely descended from the deceased Native American.” The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants may include the scientific analysis of the remains and associated items.

### **California Public Resources Code Section 5024.5**

PRC 5024.5 states: “(a) No state agency shall alter the original or significant historical features or fabric, or transfer, relocate, or demolish historical resources on the [agency’s] master list...” This law also obligates State agencies to adopt prudent and feasible measures that will eliminate or mitigate any potential adverse effects a proposed project may have upon a listed historical resource.

### **California Public Resources Code Section 5097.5 and 5097.7**

PRC Section 5097.5, as amended, and PRC Section 5097.7 strengthen existing State law regarding criminal penalties and restitution for crimes of archaeological site vandalism, theft of archaeological materials or artifacts in curation facilities, and damages to historic buildings and other cultural properties on State and local government lands.

The State PRC (Chapter 1.7), Sections 5097 and 30244, includes additional State-level requirements for the assessment and management of paleontological resources. These statutes require reasonable mitigation of adverse impacts to paleontological resources resulting from development on State lands, and define the excavation, destruction, or removal of paleontological “sites” or “features” from public lands without the express permission of the jurisdictional agency as a misdemeanor. As used in Section 5097, “state lands” refers to lands owned by, or under the jurisdiction of, the State or any State agency.



“Public lands” is defined as lands owned by, or under the jurisdiction of, the State, or any city, county, district, authority, or public corporation, or any agency thereof.

### **3.3 Local**

#### **City of Los Angeles General Plan Conservation Element**

The City of Los Angeles General Plan Conservation Element includes goals, objectives, and policies related to cultural resources, including archaeological and historical conservation and preservation. Section 3 of the Conservation Element (City of Los Angeles, 2001) requires that measures be taken to protect the City's historical, archaeological and paleontological resources for historical, cultural, research, and/or educational purposes. One policy requires that the City continue to identify and protect significant archaeological and paleontological sites and resources known to exist or that are identified during land development, demolition, or property modification activities.

#### **City of Los Angeles Citywide General Plan Framework Element EIR**

In 1995, the City of Los Angeles prepared an Environmental Impact Report (EIR) that presented and analyzed the potential environmental impacts associated with implementation of the Framework Element of the Los Angeles Citywide General Plan, at a programmatic level (City of Los Angeles, 1995). Existing cultural resources were mapped and presented in the Final EIR, which shows that there are no prehistoric or historic archaeological sites on or near the project site. In addition, there are no vertebrate paleontological resources on or near the site. The area east of Avalon Boulevard, including the site, is identified as having surface sediments with unknown fossils potential.

#### **City of Los Angeles Municipal Code**

##### **City of Los Angeles Historic-Monument Ordinance**

The City's Historic-Monument Ordinance (Los Angeles Administrative Code [LAAC] Section 22.171) defines a Historic-Cultural Monument (HCM) as any site, building, or structure of a particular historic or cultural significance. On the local level, a historical or cultural monument is eligible for listing as a Los Angeles Historic-Cultural Monument under Article 4, Section 22.130 of the City of Los Angeles Administrative Code if the resource meets a number of criteria.

##### **City of Los Angeles Cultural Heritage Ordinance**

The City of Los Angeles maintains a list of all sites, buildings, and structures that have been designated through the City of Los Angeles Cultural Heritage Ordinance No. 185472 as Historic-Cultural Monuments (HCMs).

## **4.0 Archeological Resources Assessment**

### **4.1 Methodology**

An Area of Potential Effects (APE) was first established to define the cultural resources study area. The cultural resources screening assessment was then conducted utilizing information obtained from the California Historic Records Information Center (CHRIS), other background research, and a result from a field inspection of the ground surface within the APE for the project to identify any prehistoric and historic-age archaeological evidence.

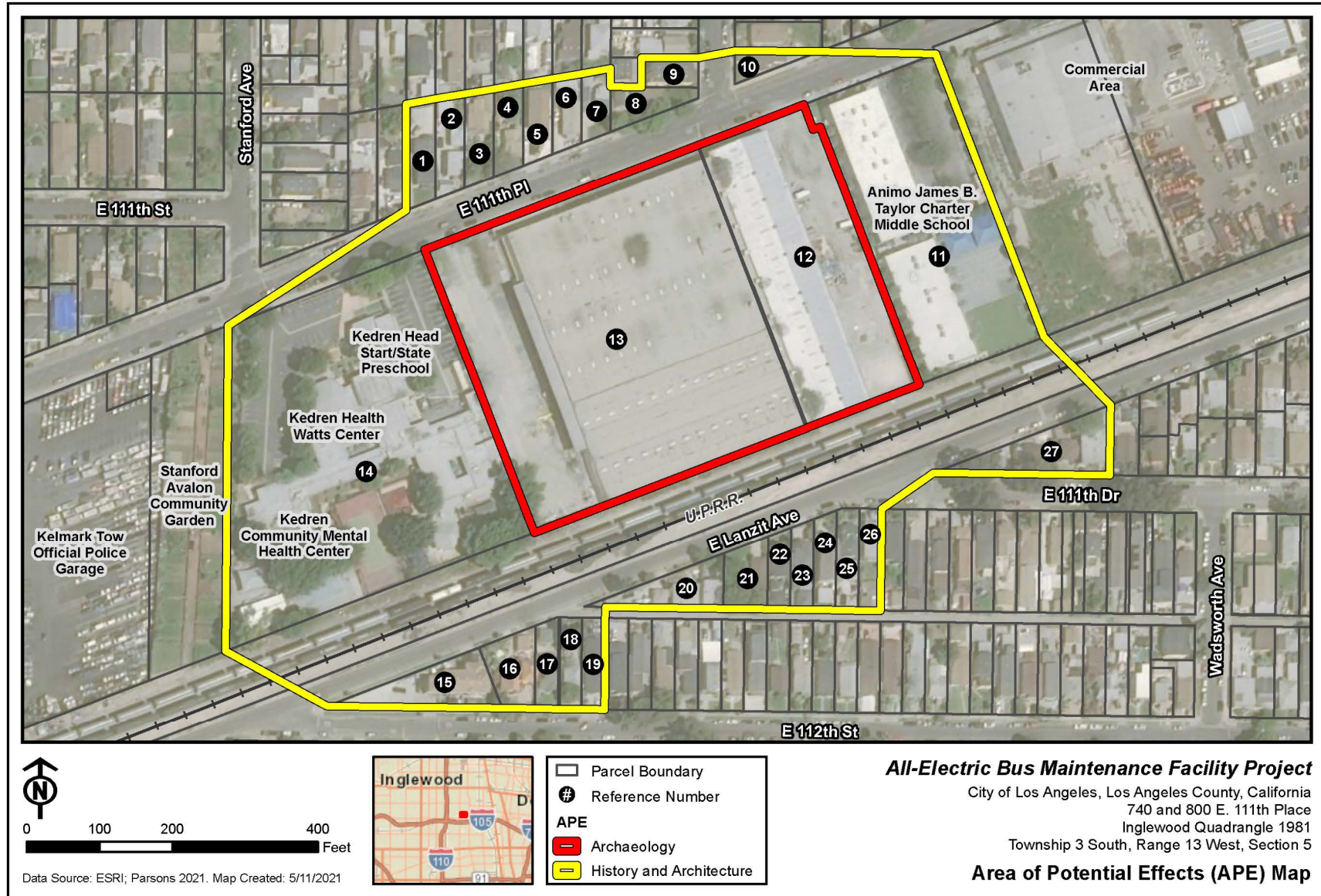
An analysis of the potential for archaeological resources and TCRs to be present on a project site is based on the review of cultural resources records and background research discussed above, including the pedestrian survey of the project site conducted on June 7, 2021. In addition, a Sacred Lands File (SLF) search by the Native American Heritage Commission was conducted on May 20, 2021. The City of Los Angeles also sent notification and a request to consult letters on June 8, 2021 to seven (7) Native American tribes on the City's AB 52 Notification List. One tribe requested consultation on this project – the Gabrielino Band of Mission Indians - Kizh Nation. The notification letters are included in Appendix A.

### **4.2 Area of Potential Effects**

The APE is the geographic area or area within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist [36 CFR § 800.16(d)]. The archaeological survey area encompasses the 5.5-acre area comprising the project site to account for all direct project impacts and activities, including demolition of the existing warehouse buildings, grading of the site, and construction of the proposed EBMF. All ground disturbing work is planned to occur and be contained within the site and the abutting sidewalk. In terms of the vertical APE for the EBMF, the maximum depth of excavation is estimated to be 15 feet below current ground surface for construction of the new facility. The architectural history survey area is described in detail in the project's Historic Resources Evaluation Report, but generally extends to all parcels immediately surrounding the project site.

Figure 4 presents the archeological and architectural history APE map of the project.

Figure 4. Area of Potential Effects Map





## **4.3 Cultural Setting and Background**

### **Regional Prehistory**

The three major periods of prehistory for the greater Los Angeles Basin region have been refined by recent research using radiocarbon dates from archaeological sites in coastal southern California (Koerper 1979; McCawley 1996; Wallace 1955).

- Millingstone Period (6,000–1,000 B.C., or about 8,000–3,000 years ago);
- Intermediate Period (1,000 B.C.–A.D. 650, or 3,000–1,350 years ago); and
- Late Prehistoric Period (A.D. 650–about A.D. 1800, or 1,350–200 years ago).

The Millingstone Period represents a long period of time characterized by smaller, more mobile groups, compared to later periods. These groups likely relied on a seasonal round of settlement that included both inland and coastal residential bases. Seeds from sage and grasses, rather than acorns, provided calories and carbohydrates. Although fewer projectile points occur in archaeological sites (compared to later periods), faunal remains indicate that similar animals were hunted. Inland Millingstone sites are characterized by numerous manos, metates, and hammerstones. Shell middens are common at coastal Millingstone sites. Coarse-grained lithic materials, such as quartzite and rhyolite, are more common than fine-grained toolstone from this time-period.

During the Intermediate Period, mortars and pestles appeared, indicating the beginning of acorn exploitation. Use of the acorn – a high-calorie, storable food source – probably allowed greater sedentism and a more complex level of social organization. Large projectile points from archaeological sites of this period indicate that the bow and arrow, a hallmark of the Late Prehistoric Period, had not yet been introduced and hunting was likely accomplished using the atlatl (spear thrower) instead. Settlement patterns during this time are not well understood. The semi-sedentary settlement pattern characteristic of the Late Prehistoric Period may have begun during the Intermediate Period, although territoriality may not have yet developed because of lower population densities.

The Late Prehistoric Period is represented by the ethnohistoric Gabrielino, a highly sophisticated, non-agricultural population which, until the early 19th century, lived in large coastal and inland towns and villages. Long distance commerce and exchange networks existed in the Gabrielino society and economic social control was often exercised through a centralized political system which assisted in ameliorating resource fluctuations in the natural environment and the redistribution of vital goods and materials (Bean and Smith 1978; McCawley 1996)

### **Ethnography**

The project APE is located in the traditional native lands of the Gabrielino of the Shoshonean language stock (Kroeber 1925:620 and McCawley 1996:1). Generally, the territory of the Gabrielino covered the Los Angeles Basin, the San Gabriel Valley, the Santa Monica and Santa Ana mountains, the coast from Aliso Creek to Topanga Creek, and the islands of San Clemente, San Nicholas, and Santa Catalina. The Los Angeles

Basin was known to include many major Gabrielino villages with a total population estimated at over 10,000 at the time of the Spanish arrival in 1769. Villages included Saar, near Santa Monica, Siba and Akura near San Gabriel, Engva at Redondo, and Ohowi near San Pedro. Gabrielino villages were politically autonomous and were organized along lines of kinship. Normally, villages were composed of several lineages, each with its own leader. The leader of the dominant lineage was the village chief, or tumiar. The chief, whose authority was legitimized by possession of the sacred bundle, was at the hub of Gabrielino religious and economic activities. He arbitrated disputes, led war parties, and supervised trade feasts and exchange networks. Being middlemen for the southern California area, the Gabrielino facilitated a complex trade system encompassing most of southern California and parts of Arizona. Besides shell beads, dried fish, sea otter pelts, and steatite, the Gabrielino also exchanged religious ideas. The Chingichngish cult of the Gabrielino was readily spread to neighboring groups along with needed trade goods. Utilizing the hallucinogenic plant *Datura*, the cult was highly formalized and ritualized involving the erection of “temples” (i.e., sacred enclosures) and offerings of food and goods.

During the 18th and 19th centuries, aboriginal Gabrielino society was greatly affected by Spanish colonization. Smallpox, measles, influenza, and other non-endemic diseases rapidly destroyed large segments of the population, leading to the abandonment of many villages and towns. Nevertheless, many Gabrielino survived, working first as laborers at the missions and later as vaqueros (cowboys) on ranches and farms (Grant 1965: 21-24).

More recently Gabrielino culture has experienced a revitalization which has resulted in a heightened consciousness of traditional values and concepts. This has led to a renewed interest in archaeology and the prehistory of the Gabrielino culture area. In general, modern Gabrielino place a high value on cultural resources such as archaeological sites, especially historically identified villages, mortuary areas, and isolated burials, shrines and traditional natural resources and features.

## **Historic Overview**

The history of Los Angeles can be broken down into four periods: the Early Explorer Period, the Spanish Mission Period, the Mexican Ranch Period, and the Anglo-American Period. The following is a brief summary of each period:

### **Early Explorer Period (1542-1769)**

The first European to contact the Gabrielino was Juan Rodriguez Cabrillo, who in 1542 sailed an exploratory expedition along the coastline of California. In October of that year, he anchored off the coast from a large Indian village located near present day San Pedro Bay. Cabrillo and his crew named the inlet the “Bay of Smokes”, probably in reference to the numerous native campfires seen on the distant shore (McCawley 1996:4).

The next European contact was in December of 1602, when Sebastian Vizcaino cruised up the coast, exploring and map making. Vizcaino, who anchored off Santa Catalina

Island, encountered many friendly natives and was impressed with their large towns and well-constructed canoes.

Further explorations came in 1769 with the Gaspar de Portola expedition. The expedition, which came overland from San Diego, encountered many large Indian villages while marching through the Los Angeles Basin. They found, as did the previous explorers, that the Native Americans in these villages were friendly and very generous (Bolton 1927:146-148).

### **Spanish Mission Period (1769-1821)**

European culture was first extensively introduced to Los Angeles County by the Franciscan friars who under the sponsorship and administration of the Spanish monarchy founded the San Gabriel mission in 1771. In addition to programs focused on the conversion of aboriginal peoples to Christianity, the missionization process included, but was not limited to, establishment of cattle ranches, farms, building projects and other activities designed to consolidate and secure the western frontier of the Spanish empire. All such enterprises continued uninterrupted through the secularization of the missions in 1822, at which time a great proportion of the mission lands was granted to civilians (e.g., Californios). Although by this time many Native Americans were completely acculturated, a substantial number of Indians retained traditional ways of life and did not interact with European society.

### **Mexican Ranch Period (1821-1846)**

Increased secularization resulted from the Mexican Revolution in 1821, which isolated California from the Spanish political capital. This situation led to increased cattle ranching by California-born descendants of pioneer settlers. Native Americans provided most the labor for the ranchers. Most Gabrielino Indians lived in villages which were protected by the Mexican government to some extent from encroachment by owners of large cattle ranches.

### **Anglo-American Period (1846 to present)**

The American conquest of the Los Angeles area and its occupation by military forces during the California gold rush period heralded the beginning of the Anglo-American Period. The Cattle Country Phase (1846-1867) of this period resulted from the greatly intensified raising of cattle ensuing from demand for beef by the miners in the gold fields in northern California. This economic focus continued until after the Civil War, when southern immigrants arrived looking for new opportunities in the area. This led to displacement of Californios and Native Americans.

During the early part of this period Los Angeles was sparsely populated. However, with the construction of the Southern Pacific transcontinental railway in the 1880s, population began to grow. By the 1920s, there were 500,000 people living in the Los Angeles Basin. With this increase came new forms of industry (e.g., aviation and motion pictures) and an ever-widening zone of commercial and residential developments throughout the area.



Today, the City of Los Angeles is home to over 3.9 million people and has some of the most densely populated urban land in the United States. Based on the 2000 Census, Los Angeles ranks only second to New York in population.

#### 4.4 Archival Research

Archival research focused on the identification of previously recorded cultural resources within a 0.50-mile radius of the proposed project footprint. The archival research included a review of previously recorded archaeological site records and reports, historic site and property inventories, and historic maps. Inventories of the NRHP, the CRHR, the California State Historic Resources Inventory (HRI), California Historical Landmarks and Points of Interest, Los Angeles Office of Historic Resources Historic Preservation Overlay Zones (HPOZ), the Survey LA Southeast Los Angeles Community Plan Area, and the list of City of Los Angeles' HCMs were also reviewed to identify cultural resources near the project site.

##### California Historic Resources Inventory System (CHRIS)

A search for archaeological and historical records was initiated at the South Central Coastal Information Center (SCCIC) at California State University Fullerton and was completed on June 23, 2021. The cultural resource investigations and recorded historic-age cultural resources within a 0.50-mile radius around the project site are discussed below.

##### Previous Cultural Resources Investigation Reports

A total of nine (9) previous cultural resource investigations have been conducted within a 0.50-mile radius of the project site (Table 1). None of these studies included the project site.

**Table 1. Previous Cultural Resources Investigation Reports  
within a 0.50-mile Radius of the Project Site**

Report Number	Year	Report Title	Author
LA-00075	1975	Evaluation of the Archaeological Resources and Potential Impact of the Proposed Construction of Route 105 from El Segundo to Norwalk	Rosen, Marty
LA-02950	1992	Consolidated Report: Cultural Resource Studies for the Proposed Pipeline Project	Anonymous
LA-04836	2000	Phase I Archaeological Survey along Onshore Portions of the Global West Fiber Optic Cable Project	Science Applications International Corporation
LA-06026	2002	Cultural Resources (Locke High School Site)	McKenna, Jeanette
LA-10193	2003	Negative Phase I Archaeological Survey of 0.6 Acres for the Imperial and Central Childcare Facility Project, 1200 E. Willowbrook, Los Angeles County, California	Maki, Mary
LA-08255	2006	Cultural Resources Final Report of Monitoring and Findings for the Qwest Network Construction Project State of California, Volumes I and II	Arlington, Cindy and Nancy Sikes

Report Number	Year	Report Title	Author
LA-08774	2006	Cultural Resources Records Search and Site Visit Results for T-Mobile Candidate LA13095	Bonner, Wayne H.
LA-09224	2007	Cultural Resources Records Search and Site Visit Results for T-Mobile LA130950(R), Los Angeles County, California	Bonner, Wayne H.
LA-12275	2013	Cultural Resources Records Search and Site Visit Results for T-Mobile West, LLC Candidate LA02155A (LA155 LA105-00) 11100 South Central Ave., Los Angeles, California	Bonner, Wayne and Kathleen Crawford

### ***Previously Recorded Cultural Resources***

A total of three (3) previously recorded historic-age cultural resources were identified within a 0.50-mile radius of the project site' all of them built environment resources (Table 2). None of these resources are within the project site. No prehistoric archaeological or historic archaeological resources were identified by the records search.

Three (3) historic-age resources have been previously evaluated for listing in the NRHP. Two of these have been recommended NRHP-eligible. One resource, the Gompers Middle School at 234 East 112th Street, consists of six buildings, constructed between 1937-1939, designed by architects Myron Hunt and H.C. Chambers in the Late Mediterranean Revival style. The other NRHP-eligible resource is a historic district encompassing 188 single family homes designed by the renown AfricanAmerican Los Angeles architect Paul R. Williams. The historic district, which generally borders Central Avenue on the west, Compton Avenue on the east, 103rd Street on the north and 107th Street on the south, is one of the first and only planned neighborhoods in the Watts area. It was one of the developments in Los Angeles built to provide quality single family houses for the Black community during World War II and in the years following, through 1952.

**Table 2. Cultural Resources Located within a 0.50-mile Radius of the Project**

Site Number	Site Type/Name	Year(s) Recorded	Location Relative to Project Area	Status
P-19-175276	Gompers Middle School (Built 1937-1939)	1995	Outside	Determined eligible for listing in the NRHP
P-19-190949	Paul R. Williams/Parkside Manor Historic District (Built 1944-1952)	2002	Outside	Determined eligible for listing in the NRHP
P-19-190281	Verbum Dei High School (Built 1962)	2013	Outside	Determined ineligible for listing in the NRHP

## **National Register of Historic Places**

Two resources (see Table 2) within a 0.50-mile radius of the project site have been determined NRHP eligible but no listed or previously determined eligible NRHP properties are located on or immediately adjacent to the site.

## **California Register of Historical Resources**

There are no CRHR-listed resources within a 0.50-mile radius of the project site.

## **Los Angeles Office of Historic Resources Historic Preservation Overlay Zones**

There are no Los Angeles Office of Historic Resources HPOZ within a 0.50-mile radius of the project site.

## **Survey LA Southeast Los Angeles Community Plan Area**

There are no resources listed in Survey LA for the Southeast Los Angeles Community Plan Area for the project site or within the 0.50-mile buffer zone.

## **Los Angeles Historic-Cultural Monuments**

There is one Historic-Cultural Monument within a 0.50-mile radius of the project site that has been designated by the Los Angeles Cultural Heritage Commission: Number 513, Southern California Edison Service Yard Structure, 615 East 108th Street. This HCM is located approximately 0.28 miles northwest of the project site.

## **California Historical Landmarks**

California Historical Landmarks (CHL) are buildings, structures, sites, or places that have been determined to have statewide historical interest. The Watts Towers at 1765 East 107th Street, approximately 1.6 miles northeast of the project site, is the closest CHL.

## **Historic Maps and Aerial Photographs**

The following maps, which included the project site and the surrounding area (0.50-mile radius), were consulted:

- Aerial Images: 2016, 2014, 2012, 2011, 2010, 2009, 2005, 2004, 2003, 1994, 1980, 1973, 1963, 1950
- USGS topographic quadrangles - Inglewood, California: 1987, 1972, 1964, 1950 - Watts, California: 1937, 1923
- Google Earth 2018

The historic aerial images and historic topographic maps show that the parcels encompassing the site were not utilized during the earlier part of the 20<sup>th</sup> century. Beginning in the 1930s, development began in areas surrounding the site, and railroad tracks appear on the southern boundary (originally Pacific Electric Railway, now UPRR,

along East Lanzit Avenue). Structures in the project area are evident from 1937 onward, with as many as three to six building northeast of the project site. Full development of the site occurred in the mid-1950s. Based on a review of aerial photography, the project site has remained largely unchanged since that time.

Sanborn maps were also consulted to ascertain previous development on the project site. The Sanborn Insurance Maps are detailed imagery of U.S. cities and towns in the 19<sup>th</sup> and 20<sup>th</sup> centuries. They were originally published by the Sanborn Map Company to allow insurance companies to assess current and past development to ascertain fire insurance liability of urbanized areas of the United States. The map reviewed for the project area is summarized below:

- 1969 - The property buildings are depicted as a steel scaffolding structure, tin shop, air conditioning equipment shop, parking lot and pipe storage yard. The adjacent properties to the north appear to be a lumber yard and paint store. In the adjacent parcels to the east, there appears to be a warehouse, to the west is a vacant parcel, and to the north and south are residential land uses.

## **Geologic Map Review**

The project area is located within the Los Angeles Basin, which is a structurally complex and sedimentologically diverse late Tertiary-Quaternary feature situated within the Transverse Ranges of southern California. Representing an interior drainage system, the basin has accumulated alluvial sediments (Qal – Division of Mines and Geology 1969) from powerful streams emanating from nearby canyons. Throughout the Holocene period, sediments primarily consisting of sand, gravel and other water borne deposits have accumulated in the Basin. Presumably, these sediments (as well as fill material) comprise the major soil components within the project area. No cultural material is expected in any of these sediments.

## **5.0 NATIVE AMERICAN CONSULTATION**

This assessment included a check of the Sacred Lands File (SLF) and project notification, as well as AB 52 consultation. A request was made of the Native American Heritage Commission (NAHC) for a review of their SLF and a list of Native American contacts on May 5, 2021, and a reply was received on May 20. Letters inviting seven (7) tribes to consult under AB 52 were mailed on June 8, 2021, via United States Post Office mail and by email from the Los Angeles Bureau of Engineering (LABOE) to the Native American contacts identified by the NAHC.

The NAHC provided the following tribal contacts:

- Andrew Salas, Chairperson, Gabrieleño Band of Mission Indians - Kizh Nation, P.O. Box 393 Covina, CA 91723; Phone: (626) 926-4131; email: [admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)



- Anthony Morales, Chairperson, Gabrieliño/Tongva San Gabriel Band of Mission Indians, P.O. Box 693 San Gabriel, CA 91778; Phone: (626) 483-3564; email: GTTribalcouncil@aol.com
- Sandonne Goad, Chairperson, Gabrieliño/Tongva Nation, 106 1/2 Judge John Aiso St., #231 Los Angeles, CA 90012; Phone: (951) 807-0479; email: sgoad@gabrielino-tongva.com
- Robert Dorame, Chairperson, Gabrieliño Tongva Indians of California Tribal Council, P.O. Box 490 Bellflower, CA, 90707; Phone: (562) 761-6417; email: gtongva@gmail.com
- Charles Alvarez, Gabrieliño-Tongva Tribe, 23454 Vanowen Street West Hills, CA 91307; Phone: (310) 403-6048; email: roadkingcharles@aol.com
- Lovina Redner, Tribal Chair, Santa Rosa Band of Cahuilla Indians, P.O. Box 391820, Anza, CA 92539; Phone: (951) 659-2700; email: Isaul@santarosa-nsn.gov
- Isaiah Vivanco, Chairperson, Soboba Band of Luiseno Indians, P.O. Box 487: Phone: (951) 654-5644, San Jacinto, CA 92581; email: ivivanco@soboba-nsn.gov

In addition to the contact list, the NAHC check of the SLF was negative for the project site. It was recommended by the NAHC that any additional information concerning sacred lands should be sought from the Native American contacts listed above. As indicated in Section 7.2 below, the Gabrieliño Band of Mission Indians - Kizh Nation responded in the affirmative to the City's outreach communication to tribal representatives inviting consultation under AB 52 and that consultation was subsequently conducted. This consultation was concluded on August 16, 2022.

## **6.0 RESULTS**

### **6.1 Archaeological Resources Survey**

On June 7, 2021, senior archaeologist Kristina Lindgren, RPA, accompanied by architectural historian Dean Reed, of Paleo Solutions Inc, completed an intensive pedestrian survey of the archaeological APE - the EBMF project site. The pedestrian survey was completed using standard archaeological procedures and techniques. All field practices met the Secretary of the Interior's Standards and Guidelines for a cultural resources survey. The intensive-level survey methods consisted of a pedestrian survey conducted in parallel transects spaced no more than 5-meters apart. Transects were conducted on the portions of the APE that contained no buildings, including the parking lot and side lots adjacent to the buildings. When present, visible subsurface sediments, such as in the planters, were visually examined for exposed cultural resources.

The building and parcel locations were verified with a handheld Garmin device and the ArcGIS Collector app on an Apple iPad. Field conditions and results were photo-documented using an Olympus Stylus TD-870. All photographs and documentation are on file at Paleo Solutions' headquarters in Monrovia, California.

## **6.2 Discussion and Interpretation**

### **800 East 111<sup>th</sup> Place**

Assessor Parcel Number 6071-022-013 is - a rectangular lot, with one long rectangular warehouse building (800 East 111<sup>th</sup> Place) on the approximate west third of the parcel. The remainder of the parcel is paved with concrete and asphalt. The eastern boundary, between the Animo James B. Taylor Charter Middle School, contains a narrow landscaped planter with trees, shrubs, and weeds. A stone wall borders the southern parcel boundary. The area along the northeast façade of the building is paved with concrete and contains a large collection of parts from industrial machinery, metal scraps, dumpsters, cars, tires, barrels, red brick, concrete slabs, wood pallets, and chairs. No archaeological resources were observed.

### **740-780 East 111<sup>th</sup> Place**

Assessor Parcel Number 6071-022-009 is - a square lot, with one large warehouse building (740-780 East 111<sup>th</sup> Place) that takes up a majority of the parcel. A concrete lot is located on the western portion of the parcel and is bordered by a chain link fence with corrugated metal sheets on the west end. A large stone wall is set on the south parcel boundary. No landscaping is present. A few small patches of grass are located near the primary entrance at the northeast corner of the lot. Trees line the western parcel boundary, with the Kedren Health Watts Center and Kedren Head Start Preschool. No archaeological resources were observed.

## **7.0 CONCLUSIONS**

### **7.1 Archaeological Resources**

No archaeological sites or resources were identified within the project site as part of the records search and field survey undertaken for the project. While the maximum extent of anticipated ground disturbance may be up to 15 feet, most proposed ground disturbance will be shallow and limited to utility trenching and preparing the new building foundations. Although archaeological sensitivity potential is considered low in the project area, monitor(s) will be on site during ground disturbing activities, and if cultural materials are unearthed during construction, work must be halted in that area until a qualified archaeologist can assess the significance of the find, and in consultation with the designated tribal representative, determine whether it may be a tribal cultural resource (see SC-CUL-2, PDF-CUL-1 and MM-TCR-1) and to evaluate and determine appropriate treatment for the resource in accordance with PRC Section 21083.2(i) (PDF-CUL-2).

In accordance with 14 CCR Section 15064.5(e), in the event of accidental discovery or recognition of any human remains, work in the immediate vicinity will be suspended and the Los Angeles County Coroner will be notified (California Health and Safety Code Section 7050.5). If the Coroner determines that the remains are not recent and of Native American origin, the Coroner will notify the NAHC in Sacramento within 24 hours to identify the most likely descendant (MLD). The designated MLD may make

recommendations to LABOE for means of treating or reassigning the human remains and any associated grave goods with appropriate dignity, as provided in PRC Section 5097.98 (SC-CUL-1).

Impacts on human remains would be less than significant under CEQA, which would be ensured by compliance with the following standard condition:

### **Standard Condition**

The project would need to comply with the following Standard Conditions (SCs):

**SC-CUL-1:** In the event of the inadvertent discovery of human remains, the Contractor shall immediately notify the County Coroner and the City of Los Angeles. If the County Coroner determines the remains are Native American in origin, the Coroner shall contact the Native American Heritage Commission in accordance with Health and Safety Code (HSC) Section 7050.5 subdivision c, and Public Resources Code (PRC) Section 5097.98 (as amended by Assembly Bill 2641). The Native American Heritage Commission shall designate the most likely descendant (MLD) for the remains per PRC 5097.98. Under PRC 5097.98, 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 with the MLD regarding their recommendations, if applicable. If the remains are determined to be neither of forensic value to the Coroner, nor of Native American origin, provisions of the California HSC Section 7100 37 et seq. directing identification of the next-of-kin will apply.

**SC-CUL-2:** In compliance with Section 6.6-2 of the Greenbook *Standard Specifications for Public Works Construction*) regarding archaeological and paleontological discoveries, if a discovery is made of items of archaeological or paleontological interest, the Contractor shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Engineer. When resumed, excavation operations within the area of discovery shall be as directed by the Engineer.

### **Project Design Features**

Impacts on cultural resources would be less than significant under CEQA with the incorporation of the following project design features (PDFs):

**PDF-CUL-1:** A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for Archaeology, shall be retained before the project construction and shall remain on-call during all ground-disturbing activities. The qualified archaeologist shall ensure that a Worker Environmental Awareness Protection (WEAP) training, presented by the

qualified archaeologist and Native American representative, is provided to all construction and managerial personnel involved with the project. The WEAP training shall provide an overview of cultural (prehistoric and historic) and tribal cultural resources and outline regulatory requirements for the protection of cultural resources. The WEAP shall also cover the proper procedures to be followed in the event of an unanticipated cultural resource discovery during construction. The WEAP training can be in the form of a video or PowerPoint presentation or printed literature (handouts) that can be given to new workers and contractors to avoid the necessity of continuous training over the course of the project.

**PDF-CUL-2:** In the event of an inadvertent discovery of archaeological materials, the resource shall be fully documented by the qualified archaeologist or designee and a Department of Parks and Recreation (DPR) 523 record shall be prepared. If prehistoric or potential tribal cultural resources are identified, the consulting Native American Tribes shall be notified.

The qualified archaeologist, in consultation with consulting Native American Tribes and the City of Los Angeles, shall determine whether the resource is potentially significant as per CEQA (i.e., whether it is a historical resource, a unique archaeological resource, or a tribal cultural resource). If preservation in place or avoidance is not feasible, the qualified archaeologist, in consultation with the City, shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of Public Resources Code (PRC) Section 21083.2. Treatment for most resources would consist of, but would not be limited to, in-field documentation, archival research, subsurface testing, excavation, and preparation of a final report and DPR 523 record. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of the final report and DPR 523 record(s) to the City of Los Angeles and South Central Coastal Information Center.

## **7.2 Tribal Cultural Resources**

The NAHC was contacted on May 5, 2021, to request a search of the SLF and to acquire a contact list of tribal representatives for the outreach required under AB 52. The NAHC replied on May 20, 2021 and the SLF check was negative for the project site and the NAHC gave direction to contact various tribal groups for more information. As stated above, one tribe, the Gabrieleño Band of Mission Indians - Kizh Nation, responded to the City's email communication inviting consultation under AB 52. The consultation between the Tribe and City has been concluded and resulted in the development of the following mitigation measure:

**MM-TCR-1:** Due to the potential for tribal cultural resources to exist on the project site, prior to the commencement of any ground-disturbing activity at the project site, the City of Los Angeles (the City) shall retain a tribal monitor that is qualified to identify, record, and evaluate the significance of any archaeological and/or tribal cultural finds during construction. The qualified tribal monitor shall be from or approved by the Gabrieleño Band of Mission Indians – Kizh Nation (the Tribe). Ground-disturbing activities shall include removing pavement, potholing, auguring, grubbing, removing trees, boring, excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or similar activity at the project site. The executed monitoring service agreement shall be submitted by the qualified tribal monitor to the City prior to any ground-disturbing activity. The qualified tribal monitor will complete logs describing each day's construction activities, locations, soil, and any cultural materials, human remains, and/or burial goods discovered. Tribal monitoring shall conclude when ground-disturbing activities on the project site have been completed, or when the qualified tribal monitor indicates any additional construction activity at the project site has little or no potential to impact tribal cultural resources. In accordance with PDF-CUL-1, prior to commencing any ground disturbing activities, the qualified archaeologist and the qualified tribal monitor shall provide Worker Environmental Awareness Program (WEAP) training to construction crews involved in ground-disturbing activities that provides information on regulatory requirements for the protection of tribal cultural resources. As part of the WEAP training, construction crews shall be briefed on proper procedures to follow should a crew member discover tribal cultural resources during ground-disturbing activities. In addition, workers will be shown examples of the types of resources that would require notification to the archaeological monitor and tribal monitor.

Upon discovery of any subsurface object or artifact that may be a tribal cultural resource during the course of any ground-disturbing activity, procedures to ensure that tribal cultural resources are not damaged include but are not limited to the following steps:

- All such ground-disturbing activities shall cease in the immediate vicinity of the discovery, the radius of which will be determined by the qualified tribal monitor or the qualified archaeological monitor, until the qualified tribal monitor has evaluated the find in accordance with federal, state, and local guidelines.
- The found deposits shall be treated with appropriate dignity and protected and preserved as appropriate with the agreement of the Tribe and the tribal monitor, and in accordance with federal, state, and local guidelines.



- Personnel of the project shall not collect or move any archaeological or tribal resources or associated materials or publish the location of tribal cultural resources.
- If the resources are Native American in origin, the tribal monitor will make recommendations to the City regarding the monitoring of future ground-disturbing activities, as well as the treatment and disposition of any discovered tribal cultural resources, which may include but not limited to the preservation in place or recovery and retention of them in the form and/or manner which the tribal monitor and the Tribe deem appropriate for educational, cultural, and/or historic purposes. Until a recommendation is made, the discovery should be preserved in place or left in an undisturbed state. When preserving in place or leaving in an undisturbed state is not possible, excavation should not occur unless testing or studies already completed have adequately recovered the scientifically consequential information form and about the resource and this determination is documented by a qualified archaeologist or tribal monitor.
- The City shall implement the tribal monitor and Tribe's recommendations if the City can reasonably conclude that the recommendations are reasonable and feasible to mitigate or avoid any significant impacts to the identified tribal cultural resources. If the City does not accept a particular recommendation determined to be reasonable and feasible by the qualified tribal monitor, the City may request mediation by a mediator agreed to by the tribal monitor, the Tribe, and the City who has the requisite professional qualifications and experience to mediate such a dispute. The City shall pay any costs associated with the mediation. After making a reasonable effort to mediate this particular dispute, the City may (1) require the recommendation be implemented as originally proposed by the archaeologist or tribal monitor; (2) require the recommendation, as modified by the City, be implemented as it is at least as equally effective to mitigate a potentially significant impact; (3) require a substitute recommendation be implemented that is at least as equally effective to mitigate a potentially significant impact to a tribal cultural resource; or (4) not require the recommendation be implemented because it is not necessary to mitigate an significant impacts to tribal cultural resources.
- The ground-disturbing activities may recommence outside of a specified radius of the discovery site, so long as this radius has been cleared by both the qualified archaeologist and qualified tribal monitor and determined to be reasonable and appropriate.
- The location of the find of tribal cultural resources and the type and nature of the find will not be published beyond providing it to public agencies with jurisdiction or responsibilities related to the resources, the qualified archaeologist, qualified tribal monitor, and the Tribe.
- If the resources consist of non-Native American historic archaeological materials, a qualified archaeologist will apply National Register of

Historic Places Criterion D to determine their significance. Artifacts will be curated per the Code of Federal Regulations 36 Part 79, as applicable, or be offered to a local historical society museum or educational facility, as deemed appropriate by the City.

SC-CUL-1 shall be implemented should human remains be inadvertently discovered at the project site. If the Gabrieleño Band of Mission Indians – Kizh Nation is designated Most Likely Descendant (MLD) by the Native American Heritage Commission (NAHC), the Koo-nas-gna Burial Policy shall be implemented. If the discovery of human remains includes four or more burials, the discovery location shall be treated as a cemetery and a separate treatment plan shall be prepared by the MLD. Associated funerary objects reasonably believed to have been placed with individual human remains either at the time of death or later and made exclusively for burial purposes are to be treated with utmost respect and dignity. The prepared soil and cremation soils are to be treated in the same manner as intact bone fragments. Cremations will either be removed in bulk or by means necessary to ensure the complete recovery of all sacred materials.

In such cases where discovered human remains cannot be fully documented and recovered on the same day, the remains will be covered with muslin cloth and a steel plate which can only be moved by heavy equipment. If this type of steel plate is unavailable, a 24-hour guard should be posted outside of working hours. The City will make every effort to divert project activities and keep the remains in situ and protected. If the project cannot be diverted, it may be determined that the burials will be removed. The MLD will work closely with the City's designated qualified archaeologist and tribal monitor to ensure that the excavation is treated carefully, ethically, and respectfully. Each occurrence of human remains and associated funerary objects, sacred objects, and objects of cultural patrimony will be retained and reburied within six months of recovery in a secure container. If preservation in place is not possible despite good faith efforts, a site located within the project parcel footprint, as agreed to by the City and the Tribe, and to be protected in perpetuity, shall be designated for the respectful reburial of the human remains and/or ceremonial objects. There shall be no publicity regarding any cultural materials recovered.

Any data recovery plans shall require approval by the Tribe; such documentation will include detailed descriptive notes and sketches, at a minimum. Additional documentation as outlined in a treatment plan should also be approved by the Tribe. If additional data recovery is conducted, a final report will be submitted to the Tribe, Native American Heritage Commission, and South Central Coastal Information Center. No invasive and/or destructive diagnostics on human remains shall be conducted.

## 8.0 REFERENCES

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## 9.0 PREPARERS

Alex Kirkish, Ph.D., RPA, Senior Archaeologist/Principal Investigator, Parsons. Mr. Kirkish holds a Ph.D. degree in Archaeology from the University of Leicester, Leicester, England and has 34 years of experience in California. Mr. Kirkish prepared the Archaeological Resources Assessment.

Kristina Lindgren, M.A., RPA, Senior Archaeologist, Paleo Solutions, Inc. Ms. Lindgren holds a M.A. from the University of Leicester, Leichesters, England, and has 18 years of cultural resources experience. Ms. Lindgren conducted the pedestrian field survey.

Gregory King, M.A., Public Historical Studies, University of California, Santa Barbara. Mr. King has more than 35 years' experience preparing and managing cultural resources compliance documentation for Parsons and previously, Caltrans. Mr. King reviewed the technical memorandum.

**Attachment A**  
**Sacred Lands File Search and Native American Consultation**



**NATIVE AMERICAN HERITAGE COMMISSION**

May 20, 2021

Lauren Rhodes  
City of Los Angeles Bureau of EngineeringVia Email to: [lauren.rhodes@lacity.org](mailto:lauren.rhodes@lacity.org)CHAIRPERSON  
**Laura Miranda**  
LuiseñoVICE CHAIRPERSON  
**Reginald Pagaling**  
ChumashSECRETARY  
**Merri Lopez-Keifer**  
LuiseñoPARLIAMENTARIAN  
**Russell Attebery**  
KarukCOMMISSIONER  
**William Mungary**  
Paiute/White Mountain  
ApacheCOMMISSIONER  
**Julie Tumamait-Stenslie**  
ChumashCOMMISSIONER  
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**Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, 111<sup>th</sup> Place LADOT All-Electric Bus Maintenance Facility Project, Los Angeles County**

Dear Ms. Rhodes:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Andrew Green  
Cultural Resources Analyst

Attachment

**Native American Heritage Commission  
Tribal Consultation List  
Los Angeles County  
5/20/2021**

***Gabrieleno Band of Mission  
Indians - Kizh Nation***

Andrew Salas, Chairperson  
P.O. Box 393  
Covina, CA, 91723  
Phone: (626) 926 - 4131  
admin@gabrielenoindians.org

Gabrieleno

***Soboba Band of Luiseno  
Indians***

Isaiah Vivanco, Chairperson  
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San Jacinto, CA, 92581  
Phone: (951) 654 - 5544  
Fax: (951) 654-4198  
ivivanco@soboba-nsn.gov

Cahuilla  
Luiseno

***Gabrieleno/Tongva San Gabriel  
Band of Mission Indians***

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Gabrieleno

***Gabrielino /Tongva Nation***

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Gabrielino

***Gabrielino Tongva Indians of  
California Tribal Council***

Robert Dorame, Chairperson  
P.O. Box 490  
Bellflower, CA, 90707  
Phone: (562) 761 - 6417  
Fax: (562) 761-6417  
gtongva@gmail.com

Gabrielino

***Gabrielino-Tongva Tribe***

Charles Alvarez,  
23454 Vanowen Street  
West Hills, CA, 91307  
Phone: (310) 403 - 6048  
roadkingcharles@aol.com

Gabrielino

***Santa Rosa Band of Cahuilla  
Indians***

Lovina Redner, Tribal Chair  
P.O. Box 391820  
Anza, CA, 92539  
Phone: (951) 659 - 2700  
Fax: (951) 659-2228  
Isaul@santarosa-nsn.gov

Cahuilla

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

This list is only applicable for consultation with Native American tribes under Public Resources Code Sections 21080.3.1 for the proposed 111th Place LADOT All-Electric Bus Maintenance Facility Project, Los Angeles County.

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700  
LOS ANGELES, CA 90015-  
2213

<http://eng.lacity.org>

June 8, 2021

Santa Rosa Band of Cahuilla Indians  
Lovina Redner, Tribal Chair  
P.O. Box 391820  
Anza, CA 92539  
[Isaul@santarosa-nsn.gov](mailto:Isaul@santarosa-nsn.gov)

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Lovina Redner,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.

If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to [christopher.adams@lacity.org](mailto:christopher.adams@lacity.org) or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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<http://eng.lacity.org>

June 8, 2021

Soboba Band of Luiseno Indians  
Isaiah Vivanco, Chairperson  
P.O. Box 487  
San Jacinto, CA 92581  
[ivivanco@soboba-nsn.gov](mailto:ivivanco@soboba-nsn.gov)

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Isaiah Vivanco,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.



If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to [christopher.adams@lacity.org](mailto:christopher.adams@lacity.org) or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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<http://eng.lacity.org>

June 8, 2021

Gabrieleno Band of Mission Indians - Kizh Nation

Andrew Salas, Chairperson

P.O. Box 393

Covina, CA 91723

[admin@gabrielenoindians.org](mailto:admin@gabrielenoindians.org)

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Andrew Salas,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.

If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to [christopher.adams@lacity.org](mailto:christopher.adams@lacity.org) or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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June 8, 2021

Gabrieleno/Tongva San Gabriel Banc of Mission Indians  
Anthony Morales, Chairperson  
P.O. Box 693  
San Gabriel, CA 91778  
GT Tribal Council@aol.com

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Anthony Morales,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.

If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to christopher.adams@lacity.org or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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June 8, 2021

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

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Sandonne Goad,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.



If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to christopher.adams@lacity.org or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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**DR. FERNANDO CAMPOS**  
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June 8, 2021

Gabrielino Tongva Indians of California Tribal Council  
Robert Dorame, Chairperson  
P.O. Box 490  
Bellflower, CA 90707  
[gtongva@gmail.com](mailto:gtongva@gmail.com)

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Robert Dorame,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

## **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.

If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to [christopher.adams@lacity.org](mailto:christopher.adams@lacity.org) or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works

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VICE PRESIDENT

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PRESIDENT PRO TEMPORE

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COMMISSIONER

**DR. FERNANDO CAMPOS**  
EXECUTIVE OFFICER

# CITY OF LOS ANGELES

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June 8, 2021

Gabrielino-Tongva Tribe  
Charles Alvarez,  
23454 Vanowen Street  
West Hills, CA 91307  
[roadkingcharles@aol.com](mailto:roadkingcharles@aol.com)

**SUBJECT:** Tribal Cultural Resources under the California Environmental Quality Act, AB 52. Formal Notification of Decision to Undertake a Project, and Notification of Consultation Opportunity, pursuant to Public Resources Code Section 21080.3.1

Dear Charles Alvarez,

Pursuant to Assembly Bill (AB) 52 and Section 21080.3.1 of the California Environmental Quality Act (CEQA), the City of Los Angeles (City) is hereby providing formal notification of the City's decision to undertake the proposed Electric Bus Maintenance Facility Project, also referred to as the Project, as described below.

### **Project Description**

The City of Los Angeles Department of Transportation (LADOT) is proposing to construct an Electric Bus Maintenance Facility (EBMF) at 740 and 800 E. 111th Place in South Los Angeles. The site is approximately 5.5 acres and is currently developed with warehouses which are not in use. The proposed bus maintenance facility would eventually replace the existing LADOT bus maintenance facility located at 14011 South Central Avenue (approximately 2 miles south of the new facility). The main goal of the Project is to build a modern maintenance facility to support a larger and cleaner zero-emissions bus fleet. The Project will enable LADOT to provide maintenance services, parking, and inspection functions to support approximately 130 all-electric battery bus vehicles. The EBMF, consisting of several buildings and structures, would be used to store, maintain, and dispatch the electric buses for daily service. The EBMF will provide preventative maintenance inspections, light maintenance and repair, emergency maintenance, interior vehicle cleaning, and exterior vehicle washing. It will also accommodate administrative and operations functions and will be used as a report base for bus operators.

The result of a search of the Sacred Lands File by the Native American Heritage Commission conducted on May 20, 2021 for the Project site, was negative.

If you wish to consult on this Project, please notify us in writing within 30 calendar days from receipt of this letter and provide contact information for the tribe's lead contact person. Please email your request to [christopher.adams@lacity.org](mailto:christopher.adams@lacity.org) or by mail to:

Christopher Adams  
City of Los Angeles Department of Public Works  
Environmental Management Group  
1149 S. Broadway, Suite 600, M/S 939  
Los Angeles, CA 90015

Respectfully,

*Chris Adams*

Christopher Adams, Project Manager  
Environmental Management Group  
Bureau of Engineering, Department of Public Works